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# Supporting Statement for Environment, Safety and Health

## Part A: Justification

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OMB No. 1910-0300

### ***Collection Instruments***

*Annual Fire Protection Summary Application*

*CAIRS Computerized Accident Incident Reporting System*

*LL Lessons Learned System*

*NTS Noncompliance Tracking System*

*ORPS Occurrence Reporting and Processing System*

*REMS Radiation Exposure Monitoring System*

*SBIS Safety Basis Information System*

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U.S. Department of Energy  
Washington, DC 20585

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## Introduction

**Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.**

The purpose of the Information Collection Request is to collect information from DOE contractors at DOE sites pertaining to environment, health and safety to include information on injuries, illnesses, accidents, radiation exposure and events that could adversely affect the health and safety of the public and/or workers, the environment, DOE missions, or the credibility of the Department.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 17, 2019, volume 84, number 116, page 28029. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

Information in the collection is collected through a series of systems and databases (listed below):

- Computerized Accident/Incident Reporting System (CAIRS)**
- Occurrence Reporting and Processing System (ORPS)**
- Noncompliance Tracking System (NTS)**
- Radiation Exposure Monitoring System (REMS)**
- Annual Fire Protection Summary**
- Safety Basis Information System**
- Lessons Learned System**

### A.1. Legal Justification

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

This package contains information collections that are used by Departmental management to exercise management oversight and control over Management and Operating (M&O) contractors of DOE's Government-Owned Contractor-Operated (GOCO) facilities, and offsite contractors. The contractor management oversight and control function concerns the ways in which DOE contractors provide goods and services for DOE organizations and activities in accordance with the terms of their contract; the applicable statutory, regulatory and mission support requirements of the Department; and regulations in the functional area covered by this package.

The basic authority for these collections is the statute establishing the Department of Energy ("Department of Energy Organization Act," Public Law 95-91, of August 4, 1977) which vests the Secretary of Energy with the executive direction and management functions, authority and responsibilities for the Department, including contract management. Under the provisions of 42 USC 7254 and 42 USC 7256 (a) the Secretary of Energy is authorized to prescribe such procedural

and administrative rules, including information collections pertaining to management of DOE programs or contracts, as deemed necessary or appropriate.

## A.2. Needs and Uses of Data

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection**

The information obtained from DOE contractors by this information collection is used by Department management at the appropriate levels to manage the work pertaining to environment, safety and health throughout DOE and will include automated reporting of information into the following systems:

**Computerized Accident/Incident Reporting System (CAIRS)** – The CAIRS is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations as described in DOE O 231.1B, *Environment, Safety and Health Reporting*, and associated instructions. This system contains information from reporting contractors and subcontractors.

**Occurrence Reporting and Processing System (ORPS)** – The DOE's Occurrence Reporting System is used to notify Department of Energy (DOE) personnel, including National Nuclear Security Administration (NNSA) personnel, about events that could adversely affect the health and safety of the public or the workers, the environment, DOE missions, or the credibility of the Department. It also promotes organizational learning consistent with DOE's Integrated Safety Management System's goal of enhancing mission safety and sharing effective practices to support continuous improvement and adaptation to change. The Occurrence Reporting Program, including the ORPS requirements, are described in DOE O 232.2A, *Occurrence Reporting and Processing of Operations Information*.

**Noncompliance Tracking System** – The Noncompliance Tracking System (NTS) is used by DOE contractors to report nuclear safety, worker safety and health regulatory noncompliances to DOE as described in 10 C.F.R. Part 820 and 10 C.F.R. Part 851. The most serious noncompliances reported in the system may lead to an enforcement action against the contractor. Reporting into the system is voluntary, but contractors that self-report noncompliances in accordance with the Department's expectations may be granted discretion or mitigation of proposed civil penalties for noncompliances that are subject to an enforcement investigation. DOE contractors identify and track to closure corrective actions for the noncompliances in each report. The corrective actions are reviewed by DOE Field Elements and investigators in the Office of Worker Safety and Health Enforcement and the Office of Nuclear Safety Enforcement to ensure that adverse safety conditions are corrected.

**Radiation Exposure Monitoring System (REMS)** – This is a database of occupational radiation exposure for all monitored DOE employees, contractors, subcontractors and members of the public. The Rule 10 CFR 835 702 (a) and (b) requires Annual Individual Radiation Exposure Records to be recorded. The DOE Order 231.1B, *Environment, Safety and Health Reporting*, requires the data to be reported into the Radiation Exposure Monitoring System Repository.

**Annual Fire Protection Summary Application** – This system contains information from reporting contractors and subcontractors for an Annual Fire Protection Program Summary (AFPPS). The AFPPS report is required by section 5a(8) of DOE Order 231.1B, *Environment, Safety and Health Reporting*. The DOE’s Fire Protection Program is multi-faceted, and includes published fire safety directives (Orders, standards, and guidance documents), a range of oversight activities, an annual fire protection program summary, and a directory of fire safety professionals. DOE also sponsors fire safety conferences, training initiatives, and technical assistance activities.

**Safety Basis Information System** – Subpart B of 10 CFR Part 830, *Nuclear Safety Management*, requires contractors and operators of DOE hazard category 1, 2, and 3 nuclear facilities to develop and maintain a Safety Basis for each facility and to perform work in accordance with that Safety Basis. In Appendix A to Subpart B of 10 CFR Part 830, DOE committed to provide members of the public with up-to-date information on its nuclear facility Safety Basis. The Safety Basis Information System was created to meet this requirement and also to provide DOE line managers with a tool for obtaining regularly updated profiles of the entire inventory of Safety Basis for DOE hazard category 1, 2, and 3 nuclear facilities.

**Lessons Learned System** – This system supports and promotes the integration and sharing of information both internally and externally to DOE in order to prevent adverse operating incidents and improve operational safety awareness. Lessons learned are developed from significant and recurring events, operational emergencies and good work practices to meet the requirements of DOE O. 210.2A, *DOE Corporate Operating Experience Program*. Information is facilitated through the DOE Corporate Lessons Learned database which is designed to collect and share lessons learned from operating experiences throughout the DOE complex.

### A.3. Use of Technology

**Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

All systems and databases in this collection incorporate electronic entry for respondents. Within existing budget and resource constraints, Department program managers and contractors continually work to apply the latest appropriate-level information technology (hardware and software) to reduce the contractor’s information collection burden and improve the timeliness and usefulness of the management information being collected. This includes automation of previously manual processes, where appropriate. As resources allow, the Department is in the process of updating some of these databases to incorporate more user-friendly capabilities and analysis techniques to enhance the knowledge that can be gained from the data collected.

### A.4. Efforts to Identify Duplication

**Describe efforts to identify duplication.**

The collections in this package are applicable to contract management in DOE, collected by DOE to monitor and manage the safety performance of its contractors and to fulfill federal reporting

requirements. Therefore, meaningful duplication of these collections at DOE or in other agencies is unlikely.

### **A.5. Provisions for Reducing Burden on Small Businesses**

**If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This information collection will not have a significant economic impact on small businesses or small entities. The impact of the collection of information from small business is considered in the development of the contract requirements and documents and is minimized to the extent permitted by applicable statutory requirements and other legal and management constraints.

### **A.6. Consequences of Less-Frequent Reporting**

**Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the information about safety and health performance affecting DOE employees and contractors, the public, environment, and DOE facilities is not collected, then injury or accident rates may increase due to a failure to address safety issues. Poor or declining safety performance would be detrimental to personnel and public safety and could significantly increase the cost of Departmental operations. Lack of reporting provides insufficient information for performance monitoring, trending and root cause analyses; therefore, safety issues are more likely to go uncorrected or recur. As a result, Federal safety and health programs and policies may not be effective if the information collection (reporting) is not conducted.

The frequency of collection is dictated by sound management practice, external laws and regulations, requirements of interagency reports, and Departmental orders and requirements. When any of these conditions change to permit reduction of the frequency of information collections, the reduction is made and the contract documents are changed accordingly.

### **A.7. Compliance with 5 CFR 1320.5**

**Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or**

**other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collections contained in the package are consistent with Title 5 of the Code of Federal Regulations and OMB guidelines.

### **A.8. Summary of Consultations Outside of the Agency**

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 17, 2019, volume 84, number 116, page 28029. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

### **A.9. Payments or Gifts to Respondents**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There is no remuneration given for submission of any of the information other than the fact that the expense of responding is treated as an allowable cost for contractors.

### **A.10. Provisions for Protection of Information**

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The sensitivity of information provided by respondents is assured by the Department's practices in accordance with the following statute, regulation, and policies.

- Privacy Act of 1974, as amended
- DOE Order 206.1, *Department of Energy Privacy Program*, 11/1/18
- DOE Order 205.1C, *Department of Energy Cyber Security Program*, 5/15/19
- DOE Order 200.2, *Information Collection Management Program*, 10/11/06
- DOE Order 231.1B, *Environment, Safety, and Health Reporting*, 11/28/12
- DOE Order 414.1D, *Quality Assurance*, 5/8/13
- DOE Order 210.2A, *DOE Corporate Operating Experience Program*, 4/8/11
- DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*, 1/17/17



## A.11. Justification for Sensitive Questions

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection **does not** collect information pertaining to sexual behavior, attitudes, or religious beliefs.

Collections that involve questions of a sensitive, personal, or private nature, including Personally Identifiable Information (PII) are protected from disclosure under Departmental directives.

PII Directives/Guidance:

- In accordance with the Privacy Act, DOE has established requirements for the protection of PII in DOE Order 206.1, DOE Privacy Program, and DOE Order 205.1B, Department of Energy Cyber Security Program
- Privacy Act of 1974, as amended at Title 5 USC 552a, Section 208 of the E-Government Act of 2002
- DOE employees are made aware of their responsibilities to protect PII through the mandatory DOE Privacy Awareness Training: The Privacy Act and Safeguarding Personally Identifiable Information (PII).
- Federal Register Notice, January 9, 2009, Privacy Act of 1974, Publication of Privacy Act Systems of Records; Notice/Vol. 74, No. 6

The following data sets may or may not have PII and a recent Privacy Impact Assessment (PIA), however, with the exception of the one as noted, there is no System of Records Notice (SORN) for these data sets as the information cannot be retrieved or sorted by personal identifier.

- CAIRS is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations and contains information from reporting contractors and subcontractors. PII, PIA, No SORN.
- ORPS permits notification to the DOE complex of events that could adversely affect public or DOE worker health and safety, the environment, or operations of DOE facilities. PII, PIA, No SORN
- NTS is a web-based system used by DOE contractors to voluntarily report nuclear safety and worker safety and health regulatory noncompliances to DOE. No PII, No SORN
- REMS is a database of occupational radiation exposures for all monitored DOE employees, contractors, subcontractors and members of the public. The Rule 10 CFR 835.702 (a) and (b), *Occupational Radiation Program*, requires Annual Individual Radiation Exposure Records to be recorded, and reported to the Radiation Exposure Monitoring System Repository. PII, DOE SORN #35.
- The Fire Protection database contains information from reporting contractors and subcontractors for the *Annual Fire Protection Program Summary*. No PII, PIA, No SORN

- Safety Basis Information System was created to meet the requirement in 10 CFR 830, *Nuclear Safety Management*, which requires contractors and operators of DOE hazard category 1, 2, and 3 nuclear facilities to develop and maintain a Safety Basis for each facility and to perform work in accordance with that Safety Basis. It also provides DOE line managers with a tool for obtaining regularly updated profiles of the entire inventory of Safety Bases for DOE hazard category 1, 2, and 3 nuclear facilities. No PII, PIA, No SORN
- Lessons Learned System supports and promotes the integration and sharing of information both internally and externally, to DOE, in order to prevent adverse operating incidents, improve operational safety awareness and mission quality, and support a learning organization culture. No PII, PIA, No SORN

### A.12A. Estimate of Respondent Burden Hours

**Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.**

The estimated burden hours are the sum of the burden reported by Departmental elements and field organizations as compiled from their respective contractors or estimated by expert personnel familiar with these collections. The chart below provides information for each collection. The consolidated annual burden hours of this package is 37,280 hours and the total annual responses are 82,155.

Collection Instrument	Estimated Annual Respondents	Estimated Annual Responses	Approx Time to Complete each response (mins)	Estimated Annual Burden Hours	Average Burden Hours Per Response	Average Burden Hours Per Respondent
CAIRS	420	1,825	55	1673	0.9167	4
ORPS	120	750	300	3750	5	31
NTS	30	75	270	788	4.502	26
REMS	110	79,000	23	30,283	0.3833	275
Fire Protection	30	30	480	240	8	8
Safety Basis Information	95	195	45	146	0.7487	2

System						
Lessons Learned System	40	180	113.3	400	2.2222	10
	845	82,155		37,280	0.4538	44

### A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

The estimated annualized cost to the contractor/public respondents for the data in this package is based on an assumed standard cost of \$120 per hour.

Collection Instrument	Estimated Annual Burden Hours	Estimated Costs to Respondents (Formula: \$120 x burden hour)
CAIRS	1,673	\$200,760
ORPS	3,750	\$450,000
NTS	788	\$94,560
REMS	30,283	\$3,633,960
Fire Protection	240	\$28,800
Safety Basis Information System	146	\$17,520
Lessons Learned System	400	\$48,000
Totals	37,280	\$4,473,600

## A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated annualized cost to the Federal government is based on an estimate of \$127.30 per hour (2018 GS-13, Step 10 Hourly Basic Rate), including an additional 29% for employee fringe benefits and overhead cost. This federal employee salary is rounded to \$127 per hour. It is assumed that the record keeping burden is 0.25 hour (15 minutes) per response.

- Government cost, at \$127/burden hour: \$1,183,641
- Estimated annualized Federal IT system cost (collection instruments are combined under one IT contract (including equipment, software, hardware, programming, and estimated annual updates): \$333,362
- Total estimated annualized cost for this package: \$1,517,003

Collection Instrument	Estimated Annual Burden Hours	Estimated Costs to Recordkeepers (federal employees)  (Formula: \$127 x15 min/60 min x reponse)
CAIRS	1,673	\$53,118
ORPS	3,750	\$119,063
NTS	788	\$25,019
REMS	30,283	\$961,485
Fire Protection	240	\$7,620
Safety Basis Information System	146	\$4,636
Lessons Learned System	400	\$12,700
Totals	37,280	\$1,183,641

## A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

The consolidated annual burden of this package is 37,280 hours which represents a decrease of 4,453 hours. We have determined that adjustment to this burden hour of 37,280 hours should be made as follows:

Current OMB Burden Hours Inventory                      41,733

### OMB Burden Hour Reduction

- CAIRS: The decrease in burden hours is due primarily to a decrease in the number of responses as a result of fewer injuries and illness occurring during this period. (147 hours decrease)
- ORPS: Decrease in burden from FY 2016 data occurred due to the Occurrence Reporting Directive (DOE O 232.2A) revision in 2017. The revision resulted in streamlining of reporting criteria and reduction of time to create and submit occurrence reporting. Total average time to complete an occurrence report is estimated to be an average of 5 hours. (4730 hours decrease)
- NTS: The decrease in burden hours is primarily due to a decline in the number of noncompliance reports being submitted each year. (172 hour decrease)
- REMS: Due to the annual variation of activities, allocated budgets, and an effort to ensure safe working conditions, the number of monitored individuals can change from year to year. There was an increase in approximately 3,000 monitored individuals from the 2016 response. (694 hours increase)
- Fire Protection: No Changes
- Safety Basis: Due to the nature of work at DOE sites, during the past 3 years number of users and facilities have increased. (102 hour increase).
- Lessons Learned System: Over the past couple of years, there has been a 10-15% decrease in lessons learned submittals. This is a result of the Lessons Learned System being antiquated and not the preferred method to submit and search lessons learned. AU-23 is working with RL on the possibility of transitioning to RL's OPEXShare system which is the preferred system by Lessons Learned Coordinators. (200 hours decrease)

<b>TOTALS 1910-0300</b>	<b>Burden Hrs</b>	<b>37,280</b>
	<b>Respondents/Responses</b>	<b>845/82,155</b>

Table A3. Changes in Burden

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved) (In minutes)	Burden Hours Per Response (Requested) (In minutes)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
CAIRS	Varies	418	420	1977	1825	55	55	1820	1,673	(152)	0	(152)	(147)	0	(147)
ORPS	Varies	160	120	1060	750	480	300	8480	3,750	(310)	0	(310)	(4730)	0	(4730)
NTS	Varies	40	30	210	175	274	270	960	788	(35)	0	(35)	(172)	0	(172)
REMS	Varies	116	110	76000	79000	23	23	29589	30,283	3000	0	3000	694	0	694
Annual Fire Safety Summary Application	Annually	30	30	30	30	480	480	240	240	0	0	0	0	0	0
Safety Basis Information System	Varies	188	95	87	195	30	45	44	146	108	0	108	102	0	102
Lesson Learned System	Varied	52	40	270	180	133.3	133.3	600	400	(90)	0	(90)	(200)	0	(200)
TOTAL		1,004	845	79634	82155			41733	37,280	2521	0	2521	(4453)	0	(4453)

**Table A4. ICR Summary of Burden**

	<b>Requested</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>	<b>Previously Approved</b>
Total Number of Responses	82,155	2521	0	79,634
Total Time Burden (Hr)	37,280	(4453)	0	41,733

### **A.16. Collection, Tabulation, and Publication Plans**

**For collections whose results will be published, outline the plans for tabulation and publication.**

This package contains no collections whose results will be published for statistical use.

### **A.17. OMB Number and Expiration Date**

**If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

The OMB number and expiration date will be displayed in systems/databases in this collection.

### **A.18. Certification Statement**

**Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

The Department of Energy is not requesting any exceptions to the certification statement provided in Item 19 of OMB Form 83-I.