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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 Program Database*

*Computerized Accident Incident Reporting System (CAIRS)*

*DOE OPEXShare Lessons Learned System*

*Occurrence Reporting and Processing System (ORPS)*

*Radiation Exposure Monitoring System (REMS)*

*Safety Basis Information System (SBIS)*

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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 gather information from Department of Energy (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 October 2, 2022, volume 87, number 194, page 61007. 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 gathered through a series of systems and databases (listed below):

**Computerized Accident/Incident Reporting System (CAIRS)**

**Occurrence Reporting and Processing System (ORPS)**

**Radiation Exposure Monitoring System (REMS)**

**Annual Fire Protection Program Database**

**Safety Basis Information System (SBIS)**

**DOE OPEXShare 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 concern the ways in which DOE contractors provide goods and services for DOE organizations and activities in accordance with the terms of their contracts; the applicable statutory, regulatory and mission support requirements of the Department; and regulations in the functional areas 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, authorities, and responsibilities for the Department, including contract management. Under the provisions of 42 U.S.C 7254 and 42 U.S.C 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 and illnesses, and other accidents that occur during DOE operations as described in DOE Order 231.1B, *Environment, Safety and Health Reporting*, and associated instructions. This system contains information from DOE and DOE contractors.

**Occurrence Reporting and Processing System (ORPS)** – The DOE’s Occurrence Reporting Program is used to notify 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 goals of enhancing mission safety and sharing effective practices to support continuous improvement and adaptation to change. The Occurrence Reporting Program, including the ORPS requirements, is described in DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*.

**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 Program Database** – 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 10 CFR Part 830, Subpart B, Appendix A, 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 to provide DOE line management 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.

**DOE OPEXShare 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 OPEXShare 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 100 percent 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 will update some of these databases to incorporate more user-friendly and modern 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. They are 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, contractors, the public, environment, and DOE facilities is not collected, then injury or accident rates may increase due to a failure to recognize and mitigate 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 results in 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; or**

**(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.**

Some collections in this package (CAIRS, ORPS) require respondents to report information to the agency more frequently than that prescribed by the OMB guidelines listed above (e.g., (a), (b)). This includes data on events/occurrences and injury/illness that vary based on the severity of the event or injury. Timely information is needed to support internal notifications for emergency response, corrective actions, and further communication for prevention of additional adverse impacts to safe operations. With this exception, the other 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 October 2, 2022, volume 87, number 194, page 61007. The Department also published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on January 20, 2023, volume 88, number 13, page 3732. The notices described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received for both 60-day and 30-day Federal Register Notices. Some DOE ES&H reporting database information is available to the public on public facing dashboards. No additional efforts were made other than the formal 60-day and 30-day Federal Register Notices.

## **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*, 2/3/22
- 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*, 9/15/20
- DOE Order 210.2A, *DOE Corporate Operating Experience Program*, 4/8/11
- DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*, 10/4/19

### 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 205.1C, 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. 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.
- 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.
- DOE OPEXShare 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 33,771 hours and the total annual responses is 73,040.

**Table A1. Estimated Respondent Hour Burden**

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
CAIRS	Reporting/recordkeeping	420	1825	0.9167	1,673	12
ORPS	Reporting	120	750	5	3,750	365
REMS	Reporting	100	70,000	0.3833	26,833	1
Fire Protection	Reporting	45	45	16	720	1
Safety Basis Information System	Reporting	20	20	2	40	Varies
DOE OPEXShare Lessons Learned	Reporting	70	400	1.89	755	Varies
<b>TOTAL</b>		<b>775</b>	<b>73,040</b>		<b>33,771</b>	

### A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

To determine an extremely conservative estimate of the annual cost for respondents to perform the reporting for these systems, we used BLS link <http://www.bls.gov/news.release/ecec.nr0.htm>. Specifically, [Table 4. Private industry workers by occupational and industry group](#), professional, scientific, and technical service industry at \$62.75 per hour multiplied by 1.4, or \$87.85 per hour, was used.

**Table A2. Estimated Respondent Cost Burden**

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
CAIRS	1,673	87.85	146,973
ORPS	3,750	87.85	329,438
REMS	26,833	87.85	2,357,279
Fire Protection	720	87.85	63,252
Safety Basis Information System	40	87.85	3,514
DOE OPEXShare Lessons Learned	755	87.85	66,327
<b>TOTAL</b>	<b>33,771</b>		<b>2,966,783</b>

### 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 other estimated annualized cost to the contractor/public respondents for the data in this package is all included in the above table. No additional costs are known.

### 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 \$105.80 per hour (2022 GS-13, Step 10 Hourly Rate with DC locality pay), including an additional 29% for employee fringe benefits and 30% overhead cost. This federal employee salary is rounded to \$106 per hour. It is assumed that the record keeping burden is 0.25 hour (15 minutes) per response.

- Government cost, at \$106/burden hour: \$151,448
- Estimated annualized Federal IT system cost (collection instruments are combined under one IT contract (including equipment, software, hardware, programming, cloud service, and estimated annual updates): \$1,163,000
- Total estimated annualized cost for this package: \$1,314,448

**Table A3. Estimated Cost to the Federal Government**

Collection Instrument	Number of responses per year	Hourly Wage Rate	Estimated Costs to Recordkeepers (federal employees) (Formula: \$106 x15 min/60 min x reponse)
CAIRS	1825	\$106	\$48,363
ORPS	750	\$106	\$19,875
REMS	70,000	\$106	\$53,000**
Fire Protection	45	\$106	\$19,080
Safety Basis Information System	20	\$106	\$530
DOE OPEXShare Lessons Learned System	400	\$106	\$10,600
<b>TOTAL</b>	<b>73,040</b>		<b>\$151,448**</b>

\*\* Note for REMS: Calculation of costs to recordkeepers for REMS is based on actual hours expended (~500) rather than the estimated rate of 0.25 hr/response, as this estimate results in a gross overestimation. 500 hours X \$106/hour = \$53,000 per year. The total cost (\$151,448) only includes this alternate estimate (\$53,000) for federal hours spent on REMS responses.

### 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 33,771 hours which represents a decrease of 3,509 hours. We have determined that adjustment to this burden hour of 33,771 hours should be made as follows:

Current OMB Burden Hours Inventory: 37,280

OMB Burden Hour Reduction

- CAIRS: No Change

- ORPS: No Change
- Noncompliance Tracking System (NTS): The ownership of the NTS database has been transferred to a different organization (Office of Enterprise Assessments). This request, therefore, adjusts future data collection needs for NTS to “0” for collection instruments associated with the EHSS Office of ES&H Reporting and Analysis (788-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 a decrease in approximately 9,000 monitored individuals from the 2019 response (3,450-hour decrease).
- Fire Protection: Number of respondents increased by 15 to 45 due to more sites and sub-organizations being identified to respond. Time to submit responses doubled (980 min/response, or 2 days per response) to reflect more accurate data submittals (360-hour increase).
- Safety Basis: Due to the pandemic situation and reduced need for updates to safety bases of nuclear facilities, the number of responses decreased, and the burden hours decreased (106-hour decrease).
- DOE OPEXShare Lessons Learned System: Over the past year, there has been a doubling in lessons learned submittals. This is a result of strengthening of the Lessons Learned program, modernization of the collection database, and more active users. The system has been well received by DOE and DOE contractors as a venue to share operating experience and improve organizational learning, resulting in improved safety and mission quality (355-hour increase).

**Burden Hours: 33,771**  
**Respondents/Responses: 775/73,040**

**Table A4. ICR Summary of Burden**

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	73,040	0	-9115	82,155
Total Time Burden (Hr)	33,771	0	-3509	37,280
Total Cost Burden	\$2,966,783	0	-1,506,817	\$4,473,600

### 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.