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CP3-OP-2024 FRev. 2A	TITLE: Initial Incident/Event Reporting	Page 1 of 13

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FUNCTIONAL AREA: Stabilization and Deactivation **SUBJECT MATTER AREA:** Facility Operations	**SUBJECT MATTER EXPERT**: Trenton Rodgers, Plant Shift Superintendent
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REVISION/CHANGE LOG

Revision/Change Letter	Description of Changes	Pages Affected	Date of Revision/Change
FR0	Procedure Bluesheeted	All	8/12/2017
FR1	Non-intent revision to remove from Bluesheet	All	01/07/2018
FR2	Complete revision to clarify employee event reporting requirements and improve event notifications process. Addressed CA-001245, incorporating FD HSSQ-15-003 content for compensatory actions required of personnel involved in motor vehicle and equipment accidents. Addressed CA-001379 to clarify responsibilities for notifications, fact findings, and initial event reports. Revised form name and format for CP3-OP-2024-F01 and CP3-OP-2024-F02.	All	8/28/2018
FR2A	Resolved CAPAs – revised definition of equipment relative to IER applicability (CA-1558) and added instructions for personnel to report security-related incidents (CA-1559). Revised Section 6.2 to clarify actions required for personnel involved in both equipment accidents and government vehicle accidents.	3-4, 7-8, 10-13	3/27/2019

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure defines the process for the initial reporting, notifications, and initial investigation of work-related events that result in personal injury or illness, government property damage (including all powered industrial truck [PIT], golf or utility cart, and motorized or non-motorized vehicle accidents), accidents, incidents, environmental spills or releases, precursors, near misses, programmatic or regulatory requirement non-compliances, or other abnormal conditions that occur during the course of the Deactivation and Remediation (D&R) Contractor work activities at the United States Department of Energy (DOE) Paducah Gaseous Diffusion Plant (PGDP). For the remainder of this procedure, the term "event" will refer to all of the above mentioned circumstances.

1.2 Scope

This procedure applies to all PGDP D&R employees and subcontractors performing work in support of the PGDP D&R contract either on-site or off-site.

Formal investigation of events and causal analysis are addressed under CP3-QA-3007, *Issue Investigation and Causal Analysis*.

Reporting an Incident of Security Concern (IOSC) is not addressed by this procedure. All personnel must report any potential or suspected IOSC to the Infrastructure Contractor Safeguards & Security (S&S) Department, the D&R Contractor S&S Program Manager, or Management (report potential or suspected IOSCs to the Plant Shift Superintendent [PSS] if after hours). Refer to PGDP-SS-PL-003, *Safeguards and Security Program Planning and Management Plan,* for details on the specific actions to take in the event of any potential or suspected IOSC. Chg A

2.0 REFERENCES

2.1 Use References

- CP1-HR-0112*, Employee Discipline*
- CP2-HR-0125, *Workplace Substance Abuse Program*
- CP3-EP-1019, *Emergency Notification*
- CP3-ES-0003, *Environmental Spill Reporting*
- CP3-HS-2008, *Accident Prevention/Equipment Control Tags*
- CP3-HS-2009, *Stop/Suspend Work*
- CP3-HS-2012, *Construction and Work Zone Barricades and Signs*
- CP3-OP-2001, *Plant Management Communication*
- CP3-PR-2002, *Use of Government Vehicles*
- CP3-QA-3001, *Issues Management*
- CP3-QA-3005, *Occurrence Reporting*
- CP3-QA-3008, *Fact Finding*
- CP3-SM-0020, *Administrative Controls for Powered Industrial Trucks*
- Long Term Order (LTO) FO-18-003, *PSS Communications*

- Emergency Action Plans

2.2 Source References

- 10 Code of Federal Regulations (CFR) § 830, *Nuclear Safety Management*
- 10 CFR § 835, *Occupational Radiation Protection*
- 10 CFR § 850, *Chronic Beryllium Disease Prevention Program*
- 10 CFR § 851, W*orker Safety and Health Program*
- 29 CFR § 1910.38, *Emergency Action Plans*
- DOE Order (O) 151.1D, *Comprehensive Emergency Management System*
- DOE O 231.1B Chg 1, *Environment, Safety and Health Reporting*
- DOE O 232.2A, *Occurrence Reporting and Processing of Operations Information*
- DOE O 422.1 Chg 2, *Conduct of Operations*
- DOE-HDBK-1226-2019, *Conduct of Operations Implementation*
- PGDP-SS-PL-003, *Safeguards and Security Program Planning and Management Plan*

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3.0 COMMITMENTS

None

4.0 RESPONSIBILITIES

Responsibilities are outlined in Section **6.0**.

5.0 GENERAL INFORMATION

None

6.0 INSTRUCTIONS

6.1 Initial Event Reporting and Notifications

NOTES:

Failure of an employee to promptly report a work-related event to his or her Supervisor may result in disciplinary action and/or denial of benefits as determined by Human Resources (HR). Also, delayed notification may affect determination of work-relatedness and the services provided by the Occupational Medical Provider.

Supervisors are responsible for **promptly** reporting events to the PSS – as soon as practical and no later than 15 minutes after notification of an event.

Employee

6.1.1 Promptly report all work-related events to the Supervisor and the PSS. The Supervisor may make the prompt notification to the PSS for the employee.

NOTE:

The Occupational Medicine Program Manager should be contacted regarding work-related injuries and illnesses reported to Supervision or the PSS after personnel have left the plant site.

6.1.2 **If** symptoms of a work-related injury or illness occur after leaving the plant site, outside a normal shift, **then** contact immediate Supervisor **or** PSS before seeking medical attention **or** immediately after treatment has been provided.

Supervisor or First Person on the Scene

NOTE:

Refer to the applicable facility Emergency Action Plan for specific directions to follow in the event of an emergency.

See and Flee is the appropriate response for uncontrolled chemical or radiological releases such as hydrogen fluoride or uranium hexafluoride.

6.1.3 **When** the event involves chemical spills or releases, **then implement See and Flee or SWIMS (Stop, Warn, Isolate, Mitigate, and Secure)**, as appropriate, **and** ensure the PSS has been notified as detailed in Step **6.1.4**.

6.1.4 **If** the event occurs at the PGDP **and** requires emergency assistance, **then immediately** contact the PSS by performing one of the following:

- Fire Alarm Pull Box (Caution – **NOT** for reporting a hazardous materials release)
- PSS Emergency Phone – 333 (Bell) or 555 (PAX)
- Radio – Turn knob to position 16: Call for Alpha 1. State "Emergency Traffic, Emergency Traffic"
- PSS Office – 6211, State "This is an Emergency"
- From a cell phone - (270) 441-6333
- Notify Facility Manager, Local Emergency Director (LED), or Warden.

6.1.5 **If** the event occurs off-site **and** requires emergency assistance perform the following:

A. Immediately call 911 Emergency Call Center for emergency fire, medical, or police assistance.

B. Promptly notify supervisor and the PSS.

6.1.6 **If** first person on scene is **NOT** the Supervisor, **then promptly** notify the Supervisor or the PSS of the event.

6.1.7 **If** emergency assistance is requested, **then** ensure involved employee(s) receive appropriate attention and assistance until emergency response personnel arrive.

6.1.8 Stop **and** place work in a safe condition pending investigation and determination of further actions.

6.1.9 **When** employee assessment and/or first aid is necessary as the result of a non-emergency

event, **then** accompany the employee to the designated medical facility.

PSS

NOTE:

Steps **6.1.10** through **6.1.37** may be performed in any logical order.

6.1.10 **If** an emergency response is necessary, **then** perform the following:

C. Implement appropriate response actions in accordance with approved emergency procedures.

D. Notify off-site authorities, as necessary, according to CP3-EP-1019, *Emergency Notification.*

6.1.11 **If** emergency response is **NOT** necessary, **but** the event results in or has the potential to result in any of the following, **then** contact Occupational Medicine (on the day shift) **or** Fire Services (on the back shift) for assistance:

- Medical assessment and/or first aid
- Personnel chemical or radiological exposure

6.1.12 **When** a release of a hazardous substance is suspected or known to have occurred, **then** take actions in accordance with CP3-ES-0003, *Environmental Incident Reporting.*

6.1.13 Initiate immediate occurrence notification to DOE, as necessary, according to CP3-QA-3005, *Occurrence Reporting*.

NOTE:

Long Term Order (LTO) 18-FO-003, *PSS Communications*, provides specific guidance to the PSS on how to perform notifications to group(s) or individual(s) for events.

Any notifications required below are in addition to requirements in other procedures or Timely Orders.

6.1.14 **If** the event potentially affects other Site contractor personnel, facilities, or equipment, **then** notify contractor(s), as appropriate.

6.1.15 Initiate event notification to Management and DOE, as necessary, according to LTO 18-FO-003.

NOTE:

Scene control and preservation is an essential element of accident investigation.

Event scenes involving equipment accidents are controlled by the PSS until concurrence to release the scene is provided by the DOE FR.

6.1.16 Ensure the event scene is in a safe condition **and** appropriate precautions are in place, utilizing barricades and signs in accordance with, CP3-HS-2012, *Construction and Work Zone Barricades and Signs,* as needed.

NOTE:

Events involving property damage and equipment accidents necessitate the completion of personal statements by personnel involved and any witnesses.

6.1.17 **When** necessary, obtain personal statements using CP3-OP-2024-F02, *Personal Statement Form*.

NOTE:

The Supervisor responsible for and personnel directly involved in motor vehicle accidents should refer to CP3-PR-2002, *Use of Government Vehicles,* for additional post-accident administrative requirements **NOT** specifically addressed in this procedure.

As it relates to the applicability of **Step 6.1.18**, "equipment" shall be considered any of the following when operation or control of the device, or lack thereof, results in personnel injury or property damage: Chg A

- Aerial device,
- Powered industrial truck (PIT),
- Golf or utility cart,
- Motorized or non-motorized vehicle, and
- Other equipment involved in an accident (Management discretion).

6.1.18 **If** the event consists of an equipment accident, **then** perform the following:

NOTE:

Notify the immediate Supervisor of each equipment operator and equipment spotter (as applicable) of provisional suspension of equipment operating, driving, or spotting privileges as soon as possible following event stabilization if absent at the scene.

A. Inform each equipment operator and equipment spotter (as applicable) involved in the event that the individual's equipment operating, driving, or spotting privileges are provisionally suspended pending initial accident investigation and further evaluation by the individual's Director and additional employee-initiated actions are required as outlined in Section **6.2**

NOTE:

The Occupational Medicine Provider (on the day shift) or shift medic (on the back shift) should be contacted with the name (and badge number, when available) of the individual(s) requiring post-accident testing. Confirm that alcohol **and** drug screening are required.

Personnel requiring post-accident or occurrence testing must be transported to the designated medical facility, preferably by the immediate Supervisor.

B. Implement post-accident or occurrence testing for equipment operator(s) and equipment spotter(s) involved, in accordance with CP2-HR-0125, *Workplace Substance Abuse Program*.

C. Notify Fleet or Equipment Management of any property damage or accident involving equipment.

NOTE:

Events involving property damage and equipment accidents necessitate photographs of property damaged, equipment involved, and the event scene. The property identification number (such as, CA#) of the equipment involved and photos are provided to Fleet or Equipment Management.

6.1.19 **When** appropriate, **then** obtain a variety of photographs of the event scene, including an object for size perspective.

6.1.20 Coordinate with applicable Facility Manager to apply "Caution" or "Warning" Accident Prevention or Equipment Control Tags, if appropriate, in accordance with CP3-HS-2008, *Accident Prevention/Equipment Control Tags*.

6.1.21 **When** appropriate, **then** draw diagram of event scene and measure or record pertinent data on the diagram; be specific with details and units of measurement.

6.1.22 **Prior** to release of event scene **and when** applicable, obtain concurrence from the DOE FR.

6.1.23 Assist the FAM in evaluating the event, as necessary, according to CP3-QA-3008, *Fact Finding*.

6.1.24 Assist the FAM in evaluating the event, as necessary, according to CP3-HS-2009, *Stop/Suspend Work.*

6.1.25 Consider the need to perform an initial extent of condition evaluation for events with safety-related impact **and** coordinate evaluation through appropriate manager(s), as necessary.

NOTE:

An Initial Event Report (IER) shall be generated for any equipment accident, as determined by applicability of Step 6.1.18.

The alphanumeric report number for an IER is formatted as follows: IER-DAR-(Last Two Digits of Calendar Year)-(Next Sequential Number starting with 001). For example, the first IER issued by the D&R Contractor in 2019 would be #IER-DAR-19-001.

Verbal and written notification requirements for other events are addressed in LTO 18-FO-003, (Step 6.1.15.)

PGDP D&R Management may elect for an IER to be generated for other events of concern to Management.

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6.1.26 Initiate development of CP3-OP-2024-F01, *Initial Event Report (IER*)**,** as necessary.

6.1.27 At a minimum, provide verbal notification of an IER to the following:

- S&H Program Manager
- FAM
- CPAP Manager
- EDO
- DOE FR

6.1.28 **Prior** to finalizing CP3-OP-2024-F01, review the IER for accuracy **and** ensure the following:

- Event description and actions taken are limited to verifiable facts that clearly convey the details of the event.
- Personally Identifiable Information (PII) is **NOT** included on the form (such as, employee names and badge numbers of personnel involved in the event)
- Events requiring medical evaluation(s) include **only** the following statement to avoid inadvertently commenting on categorization of potentially recordable injuries and illnesses – *"Employee(s) transported to designated medical facility for evaluation. The details of the incident will be reported, as applicable, per 29 CFR 1904 after an investigation of the incident has been completed."*

6.1.29 Distribute the IER by email to the approved distribution list.

6.1.30 Coordinate with FAM (or designee) to generate Issue Identification according to CP3-QA-3001, *Issues Management*, for the following:

- Any event requiring an IER
- Other events as determined by the FAM or PSS, with support from the CPAP Manager or S&H Program Manager, as requested

S&H Program Manager

6.1.31 **When** applicable, notify Radiation Protection Program Manager (RPPM), Emergency Management (EM) Program Manager, Occupational Medicine Program Manager, or Industrial Hygiene Manager.

6.1.32 Assist the FAM and PSS, as requested, in evaluating the event in support of notification, fact finding and issue identification.

Functional Area Manager

6.1.33 Initiate fact finding, as necessary, according to procedure CP3-QA-3008.

6.1.34 Initiate Issue Identification, according to CP3-QA-3001 for the following:

- Any event requiring an IER
- Other events as determined by the FAM or PSS, with support from the CPAP Manager or S&H Program Manager, as requested

CPAP Manager

6.1.35 Assist the PSS, as requested, in evaluating the event in support of notification or communication to DOE according to CP3-QA-3005.

6.1.36 Assist the FAM, as requested, in support of fact finding according to CP3-QA-3008.

6.1.37 Ensure the event is entered, as necessary, into Issues Management according to CP3-QA-3001.

6.2 Compensatory Actions for Personnel Involved in Accidents Involving Equipment

NOTE:

Section **6.2** provides additional instructions for personnel (equipment operator or equipment spotter, as applicable) involved in an equipment accident – after the initial report and notifications have been performed in accordance with Section **6.1**.

Personnel are reminded that following an equipment accident, equipment driving, operating, or spotting privileges, as applicable, are provisionally suspended as communicated by the PSS. This provision suspension remains in place pending initial accident investigation and further evaluation and implementation of Section **6.2** by the individual's Director (or designee). Chg A

For motor vehicle accidents, refer to CP3-PR-2002, *Use of Government Vehicles,* for additional post-accident administrative requirements not specifically addressed in this procedure.

Employee

6.2.1 Meet with Director or Designee to discuss the equipment accident within 24 hours of the accident or as quickly as possible.

Director or Designee

6.2.2 Determine whether the individual's equipment operating, driving, or spotting privileges, as applicable to the event, will remain suspended **and** inform the employee of the decision.

NOTE:

CP3-SM-0020, *Administrative Controls for Powered Industrial Trucks*, requires refresher training for PIT operators that have been involved in an accident. Chg A

CP3-PR-2002, *Use of Government Vehicles,* requires anyone driving a government vehicle involved in an accident to complete a recognized defensive driving course within seven (7) days of the event.

6.2.3 Coordinate employee assignment to additional training/re-training requirements for equipment operation or equipment spotting, as required or otherwise deemed appropriate.

6.2.4 Determine whether additional disciplinary action is warranted in accordance with CP1-HR-0112*, Employee Discipline*.

Employee

6.2.5 **If** event resulted from driving a government vehicle involved in an accident, **then** perform the following: Chg A

A. Complete a recognized defensive driving course within seven (7) working days of the event.

B. Present certificate of course completion to Director or designee so that he/she can choose to remove any driving, operating, or spotting restrictions that may have been imposed.

C. Provide a copy of certificate of course completion to HR for inclusion in employee's personnel file.

NOTE:

With the exception of the requirement for a driver to complete a defensive driving course within seven (7) days of an accident when operating a government vehicle, the completion timeframe for any additional training or re-training requirements assigned for equipment operation or equipment spotting, is at the discretion of the Director and may be completed after restoration of the employee's equipment operating, driving, or spotting privileges, if deemed appropriate.

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Director or Designee

6.2.6 **When** employee has provided certificate of completion for a recognized defensive driving course, as applicable, **and** a determination is made regarding the status of an employee's equipment operating, driving, or spotting privileges, **then** inform the employee, HR, and the PSS of the decision.

7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

- CP3-OP-2024-F01, *Initial Event Report (IER)*
- CP3-OP-2024-F02, *Personal Statement Form*

Forms are to be completed in accordance with CP3-OP-0024, *Forms Control*.

7.2 Records Disposition

The records are to be maintained according to CP3-RD-0010, *Records Management Process*.

Appendix A – Acronyms/Definitions

ACRONYMS

CFR – Code of Federal Regulations

CPAP – Contractor Performance Assurance Program

DOE – United States Department of Energy

EDO – Emergency Duty Officer

EM – Emergency Management

FAM – Functional Area Manager

FR – Facility Representative

HR – Human Resources

S&H –Safety & Health

IER – Initial Event Report

O – Order

PGDP D&R – Paducah Gaseous Diffusion Plant, Deactivation and Remediation Contractor

PPE – Personal Protective Equipment

PSS – Plant Shift Superintendent

RPPM – Radiation Protection Program Manager

S&S – Safeguards & Security Chg A

STD - Standard

DEFINITIONS

Accident – An unexpected event that produces personal injury, illness or death; damage to, or loss of, property or vehicles; or environmental occurrences involving reportable quantities of specific substances.

Condition – Any as-found state, whether or not resulting from an event, which may have adverse safety, health, quality assurance, security, and operational or environmental implications. A condition is more programmatic in nature than an accident or incident.

Equipment – For the purpose of this procedure, shall be considered any of the following when operation or control of the device, or lack thereof, results in personnel injury or property damage: aerial device, powered industrial truck (PIT), golf or utility cart, motorized or non-motorized vehicle, and other equipment involved in an accident, at Management's discretion. Chg A

Appendix A – Acronyms/Definitions (Continued)

Event – For the purpose of this procedure, shall be an inclusive term, that includes work-related events that result in personal injury or illness, government property damage (including all PIT, golf/utility cart, and motorized/non-motorized vehicle accidents), accidents, incidents, environmental spills or releases, precursors, near misses, programmatic or regulatory requirement non-compliances, or other abnormal conditions that occur during the course of the D&R Contractor work activities at PGDP.

Extent Of Condition – A generic implication of a failure, malfunction, deficiency, defective item, weakness or problem, i.e., the actual or potential applicability for an event or condition to exist in other activities, projects, program, facilities, or organizations.

Functional Area Manager (FAM) – For the purposes of this procedure, the FAM fulfills the responsibilities of the Facility Manager as defined in DOE O 232.2A. The FAM serves as the individual, or designee, with direct line responsibility for operation of a facility or group of related facilities, including authority to direct physical changes to the facility. A FAM could also be responsible for a program or activity (Functional Manager).

Incident – An undesired event which under slightly different circumstances could result in harm to people, damage to property, loss to process, or harm to the environment. A generic term used for those events that do not cause harm but which might have done so under different circumstances.

Incident of Security Concern (IOSC) – Security incidents include a range of possible actions, inactions, or events that: pose threats to national security interests and/or departmental assets; Create potentially serious or dangerous security situations; have a significant effect on the S&S Program capability to protect DOE S&S interests; indicate the failure to adhere to security procedures; or illustrate the system is not functioning as designed by identifying and/or mitigating potential threats (e.g., detecting suspicious activity, hostile acts, etc.). Chg A

Occupational Medical Provider – A medical professional assigned or designated to provide medical treatment for occupational injuries or illness.

Occurrence – An event or condition as defined by DOE O 232.2A as adversely affecting, or which may adversely affect, DOE or contractor personnel, the public, property, the environment, or the DOE mission.

Promptly – As soon as practical and no later than 15 minutes after notification of the event.

Timely Order – Provide a means for management to communicate guidance and short-term information to personnel. Timely Orders are used whenever it is necessary to disseminate information to personnel concerning special operations, administrative details, or environmental, safety and health issues, and are used to supplement but not replace or change existing procedures. Timely Orders are issued as either a Functional Directive or Long Term Order.