

PRCN Number: PRCN-UPF-C	P-108-R25-05	Effective Date: 0	06/11/24		
NOTE: PRCN Effective Date cannot precede effective date of associated document.					
🖂 Inte	ent Change	🗌 No	on-Intent Change		
Associated Document Number:	UPF-CP-108		Rev: 25		
Associated Document Title:	UPF Event Management and Investigation				
Justification for Change:	Update Section 1.3, Applicability, to clarify event investigation process				

Identify the scope of the change, including mark-up (i.e., strike-through for deletions, colored text for additions) of any new, removed, or changed content.

### Update first four sentences of Section 1.3, Applicability:

### FROM:

This Procedure applies to events at the UPF construction site and supporting offices and facilities (e.g., Commerce Park, off-site warehouses). Events may also be subject to the requirements of Y14-192, Occurrence Notification and Reporting. All fire events shall be reported and investigated in accordance with UPF-CP-211, using UCN-23506. All electrical events shall be reported and investigated in accordance with UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual, using OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigation. APA-2HC-E0A0-000104-001, Core Process 104 – Injury and Illness Reporting and Recordkeeping, describes the Environmental, Safety and Health (ES&H) performance reporting, database management, quality assurance, and compliance with regulatory requirements associated with workplace injuries and illnesses and reporting.

### TO:

This Procedure applies to events at the UPF construction site and supporting offices and facilities (e.g., Commerce Park, off-site warehouses). UPF events associated with work performed by CNS or CNS processes will be investigated in accordance with E-PROC-0007, *Enterprise Event Recover and Notification Program*. If personnel affiliated with CNS and personnel affiliated with BNI are both involved in an event, the event investigation will be investigated in accordance with UPF-CP-108. Events may also be subject to the requirements of Y14-192, *Occurrence Notification and Reporting*. All fire events shall be reported and investigated in accordance with UPF-CP-211, *Fire Prevention and Protection*; using UCN-23506, *Fire Investigation Report*. All electrical events shall be reported and investigated in accordance with UPF-MANUAL-CM-001, *Uranium Processing Facility Construction Electrical Safety Manual*, using OT-SH-801768-A038, *UPF Electrical Hazard and Incident Investigation*. APA-2HC-E0A0p-000104-001, *Core Process 104 – Injury and Illness Reporting and Recordkeeping*, describes the Environmental, Safety and Health (ES&H) performance reporting, database management, quality assurance, and compliance with regulatory requirements associated with workplace injuries and illnesses and reporting.



Preparer						
UPF Construction Issues Management	Kellie R. Coleman	Printed Name/Signature	06/06/24 Date			
		Concurrence				
N/A		N/A	N/A			
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PRCN PRCN-UPF-CP-108-R25-04 Effective Date: 10/04/23							
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Intent Change Non-Intent Change							
Associated Document Number:	UPF-CP-108		Rev: 25				
Associated Document Title:	Associated Document Title: UPF Event Management and Investigation						
Justification for Change:	Justification for Change: Address issues raised by CR: 25774-000-GCA-GAM-04467, Y-12 APMO <i>Performance Problem PP-1 - Required OSHA Event Notifications Not Covered</i> <i>in Procedure (ASM-9.30.2022-5969)</i> , to clarify notifications required to government bodies.						
Identify the scope of the cha any new, removed, or chang		<-up (i.e., strike-through for de	eletions, colored text for additions) of				
Revise Section 1.3 to add as l	ast paragraph:						
APA-2HC-E0A0-000104-001, <i>Core Process 104 – Injury and Illness Reporting and Recordkeeping</i> , describes the Environmental, Safety and Health (ES&H) performance reporting, database management, quality assurance, and compliance with regulatory requirements associated with workplace injuries and illnesses and reporting.							
Update Section 6.2, Interfacing	g References:						
APA-2HC-E0A0-000104-001, C	ore Process 104 – Inj	iury and Illness Reporting and Re	cordkeeping				
Update Appendix B, add to last sentence of table description:							
In some cases, categorization is required within 2 hours of discovery and notifications within timeframes as soon as 2 hours of categorization. APA-2HC-E0A0-000104-001, <i>Core Process 104 – Injury and Illness Reporting and Recordkeeping</i> , describes the Environmental, Safety and Health (ES&H) performance reporting, database management, quality assurance, and compliance with regulatory requirements associated with workplace injuries and illnesses and reporting.							
		Preparer					
ES&H Issues Management	Anton R. Panev	Am Park	09/27/23				
Printed Name/Signature Date							
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UPF ES&H Manager, BNI	Kieran S. Kelly	Hordes	09/27/23				
	Catherine Flavin for	Printed Name/Signature	Date				
Sr. Vice President & UPF Project Director	John H. Platt II	Catherine Flaven	10/03/23				

Printed Name/Signature

Date



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🛛 Inte	ent Change		on-Intent Change	
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Associated Document Title:	UPF Event Management and	Investigation		
Justification for Change:This PRCN is driven by Action #3 of Condition Report 25774-000- 04172, Disconnect between Y-12 Fire Protection Program Manual UPF-CP-211 Relative to Fire Event Reporting and Investigation			tection Program Manual Y79-001 and	

Identify the scope of the change, including mark-up (i.e., strike-through for deletions, colored text for additions) of any new, removed, or changed content.

### Section 1.3, update:

### FROM:

This procedure applies to events at the UPF construction site and supporting offices and facilities (e.g., Commerce Park, offsite warehouses). E-PROC-0007, Enterprise Event Recovery and Notification Program, is applicable to the UPF Project for Event Notification; however, Fact Finding and Critiques are not applicable to the UPF Project. Events may also be subject to the requirements of Y14-192, Occurrence Notification and Reporting.

### TO:

This procedure applies to events at the UPF construction site and supporting offices and facilities (e.g., Commerce Park, offsite warehouses). <u>E-PROC-0007</u>, Enterprise Event Recovery and Notification Program, is applicable to the UPF Project for <u>Event Notification</u>; however, Fact Finding and Critiques are not applicable to the UPF Project. Events may also be subject to the requirements of Y14-192, Occurrence Notification and Reporting. All fire events shall be reported and investigated in accordance with UPF-CP-211, using UCN-23506. All electrical events shall be reported and investigated in accordance with UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual, using OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigation.

### Section 2.2, add bullet:

• Following the chain of command to flow down event notifications to all applicable parties (i.e., CNS, APMO, NNSA).

### Section 2.4, update bullet 5:

### FROM:

· Determining the level of investigation to be completed for events

### то:

· Determining the level of investigation to be completed for events other than fire and electrical

### Section 2.4, update bullet 7:

### FROM:

 Contacting the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash. The OC will contact the Electrical Safety Committee Chairperson in accordance with Y73-528, Electrical Safety Manual

### TO:

 Contacting the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash. The OC will contact the Electrical Safety Committee Chairperson in accordance with Y73-528, Electrical Safety Manual. Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH-801768-A038, as applicable for the event



#### Section 2.5, delete bullet 2

#### FROM:

 Sending out the Event Notification (Consolidated Nuclear Security [CNS] Notification) in accordance with E-PROC-0007

#### TO:

 Sending out the Event Notification (Consolidated Nuclear Security [CNS] Notification) in accordance with E-PROC-0007

#### Section 4.1, update:

#### FROM:

When an event occurs, the Responsible Manager's immediate and short-term response activities are to preserve life, property, the environment, and UPF assets. Appendix B, Event Reporting and Notification Matrix, is a guide for assisting users with the correct contacts and notification methods. Refer to E PROC-0007, Section 8, for the CNS Event Notification process.

#### TO:

When an event occurs, the Responsible Manager's immediate and short-term response activities are to preserve life, property, the environment, and UPF assets. Appendix B, Event Reporting and Notification Matrix, is a guide for assisting users with the correct contacts and notification methods. Refer to E PROC-0007, Section 8 Section 4, Event recovery and Notification Process, for the CNS Event Notification process.

### Section 4.2, Table 1, Step 13, update:

### FROM:

Report applicable events in accordance with E-PROC-0007.

#### TO:

Report applicable events in accordance with E-PROC-0007. When applicable, perform Occurrence Reporting and Processing System notifications and generate a Condition Report in accordance with Y15-95-816.

### Section 4.2, Table 1, Step 14, update:

#### FROM:

Complete and submit an event notification within the Incident Reporting and Information System (IRIS). Contact the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash.

#### TO:

Complete and submit an event notification within the Incident Reporting and Information System (IRIS). Contact the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash. Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH-801768-A038 as applicable for the event.

### Section 4.3, Table 2, Step 12, update:

#### FROM:

Turn over the scene to the Event Investigator for event investigation, and assist as necessary.

#### TO:

Turn over the scene to the Event Investigator for event investigation, and assist as necessary. For fire and electrical incidents, the scene shall remain secured until released by the event investigator.

### Section 4.3, Table 2, Step 13, update:

### FROM:

Complete Evidence Collection/Processing and Investigation in accordance with Sections 4.4, 4.5, and 4.6, as applicable.

#### TO:

Turn over the scene to the Event Investigator for event investigation, and assist as necessary. For fire and electrical incidents, the scene shall remain secured until released by the event investigator.

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### Section 4.3, Table 2, Step 15, update:

### FROM:

Applicable events shall be reported through E-PROC-0007.

### TO:

Applicable events shall be reported through E-PROC-0007. When applicable, perform Occurrence Reporting and Processing System notifications and generate a Condition Report in accordance with Y15-95-816.

### Section 4.3, Table 2, Step 16, update:

### FROM:

Complete and submit an Event Notification within the IRIS. Contact the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash.

### TO:

Complete and submit an Event Notification within the IRIS. Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH-801768-A038 as applicable for the event.

### Section 4.9, Add text to Table 8, Step 4

Submit UCN-23257 to the DMC for records retention. The finalized Event Investigation Reports are uploaded to IW for records retention. Access to all finalized UCN-23257, UPF Event Investigation Reports, will be granted to the appropriate Project personnel within CNS ESH&Q and CAS. Access may also be granted to other Project personnel on as-needed basis.

### Section 5.0, update Records

### FROM:

Records generated by this Procedure shall be maintained in accordance with Y15-95-800, UPF Document Management. Record types for documents managed by the UPF DMC in InfoWorks are identified in ML-PS-801768-A004, Uranium Processing Facility Project Records Retention and Turnover List, as prescribed by Y15-95-806, UPF Records Retention and Turnover. Quality Type is listed as Quality-Lifetime (QA-L), Quality-Nonpermanent (QA-NP), or Non-Quality (Non-QA) in accordance with E-PROC-3114, Records Management (CNS).

Records generated during the performance of this Procedure include:

Record or Form Number	Record Title	Record Holder	System/ Location	Document Type	Quality Type
UCN-23257	UPF Event Investigation Report, which may include:	UPF DMC	InfoWorks	EVR	Non-QA
	<ul> <li>DOE F 5484.3, Individual Accident/Incident Report</li> </ul>				
	SF 91, Motor Vehicle Accident     Report				
	SF 94, Statement of Witness				
	UCN-23256, UPF     Employee/Witness Statement				
UCN-23470	UPF Subcontractor Event Investigation Report, which may include:	UPF DMC	InfoWorks	SEVR	Non-QA
	<ul> <li>DOE F 5484.3, Individual Accident/Incident Report</li> </ul>				
	<ul> <li>SF 91, Motor Vehicle Accident Report</li> </ul>				
	SF 94, Statement of Witness				
	UCN-23256, UPF     Employee/Witness Statement				

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### TO:

Records generated by this Document shall be maintained in accordance with Y15-95-800, UPF Document Management. The following records generated are:

Record or Form Number	Record Title	System/ Location	Document Type
UCN-23257	UPF Event Investigation Report, which may include: DOE F 5484.3, Individual Accident/Incident Report SF 91, Motor Vehicle Accident Report SF 94, Statement of Witness UCN-23256, UPF Employee/Witness Statement	InfoWorks	EVR
UCN-23470	UPF Subcontractor Event Investigation Report, which may include: DOE F 5484.3, Individual Accident/Incident Report SF 91, Motor Vehicle Accident Report SF 94, Statement of Witness UCN-23256, UPF Employee/Witness Statement	InfoWorks	SEVR

### Section 6.2, add Interfacing References

OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigations UCN-23506, Fire Investigation Report UPF-CP-211, Fire Prevention and Protection

UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual

### Appendix A, add definition for Fire to read:

Unplanned destructive and uncontrolled burning, including detonation and deflagration, as manifested by any or all of the following: flame, heat, or smoke. Fire does not include the following events unless they cause a fire or occur as a consequence of the event: lightning or electrical discharge; rupture of a pressure vessel not caused by internal combustion; detonation of munitions; overheat (without damage to initiating material); or failure of electric motors and other electrical equipment through overheating and shorting where any visible sparks or flames self-extinguish after power is removed from the device.

### Appendix B, add text to Matrix header:

All fire and electrical events shall be reported and investigated by completing UCN-23506 in accordance with UPF-CP-211, Fire Prevention and Protection; and in accordance with OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigation and UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual. Events may be subject to the Y14-192, Occurrence Notification and Reporting Process. In some cases, categorization is required within 2 hours of discovery and notifications within timeframes as soon as 2 hours of categorization.

		Preparer			
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Approval					
UPF ES&H Manager, BNI	Kieran S. Kelly	Alazalla	03/31/23		
		Printed Name/Signature	Date		
UPF Project Director	John H. Platt	Alle	04/03/23		
		Printed Name/Signature	Date		



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Associated Document UPF-C	CP-108			Rev: 25				
Associated Document Title: UPF E	Event Management and	Investigation	n					
Identify the scope of the change, incl as Condition Reports, that are driving		d, or change	ed conten	t. Notate any	references, such			
CR#: 25774-000-GCA-GAM-035 Resulting from EOC of CR 0313		s, and Stat	us Chan	ges to Guida	ance Documents			
Add to the Revision log of UPF-C	:P-108:							
This revision supersedes DI-SH-801768-A001, <i>UPF Injury Illness Protocol,</i> Revision 1. This revision supersedes DI-SH-801768-A003, <i>UPF Injury and Illness Reporting and Recordkeeping,</i> Revision 0.								

Preparer							
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UPF Issues Management	Printed Name/Signature	Date					
	Approval						
John D. Campbell UPF ES&H Oversight Lead, CNS:	Printed Name/Signature	10/26/22 Date					
Kieran S. Kelly UPF ES&H Manager, BNI:	Ale Ale	10/26/22					
	Printed Name/Signature	Date					
John H. Platt UPF Project Director:	Alle	10/26/22					
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PRCN PRCN-UPF-CP Number:	-108-R25-01	PRCN Rev:	0	Effective 02/03/2022 Date:
NOTE: PRCN E	ffective Date ca	innot precede effective	e date of as	sociated document.
PRC	CN Eligible Intent	t Change	Non-Inter	nt Change
Associated Document Number:	UPF-CP-108			Rev: 25
Associated Document Title:		nagement and Investiga		
as Condition Reports, that ar	e driving the cha	inge	•	nt. Notate any references, such
Added bullet in Section 2.4, E	3NI ES&H Manag	ger		
focus of an event in Completing Bechtel Determining the app Determining the leve Prescreening applic To: BNI ES&H Manager The BNI ES&H Manager is re Designating event in Collaborating with th focus of an event in Completing Bechtel Determining the app Determining the leve	esponsible for: ne Event Investigation, as n corporate notific propriate level of able events for e esponsible for: nvestigators ne Event Investig vestigation, as n corporate notific propriate level of el of investigation	eeded cations investigation based on n to be completed for ev entry into the Issues Mar gator and Responsible M eeded cations	the outcome rents nagement P lanager to c the outcome rents	develop lines-of-inquiry and dir e and/or potential of an event
potential for employ	ee injury from el		sh. The OC	ve resulted in or have the will contact the Electrical Safet <i>Manual</i>
-rom: 4.2 Event Response (Non-E	Emergency)			
BNI ES&H Manager (or designee)		plete and submit an even orting and Information S		
_				
Го:				
BNI ES&H Manager (or designee)	14 Repo	ter (OC) for all electrical	ystem (IRIS incidents th	on within the Incident 6). Contact the Operation hat have resulted in or have ectrical shock or arc-flash.
From:				
4.3 Event Response (Eme	ergency)			



To: 4.3 Event Response (Emergency)						
BNI ES&H Manager (or designee)	16	Complete and submit an Event Notification within the IRIS. Contact the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash				

Update Section 6.2, Interfacing References to add Y73-528, *Electrical Safety Manual* 

Preparer							
UPF Issues Management	Jill S. Logsdon	Jube	12/27/21				
		Printed Name/Signature	Date				
		Approval					
UPF ES&H Manager, CNS:	Jamie M. Horning	for Jamie Horning / // may / 4	2. agan 12/30/21				
		Printed Name/Signature	0 Date				
UPF ES&H Manager, BNI:	Kieran S. Kelly	Kieran Kelly	01/03/22				
_		Date					
UPF Project Director:	Dena J. Volovar	Oma Valour	01/04/22				
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Preparer:

Jill S. Logsdon

UPF Issues Management

Approval:

Jamie M. Horning

UPF CNS ES&H Manager

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Dena J. Volovar Senior Vice President and UPF Project Director

09/13/21 Date

Date

09/13/21

09/13/21

Date

09/13/21

Date

10/18/21

Effective Date

	Implements Qual	lity Requirements	
⊠ None	□ BNI		$\Box$ BNI and CNS

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## **REVISION LOG**

## **Revision 25**

☑ Intent □ Non-Intent

- This revision was prepared under Y15-95-235, UPF Command Media, Rev. 11.
- This revision incorporates the changes identified in and supersedes:
  - PRCN-UPF-CP-108-R24-01 (corrected the use of Tools for Opportunities Performance Improvement through Communication [TOPIC] from the Incident Event Notification system per CR 025774-000-GCA-GAM-02020)
  - PRCN-UPF-CP-108-R24-02
- This revision supersedes DI-SH-801768-A001, UPF Injury Illness Protocol, Revision 1
- This revision supersedes DI-SH-801768-A003, UPF Injury and Illness Reporting and Recordkeeping, Revision 0
- Forms:
  - UCN-23470, UPF Subcontractor Event Investigation Report-New
  - 0-60, 0-60 Initial Notification Form–Obsolete
- An evaluation determination has been performed confirming that this Procedure does implement requirements tracked in the Programmatic Requirements Management System (PRMS)
- Other changes include:
  - OT-SH-801768-A002, *UPF Event Reporting Incident and Notification Matrix*, was obsoleted with this revision
  - Global change of all instances of Initial Event Notification to Event Notification
  - <sup>o</sup> Updated Appendix B, *Event Reporting Incident and Notification Matrix*
  - <sup>o</sup> Deleted Appendix C, *Bechtel Core Process 108 Information*
  - Updated Section 5.0, Records
  - Updated acronyms
  - Updated references
  - Editorial changes and template updates
- This revision is a total rewrite; due to the extent of changes, revision bars are not shown

### Revision 24

☑ Intent □ Non-Intent

- Revised Section 3.1, *Event Response and Notification*, to address 25774-000-GCA-01556 and to include CNS and UPF Designated Personnel as well as Company-specific Off-Project Notifications.
- Minor technical edits as noted by rev bars.
- An evaluation determination has been performed confirming that this Command Media implements no Quality requirements, as tracked in PRMS.

### Previous revisions on record

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## 1.0 INTRODUCTION

## 1.1 Purpose

This document establishes the process by which events, including occupational injury/illness, near-misses, vehicle and/or property damage, and Project-related environmental events, are reported and investigated.

## 1.2 Scope

This procedure is used to assist Uranium Processing Facility (UPF) Project Management in identifying, reporting, and correcting workplace hazards and system deficiencies.

This procedure shall be utilized in conjunction with company-specific (e.g., owner, client, contractor, subcontractor) policies, plans, procedures specific (but not limited) to off-Project notifications, legal reviews, and input of event information in respective company-specific databases.

## 1.3 Applicability

This Procedure applies to events at the UPF construction site and supporting offices and facilities (e.g., Commerce Park, off-site warehouses). UPF events associated with work performed by CNS or CNS processes will be investigated in accordance with E-PROC-0007, *Enterprise Event Recover and Notification Program*. If personnel affiliated with CNS and personnel affiliated with BNI are both involved in an event, the event investigation will be investigated in accordance with UPF-CP-108.

Events may also be subject to the requirements of Y14-192, Occurrence Notification and Reporting. All fire events shall be reported and investigated in accordance with UPF-CP-211, Fire Prevention and Protection; using UCN-23506, Fire Investigation Report. All electrical events shall be reported and investigated in accordance with UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual, using OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigation. APA-2HC-E0A0-000104-001, Core Process 104 – Injury and Illness Reporting and Recordkeeping, describes the Environmental, Safety and Health (ES&H) performance reporting, database management, quality assurance, and compliance with regulatory requirements associated with workplace injuries and illnesses and reporting.

## 2.0 **RESPONSIBILITIES**

## 2.1 UPF Project Director

The UPF Project Director is responsible for ensuring that all events occurring on the UPF construction site and at supporting facilities are investigated to the proper extent, and are dispositioned appropriately.

## 2.2 Responsible Manager

The Responsible Manager (e.g., Site Manager, Startup Manager) is responsible for:

• Allocating resources to support event investigations and event reporting

- Coordinating with the Bechtel National, Inc. (BNI) Environmental, Safety and Health (ES&H) Manager to determine the level or extent of event investigation
- Participating in the event investigation as required
- As applicable, developing immediate, remedial, compensatory, and/or corrective actions, as appropriate
- As appropriate, develop corrective actions in accordance with Y15-95-816, UPF Issues Management Process
- Following the chain of command to flow down event notifications to all applicable parties (i.e., CNS, APMO, NNSA).

## 2.3 Supervisor

The Supervisor (e.g., Superintendent, Subcontract Technical Representative) is responsible for:

- Reporting events to the appropriate Responsible Manager to initiate event management and investigation processes
- Ensuring that affected personnel under their direction are provided the appropriate level of medical attention when the event includes an injury/illness
- Participating in the event investigation

## 2.4 BNI ES&H Manager

The BNI ES&H Manager is responsible for:

- Designating event investigators
- Collaborating with the Event Investigator and Responsible Manager to develop lines-of-inquiry and direct focus of an event investigation, as needed
- Completing Bechtel corporate notifications
- Determining the appropriate level of investigation based on the outcome and/or potential of an event
- Determining the level of investigation to be completed for events other than fire and electrical
- Prescreening applicable events for entry into the Issues Management Process
- Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH-801768-A038, as applicable for the event

### 2.5 Issues Management Representative

The Issues Management Representative is responsible for:

- Performing required Occurrence Reporting and Processing System notifications
- Completing the requirements outlined in Y15-95-816 and Y14-192, as applicable

### 2.6 Event Investigator

The Event Investigator is responsible for:

• Coordinating and completing required event notifications with the Responsible Manager and Issues Management Representative (as applicable)

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- Performing the event investigation
- Keeping the Responsible Manager informed throughout the process of the investigation
- Assisting the Responsible Manager with the development of corrective actions
- Ensuring the collection of all evidence (e.g., human, physical, objective) related to the investigation

## 2.7 Subcontractors

Subcontractors are responsible for:

- Promptly and properly submitting a notification about event(s), securing the event scene, initiating the event investigation, completing the necessary documentation, and correcting open issues/actions in accordance with this procedure
- Completing and submitting, in a timely and quality manner, the required forms when an event occurs, including UCN-23470, *UPF Subcontractor Event Investigation Report,* and applicable UCN-23256, *UPF Employee/Witness Statement*
- **NOTE 1:** Where cited throughout this document UCN-23470, UPF Subcontractor Event Investigation Report, is the subcontractor equivalent form for UCN-23257, UPF Event Investigation Report.
- **NOTE 2:** Subcontractors shall complete UCN-23470 for Class 1 events.

## 2.8 UPF Personnel

All UPF personnel, including subcontractors, are responsible for immediately notifying their supervisors if an event is observed that has, or could have, an adverse effect on the safety and health of personnel, property, or the environment. UPF Personnel will participate as necessary in incident investigations.

## 3.0 EVENT CLASSIFICATION

Initial event classification is used to assure that appropriate organizational levels and individuals are notified within the Project/facility and corporate organizations when an event occurs. It also is used to establish a timely and appropriate level of response and investigation consistent with severity based on Bechtel definitions and circumstances.

The BNI ES&H Manager, or designee, will classify the event. Event classification may involve consultation with the appropriate corporate organizations.

## 3.1 Class 1 Events

A Class 1 event has limited potential impact for employee, public, or environmental exposure. It may be resolved quickly by the observer or other personnel in the immediate area. Class 1 events include, but are not limited to:

- Injury or health events that could be handled by first aid treatment
- Environmental events readily corrected or cleaned up and not warranting government notification

- Minor property damage or theft less than \$25,000 (estimated)
- Utility hits that result in minor damage but no service interruption
- Tickets or minor fines from an authority having jurisdiction (AHJ) (e.g., less than \$250)
- Near miss incidents that could have resulted in any of the outcomes described as a Class 1 event

## 3.2 Class 2 Events

A Class 2 event is not life threatening to people, and does not pose major risk to the environment. It may require mobilization of limited personnel or equipment in coordination with, and with support from, relevant Project departments. Class 2 events include, but are not limited to:

- Injury or illness events requiring medical treatment that exceed first aid
- Any injury/illness to a third party
- Government inquiries or responses related to impacts or allegations of impact, or a minimal fine from an AHJ (e.g., greater than \$250)
- Equipment/property damage or theft less than \$500,000 and greater than \$25,000
- Substantial chemical and hazardous spill or release requiring mobilization of a spill response team
- Utility hits that result in service interruption and/or are deemed to be a Management Concern in accordance with Y14-192
- Demonstrated impacts to public health or public safety
- Events with the potential for significant local media coverage
- Required reporting of environmental or health monitoring exceedances to the AHJ
- Near miss events that could have resulted in any of the outcomes described as a Class 2 event

## 3.3 Class 3 Events

A Class 3 event could, or has, disrupted the Project site or surrounding area, or caused major harm to individuals, property, or the environment. It may require response by external emergency responders and reporting to regulatory agencies. Class 3 events include, but are not limited to:

- Fatalities
- Occupational injuries/illnesses resulting in serious physical harm. Serious physical harm means a body part is made functionally useless or substantially reduced in efficiency. Injuries involving impairment that requires treatment by a medical doctor and extensive rehabilitation (e.g., major bone fracture, deep burn, amputation, significant avulsion)
- Hospitalization of one or more employees
- Significant property damage greater than \$500,000 (e.g., fires, spills, explosions)
- Significant environmental events with major acute or widespread impacts to the environment or communities
- Events giving rise to government investigations, regulatory notices of violation, or substantive fines

- Law enforcement actions, criminal charges, or other similar actions
- Events with the potential for significant regional or national/international media coverage
- Major events having the potential for significant liability or charges including, but not limited to, personal injury lawsuits, business interruption claims, consequential damages, and impact on the general public or environment beyond the jobsite
- Sabotage, explosion, significant threat, weather, fire, or rescue situations
- Significant near miss events that could have resulted in any of the outcomes described as a Class 3 event

## 4.0 EVENT RESPONSE

## 4.1 Event Response and Notification

When an event occurs, the Responsible Manager's immediate and short-term response activities are to preserve life, property, the environment, and UPF assets. **Appendix B**, *Event Reporting and Notification Matrix*, is a guide for assisting users with the correct contacts and notification methods. Refer to E PROC-0007, Section 4, *Event recovery and Notification Process*, for the CNS Event Notification process.

**NOTE:** Events are subject to the review and reporting requirements of Y14-192. Applicable events require categorization within two hours of discovery and notifications within two hours after categorization.

Reclassification of injuries or illnesses does not require an Event Notification; however, an email distribution shall be made. Notification contacts include (but are not limited to) CNS personnel (including UPF and Y-12 National Security Complex [Y-12] designated personnel), Uranium Processing Facility Project Office designated personnel, and company-specific off-Project personnel (e.g., BNI).

## 4.2 Event Response (Non-Emergency)

Follow the steps in **Table 1** to respond to non-emergency events.

Appointee	Step	Action	
NOTE: The order of	<b>NOTE:</b> The order of action steps may vary depending on the complexity of the event.		
UPF Personnel	1	Report the event to the supervisor. IF an individual is unable to do so because of injury or illness, THEN a coworker should contact the supervisor.	
Supervisor	2	IF an injury/illness is involved, THEN ensure that workers are treated for injuries/illnesses. For minor injuries, employees may be taken to UPF Medical Facility.	
	3	Immediately notify the Responsible Manager.	

## Table 1. Event Response (Non-Emergency)

Level 3 - Bechtel Internal and Selected External Distribution

Appointee	Step	Action
	4	If necessary, notify Y-12 Operations Center. <u>NOTE:</u> See <i>Appendix B</i> for information on what incidents require notification to the Y-12 Operations Center.
	5	If necessary, pause work at the event location and make sure the area is safe.
	6	Notify the respective Event Investigator of the event.
Deenensikle	7	Preserve the scene. Instruct personnel to not disturb, touch, or handle any physical evidence, with the exception of making the area safe.
Responsible Manager (or designee)	8	As necessary, secure and control the scene from unauthorized personnel. Establish a perimeter around the entire scene that is large enough to include any evidence or items of interest. Use barricades, signs, and tape in accordance with UPF-CP-214, <i>Barricades and Signs</i> .
	9	Identify witnesses and instruct them to meet with the Event Investigator.
	10	Turn over the scene to the Event Investigator for event investigation, and assist as necessary.
Event Investigator	11	Complete Evidence Collection/Processing and Investigation in accordance with Sections 4.4, <i>Evidence</i> <i>Collection/Processing</i> ; 4.5, Investigation Process; and 4.6, <i>Investigation Process (Motor Vehicle Incidents)</i> , as applicable.
Supervisor/ Responsible Manager	12	Recommend and implement immediate and/or compensatory measures to ensure the safety of personnel and security of the scene.
Issues Management Representative	13	When applicable, perform Occurrence Reporting and Processing System notifications and generate a Condition Report in accordance with Y15-95-816.
BNI ES&H Manager (or designee)	14	Complete and submit an event notification within the Incident Reporting and Information System (IRIS). Contact the Operation Center (OC) for all electrical incidents that have resulted in or have the potential for employee injury from electrical shock or arc-flash. Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH- 801768-A038 as applicable for the event.

## 4.3 Event Response (Emergency)

Follow the steps in **Table 2** to respond to emergency events.

## Table 2. Event Response (Emergency)

Appointee	Step	Action		
	<b>NOTE:</b> The event scene will be under the control of Y-12 Emergency Services. Assist as requested, secure the scene, and preserve evidence to the extent possible.			
	1	IF the event requires emergency attention for a fire or medical condition, THEN stop work immediately.		
UPF Personnel/ Witness	2	Implement emergency notification procedures by contacting or having someone contact Y-12 Emergency Services or the Y-12 Operations Center. <u>NOTE:</u> If the emergency has occurred offsite call 911 directly for Emergency Services response.		
	3	Notify the supervisor, if possible.		
	4	Move affected personnel to a safe location, if applicable.		
Supervisor/ Responsible Manager	5	Establish control of the area, and ensure access for Emergency Services.		
	6	Ensure that affected personnel are treated as soon as possible.		
	7	Take appropriate and immediate action to stabilize the event scene, and place equipment in a safe configuration.		
	8	Notify the respective Event Investigator.		
Responsible Manager	9	Preserve the scene. Instruct personnel to not disturb, touch, or handle any physical evidence, with the exception of making the scene safe.		
(or designee)	10	Secure and control the scene from unauthorized personnel. Establish a perimeter around the entire scene that is large enough to include any evidence or items of interest. Use barricades, signs, and tape in accordance with UPF-CP-214.		
	11	Identify witnesses and instruct them to meet with the Event Investigator.		
	12	For fire and electrical incidents, the scene shall remain secured until released by the event investigator.		
Event Investigator	13	Turn over the scene to the Event Investigator for event investigation, and assist as necessary. For fire and electrical incidents, the scene shall remain secured until released by the event investigator.		

Appointee	Step	Action
Supervisor/ Responsible Manager	14	Recommend and implement immediate and/or compensatory measures to ensure the safety of personnel and security of the scene.
Issues Management Representative	15	When applicable, perform Occurrence Reporting and Processing System notifications and generate a Condition Report in accordance with Y15-95-816.
BNI ES&H Manager (or designee)	16	Complete and submit an Event Notification within the IRIS. Verify notification of the Operations Center has occurred as required by this procedure, UPF-CP-211, or OT-SH-801768-A038 as applicable for the event.

## 4.4 Evidence Collection/Processing

The Event Investigator gathers evidence and facts. Factual proof is required to validate cause and applicability to the event being analyzed. The three key types of evidence are human, physical, and objective.

Follow the steps in Table 3 to collect and process evidence.

Appointee	Step	Action
Event Investigator	1	Instruct affected employee(s)/witness(es) to fill out UCN-23256.
	2	Request Y-12 Photography, or an approved designee, to photograph the event scene in its original state. IF an item must be removed from the scene, THEN photograph the item prior to removal, AND make a note of the removal on the UCN-23257 photo attachment sheet.
	3	Collect Safety Task Analysis Risk Reduction Talk cards, work packages, permits, and training records, as appropriate.
	4	Attach all pertinent evidence to the completed UCN-23257 and/or IRIS entry, as applicable

## Table 3. Evidence Collection/Processing

## 4.5 Investigation Process

The investigation process focuses on determining the facts and causes of an event. The level of investigation will be based on the associated hazard, potential severity of the event, and a determination of whether BNI ES&H controls would have mitigated the event. All events will require entry into the IRIS database. Direct hire Class 1 events will be investigated and the results will be recorded in the IRIS database; they are not required to complete UCN-23257 unless specified by the BNI ES&H Manager, or designee. All subcontractor events will require UCN-23470. The Issues Management Representative will follow all requirements outlined in Y15-95-816 and Y14-192 for applicable events.

The Event Investigator will lead the investigation utilizing the following personnel (as necessary):

- Responsible Manager, or designee
- Supervisor
- Affected employee(s)
- Associated subject matter experts

Submission of recordable injury notification through U.S. Department of Energy (DOE) F 5484.3, *Individual Accident/Incident Report*, for entry into the DOE Computerized Accident/Incident Reporting and Information System (CAIRS) is required to be logged within seven calendar days from the time that the injury or illness is determined to be recordable.

Follow the steps in **Table 4** to investigate an event.

## Table 4. Investigation Process

Appointee	Step	Action	
	<b>NOTE:</b> Include the completed DOE F 5484.3, Individual Accident/Incident Report, with the final UCN-23257 for required events.		
	1	Using information gathered during the evidence collection/processing phase, complete an IRIS entry and UCN-23257, as required.	
Event Investigator	2	Concurrently, for applicable events complete DOE F 5484.3. This form must be completed and submitted into the CAIRS within seven calendar days of event classification. DOE F 5484.3 is NOT required for near miss events.	
	3	UCN-23257 and associated materials (package) shall be completed and submitted within five working/seven calendar days of classification of the event. The BNI ES&H Manager shall be notified when the investigation needs to be extended, and the reasons for the extension shall be explained.	

## 4.6 Investigation Process (Motor Vehicle Incidents)

Motor vehicle incidents (e.g., collisions) shall be reported and reviewed to determine corrective measures. Only events involving a Government Service Administration (GSA) Owned Vehicle(s) are applicable to this section. Construction equipment, forklifts, cranes, non-passenger-type vehicles, and non-GSA owned vehicles will be investigated in accordance with **Section 4.5**, *Investigation Process*.

Follow the steps in **Table 5** to investigate motor vehicle incidents.

Appointee	Step	Action
<b>NOTE:</b> If an affected employee completes SF 91, Motor Vehicle Accident Report, and/or SF 94, Statement of Witness, then they are not required to complete UCN-23256.		
Supervisor	1	Instruct the driver(s) to complete SF 91, <i>Motor Vehicle Accident Report</i> in accordance with Y30-95-803, <i>Use of Motor Vehicles and Utility Vehicles on the UPF Project</i> , and submit to the Property Administrator within two working days of the date of accident.

## Table 5. Motor Vehicle Incident Investigation Process.

Appointee	Step	Action
	2	Instruct any witnesses to complete SF 94 <i>Statement of Witness</i> in accordance with Y30-95-803, and submit it to the UPF Property Administrator within two working days of the date of accident.
	3	Instruct the driver(s) to prepare a sketch or provide an equivalent map of the scene.
	4	For an off-site event, instruct the driver(s) to obtain a copy of the police report.
	5	Assemble motor vehicle incident forms and associated documentation, and forward to the Event Investigator for review.
Event Investigator	6	If the event results in a recordable injury, incorporate motor vehicle event information into UCN-23257.
Supervisor	7	Submit assembled motor vehicle incident forms to the UPF Government Property Manager as soon as practicable.

## 4.7 Event Analysis

The purpose of event analysis is to determine why an adverse event occurred so that the appropriate corrective action can be planned and implemented to prevent recurrence.

**NOTE:** This is an initial analysis of the event by the Event Investigator and all formal event analysis as required by Y15-95-816 will be performed by a qualified Causal Analyst.

Follow the steps in Table 6 to perform an event analysis.

## Table 6. Event Analysis Process

Appointee	Step	Action	
NOTE: Consult	NOTE: Consult Attachment 1 of DOE-STD-1197-2011, Occurrence Reporting Causal Analysis.		
	1	Perform basic event analysis and document findings for applicable events in the Causal Analysis section of UCN-23257.	
Event Investigator	2	Explain the choice of event codes based on the information contained in the report.	
	3	Review event codes with the Responsible Manager.	

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UPF Event Management and Investigation

## 4.8 Immediate/Compensatory Measures

Follow the steps in Table 7 to develop immediate/compensatory measures.

## Table 7. Immediate/Compensatory Measures Process

Appointee	Step	Action		
Responsible Manager	1	Develop immediate/compensatory measures to address the identified cause(s) of the event.		
Issues Management Representative/ Event Investigator	2	Review the proposed measures/actions to ensure they address the identified cause(s). Immediate actions should be tracked in the IRIS for events that do not require formal action in accordance with Y15-95-816.		
Responsible Manager	3	Implement the proposed measures/actions.		

### 4.9 Records Submittal

Follow the steps in **Table 8** to submit records.

## **Table 8. Records Submittal Process**

Appointee	Step	Action				
	1	Obtain a document number for UCN-23257 or, as applicable, UCN-23470, from the Document Management Center (DMC). <u>NOTE:</u> UCN-23470 will only be submitted to DMC for records retention for Class 2 and 3 incidents.				
	2	Compile all required forms, notifications, and collected evidence into an Event Investigation package.				
Event Investigator 4 5	3	IF UCN-23257 or any other document contains Official Use Only and/or Personally Identifiable Information (i.e., previous diseases or metric information such as weight, height, blood pressure) as defined in E-PROC-3123, <i>Identification and Protection of Unclassified Controlled</i> <i>Nuclear Information and Official Use Only Information</i> , THEN ensure that the form is marked accordingly.				
	4	Submit UCN-23257 to the DMC for records retention. The finalized Event Investigation Reports are uploaded to IW for records retention. Access to all finalized UCN-23257, <i>UPF Event Investigation Reports</i> , will be granted to the appropriate Project personnel within CNS ESH&Q and CAS. Access may also be granted to other Project personnel on as-needed basis.				
	5	<ul> <li>When revisions are made to a previously submitted UCN-23257:</li> <li>Identify the changes in UCN-23257.</li> <li>Resubmit the report to the DMC. Include the revision number at the top of the first page of the form.</li> </ul>				

## 5.0 RECORDS

Records generated by this Document shall be maintained in accordance with Y15-95-800, *UPF Document Management.* 

The following records generated are:

Record or Form Number	Record Title	System/ Location	Document Type
UCN-23257	UPF Event Investigation Report, which may include: DOE F 5484.3, Individual Accident/Incident Report SF 91, Motor Vehicle Accident Report SF 94, Statement of Witness UCN-23256, UPF Employee/Witness Statement	InfoWorks	EVR
UCN-23470	UPF Subcontractor Event Investigation Report, which may include: DOE F 5484.3, Individual Accident/Incident Report SF 91, Motor Vehicle Accident Report SF 94, Statement of Witness UCN-23256, UPF Employee/Witness Statement	InfoWorks	SEVR

## 6.0 **REFERENCES**

## 6.1 Source References

10 CFR 851, Worker Safety and Health Program, Subpart C, Section 851.26

2HC-E0A0-00104-000, Core Process 104, *Injury and Illness Reporting and Recordkeeping* 

2HC-E0A0-00108-000, Core Process 108, Incident Notification and Investigation

DI-QA-801768-A004, UPF Causal Analysis

DOE O 225.1B, Accident Investigations

- DOE O 231.1B, Environment, Safety and Health Reporting
- E-SD-2009, Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements

PL-SH-801768-A009, UPF Construction Environmental Control Plan

## 6.2 Interfacing References

APA-2HC-E0A0-000104-001, *Core Process 104 – Injury and Illness Reporting and Recordkeeping* 

DOE F 5484.3, Individual Accident/Incident Report

DOE-STD-1197-2011, Occurrence Reporting Causal Analysis

E-PROC-0007, Enterprise Event Recovery and Notification Program

E-PROC-3114, Records Management

E-PROC-3123, Identification and Protection of Unclassified Controlled Nuclear Information and Official Use Only Information

ML-PS-801768-A004, Uranium Processing Facility Project Records Retention and Turnover List

OT-SH-801768-A038, UPF Electrical Hazard and Incident Investigation

UCN-23506, Fire Investigation Report

UPF-CP-211, Fire Prevention and Protection

UPF-CP-214, Barricades and Signs

UPF-MANUAL-CM-001, Uranium Processing Facility Construction Electrical Safety Manual

Y14-192, Occurrence Notification and Reporting

Y15-95-800, UPF Document Management

Y15-95-806, UPF Records Retention and Turnover

Y15-95-816, UPF Issues Management Process

Y30-95-803, Use of Motor Vehicles and Utility Vehicles on the UPF Project

Y73-528, Electrical Safety Manual

## 7.0 SUPPLEMENTAL INFORMATION

Appendix A, *Acronyms and Definitions* Appendix B, *Event Reporting and Notification Matrix*  PRCN 03

# APPENDIX A Acronyms and Definitions

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## Acronyms

AHJ	Authority Having Jurisdiction
BNI	Bechtel National, Inc.
CAIRS	Computerized Accident/Incident Reporting and Information System
CNS	Consolidated Nuclear Security
DMC	Document Management Center
DOE	U.S. Department of Energy
ES&H	Environmental, Safety and Health
GSA	Government Service Administration
IRIS	Incident Reporting and Information System
Non-QA	Non-Quality
ORPS	Occurrence Reporting and Processing System
QA-L	Quality-Lifetime
QA-NP	Quality-Nonpermanent
TOPIC	Tools for Opportunities - Performance Improvement through Communication
UPF	Uranium Processing Facility
Y-12	Y-12 National Security Complex

## Definitions

Affected Employee	An individual directly involved in the sequence of an event or directly affected by the event.
Critique	A formal process involving a facilitated meeting to establish a detailed history, sequence, and condition of facts of significant events. Critique participants include personnel directly associated with an event and others as appropriate (e.g., subject matter experts, responders, managers with direct oversight/responsibility).
Event	For the purposes of this procedure, an event is defined as an unwanted, undesirable change in the state of Project structures, systems, or components, or in the human/organizational conditions (e.g., health, behavior, administrative controls, environment), including any undesirable consequence, any system that does not achieve its goals, or any actions that involve serious degradation or termination of a system's ability to perform its required function.
Event Investigation	A process in which persons directly involved in an event (i.e., affected employees and observers) and any other designated individual(s) participate to document the facts of the event for the purposes of determining causes, error precursors, and corrective actions.
Event Investigator	A designated person (or other competent person) with expertise to conduct the event investigation based on their experience and knowledge with respect to an application, scope, interpretation, and/or implementation of certain codes, standards, or regulations that directly relate to the type of event or condition.

Level 3 - Bechtel Internal and Selected External Distribution

# APPENDIX A Acronyms and Definitions

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Fire	Unplanned destructive and uncontrolled burning, including detonation and deflagration, as manifested by any or all of the following: flame, heat, or smoke. Fire does not include the following events unless they cause a fire or occur as a consequence of the event: lightning or electrical discharge; rupture of a pressure vessel not caused by internal combustion; detonation of munitions; overheat (without damage to initiating material); or failure of electric motors and other electrical equipment through overheating and shorting where any visible sparks or flames self-extinguish after power is removed from the device.
Responsible Manager	A member of the management team who has primary accountability over the area, personnel involved, or activity where an event occurred. Examples include: Project Field Engineer, Site Manager, Construction Subcontracts Manager, and Start-Up Manager.

# APPENDIX B Event Reporting and Notification Matrix

(Page 1 of 2)

	Event Rep	ort	ing and Notifi	cation Matrix	
CP-211, Fire Preven Incident Investigati Manual. Events ma categorization is re categorization, base	tion and Protection; an on; and UPF-MANUAL y be subject to the Y14 quired within 2 hours o d on CR: 25774-000-0	d in CN -192 of dis GCA Pro	accordance with O 1-001, Uranium Pro 2, Occurrence Notif acovery and notifica -GAM-04467, Y-12	T-SH-801768-A038, U cessing Facility Constr ication and Reporting I tions within timeframe APMO Performance P 2022-5969), to clarify I	in accordance with UPF- PF Electrical Hazard and uction Electrical Safety Process. In some cases, s as soon as 2 hours of roblem PP-1 - Required notifications required to
Type of Event	Timeframe for Initial Contact	F	oint-of-Contact	Contact Method	Responsible Person(s)
	Immediate	1.	Supervisor/STR, ES&H	Phone/Radio	Affected Employee or Witness
Class 1	2 hours (or less) for all environmental, theft, or minor fine incidents.	2.	Y-12 Operations Center	Phone/Radio	Supervisor
	End of Shift (if required)	3.	0-60/Initial Incident Notification	IRIS	Event Investigator
	ſ	1.		L	
	Immediate	1.	Supervisor/STR, ES&H	Phone/Radio	Affected Employee or Witness
Class 2 (non Occurrence Reporting and Processing System	2 hours (or less)	2.	Y-12 Operations Center, Project Director/Project Manager	Phone/Radio	Supervisor
[ORPS] triggering)	End of Shift	3.	0-60 Initial Incident Notification	IRIS	Event Investigator
		4	Current de en/CTD		Affected Employee on
	Immediate	1.	ES&H	Phone/Radio	Affected Employee or Witness
Class 2 (ORPS triggering)	2 hours (or less)	2.	Y-12 Operations Center, Project Director/Project Manager	Phone/Radio	Supervisor
	End of Shift	3.	Event Notification (CNS Notification)	TOPIC	Issues Management Representative
	End of Shift	4.	0-60/Initial incident Notification	IRIS	Event Investigator

# APPENDIX B Event Reporting and Notification Matrix

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Class 3	Immediate	1.	Supervisor/STR, ES&H	Phone/Radio	Affected Employee or Witness
	2 hours (or less)	2.	Y-12 Operations Center, Project Director/Project Manager	Phone/Radio	Supervisor
	End of Shift	3.	Event Notification (CNS Notification)	TOPIC	Issues Management Representative
	End of Shift	4.	0-60/Initial incident Notification	IRIS	Event Investigator
Type of Event	Timeframe for Initial Contact	P	oint-of-Contact	Contact Method	Responsible Person(s)
Injury/Illness Requiring Ambulance Transport (Non Work Related)	Immediate	1.	Supervisor/ STR, ES&H	Phone/Radio	Affected Employee or Witness
	2 hours (or less) from time of discovery as applicable	2.	Limited Management Distribution	Text/Email	BNI ES&H Manager (or designee)/ Responsible Manager

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