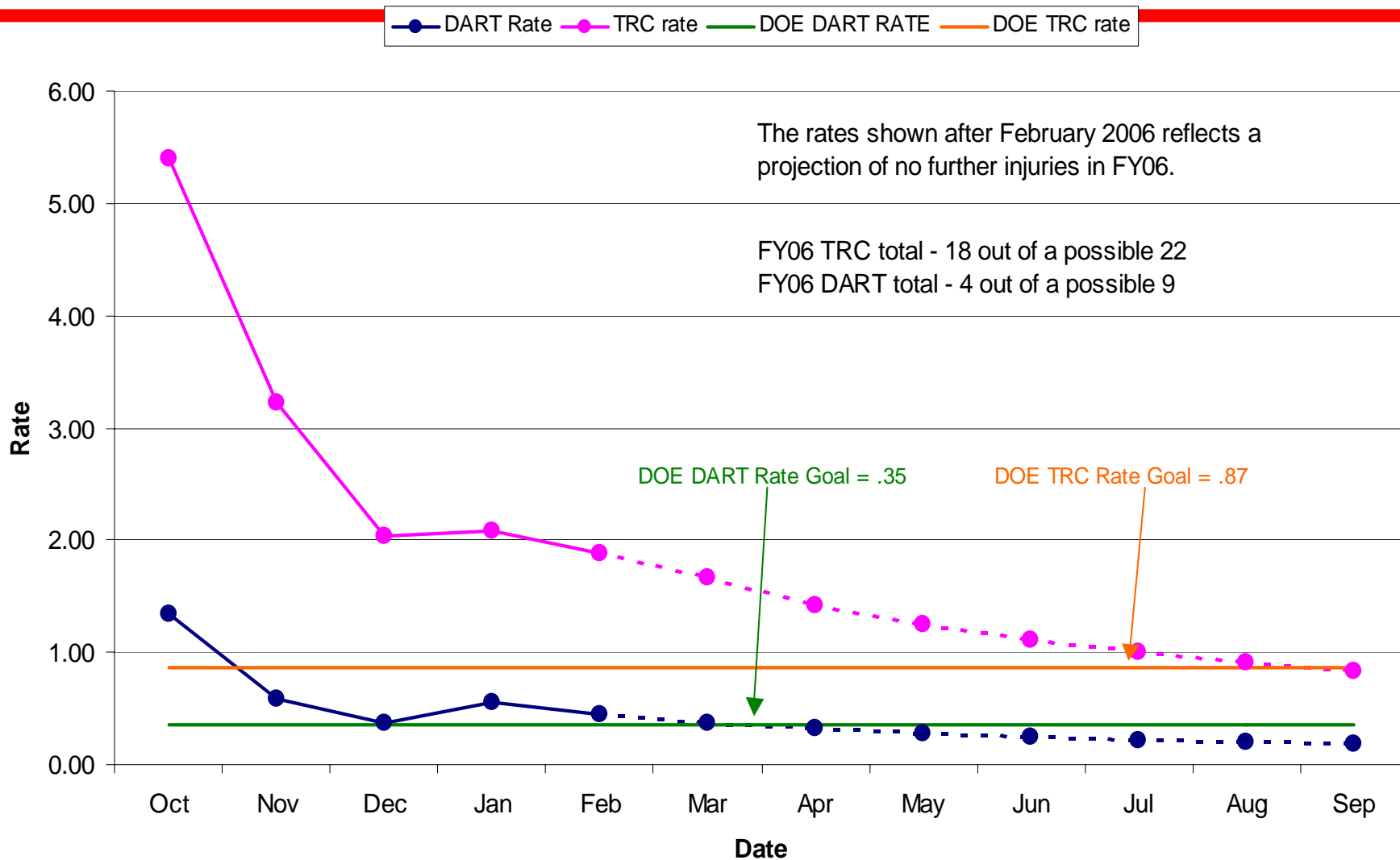

ESH Coordinators Meeting

3/22/06

BNL FY06 Days Away, Restricted or Transferred (DART) and OSHA Total Recordable Case (TRC) Rates



Performance Target 5.1.1.1 & 5.1.1.2

■ Performance Target 5.1.1.1

- BNL will improve safety performance as measured by the days away, restricted or transferred case rate.
- **Expectation:** BNL will meet the Office of Science interim goal of **0.35** cases per 200,000 hours worked.

■ Performance Target 5.1.1.2

- BNL will improve safety performance as measured by the OSHA total recordable case rate.
- **Expectation:** BNL will meet the Office of Science interim goal of **0.87** cases per 200,000 hours worked.

Target 5.1.1.1 & 5.1.1.2

BHSO 1st Quarter Performance Review:

- There has been particularly poor performance on Recordable Cases (11 out of 22 allowable cases)
- BHSO believes that while the OHSAS process and associated Job Risk Assessments (JRAs) are and have been developed and implemented, in many instances these laboratory processes do not yet fully and effectively apply to activities that are routine in nature (i.e. “skill of the worker”)

Performance Target 5.1.1.1 & 5.1.1.2

- BHSO also recommends continued focus on strengthening the role of supervisors in work planning and oversight of those routine activities. Also now that JRA's are almost completely developed – need to focus on more aggressive use of JRA's and in some cases better written JRA's.

Performance Target 5.2.1.1

BNL will implement a safety observation process for Level 1, 2 and 3 managers. Expectations for the implementation and performance of the process will be directed by the Laboratory Director and will include:

- Training for Level 1, 2 and 3 managers as appropriate
- Expectations for the frequency and quality of field observations
- Documentation of field observations
- Dispositioning field observations and follow through tracking and trending of observation results.

Performance Target 5.2.1.1

BHSO 1st Quarter Performance Review:

We have not seen much progress in the implementation of the safety observation process. We have not seen evidence that expectations have been set as a first step.

Performance Target 5.2.1.3

BNL will implement an effective issues management process that includes timely reporting, effective response, rigorous causal analysis, effective corrective action management, compliance with requirements, and useful lessons learned. "Issues" may be identified through assessments (internal or external), inspections or self-revealing events.

Performance Target 5.2.1.3 - BHSO Review

BHSO 1st Quarter Performance Review: There still exist gaps in Issue Management and in the Feedback & Improvement cycle to the extent that numerous objectives are being simultaneously worked and/or developed by BSA. The vulnerabilities acknowledged by BSA, and the re-engineering needed to yield improved performance in this area would dictate a more cautious-yet-optimistic view.

- BHSO was satisfied with scope, depth, and findings detailed in the ISM Assessment. BHSO remains concerned with management progress towards resolution of those related issues.

Quality Management System

- The ORPS redesign progress has slowed somewhat in completing the redesign implementation plan (only a few items remain). Several BSA management groups (both senior- and line management) still need to undergo ORPS training.

Worker Safety & Health Management System

BHSO 1st Quarter Performance Review: Agree with “Yellow” rating. However, BSA’s MS assessment summary should be augmented to give a more complete picture of the health of the Worker Safety and Health program at Brookhaven National Laboratory in key ESH areas.

- OSHA Compliance: Significant progress has been made this year to close out some higher-risk OSHA findings. However, long-term OSHA vulnerabilities currently exist (e.g. needed safety shower upgrades throughout BNL, blocked panels, unlabeled breakers, etc) that require large investments over the next few years in order to improve OSHA compliance in facilities.

Worker Safety & Health Management System (cont'd)

- Higher risk/visibility ESH programs: The health of the construction safety program on site should be described – it is a high profile area and we have a lot of active construction work at BNL. Electrical Safety (e.g., the status of corrective actions from the DOE Energized Electrical Safety Review or the BNL Energized Electrical Safety Self-Assessment or the progress being made in NRTL training) and the key results of the recent assessments in ISM, machine shop safety, C-AD maintenance and Plant Engineering construction safety should be presented. Further, the data points that are presented give some specific tasks (like training was held) but the summary doesn't comment on the significance of those items and how much more there may be yet to do for each of the ESH areas.

Next Steps...

- Please provide me with examples of noteworthy activities
- JRA Use /modifications:
 - Additional Corrective actions taken to improve safety
 - Suggestions for S2 initiatives resulting from JRAs
- Progress on Electrical Safety initiatives:
 - Electrical Circuit Breaker and Switch Operation Safety Training for Non-Electrical Workers (TQ-ELECT-BSOP)
 - Progress on Electrical Equipment Inspection
 - Completion of Self Assessments

10 CFR 850 & 851 Implementation Plan

Gap Analyses

Request existing safety committees and SMEs to conduct Gap Analyses for functional areas by 5/30/06:

- Biological Safety
- Occupational Medicine
- Industrial Hygiene
- Pressure Safety
- Electrical Safety
- Construction Safety
- Motor Vehicle Safety
- Fire Protection
- Firearms Safety
- Explosive Safety

Deficiencies must be mitigated prior to 2/9/07

Hazard Identification and Assessment

- Contractor must establish procedures to identify existing and potential workplace hazards and assess the risk of associated workers injury and illness. Procedures must include methods to:
 - Evaluate operations, procedures and facilities to identify work place hazards
 - Perform routine job activity-level hazard analyses

Hazard Identification and Assessment

- Contractors must:
 - Assess worker exposure to chemical, biological, physical or safety workplace hazards through appropriate workplace monitoring.
 - Contractors must perform baseline monitoring to assure compliance with requirements.
 - Document assessments using recognized testing methodologies using accredited/certified laboratories

Hazard Prevention and Abatement

- For existing hazards identified, contractors must:
 - Prioritize and implement abatement actions according to the risk to workers
 - Implement interim protective measures pending final abatement
- Contractors must address hazards when selecting or purchasing equipment, products and services

Enforcement Process

- Reporting of 10CFR850 and 851 non-compliances will be reported through NTS similar to PAAA events
- Enforcement will be conducted by same office that oversees PAAA process
- DOE will provide thresholds and criteria for self reporting in April 06
- BNL is developing process for screening events to determine if threshold is exceeded
 - Will need a process to screen all events to trend and determine if there is a programmatic breakdown

Path Forward...

- Several teleconference calls scheduled. 3/28, 3/30, 4/10, 4/18, 5/4
- ISM Workshop in Albuquerque 4/24-27
- Please email me questions to ask DOE
 - Gap analyses
 - Known areas that we can broach to request variance

Questions ?