

ISMS & 851 = DOE VPP Long-Term Success

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Bibliography for Mike Kinney, CSP

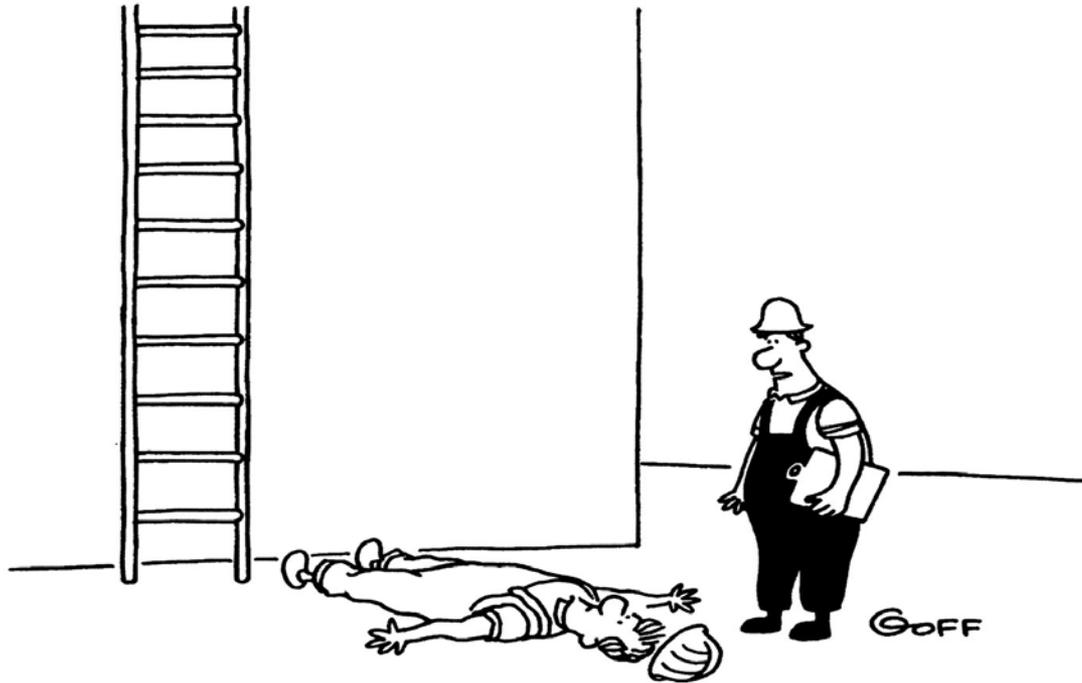
Mike Kinney is a Professional Member of the American Society of Safety Engineers, a BCSP Certified Safety Professional (CSP), Department of Energy (DOE) Certified Accident Investigator, Certified Incident Investigation Team Leader, and is currently completing requirements to be sworn-in as an OSHA Special Government Employee (SGE). Mike has more than 35 years experience in the subject areas of construction safety, facility safety, fire protection, and safety program management. During this varied career, Mike has: coordinated construction turnover and testing of power piping systems for commercial nuclear power plants governed by the Nuclear Regulatory Commission; assisted the United States Navy at the Admiral level with development of performance measures for management reviews as well as health and safety inspections; served on DOE Headquarters Working Groups addressing development of Safety Analysis Reports; implementation of nuclear safety rules (e.g., 10 CFR 830); promulgation of 10 CFR 851, Worker Safety and Health; and also served on a series of DOE Operational Readiness Review Boards throughout the DOE Complex. Currently, Mike is assisting DOE Headquarters with development and issuance of updated ISMS guidance, as well as assisting with sitewide initiatives at the Nevada Test Site, including long-term maintenance of Integrated Safety Management System (ISMS) program requirements and serving as the DOE VPP Champion for National Security Technologies, LLC. Mike is also completing his master's degree in Safety Engineering.



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Getting Started



"You weren't listening. I said, 'Don't fall.'"



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Getting Started (continued)

- Good news!
- Opportunity to win free “stuff” [OK, OK, beads]
- The DOE DEAR Clause 48 CFR 970.5223-1 “Integration of Environment, Safety and Health into Work Planning and Execution,” defines numerous criteria, including identification of hazards, controls, training, roles and responsibilities
- 10 CFR 851, “Worker Safety and Health Program,” also contains criteria addressing hazard identification, controls, training, recordkeeping, and workers’ rights



Getting Started (continued)

- DOE M 450.4-1, Integrated Safety Management System Manual
 - Contains ISMS Continuing Core Expectations (CCEs) originally established by DOE G 450.4-1B, “Integrated Safety Management System Guide for use with Safety Management System Policies (DOE P 450.4, DOE P 450.5, and DOE P 450.6); The Functions, Responsibilities and Authorities Manual and the Department of Energy Acquisition Regulation”
 - Also introduces Safety Culture Attributes
 - Technical inquisitiveness
 - Individual attitude
 - Adherence to standards



Background

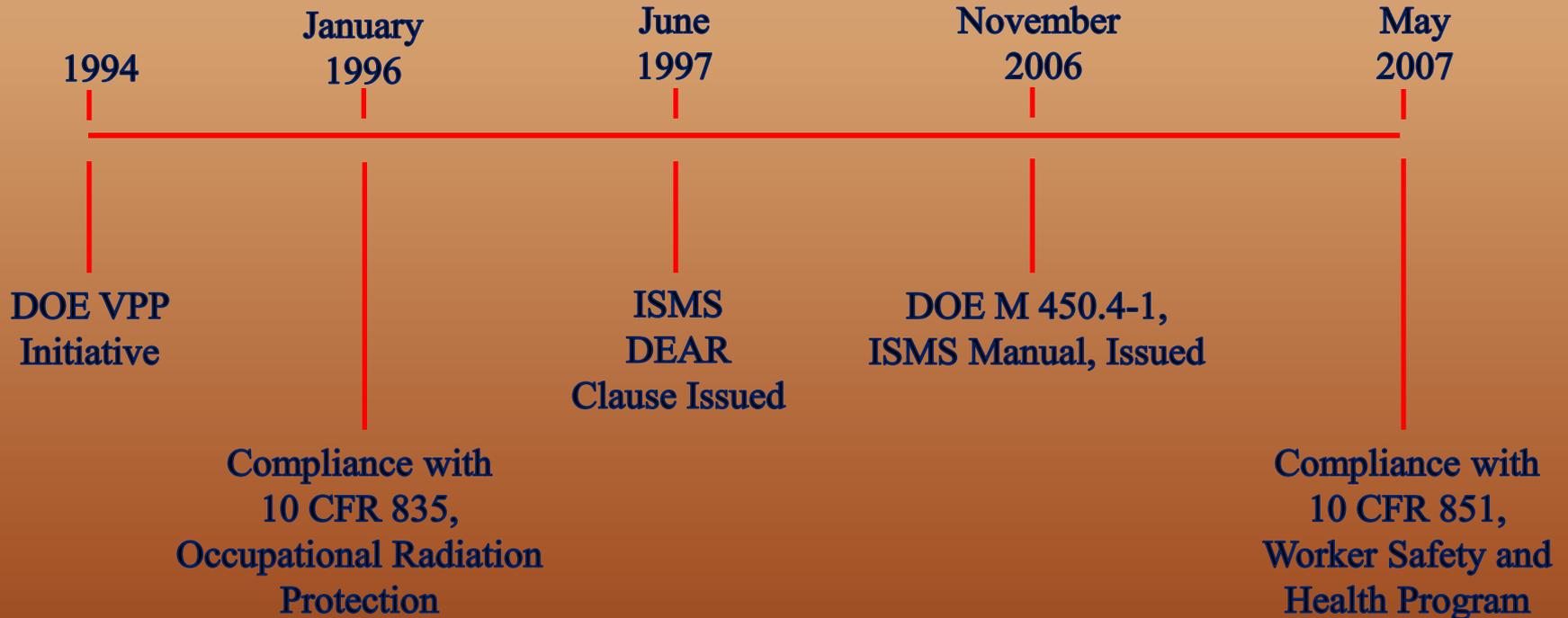
- National Security Technologies, LLC (NSTec), was committed to the DOE VPP “Journey”
 - Achievement of DOE VPP Star would be the next step in our ongoing journey
- Effort recognized as a multi-year process
- Did not want DOE VPP process viewed as a stand-alone initiative nor a flavor of the month...day...hour
- Limited funding available
- To assist with long-term maintenance of DOE VPP, needed to integrate with existing programs



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Back to the Future



DOE ISMS Continuing Core Expectations (CCEs)

| CCE | Criteria | CCE | Criteria |
|-----|---|-----|----------------------------------|
| 1 | Annual ISMS updates | 6 | Feedback and improvement process |
| 2 | ISMS effectiveness | 7 | Review and update of List A/B |
| 3 | Performance of work | 8 | Contractor and DOE assessments |
| 4 | Roles and responsibilities, line management responsibility for safety | 9 | Approval of work by DOE |
| 5 | Balancing of priorities | 10 | DOE ISMS Implementation |



DOE ISMS CCEs

Supporting DOE VPP Implementation

| CCE | Criteria | CCE | Criteria |
|-----|---|-----|----------------------------------|
| 1 | Annual ISMS updates | 5 | Balancing of priorities |
| 2 | ISMS effectiveness | 6 | Feedback and improvement process |
| 3 | Performance of work | 8 | Contractor and DOE assessments |
| 4 | Roles and responsibilities, line management responsibility for safety | | |



DOE ISMS CCE Criteria

CCE-3: Work activities reflect effective implementation of the functions of ISMS

Are higher-level work documents, such as project plans, translated into discrete work packages and procedures with well-defined boundaries and interfaces?

Do work-planning processes provide for early involvement of workers and safety and health to fully define the work to allow identification of hazards?

Are standardized hazard controls developed and used in a graded approach based on project/work complexity, risk performance frequency, and initial hazard screenings?

Is emphasis placed on designing work and/or controls to reduce or eliminate hazards to prevent accidents and unplanned releases and exposures?

Do individuals question deviations; do team members support one another through awareness of each other's actions and constructive/timely feedback when necessary?

Is worker involvement in hazard identification and work planning processes adequate and mandated by procedures?



DOE VPP Program Elements/Criteria

PE-1, Management Leadership

Commitment; accountability; employee notification

PE-2, Employee Involvement

Degree and manner of involvement; methods available for employee involvement in the Safety and Health program

PE-3, Worksite Analysis

Comprehensive surveys, hazard reporting

PE-4, Hazard Prevention and Control

Professional expertise, safety and health rules, PPE, emergency preparedness, radiation protection, medical

PE-5, Safety and Health Training

Hazard recognition, formal/informal safety and health training



Mapping of DOE VPP Program Elements

| DOE VPP Program Element (PE)/Criteria | DOE ISMS/CCE Criteria | 10 CFR 851 Criteria |
|--|--------------------------------|-----------------------------------|
| PE #1, Management Leadership | | |
| 1.1, Commitment: Safety and Health policy, setting of goals and objectives, senior management involvement | §970.5223-1(e) CCE-1, 2 & 5 | §851.20 (a)(1) |
| 1.4, Accountability: Process to hold line management and supervisors accountable | §970.5223-1(b) CCE-2 & 4 | §851.20(a)(3) |
| 1.10, Employee Notification: DOE VPP participation; express concerns; receive information | CCE-3 & 6 | §851.20(b)(6) §851.20(b)(7) |
| PE #2, Employee Involvement | | |
| 2.1, Degree and Manner of Involvement: Methods available for employee involvement in the Safety and Health program | CCE-3 & 6 | §851.20(a)(4) |
| PE #3, Worksite Analysis | | |
| 3.2, Comprehensive Surveys: Initial identification of safety and health hazards, baseline surveys, etc. | §970.5223-1(b)(5) CCE-3 & 8 | §851.21(a) Appendix A, 6(a) |



Mapping of DOE VPP Program Elements (continued)

| DOE VPP Program Element (PE)/Criteria | DOE ISMS/CCE Criteria | 10 CFR 851 Criteria |
|---|--------------------------------|--|
| PE #4, Hazard Prevention and Control | | |
| 4.5, Emergency Preparedness: Emergency planning and preparedness program; drills; development of credible scenarios | CCE-4 | Appendix A, 2(a) |
| 4.7, Medical Programs: Integration of the occupational medicine program with the Safety and Health program; availability of onsite and offsite medical services/physicians; involvement by occupational health providers in hazard analysis, etc. | CCE-4 | Appendix A, 8(a)-(k) |
| PE #5, Safety and Health Training | | |
| 5.1, Employees: Hazard recognition; formal and informal safety and health training | CCE-4 | §851.25(a) |
| 5.2, Supervisors: Understanding of hazards; employees following rules; how to respond to an emergency | §970.5223-1(b)(3) CCE-3 & 4 | §851.25(a) §851.25(c) Appendix A, 2(a) |



Results

- A series of existing NSTec processes readily compliment the DOE VPP effort
 - ISMS
 - ISMS Continuing Core Expectations
 - 10 CFR 835, Occupational Radiation Protection
 - 10 CFR 851, Worker Safety and Health Program
- Use of existing programs enhances buy-in throughout NSTec
 - Reduced impact on budget
 - Not a flavor of the month, here to stay
 - VPP: What's In It for Me?
 - “This is MY VPP!”
- DOE HS-12 Onsite Review Team
 - Innovative, technically sound strategy
 - Supports long-term maintenance of DOE VPP Star certification
 - Has been significant concern at some sites



Conclusions

- Utilization of this strategy has numerous benefits
 - Builds upon existing programs
 - Limited budget impact
 - Sends clear signal that this is not a flavor of the month
 - Recognizes the importance of previous efforts to enhance safety
 - Supports long-term maintenance of the DOE VPP Star certification
- Perhaps most importantly
 - Use of this strategy reinforces the importance, and ownership, of NSTec DOE VPP implementing processes, supports continuous improvement, while also ensures that the NSTec DOE VPP initiative remains at the forefront to serve as one of the keystone efforts to ensure safety of personnel, visitors, and the public

