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Sponsor: Dori Ellis, 4000, Acting

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GN470034 – PERFORMING AND DOCUMENTING MANAGEMENT SURVEILLANCES

Subject Matter Expert: [Johnny D. Ethridge](#); CA Counterpart: [Dennis Beyer](#)

GN470034, Issue G

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* Indicates a substantive change

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1.0 PURPOSE, SCOPE, AND OWNERSHIP

Purpose

This *ES&H Manual* supplement provides guidance and instructions for performing management surveillances as required by the Sandia ES&H Appraisal Program. This procedure also provides instructions on documenting surveillances and distributing that documentation.

The purpose of management surveillance is to:

- Educate management about the space they manage and the hazards and risks associated with the activities performed in that space.
- Demonstrate, through personal interaction with personnel, management's commitment to ES&H.
- Identify ES&H problems and potential noteworthy practices.

This document supplements CPR 400.1.1 (MN471001), *ES&H Manual*, [Section 22A](#), "ES&H Self-Assessment Activities."

Scope

This procedure applies to all Sandia management performing surveillances at any of Sandia's facilities. **This procedure should be used to observe all phases of work (e.g., requests, planning, execution, and/or critique) and verify appropriate worker involvement.**

Ownership



The ES&H Training & Information Management Department (10313), is responsible for the development, approval, revision, and administration of this procedure. Forward **any** suggestions for improvement to the manager of Department **10313**.

*2.0 RESPONSIBILITIES

The individuals listed are responsible for performing the activities described below and in [Section 4.0](#). They should review this document as necessary to fulfill its requirements. Period for surveillances is to be determined by organization management based on internal risk management objectives.

Managers are required to have a sound understanding of the site's work planning and execution processes as described in the Integrated Safety Management System (ISMS) Sections 2.1.2, "Safety Management Functions," and 2.1.3, "Guiding Principles."

Note: Identification of unsafe work conditions or operations during the course of assessment activities shall result in the suspension of the activity and an immediate report to management.

President shall perform periodic management surveillances of selected Sandia facilities and ensure that presidential management surveillances are documented in accordance with [Section 4.4](#) of this procedure.

Executive Vice President (EVP) shall perform periodic management surveillances of selected Sandia facilities and ensure that EVP management surveillance is documented in accordance with [Section 4.4](#) of this procedure.

Vice presidents (VPs) shall perform periodic management surveillances of selected facilities within their division, and respond, as required, to deficiencies identified as their responsibility resulting from management surveillances.

Division ES&H Coordinators shall coordinate division management surveillances, coordinate presidential and EVP management surveillances if the facility being surveyed is in their division, and ensure that division management surveillances are documented in accordance with [Section 4.4](#) of this procedure.

Directors shall perform periodic management surveillances of facilities within their

center and respond as required to any deficiencies identified as their responsibility resulting from management surveillances.

Senior Managers shall perform periodic management surveillances of facilities within their groups and respond as required to any deficiencies identified as their responsibility resulting from management surveillance. Senior managers shall ensure that their management surveillances, **including implementation (i.e., the establishment of clear expectations and performance measures)**, are documented in accordance with [Section 4.4](#) of this procedure.

Department Managers shall perform periodic management surveillances of facilities within their department and respond as required to any deficiencies identified as the responsibility of their department as a result of management surveillances and ensure that department management surveillances are documented in accordance with [Section 4.4](#) of this procedure.

Department Managers who have office hazards only and three or less direct reports "including contractors" may be exempted **provided that the space is covered by the director's management surveillance.**

Center ES&H Coordinators shall coordinate center management surveillances and ensure that center management surveillances are documented in accordance with [Section 4.4](#) of this procedure.

3.0 DEFINITIONS

Deficiency – A single, identified noncompliance with a requirement invoked by Sandia. Requirements include laws, regulations, and directives.

Facility – A distinct building, plant, storage unit, laboratory, or test range that is within the boundaries of a DOE- or contractor-controlled site. A facility may include any equipment, structure, system, process, or activity that fulfills a specific purpose. Facilities may be DOE owned, leased, or permitted from another federal agency.

Management surveillance – A documented, direct observation of a facility to familiarize management with the hazards they manage and demonstrate their commitment to

formal, disciplined operations.

Noteworthy practice – An observed policy, procedure, or practice that is particularly efficient or effective when compared to other policies, procedures, or practices.

*4.0 PROCEDURE

4.1 Preparing for the Surveillance

4.1.1 Schedule periodic surveillances as described in [Section 2.0](#).

- a. Management surveillances may or may not be announced. When the space to be walked requires escort or entry is restricted by lock or other means, you may have to notify necessary personnel before the surveillance to ensure access. You may also have to announce surveillances when planning to visit infrequently used areas, such as remote sites, to ensure that staff who operate in those areas will be present.
- b. Schedule surveillances when normal operations occur at the facility.
- c. In selecting facilities for president-, EVP-, and VP-led surveillances, the Primary Hazard Screening (PHS) or **Hazards Analysis (HA)** for the facility and its activities **should be reviewed**.

4.1.2 Organize surveillance teams.

- a. A presidential or EVP-led surveillance shall consist of, as a minimum, the president or EVP and either the division ES&H coordinator or the center ES&H coordinator of the space to be surveyed.
- b. A VP-led surveillance team shall consist of, as a minimum, the VP and either the division ES&H coordinator or the center ES&H coordinator of the space to be surveyed.
- c. A director-led surveillance team shall consist of a minimum of two people, the director and either a center or division ES&H coordinator, a member of the Division ES&H Team, or another person knowledgeable about ES&H.



- d. A Senior Manager-led surveillance team shall consist of, as a minimum, the senior manager. For high-risk areas and operations, the Senior Manager may request that the Center ES&H coordinator, a member of the Division ES&H Team, or another person knowledgeable about ES&H accompany the manager.
- e. A department manager-led surveillance team shall consist of, as a minimum, the department manager.
- f. Additional personnel to consider including on surveillance teams are other ES&H coordinators, union representatives, department members (particularly those with advanced ES&H training), Division ES&H Team members, ES&H Subject Matter Experts (SMEs), and space and sites services representative(s).

4.1.3 Consider safety precautions, such as in-briefings and personal protective equipment, when planning a surveillance in order to allow appropriate time and prevent unnecessary delay.

4.1.4 Identify the individual(s) responsible for recording during the surveillance and satisfying the documentation requirements of [Section 4.4](#).

***4.1.5** Consider the following before conducting a surveillance:

- Implementation of [CPR 400.1.2](#), **Integrated Safety Management System (ISMS) Description**.
- **Hazards Analysis (HA)**, Primary Hazard Screenings (PHSs), and the **Hazard Aggregation Rollup Process (HARP)** to identify hazards and potential environmental impacts and training, procedures, and engineering and administrative controls necessary to perform work safely.
- Specific information on activities ongoing in the facility.
- Occurrence reports, injury and illness statistics, and summaries of incidents related to the facility or activity to allow more effective on-scene review of the event.
- Identified deficiencies and findings from past appraisals associated with the facility or activity and the actions taken to address them.



- Detailed requirements associated with a particular hazard in the facility, such as requirements for managing an overhead crane.
- Obtaining permission from the building or facility ES&H coordinator and/or the individual space owner before entering restricted access areas or touching any facility or lab equipment or materials.

*4.2 Conducting the Surveillance

*4.2.1 Hold a brief meeting before the surveillance to discuss the primary hazards and any related safety precautions of the facility to be surveyed. (Department Managers and Senior Managers performing the surveillances alone are not required to hold meetings.)

- a. Members of the organization(s) to be surveyed should be included.
- b. Consider the facility mission, facility layouts, and all phases of work. In addition to these subjects, discuss topics such as those identified in number [4.1.5](#).
- c. Observe all phases of work (e.g., requests, planning, execution, and/or critique) and verify appropriate worker involvement.

4.2.2 Observe all ES&H requirements at the facilities and sites.

4.2.3 Immediately stop any unsafe act or practice that is observed and communicate the concerns to the responsible manager.

*4.2.4 Focus on self-education and communicating the importance of ES&H and formal, disciplined operations to the staff during the surveillance. Ensure that management expectations of performance are being met. Pay particular attention to the following:

Demonstration of ownership. Are the space owners proactive? Do they understand your purpose and ensure supervision as required? Do they know and understand the hazards associated with their space and the activities performed in that space? Do they know how those hazards are mitigated? Is their housekeeping acceptable?

Quality of operations. Is the level of formality appropriate for the hazards observed? Would you be proud if the facilities and operations observed were your own?

Hazard mitigation. Are risks reduced to a level as low as reasonably achievable? How?

Visible ES&H problems. Question potential releases to the environment (drains, hazardous waste, hoods, garbage cans, etc.). Identify potential injury scenarios.

Interaction with workers in coaching relationships . Notice and encourage any positive behaviors to personnel and discern opportunities for their improvement. Ask the personnel if there are any problems they are currently working on or are having trouble resolving. Verify management functions and guiding principles of ISMS and how they are implemented at the facility/project/activity level. As a coaching opportunity, explain the requirements to personnel so that they understand the hazards associated with their work and how the risks associated with those hazards are mitigated.

4.2.5 Use a graded approach to achieve adequate coverage on surveillances; that is, direct more effort at the areas with greater potential for damage to the environment or impact on the safety and health of the worker or public.


- a. It is **not a requirement** to visit every office in office areas.
- b. When conducting surveillances in labs, machine shops, assembly areas, etc., focus on the hazards. Work to see every owned space in these types of facilities, including storage and other less frequented areas.
- c. Include a walk around the site or the building if the line manager performing the surveillance coordinates the site or building.

4.2.6 Consider conducting a brief meeting after the surveillance to discuss what was observed. Members of the organization(s) surveyed should be included. Subjects to consider include:

- Which deficiencies, if any, will be written up in the Management Surveillance Report.
- Any action items.
- Positive observations, including any potential noteworthy practices.


***4.3 Developing Corrective Actions**

- Verify that all identified deficiencies have appropriate corrective actions, owners, and an expected date of completion.

- 
- Ensure that all corrective actions are implemented on schedule.
 - Verify appropriate worker involvement to effectively prevent reoccurrence of the deficiencies.
 - Monitor the timeliness for completion of each corrective action.

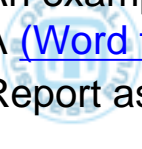
*4.4 Documenting the Surveillance

*4.4.1 Complete a Management Surveillance Report after the surveillance. The Management Surveillance Report is a local document whose format (memo, form, etc.) is at the discretion of the responsible line. The report shall include the following:

- 
- Date the report is completed
 - Date of the surveillance
 - Manager leading the surveillance
 - Members of the surveillance team
 - Site, facility, and specific rooms (if appropriate) visited
 - Identified deficiencies, the organizations/**individuals**

assigned to address them, **and the expected date of completion.**

- Identified potential noteworthy practices and the organizations responsible for implementing them
- Action items and personnel assigned to each item



An example of an acceptable Management Surveillance Report is provided in Appendix A ([Word file](#)/[Acrobat file](#)). Include additional information in the Management Surveillance Report as required by the manager performing the surveillance.

4.4.2 Distribute the report to surveillance participants and managers of affected organizations.

4.4.3 Record completion of surveillances in organization records. Include the date of surveillance, facility walked, and location of the Management Surveillance Report.

4.4.4 Maintain a file copy of Management Surveillance Reports in organizational files until superseded by a newer report.

Note: If Management Surveillance Reports are used for any purpose that requires longer periods of retention (e.g., Evaluation and Self-Assessment Records), the reports are to be disposed of according to the applicable record retention period as described in the [Sandia Records Retention and Disposition Schedule](#), even when superseded. See the Sandia Records Retention and Disposition Schedule for additional guidance on determining the appropriate record retention period for these purposes.

***4.4.5** Ensure that the report is input into a site assurance system by entering it into a local system (e.g., CATS, LESA, or organizational tracking system) or forwarding the report to the appropriate [ES&H Coordinator](#).

***4.5 Performance Metrics**

4.5.1 Review the site assurance performance system to ensure that deficiencies are being addressed appropriately.

4.5.2 Review deficiencies to determine reoccurrences and trends.

4.5.3 Use the [ES&H Assurance Dashboard](#) to measure ISMS process effectiveness.

5.0 RECORDS

Management Surveillance Report

***6.0 REFERENCES**



*Requirements Source Documents

SNL, [CPSR001.3](#), *Integrated Laboratory Management System*.

SNL, [CPR400.1.2](#), *Integrated Safety Management System (ISMS) Description*

SNL, PG470094, *ES&H Appraisals*, January 24, 1991.



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CHANGE HISTORY

GN470034, *Performing and Documenting Management Surveillances*



April 13, 2007

Note: (*) asterisk denotes substantive change.

- **Change:** The CA Counterpart from Donn Wright to Dennis Beyer.
- Under topic, "1.0 Purpose, Scope, and Ownership," and under subtopic "Scope":
 - **Add:** The sentence "This procedure should be used to observe all phases of work (e.g., requests, planning, execution, and/or critique) and verify appropriate worker involvement."



- Under topic, "1.0 Purpose, Scope, and Ownership," and under subtopic "Ownership":
 - **Change:** The paragraph **from** "The ES&H Planning & Awareness Department (3130), is responsible for the development, approval, revision, and administration of this procedure. Forward suggestions for improvement to the manager of Department 3130" **to** "The ES&H Training & Information Management Department (10313) is responsible for the development, approval, revision, and administration of this procedure. Forward any suggestions for improvement to the manager of Department 10313."
- Under topic, "2.0 Responsibilities":
 - **Change:** The requirement **from** "The individuals listed below are responsible for performing the activities described below and in Section 4.0" **to** "The individuals listed are responsible for performing the activities described below and in Section 4.0."
 - ***Add:** The requirement "Managers are required to have a sound understanding of the site's work planning and execution processes as described in the Integrated Safety Management System (ISMS) Sections 2.1.2, 'Safety Management Functions,' and 2.1.3, 'Guiding Principles.'" "



- ***Add:** The requirement “Note: Identification of unsafe work conditions or operations during the course of assessment activities shall result in the suspension of the activity and an immediate report to management.”
- **Move:** The requirement, “Center ES&H coordinators shall coordinate center management surveillances and ensure that center management surveillances are documented in accordance with Section 4.3 of this procedure,” so that it is the very last sentence in this topic.



- ***Change:** The requirement under “Senior Managers” **from** “Senior managers shall ensure that their management surveillances are documented in accordance with Section 4.3 of this procedure” **to** “Senior managers shall ensure that their management surveillances, including implementation (i.e., the establishment of clear expectations and performance measures), are documented in accordance with Section 4.3 of this procedure.”

- Under topic, “4.0 Procedure,” under subtopic “4.1 Preparing for the Surveillance,” and under paragraph 4.1.5:

- ***Add:** The requirement “Consider the following before conducting a surveillance: Implementation of [CPR 400.1.2](#), Integrated Safety Management System (ISMS) Description.”



- ***Change:** The requirements **from** “Consider the following before conducting a surveillance: Preliminary hazard assessments (PHAs), primary hazard screenings (PHSs), and the environmental checklist/action description memorandum (ECL/ADM) to identify hazards and potential environmental impacts and training, procedures, and engineering and administrative controls necessary to perform work safely” **to** “Consider the following before conducting a surveillance: Hazards Analysis (HA), Primary Hazard Screenings (PHSs), and the Hazard Aggregation Rollup Process (HARP) to identify hazards and potential environmental impacts and training, procedures, and engineering and administrative controls necessary to perform work safely.”

- ***Change:** The requirements **from** “Consider the following before conducting a surveillance: Identified deficiencies and findings from past appraisals associated with the facility or activity. This will allow you to review the deficiencies and findings and the actions taken to address them” **to**





“Consider the following before conducting a surveillance: Identified deficiencies and findings from past appraisals associated with the facility or activity and the actions taken to address them.”

- ***Move:** The requirement in Paragraph 4.2.3, “Obtain permission from the building or facility ES&H coordinator and/or the individual space owner before entering restricted access areas or touching any facility or lab equipment or materials” **to** Paragraph 4.1.5 as “Consider the following before conducting a surveillance: Obtaining permission from the building or facility ES&H coordinator and/or the individual space owner before entering restricted access areas or touching any facility or lab equipment or materials,” and renumber paragraphs 4.2.4, 4.2.5, 4.2.6, and 4.2.7 **to** 4.2.3, 4.2.4, 4.2.5, and 4.2.6, respectively.



- Under topic, “4.2 Conducting a Surveillance”:

- ***Change:** Paragraph 4.2.1, b, **from** “You should also consider the facility mission, and facility layouts. In addition to these subjects, you may want to discuss topics such as those identified in number 4.1.5” **to** “Consider the facility mission, facility layouts, and all phases of work. In addition to these subjects, discuss topics such as those identified in number 4.1.5.”
- ***Add:** The following requirement as Paragraph 4.2.1, c: “Observe all phases of work (e.g., requests, planning, execution, and/or critique) and verify appropriate worker involvement.”
- ***Change:** Paragraph 4.2.4 **from** “Focus on self-education and communicating the importance of ES&H and formal, disciplined operations to the staff during the surveillance. Pay particular attention to the following” **to** “Focus on self-education and communicating the importance of ES&H and formal, disciplined operations to the staff during the surveillance. Ensure that management expectations of performance are being met. Pay particular attention to the following.”
- ***Change:** The requirement **from** “Communication with personnel. Ask the personnel if there are any problems they are currently working on or are having trouble resolving. Reinforce to personnel your requirement that they understand the hazards associated with their work and how the risks associated with those hazards are mitigated” **to** “Interaction with workers in coaching relationships. Notice and encourage any positive behaviors to





personnel and discern opportunities for their improvement. Ask the personnel if there are any problems they are currently working on or are having trouble resolving. Verify management functions and guiding principles of ISMS and how they are implemented at the facility/project/activity level. As a coaching opportunity, explain the requirements to personnel so that they understand the hazards associated with their work and how the risks associated with those hazards are mitigated.”

- ***Add:** The following paragraph and requirements:

- **4.3 Developing Corrective Actions**

- Verify that all identified deficiencies have appropriate corrective actions, owners, and an expected date of completion.
- Ensure that all corrective actions are implemented on schedule.
- Verify appropriate worker involvement to effectively prevent reoccurrence of the deficiencies.
- Monitor the timeliness for completion of each corrective action.



- **Change:** The paragraph number of paragraph 4.3, “Documenting a Surveillance,” to Paragraph 4.4, and change all subordinate paragraphs accordingly.

- Under topic, “4.4 Documenting a Surveillance”:

- ***Change:** The requirement under paragraph 4.4.1 **from** “Identified deficiencies and the organizations assigned to address them” **to** “Identified deficiencies, the organizations/individuals assigned to address them, and the expected date of completion.”
- *** Add:** The following paragraph and requirement:

- **4.4.5** Ensure that the report is input into a site assurance system by entering it into a local system (e.g., CATS, LESA, or organizational tracking system) or forwarding the report to the appropriate ES&H Coordinator.



- ***Add:** The following paragraph and requirements:

- **4.5 Performance Metrics**

- **4.5.1** Review the site assurance performance system to ensure that deficiencies are being addressed appropriately.
- **4.5.2** Review deficiencies to determine reoccurrences and trends.
- **4.5.3** Use the ES&H Assurance Dashboard to measure ISMS process effectiveness.



- Under topic, “6.0 References”:

- **Add:** The subtopic “Requirements Source Documents,” immediately below the topic, so that all listed references are subordinate to this subtopic.
- ***Add:** The reference “ SNL, [CPR400.1.2](#), *Integrated Safety Management System (ISMS) Description*,” under “Requirements Source Documents.”

**Administrative Changes Only
January 24, 2007**

This section has been revised to:



- **Change:** SME from “Suzanne H. Weissman,” to “Johnny D. Ethridge.”

November 29, 2005

Note: The following changes, although substantive, are being made without formal review from the ES&H Manual Committee and the General Reviewers, at the request of Tom Hunter via the “ESH CPR Steering Team Checklist Responses.”

Sections 2 and 4 were revised to:

(*Indicates a substantive change)



- ***Add:** Senior manager duties (details in text) as new bullet preceding “Department Managers” in Sect. 2, Responsibilities, in one place.
- ***Add:** Senior manager surveillance duties (details in text) as new item “d” paragraph preceding “e” (dept. manager surveillances) in Sect. 4.1.2, in Sect. 4, Procedures, in one place.
- **Change:** Items in Sect. 4.1.2 formerly labeled “d” and “e” are now labeled “e” and “f”.
- ***Add:** “and Senior managers” following “Department managers” in second sentence of Sect. 4.2.1, in one place.



November 2 , 2005
Administrative Changes Only

This document was administratively revised to:

Change: The SME from Steven Yesner to Suzanne Weissman.

June 29, 2005
Administrative Changes Only

This document was administratively revised to:

Change: Executive Policy Sponsor from Les Shephard to Frank Figueroa



January 6, 2004
Administrative Changes Only

This document was administratively revised to:

Add:

- Under Section 4.3, "Documenting the Surveillance," a note to provide additional guidance to Members of the Workforce on appropriate retention periods of Management Surveillance Reports.
-



June 17, 1997

This document was revised to:

- Transfer ownership of the document.
- Delete outdated references.
- Revise references to PHA to PHS to be consistent with Integrated Safety Management System (ISMS).
- Revise the frequency of management surveillances to be "periodic" to be consistent with the revisions to *ES&H Manual*, Chapter 1.
- Let the manager determine the period and scope of surveillances.
- Allow an exemption for managers who have only office hazards and 3 or fewer reports, providing that the facility is covered under the director's surveillance.
- Add a definition for "ES&H Inspection" and text allowing ES&H inspections and surveillances to be done together as long as the intent and documentation of each are met.
- Delete the 10 working day limit for completing the report of the surveillance.
- Change file copy retention in organization files from "open ended" to "until superseded by a newer report."



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APPENDIX A – SAMPLE MANAGEMENT SURVEILLANCE REPORT

Subject Matter Expert: [Johnny D. Ethridge](#); CA Counterpart: [Dennis Beyer](#)

GN470034, Issue G

Revision Date: [April 13, 2007](#); Replaces Document Dated: November 29, 2005

Sandia National Laboratories

Albuquerque, New Mexico 87185

date: May 6, 1991

to: Distribution

from: J. F. Nagel, 5100 ES&H Coordinator

subject: 5100 Surveillance, Building 809, 4/29/91

A 5100-Level walk-through was held April 29, 1991. Participants included G. Beeler (5100), J. Nagel (5100 ES&H Coord.), P. Sena (5122, 809 Building ES&H Coordinator), D. Gluvna (5122-1, Building 809 Manager), and R. Burger (5131, 5000 SAJS Participant). The primary reason for this walk-through was for G. Beeler to see the deficiencies identified during the 5000 Self-Assessment Jump Start, and how they were addressed.

General observations/discussion include:

- Overall, building 809 was very well maintained.
- Most of the deficiencies identified had already been addressed.
- Those deficiencies that had not been addressed, were either in the process of being addressed or were awaiting Facility Maintenance or Engineering.
- It was noted that clear ownership and responsibilities for the vacuum cleaner used for depleted uranium should be established.

JFN:5131

Distribution:

5100 G. N. Beeler
5100 ES&H File 3.0
5120 W. R. Reynolds
5122 P. A. Sena
5122-1 D. E. Gluvna
5131 R. J. Burger