

SC Break-out Session ISM Champions Workshop

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Background

- Response to Under Secretary Garman memos reflect the results of the FY-05 OE and OA reviews as well as separate reviews by SC (energized electrical work), ANL, and ASO.
- OE conducted a PAAA Program review during the first quarter of FY-05.
- OA conducted an inspection of ANL and ASO during the third quarter of FY-05
- OA inspection included an evaluation of the effectiveness of work planning and work control at the activity level and feedback and improvement systems.
- ASO and ANL responded to the 24 OA findings with a corrective action plan that included about 275 individual corrective actions
- OA identified numerous issues associated with the ANL nuclear program (management and operation of nuclear facilities, radiation protection, external dosimetry) which resulted in OE doing a separate PAAA investigation.
- Corrective action plans were developed in response to the OE and OA reviews. A response is being developed for the OE investigation.

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Summary of Work Planning and Control Issues

- Inconsistent planning and control across ANL Divisions ANL needs to improve its work planning and control processes at the institutional level to ensure that all applicable requirements are consistently identified, responsibilities for implementation are assigned, appropriate implementing documents/procedures are developed, and effective implementation is verified by management. This process needs to ensure that the required information flows down to the activity level.
- Inadequate Radiation Protection Program ANL needs to revise the ANL institutional radiation protection program to ensure effective site-wide performance and compliance with 10 CFR 830 and -835 requirements.
- Procedures are too general ANL needs to ensure that hazards and hazard controls are sufficiently documented at the activity level in procedures and/or other work documents to confirm that risks to workers and the environment have been adequately identified, analyzed, and controlled.

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Summary of Work Planning and Control Issues (continued)

- Nuclear facilities and operations are not sufficiently rigorous ANL needs to enhance its overall nuclear facilities operations to ensure nuclear requirements are identified, implemented, and verified. This includes nuclear safety analysis, identifying and maintaining appropriate technical specifications, implementing quality assurance, performing USQ analysis and performing internal verification processes.
- Inadequate oversight by ASO and SC ASO needs to enhance its program of operational awareness and assessment activities including increased scope and rigor to ensure that the ANL ES&H performance at all levels and in all organizations is sufficiently and accurately evaluated, consistent with DOE Policy 450.5.

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Summary of Feedback and Improvement Issues

- Inadequate issues management ANL needs to establish an effective corrective actions program that ensures that safety deficiencies are identified and appropriately documented, rigorously categorized and evaluated in a timely manner, with root causes and extent of condition accurately identified, and effective corrective actions are implemented to prevent recurrence.
- Inadequate internal oversight within ANL ANL needs to establish and implement a fully effective program of assessment activities with sufficient scope and rigor, independent of those performing the work, to ensure that ES&H performance at all levels and in all organizations is consistently and accurately evaluated.
- Incomplete lessons learned program ANL needs to implement a rigorous lessons learned program that ensures that applicable lessons learned are identified and appropriate corrective actions are taken to improve safety performance and prevent adverse events or noncompliance with regulations.
- Inadequate follow-up by ASO ASO needs to establish and implement a fully effective issues management and corrective action process that ensures safety deficiencies are consistently identified through ASO line management oversight activities and appropriately documented and tracked to closure, consistent with DOE Order 414.1B.



Summary of Feedback and Improvement Issues (continued)

■ Insufficient training – ASO and ANL need to enhance staff skills through training.





Actions to Re-Invigorate ISM at ASO and ANL and Schedule

Actions

- Fully respond to the ISM issues that have been identified during FY-05 and FY-06 and ensure that these issues are effectively implemented. These corrective actions will enhance the ANL and ASO ISM Programs.
- Identify a long term strategy for operating the nuclear facilities at ANL and staff that program accordingly. Ensure that a full compliance program is in place for the nuclear operations at ANL consistent with the long term strategy.
- ASO is modifying its Facility Representative Program to perform more detailed oversight of work planning and performance. A more formal system is in place to capture and analyze the data from these reviews.

Schedule

 All ANL and ASO actions are scheduled for completion prior to the end of FY-06; about half are already completed