

ERP Operations Procedures Manual

4.8 OHSAS IMPLEMENTATION MANUAL

Text Pages 1 - 14
Attachments - 4

Approved: _____


ERP Director
Les Hill

Date: _____

9/21/06

Preparer: B. Heneveld

ERP-OPM-4.8, Revision 0



ENVIRONMENTAL
MANAGEMENT SYSTEM
REGISTERED TO
ISO 14001:2004

Table of Contents

1.0	PURPOSE & SCOPE.....	2
1.1	PURPOSE.....	2
1.2	SCOPE.....	2
2.0	ROLES AND RESPONSIBILITIES	3
3.0	DEFINITIONS AND ACRONYMS.....	3
3.1	DEFINITIONS.....	3
3.2	ACRONYMS	5
4.0	ERP IMPLEMENTATION OF OHSAS 18001 REQUIREMENTS	6
4.1	GENERAL REQUIREMENTS.....	6
4.2	POLICY	6
4.3	PLANNING	6
4.3.1	<i>Planning for Hazard Identification, Risk Assessment and Risk Control.....</i>	<i>6</i>
4.3.2	<i>Legal and Other Requirements</i>	<i>7</i>
4.3.3	<i>Objectives.....</i>	<i>8</i>
4.3.4	<i>OH&S Management Program(s)</i>	<i>8</i>
4.4	IMPLEMENTATION AND OPERATION	9
4.4.1	<i>Structure and Responsibility</i>	<i>9</i>
4.4.2	<i>Training, Awareness and Competence.....</i>	<i>9</i>
4.4.3	<i>Consultation and Communication</i>	<i>10</i>
4.4.4	<i>Documentation.....</i>	<i>11</i>
4.4.5	<i>Document Control and Data Control</i>	<i>11</i>
4.4.6	<i>Operational Control.....</i>	<i>11</i>
4.4.7	<i>Emergency Preparedness and Response.....</i>	<i>12</i>
4.5	CHECKING AND CORRECTIVE ACTIONS	13
4.5.1	<i>Performance Measurement and Monitoring.....</i>	<i>13</i>
4.5.2	<i>Accidents, Incidents, Non-Conformances and Corrective and Preventive Action</i>	<i>13</i>
4.5.3	<i>Records and Records Management.....</i>	<i>13</i>
4.5.4	<i>Audits.....</i>	<i>14</i>
4.6	MANAGEMENT REVIEW.....	14

ATTACHMENT 1 – RESPONSIBILITY MATRIX

ATTACHMENT 2 – ERP OH&S TEAM

ATTACHMENT 3 – OH&S OBJECTIVES

ATTACHMENT 4 – ERP OH&S DOCUMENT & RECORDS

4.8 OHSAS IMPLEMENTATION MANUAL

1.0 PURPOSE & SCOPE

1.1 Purpose

The purpose of this Occupational Health and Safety Assessment Series (OHSAS) Implementation Manual is to describe the internal procedures used within Environmental Restoration Projects (ERP) to implement and satisfy the OHSAS 18001 Standard and provide a safe and healthful work environment for all employees, visitors and contractors.

1.2 Scope

The ERP OHSAS Program applies to all activities conducted within ERP. These activities include the current routine surveillance and maintenance of existing facilities including the Brookhaven Graphite Research Reactor (BGRR), High Flux Beam Reactor (HFBR), Waste Loading Area (WLA) and ancillary facilities. This program is also applicable for the remediation support provided during the decommissioning, removal and/or demolition of facilities planned to be conducted by or under the oversight of ERP. These projects include:

- BGRR Pile Removal;
- BGRR Bioshield Removal;
- HFBR Decommissioning;
- HFBR Ancillary Building Decommissioning and Demolition; and
- WLA (Contaminated Soil Removal).

Brookhaven National Laboratory (BNL) has established and maintains an Occupational Safety and Health (OSH) Program to implement OHSAS 18001 principles at BNL. The program is documented in the Interim OSH Program Description at the institutional level. The BNL OSH program is aligned with the BNL Management System approach. The Standards Based Management System (SBMS) provides an interim Subject Area OHSAS 18001 Interim Procedures with guidance and requirements documents describing the Laboratory OSH program. The content of the SBMS documents addresses the external requirement sources that apply to BNL's work. The processes that BNL uses to implement the requirements of OHSAS 18001 are described within these documents. This ERP OHSAS Implementation Manual documents the processes used to implement the OH&S Management System program for ERP.

2.0 ROLES AND RESPONSIBILITIES

The organizational chart for ERP is provided on the ERP web-site. The responsibility matrix that applies to ERP is provided in Attachment 1. The Director of ERP is the responsible individual for ERP's OH&S Program. Each senior manager within ERP is given responsibility for implementation of the elements of ERP's OH&S Program within their area of responsibility. To assist in the development and implementation of ERP's OH&S, there is an OH&S team (Attachment 2) lead by the OH&S Manager. The OH&S Manager is appointed by and reports directly to the ERP D&D Support General Manager, and has continual direct access to the ERP Director. The OH&S Manager serves as OH&S team leader and OH&S document custodian for ERP. The OH&S team includes the Training Services Manager, Quality Management Services (QMS) Manager, Environmental Compliance Representative (ECR), Radiation Protection Manager (RPM), Radioactive Waste Management Manager, Safety and Industrial Hygiene Manager (S&IH), and a Work Control Coordinator (WCC).

The senior managers within ERP communicate with the OH&S Manager to ensure proper implementation of any activities that may have OH&S implications. Responsibility for OH&S is further delegated down through line management to each staff member, with each level assuming an appropriate role. Additional details of the responsibilities of managers and staff are specified within the following sections of this document.

3.0 Definitions and Acronyms

3.1 Definitions

- 3.1.1 **Accident** is an undesired event giving rise to death, ill health, injury, damage or other loss.
- 3.1.2 **Activity** is the same as work.
- 3.1.3 **Audit** is the systematic examination to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable for achieving ERP's policy and objectives.
- 3.1.4 **Continual improvement** is the process of enhancing the OH&S management system, to achieve improvements in overall occupational health and safety performances, in line with ERP's OH&S policy.
- 3.1.5 **Craft** is a generic job classification.
- 3.1.6 **Hazard** is a source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the work place environment, or a combination of these.

- 3.1.7 **Hazards identification** is the process of recognizing that a hazard exists and defining its characteristics.
- 3.1.8 **Incident** is an event that gave rise to an accident or had the potential to lead to an accident. Note that an incident where no ill health, injury, damage, or other loss occurs is also referred to as a “near-miss”. The term “incident” includes “near-misses”.
- 3.1.9 **Interested parties** are those individuals or groups concerned with or affected by the OH&S performance of ERP.
- 3.1.10 **Job classifications** are grouping of similar work classifications.
- 3.1.11 **Non-conformance** is any deviation from work standards, practices, procedures, regulations, management system performance etc. that could either directly or indirectly lead to injury or illness, property damage, damage to the workplace environment, or a combination of these.
- 3.1.12 **Objectives** are goals in terms of OH&S performance that ERP sets itself to achieve.
- 3.1.13 **Occupational health and safety** are conditions and factors that affect the well being of employees, temporary workers, contractor personnel, visitors and any other person in the workplace.
- 3.1.14 **OH&S management system** is part of the overall management system that facilitates the management of the OH&S risks associated with ERP. This includes the organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining ERP’s OH&S policy.
- 3.1.15 **Performance** is the measurable results of the OH&S management system, related to ERP’s control of health and safety risks, based on its OH&S policy and objectives.
- 3.1.16 **Risk** is a combination of the likelihood and consequence(s) of a specified hazardous event occurring.
- 3.1.17 **Risk assessment** is the overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable.
- 3.1.18 **Safety** is the freedom from unacceptable risk of harm.

- 3.1.19 **Skill-of-the-craft**, also known as **skill of the worker**, is the level of proficiency required by the worker to successfully perform the work using existing knowledge, experience, or procedures without direct supervision. It is applied to routine, low hazard tasks that support fulfillment of a facility or group's function. The tasks can range from complex to simple day-to-day activities. The level of worker's technical proficiency shall be verifiable by documented qualification from the work provider's supervisor.
- 3.1.20 **Tolerable risk** is risk that has been reduced to a level that can be endured by ERP having regard to ERP's legal obligations and OH&S policy.
- 3.1.21 **Work** is physical activities including maintenance, modification, setup, construction, remediation or demolition of facilities, systems, or equipment by BNL or non-BNL personnel. The definition of work used in this document does not include the work involved in planning, analyzing, and conducting experiments.

3.2 Acronyms

- 3.2.1 **ALD:** Assistant Laboratory Director
- 3.2.2 **BGRR:** Brookhaven Graphite Research Reactor
- 3.2.3 **DDO:** Deputy Director of Operations
- 3.2.4 **ECR:** Environmental Compliance Representative
- 3.2.5 **ERP:** Environmental Restoration Projects
- 3.2.6 **ESH:** Environmental, Safety and Health
- 3.2.7 **FATS:** Family Assessment Tracking System
- 3.2.8 **FRA:** Facility Risk Assessment
- 3.2.9 **GET:** General Employee Training
- 3.2.10 **HFBR:** High Flux Beam Reactor
- 3.2.11 **IPT:** Independent Project Team
- 3.2.12 **IRP:** Independent Review Panel
- 3.2.11 **ISO:** International Organization for Standardization
- 3.2.12 **JRA:** Job Risk Assessment
- 3.2.13 **JTA:** Job Training Assessment
- 3.2.14 **OHSAS:** Occupational Health and Safety Assessment Series
- 3.2.15 **OH&S:** Occupational Health and Safety
- 3.2.16 **OPM:** Operations Procedure Manual
- 3.2.17 **OSH:** Occupational Safety & Health
- 3.2.18 **PORC:** Program Operations Review Committee
- 3.2.17 **QMS:** Quality Management Services
- 3.2.18 **R2A2:** Roles, Responsibilities, Accountabilities, and Authorities
- 3.2.19 **S&IH:** Safety and Industrial Hygiene
- 3.2.20 **SBMS:** Standards Based Management System
- 3.2.21 **SHSD:** Safety and Health Services Division
- 3.2.22 **SME:** Subject Matter Expert

- 3.2.23 **SOP:** Standard Operating Procedure
- 3.2.24 **WCC:** Work Control Coordinator
- 3.2.25 **WLA:** Waste Loading Area

4.0 ERP IMPLEMENTATION OF OHSAS 18001 REQUIREMENTS

This OH&S Program establishes requirements to control OH&S risks and continually improve our performance. The ERP OH&S program has been developed to:

- a) ensure that work is safely performed without injury to our workers;
- b) meet the requirements of Occupational Health and Safety Management System (OHSMS) 18001:1999;
- c) establish an OH&S management system to eliminate or minimize risk to employees, visitors, contractors and other interested parties who may be exposed to OH&S risks associated with our work activities;
- d) implement, maintain and continually improve our OH&S management system;
- e) assure our program conforms to the BNL's OSH policy;
- f) demonstrate such conformance to auditors and others; and
- g) seek independent verification/registration of our OH&S management system by an external organization.

4.1 General Requirements

ERP OHSAS 18001 compliance requires the implementation of specific Standards Based Management System (SBMS) and ERP procedures. This program establishes our OH&S policy, planning, implementation and operation, checking and corrective action, continual improvement, and management review to ensure the protection of our employees, contractors, visitors and others as detailed in the following sections.

4.2 Policy

- The ERP Occupational Health and Safety (OH&S) policy is that of the Laboratory and is approved by the Laboratory Director. It clearly states overall safety and health objectives and a commitment to continually improving safety and health performance. It can be found on the BNL web-site and is available to all interested parties. Copies of the policy are posted in appropriate areas of facilities under the control of ERP. Communication of the policy is accomplished through employee training that includes specific details of each individual's OH&S obligations. A plaque detailing the ERP OH&S obligations is located in the hallway of 143-foot elevation of building 701 adjacent to the building occupant mailboxes.

4.3 Planning

4.3.1 Planning for Hazard Identification, Risk Assessment and Risk Control

ERP uses the procedures established in BNL's Standards Based Management System (SBMS) for the ongoing identification of hazards, the assessment of risks, and the implementation of necessary control measures. These procedures address routine and non-routine activities, activities of all personnel, including subcontractors and visitors, having access to the workplace, as well as all facilities at the workplace, whether provided by ERP or others. Results from these assessments and the effects of these controls are documented and kept up to date and are considered when setting OH&S objectives.

BNL's methodology for hazard identification and risk assessment has been defined in SBMS to:

- ensure we are proactive rather than reactive;
- classify risks and identification of those that are to be eliminated or controlled by measures defined herein;
- be consistent with our operating experience and capability of risk control measures;
- provide input into determination of facility requirements, identification of training needs and/or development of operational controls; and
- provide for the monitoring of required actions to ensure both the effectiveness and timeliness of its implementation.

The implementation of these processes by ERP is accomplished by ERP's OH&S team, Subject Matter Experts (SMEs), ES&H Coordinator, managers, supervisors, and workers. Specific Facility Risk Assessments (FRAs) and Job Risk Assessments (JRAs) have been developed by the OH&S working group and are available online, the shared U: drive and directly from the OH&S Manager.

4.3.2 Legal and Other Requirements

Legal and other requirements are described in the BNL SBMS Subject Area, "Requirements Management." The ERP QMS is responsible for subscribing to the automatic updates in SBMS for initial notification of changes in OH&S requirements and to the Lab's OH&S program. These updates are sent to the responsible ERP personnel for review and implementation as appropriate. Each review is documented and tracked as part of the ERP Family Assessment Tracking System (FATS) until the review and subsequent actions are complete (e.g., procedure revisions, training, etc.), in accordance with ERP-OPM-3.5, "Operating Experience and Internal Lessons Learned." As required, assistance is sought from Subject Matter Experts (SME) for guidance and interpretation. Results of

the review are communicated to employees, as relevant, through procedure modifications, training and/or announcements.

Where unique activities occur (e.g. fire code) within ERP responsibility, the OH&S Manager communicates with a SME to identify and access the legal and other OH&S requirements that are applicable to operations and activities and take action to communicate the requirements to affected parties.

4.3.3 Objectives

ERP is committed to continual improvement. Annually ERP conducts an OHSAS/EMS management review to assess its performance and set goals for the upcoming year. Lab wide initiatives, Critical Outcomes, legal and other requirements, OH&S hazards and risks, ERP initiatives, and past performance of all activities are reviewed. Technological options, financial, operations and business requirements and the views of interested parties are also considered during this process. Current OH&S objectives are included as Attachment 3 to this document.

During the development of the annual self-assessment plan, ERP performance measures (i.e., objectives) are established. Performance measures are quantified wherever practical. ERP's OH&S Objectives are identified in ERP-OPM-2.5, "Self Assessment Plan". Meetings are held with managers and responsible individuals to review progress and discuss issues that may arise. This process is described in the BNL SBMS Subject Area, "Integrated Assessment" and the results are documented in the ERP Self-Assessment Plan.

4.3.4 OH&S Management Program(s)

ERP's OH&S program is part of BNL's OH&S program. The BNL OH&S program uses SBMS subject areas and interim procedures such as FRA, JRA, Work Planning and Control for Operations, Facility Hazard Categorization, Hazard Analysis, Training and Qualifications, and Integrated Assessment Program to identify and meet its OH&S objectives. This document identifies how ERP implements BNL's program. Based on the objectives identified during management reviews, project plans, or action plans, are developed to identify the project scope, schedule, responsibilities and authorities for completing the projects and achieving the objectives. These plans are identified in ERP-OPM-2.5, "Self Assessment Plan" and are reviewed with management each quarter, as a minimum. In addition, adhoc projects are investigated, and may be implemented, by line supervision. As necessary, this program is amended to address changes to activities, products, services, or operating conditions that affect ERP.

4.4 Implementation and Operation

4.4.1 Structure and Responsibility

Roles, responsibilities and authorities for OH&S issues are identified in each supervisor and employee's Roles, Responsibilities, Accountabilities, and Authorities (R2A2) as described in BNL SBMS Subject Area, "R2A2".

Responsibility for the implementation of the OH&S management program rests with senior management. The OH&S Manager has been appointed by the ERP Director as the senior manager responsible for ensuring that the OH&S management system is properly implemented. The OH&S Manager's responsibilities include ensuring that appropriate OH&S requirements are established, implemented and maintained in accordance with OHSAS 18001. The OH&S manager also reports on performance with impact to OH&S are presented to senior management for review and available for use as a basis for continual improvement.

All those with management responsibility shall demonstrate their commitment to continual improvement of OH&S performance through the implementation of the ERP Self-Assessment Plan.

4.4.2 Training, Awareness and Competence

ERP relies on the Laboratory-wide training programs, as described in the BNL SBMS Subject Area, "Training and Qualifications" as well as the ERP specific training programs to ensure employees are qualified (i.e., competent) to perform tasks that may impact OH&S in the work place. Qualifications are defined in terms of education, experience, training, and any special requirements (e.g., external certification and medical requirements which are documented on Job Assessment Forms (JAF)). Training requirements are identified in Job Training Assessments (JTA) and have been established in accordance with regulatory requirements, SBMS requirements for work to be performed, hazards that may be encountered, areas that will be accessed, potential for risk, and general site requirements. Where applicable, specific job training for OH&S has been integrated into the existing training program. Skill-of-the-Craft is considered when establishing training needs. Non-routine and technically complex work activities are addressed during the work planning process, as described in the Work Planning and Control Subject Area, and may include a JRA to identify and reduce risks and hazards to the worker.

As is relevant for the job function of each employee, training procedures have been developed and provided to ensure employees are aware of the

importance of, and their roles and responsibilities in achieving conformance to the OH&S policy and procedures, and to the requirements of the OH&S management system. Training procedures have been developed taking into account the differing levels of responsibility, ability and literacy of employees, as well as risks they may face. Training includes employee awareness of the OH&S consequences, actual and potential, of their work activities and the OH&S benefits of improved personal performance, as well as the potential consequences of departure from specified operating procedures. Emergency preparedness and response requirements are also included in these procedures and employee training.

4.4.3 Consultation and Communication

The OH&S Manager is responsible for reviewing all new and revised SBMS OH&S documents to determine if there is an impact to ERP's OH&S program. As required, assistance is sought from SME for guidance and interpretation, as well as from employees. Reviews and their results are documented and maintained by the OH&S Manager or designee. All actions resulting from these reviews are tracked in the ERP FATS unless they can be implemented within 30 days.

ERP communicates OH&S goals (Objectives and Targets) and other pertinent OH&S information (e.g., procedural changes, lessons learned, safety concerns) through the OH&S Manager, ES&H Coordinator, ERP Management and staff. Feedback from employees, guests and contractors is achieved through the use of procedures, internal memos, e-mail, meetings, toolbox discussions, weekly safety meetings, OH&S Team meetings, and safety discussions.

Through JRAs, FRAs, work planning, and pre-job briefings, employees are involved in the identification of hazards and risks and the development and review of policies and procedures. The OH&S Team, which is comprised of cross-functional staff representing workers, Subject Matter Experts, management and ES&H professionals, is consulted when there are any changes that affect workplace OH&S rules or policy changes. These changes are discussed, and feedback is sought, directly with the workers during routinely held safety meetings and daily toolbox meetings.

ERP's Corrective Action Program and toolbox meetings allow the worker to bring up OH&S issues for discussion and resolution by management, in addition to fostering a closer relationship between staff. The Condition Reporting form is a mechanism that allows all employees to bring OH&S issues to management's attention. Each form prepared by an employee is sent to the Quality Management Services Manager where it may be assigned to an individual, if appropriate, for follow up and tracked to

completion. Status is reported at Safety Meetings, ES&H Committee meetings and/or during toolbox meetings and safety talks or directly with the employee submitting the condition, as appropriate.

Communication on the status of the ERP OH&S program to other Laboratory Departments/Divisions is accomplished by meetings, presentations, and/or e-mail. In addition, the OH&S Manager is a member of the BNL Safety committee, which provides an additional means for sharing safety related information Lab wide.

4.4.4 Documentation

This program description identifies the core elements of the OH&S program and provides links to related SBMS documentation. ERP's web site provides a list of the BNL and ERP's specific procedures that are used for implementation of the OH&S.

4.4.5 Document Control and Data Control

ERP follows Laboratory SBMS procedures for the control of documents and data required by OHSAS. Attachment 4 provides the ERP OH&S Records schedule and retention periods.

The Internal Controlled Documents and the Records Management Subject Areas provide the requirements to be met by ERP and include archival and data retention. Procedures also address periodic review and update of procedures and identification of who is authorized to approve them for adequacy. The procedures are available on the intranet to ensure accessibility to all employees. Through the use of the intranet, employees are ensured to have access to the latest documents.

4.4.6 Operational Control

An output of the JRA and FRA procedures is a list of operations and activities that are associated with identified risks where control measures may need to be applied. Using this list, controls are established on a priority basis to address the identified hazards and risks. The OH&S Manager maintains this list.

ERP uses numerous procedures and processes to identify and control its risks for its employees, guest and contractors. These include SBMS Program Descriptions, Management Systems and Subject Areas, as well as ERP procedures. ERP OHSAS 18001 compliance requires adhering to procedures that include:

- Occupational Health and Safety for OHSAS 18001 Program Description
- Facility Operations Management System
- Facility Safety Management System
- Worker Safety and Health Management System
- Transfer of Hazmat Onsite Subject Area
- Guests and Visitors Subject Area
- Inspections and Acceptance Subject Area
- Purchase Requisition Review
- Work Planning & Control Subject Area
- Corrective Action Subject Area
- Non-Conformance Reporting Subject Area

Controls for processes with identified risks are monitored continuously for effectiveness and reviewed annually by the OH&S Manager, or designee, during the self-assessment process.

Engineering projects and designs are reviewed by subject matter experts for OH&S impact. The evaluation of OH&S impact during work planning is performed in accordance with the Work Planning and Control Subject Area and ERP procedures. Appropriate control measures are implemented to eliminate or reduce hazards and risk to workers.

Relevant OH&S operational controls are identified and their requirements are formally communicated to the suppliers and subcontractors performing the work. Communication is accomplished via BNL's "General Terms and Conditions for Construction & Labor Hour Contracts", as well as through contractual "statement of work" included in the purchase order or contract.

4.4.7 Emergency Preparedness and Response

ERP follows the requirements of the Emergency Preparedness subject area that is updated and exercised in accordance with Laboratory procedures and Emergency Planning. ERP participates in periodic drills conducted to test and continually improve our emergency plans and procedures. These plans and procedures are also reviewed as part of our incident investigation process where applicable.

4.5 Checking and Corrective Actions

4.5.1 Performance Measurement and Monitoring

ERP follows the BNL SBMS Subject Area, “Integrated Assessment” and ERP-OPM-2.5, “Self Assessment Plan” for the identification and implementation of its monitoring and measurement program. OH&S indicators, and/or performance measures, associated with objectives and targets are identified in ERP-OPM-2.5 and are tracked on a routine basis. Both qualitative and quantitative measures are used in this system. Reactive monitoring assessments are performed resulting from accidents, injury statistics, and employee safety concerns to identify and implement corrective actions to preclude recurrence. Proactive reviews are conducted by Tier I facility and jobsite inspections, self-assessments, routine walk-throughs, and unscheduled reviews to accomplish periodic evaluation of compliance with OH&S requirements.

Monitoring and measurement equipment used for OH&S are calibrated and maintained in accordance with the Calibration Subject Area and the Laboratory’s Maintenance Management Center by the SHSD Division.

Documentation of these reviews and data is part of the document control system for the respective SHSD Division.

4.5.2 Accidents, Incidents, Non-Conformances and Corrective and Preventive Action

OH&S related accidents, incidents and non-conformances are investigated by ERP using SBMS and ERP procedures. These procedures provide instructions for the handling and investigation of accidents, incidents and non-conformances and provide instructions for conducting root cause analysis, and the development of corrective and preventive actions. In addition, they require that the proposed corrective and preventive actions be evaluated through the risk assessment process prior to implementation, as appropriate. Corrective and preventive actions are tracked to completion in the Laboratory’s Assessment Tracking System (ATS) or in ERP’s FATS. Completed actions are evaluated to assure their effectiveness.

4.5.3 Records and Records Management

Work planning reviews, job risk assessments, facility risk assessments, injury and accident investigations, Tier I records, maintenance records, calibration records, and corrective and preventive action records are maintained by the appropriate project in accordance with SBMS, ERP-OPM-2.6, “Records Management”, and project requirements. Audits of

the ERP OH&S program are maintained by the OH&S Manager or designee. Training records are maintained by the Training Services Manager. The QMS Manager maintains Laboratory level corrective and preventive action records. Subcontractor Safety Plan reviews are maintained by the Safety and Health Services Division. Medical records are maintained by the Occupational Medical Clinic. Industrial hygiene monitoring data are maintained by ERP with a copy provided to SHSD. Attachment 4 provides ERP OH&S Record Schedules and retentions.

4.5.4 Audits

ERP includes ES&H audits as part of its Self-Assessment Plan. Assessments are performed in accordance with the Integrated Assessments Program Subject Area. ES&H assessments are conducted at frequencies appropriate for specific operations due to the importance of the activity, regulatory requirements, or past performance (i.e., operational and assessment performance). Assessments may be conducted by ERP or may be part of the BNL Internal integrated ES&H Assessment. Additional assessments are scheduled when identified by ERP Management, OH&S Manager or by an OH&S team member.

Independent assessments of the ERP OH&S are scheduled through the BNL Independent Oversight Office or the Quality Management Office in accordance with the Laboratory's SBMS.

4.6 Management Review

The Director and Senior Managers of ERP review ERP's OH&S annually, at a minimum. In addition, the PORC and the IRP meet as needed to review operations, procedures and work methods. The review ensures that all necessary information is collected to allow management to carry out the evaluation and includes, as a minimum, accidents and injuries, areas of high hazard and high risks, OH&S performance, Tier I trends, OH&S audit results, corrective and preventive actions.

The review addresses the possible need for changes to policy, objectives and other elements of OH&S in light of OH&S audit results, changing circumstances and the commitment to continual improvement. This review will be documented.

Attachment 1 – Responsibility Matrix


ERP RESPONSIBILITY MATRIX CONTACT PERSON	OH&S POLICY	PLANNING FOR HAZARD IDENTIFICATION, RISK ASSESSMENT AND RISK CONTROL	LEGAL & OTHER REQUIREMENTS	OBJECTIVES	OH&S MANAGEMENT PROGRAM	STRUCTURE AND RESPONSIBILITY	TRAINING, AWARENESS AND COMPETENCE	CONSULTATION AND COMMUNICATION	DOCUMENTATION	DOCUMENT & DATA CONTROL	OPERATIONAL CONTROL	EMERGENCY PREPAREDNESS AND RESPONSE	PERFORMANCE MEASUREMENT & MONITORING	ACCIDENTS, INCIDENTS, NON-CONFORMANCES, CORRECTIVE & PREVENTATIVE ACTION	RECORDS & RECORDS MANAGEMENT	AUDIT	MANAGEMENT REVIEW
DIRECTOR	X																
BNL OH&S MANAGEMENT REPRESENTATIVE	X																
ERP OH&S MANAGEMENT REPRESENTATIVE		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ERP POINT OF CONTACT		X		X	X			X			X	X	X	X			
RADIATION PROTECTION MANAGER		X					X				X						
TRAINING SERVICES MANAGER							X										
QUALITY MANAGEMENT SERVICES MANAGER			X	X										X		X	
WORK CONTROL MANAGER		X									X						
ES&H COMMITTEE MEMBERS		X	X					X									
SUPERVISOR/MANAGER		X					X	X			X		X	X			

Attachment 2 – ERP OH&S Team

**Safety and Industrial Hygiene Manager
Training Services Manager
Work Control Coordinator
Field Engineer
Environmental Compliance Representative
Radiation Protection Manager
Quality Management Services Manager
Radioactive Waste Management Manager
BNL Industrial Hygiene Manager***

*Note: This individual assists the ERP OH&S Team as a subject matter expert.

Attachment 3 – OH&S Objectives

<p>BROOKHAVEN NATIONAL LABORATORY</p>	<p>Environmental Restoration Projects OHS Management Plan</p>		
<p>SUBJECT: OHS FY 2006 Objectives and Targets March 1, 2006, Rev 0</p>	<p>PREPARED BY: Brian Heneveld, _____ Signature on file _____ Date: _____</p> <p>REVIEWED BY: Fred Petschauer _____ Signature on file _____ Date: _____</p> <p>APPROVED BY: Les Hill _____ Signature on file _____ Date: _____</p>		
<p>1. Objective: Registration of the Occupational Safety & Health Management OHSAS 18001 System</p>			
Target	Actions	Person Responsible	Due Date
Achieve OHSAS 18001 registration by meeting target dates for Phase 3 registration	Complete JRAs and FRAs	OHS Rep, ESH Coordinator	09/06
	Issue OHS Objectives & Targets	OHS Rep	04/06
	Improve OSH awareness by reviewing the OHSAS 18001 program at meetings and performing OSH Training	OHS Rep	11/06
	Close corrective actions that result from the Registration Audit (as needed)	OHS Rep	12/31/06
<p>2. Objective: Accident and Injury Reduction</p>			
Review high risk assessments for improvement potential	Review 3 JRAs or FRAs with risk score >30 for improvement potential	OHS Rep, ESH Coordinator	6/30/06
<p>3. Objective: Improve Operational Performance</p>			
Improve Tier 1 performance	Close findings involving corrective action by our organization on a timely basis (<60 days). Analyze performance if trends detected.	ESH Coord, OHS Rep and Building Manager	9/30/06
<p>4. Objective: Communications Improvement</p>			
Improve OHS awareness and obtain staff feedback	Conduct Employee safety communications meetings	OHS Rep	9/30/06
	Provide the FY 2006 Objectives to the staff for awareness and feedback	OHS Rep	8/31/06

Attachment 4 – ERP OH&S Document & Records

	Topic / Series Title	Record Description	Foremost Address	BNL Site Specific File Plan DOE Retention	Responsible Party
1.	Occupational Health & Safety (OHSAS 18001) Management System Description (Manual)	The written OSH program of an organization. CONTROLLED DOCUMENT	A ADM/1000-15-37	ADM-16.1.1 Permanent	ERP OH&S Manager located at BGRR
2.	Occupational Health & Safety (OHSAS 18001) Management Plans	Annual list of targets & objectives and performance indicators for the improvement of the OSH program of an organization. CONTROLLED DOCUMENT	A ADM/1000-17-06	ADM-16.1.2 - Cut off at the end of each fiscal year. Destroy 5 years after cutoff.	ERP OH&S Manager located at BGRR
3.	OSH 18001 Support and Risk Assessments Files	Records verifying organizational compliance with the OSH 18001 program. Central file for task lists and JRA/ FRA risk assessments CONTROLLED DOCUMENT	A ADM/1000-17-16	ADM-16.1.2 - Cut off at the end of each fiscal year. Destroy 5 years after cutoff.	ERP OH&S Manager located at BGRR
4.	OSH Management Reviews and OSH Records of Decision Documents	Documentation of presentations to senior management on the actions and status of the organizations OSH program.	A ADM/1000-17-16	ADM-16.1.2 - Cut off at the end of each fiscal year. Destroy 5 years after cutoff.	ERP OH&S Manager located at BGRR
5.	OSH Internal Assessments/ Audits	Self Assessment Plan, Internal Assessment Results of an organization.	A ADM/1000-20-03	ADM-22.1.A.2 Destroy after 10 years	ERP OH&S Manager located at BGRR
6.	WOSH Committee Records	Agenda, minutes, attendance, presentations, etc.) for the Safety & Health committee with worker representation of an organization.	A ADM/1000-15-21	ADM-16.8.B.1 3 years	ERP OH&S Manager located at BGRR
7.	Training for OHSAS18001 at the organization level	Records for environmental safety & health training such as manuals, syllabuses, and other training aids; description of course content; examination documentation, attendance rosters; documentation of required performance, & lesson plans.	A ADM/1000-01-22	ADM-1.29.2.A.2 - Transfer to a federal records center after last session. Destroy 75 years after transfer.	ERP Training Manager located at BGRR
8.	Local Emergency Planning documents	Contains Local Emergency Response Plan generated for each building at BNL. It may contain the original plan, procedures for an emergency situation, locations of emergency shut offs, building floor plans, in/out door assembly areas and evacuation zone. CONTROLLED DOCUMENT	A ADM/1000-17-23	ADM-18.27 - Destroy 3 years after issuance of a new plan or directive.	ERP Emergency Planning Coordinator located at BGRR

ONLINE COPY – ERP OPERATIONS PROCEDURES MANUAL

9.	Emergency Contingency Plans	Consists of the emergency response plans, which identify environmental and safety hazards at a facility and surrounding areas. The plan lists phone location, name of contact, and diagram of pertinent area. CONTROLLED DOCUMENT	B ENV/2000-01-02	ENV-1.B.1 - destroy 3 years after issuance of a new plan	ERP Emergency Planning Coordinator located at BGRR
10.	Tier 1 Facility Safety Inspections	Records of routine safety inspections.	A ADM-1000-17-37.	ADM-18.9 - Cut off at the end of the fiscal year. Destroy 75 years after discontinuation of the facility.	ERP OH&S Manager located at BGRR
11.	Safety Assessment Documents & Safety Analysis Reports	Documentation of safety analysis reports relating to facilities. Records relating to health, safety & environmental issues. Records should include related DOE Safety Evaluation Report. CONTROLLED DOCUMENT	B ENV/2000-01-04	ENV-1.B.4.B - Review annually. Cutoff when superseded, obsolete, or cancelled. Destroy 25 years after cutoff	ERP OH&S Manager located at BGRR
12.	Work Planning and Control Documentation- (Work Permits)	Consists of work planning & control documentation. It includes the original, signed work permit, the job tracking log & the control procedures.	A ADM/1000-17-28	ADM-18.37 - Destroy 75 years after the date of the permit.	ERP Work Control Manager located at BGRR
13.	Non Radiological Permits	Safe work permits granting approval for employees to work on a potentially hazardous job or area. Includes confined space, working on or near energized equipment, digging, cutting/welding and penetration permits. Permits contain job descriptions, instructions to workers & approval signature of responsible supervision.	A ADM/1000-17-35	ADM-18.37 - Destroy 75 years after the date of the permit	ERP OH&S Manager located at BGRR
14.	Occurrence Reports that are OSH related	Reports documenting specific occurrences in the organization, which violate or pose a threat to safety. These files are for Investigative incidents and Critiques not maintained in the DOE Occurrence Reporting System.	A ADM/1000-17-10	ADM-18.11.1.B - EPI - Cut off at the end of the fiscal year in which the case was closed. Destroy 15 years after cutoff.	ERP OH&S Manager located at BGRR
15.	Operating Manuals that are OSH related	Operating Manuals for OSH meters identified in operational control documents such as JRA, FRA, SOP, ESR, Work Permits, etc.	A ADM/1000-17-36	ADM-17.32A- Retain until item removed from service	ERP OH&S Manager located at BGRR
16.	Equipment Records for OSH meters	Control and Calibration records of Measuring/Test Equipment used in hazard assessments	ENV/2000-04-03	ADM-1.21.2D Destroy 5 years after calibration.	SHSD Equipment Control Manager
17.	R2A2	This series consists of the signed record copy of position descriptions that include information on title, series, grade, duties, and responsibilities and related information for each employee of BNLK.	A ADM/1000-01-2	ADM-1.7.B Destroy 75 years after position is abolished or description is superseded.	ERP Director

ONLINE COPY – ERP OPERATIONS PROCEDURES MANUAL

**PLEASE CLICK HERE TO COMPLETE
READING ACKNOWLEDGEMENT FORM**