

OSHA Assessment of ORNL – Notes from Steve Hoey

Had the opportunity to listen in on a briefing by Kelly Bierschmit and Carol Scott at ORNL on their just completed OSHA inspection for External Regulation preparation. Here are my notes:

- This is all "unofficial" gleaned from discussions between the escorts and inspectors, OSHA seemed close to the vest about giving status (apparently until the official outbriefing on 6/5). So some of this may change. Overall impression is that moving to external regulation under OSHA may not be such a big deal after all.
- 22 inspectors for 12 days (was projected to be 3 weeks), in teams of 2.
- looked at all facilities except for office space (only sampled offices).
- Came up with 766 observations (ORNL had predicted over 2000).
- Typical violations, blocked electrical panels, lack of GFCI's, eye washes not in lab but in hall, LOTO line of sight issues, fume hood face velocity.
- Did look at construction 1926 as it effected ORNL employees, some fall protection and railing issues.
- No imminent danger identified.
- Some programmatic evaluations, LOTO, Blood borne, SAR's (as in the virus) but didn't sound like they found anything significant.
- Typically the inspectors found about what they expected as compared to outside industries, and unofficially put ORNL at the middle to upper bracket compared to outside.
- OSHA told ORNL that they should be able to go to External Regs with no problem, and that ORNL would not even be on the OSHA screen unless there was a major accident, spiraling accident stats or labor issues.
- OSHA team did use some consultants (to translate DOE language to OSHA), ORNL steered clear of ISM and focused on the OSHA regulations.
- All inspectors were escorted by knowledgeable people, even DOE provided some escorts.
- OSHA did ask for any prior safety deficiency lists by facility (ORNL denied that they had any and apparently OSHA did not believe them). They wanted to append the list to their inspection and were even afraid that the lab would pull out a bigger list than what OSHA found to discredit their inspection to tank ER. (Bit of conflict between Congress and DOE?)
- ORNL did provide the 5yr program plan and list of GPP/GAA items as their list of regulator deficiencies.
- OSHA looked at the radiological program and accelerators and stated that they would have no problem regulating them. They apparently did see some RAD violations but did not document because not technically OSHA regulations?
- The team was interested in culture changes and said programs like VPP would help boost and maintain the lab's credibility with OSHA.
- ORNL mentioned they do a "Dupont STOP" program? OSHA seemed impressed.
- Did have discussions with union's but informal at work place; ORNL used union safety reps as escorts in work areas.
- ORNL's ER estimate for OSHA upgrades was approximately 1 million, seem to feel that that was pretty much on target and that this assessment validated that. OSHA offered a lot of flexibility in deficiency corrections, e.g., if a building had a violation (GFCI's) but was going to be renovated in two years that that was OK.
- ORNL will have an official outbrief on 6/5 and we will have access to that.