

EMS CORRECTIVE ACTION REQUEST STATUS

Finding #	EMS Element	Finding	Location	Corrective Action Planned	Corrective Action Status	Date Completed
1	Roles and Responsibilities	There was no indication from staff that the EMS team at the facility extends, in practical terms, beyond the NCOOS EMS Team level members. As a result, the EMS at NCCOS overall remains dependent on a few critical EMS team members at each facility. Absence of these individuals would result in significant long-term adverse impacts to the EMS. More emphasis should be placed on the system itself so that even in the absence of key employees key environmental functions remain operational.	NCCOS	More emphasis should be placed on the system itself so that even in the absence of key employees key environmental functions remain operational (includes supervisors).	Completed Increased through the addition of the Facility EMS Teams Scheduled for 01/02/07	12/29/06

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2	Personnel Performance Standards	There is a lack of evidence of EMS or environmental performance standards being formally included in employee or EMS Team member performance plans.	NCCOS	NCCOS needs to include evidence of EMS or environmental performance standards in employee or EMS Team member performance plans.	Review of performance standards will take place during FY 2007 transition to DEMO system and then elements included in FY 2008 performance plans. Scheduled for 11/01/07	11/2007
3	Environmental Improvement Activities	While Environmental Improvement Activities have been developed through Environmental Management Plans, there is no clear-cut method of tracking costs associated with environmental improvements. In general, more effective and informative methods of environmental performance measurement should be established.	NCCOS	Annually do a quality control review of costs under the Facility Costs Accounting Codes versus activities at the Facilities	Scheduled for end of Fiscal Year	11/2007

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4	Environmental Awareness and Training	Environmental training requirements of specific job functions, roles and responsibilities are not always clearly defined. In some cases there is confusion among staff between “safety” and “environmental compliance”, and “environmental management”.	NCCOS	<p>The “Training Matrix” should be enhanced to more effectively identify the environmental requirements of specific job functions and roles.</p> <p>EMS Team will identify and enhance job function/ Categories</p> <p>NCCOS EMS and Local Facility Teams will develop online Competency Training for job functions</p>	<p>EMS Team Representatives met with the SECO Training Team for guidance and assistance on 4/30/07.</p> <p>Existing Training Matrix will be used as a guide and reference in accordance with DOC/NOAA policies and OSHA Standards and Training Guidelines.</p> <p>Competency training being developed and initial module scheduled for completion 3/2008. Competency training modules for Lab Safety and Green Purchasing are available on the website.</p>	<p>2/27/08</p> <p>3/26/08</p>

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5	Environmental Operational Control	Although EMS Work instructions are available on the NCCOS EMS website, (some facility-specific instructions are on the intranet), the majority of employees interviewed were not aware of them. Those that were aware of the Work Instructions had not integrated them into day-to-day activities.	NCCOS	Further education of employees and emphasis on improving work instructions is required. NCCOS EMS Team will develop an EMS statement to be included in the SOPs/SOGs.	Scheduled for 09/07/07	2/2008

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6	Internal Communications	The perception by employees of the degree of commitment by management to the EMS needs improvement. Many employees expressed the desire for upper management to take a more active and visible role in endorsing EMS. Aside from the federal component, employees lack an understanding of the management structure of HML (the role and responsibilities of the Director and Science Board) and, to a lesser degree CCEHBR, and an understanding of the role of NCCOS.	NCCOS	Enhance upper management active/ visible role in endorsing EMS through staff meetings and emails.	A one on one orientation is conducted with new staff at HML and CCEHBR (completed 08/2006) NCCOS SSMC (completed 09/2006) CCFHR holding quarterly all hands meetings (completed 12/2007)	12/2007

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7	Documents and Records Control of EMS	EMS documents are stored and managed via the NCCOS EMS website, and the NCCOS facility-specific intranet. In some cases, hardcopy version environmental documents such as plans, reports, permits, radiation safety plan, etc. were different than those on websites. Therefore, it was not clear which documents were current and which were obsolete. It is critical that an NCCOS wide Document Control System be implemented to meet the document management demands of NCCOS.	NCCOS	NCCOS EMS Website will be the repository for current documents. Last updated dates will be included on the website pages.	Completed	8/10/07