

Environment, Health, and Safety Division



Integrated Safety Management Plan

Original: May, 1998

Rev 1: Sept, 1999	Rev 6: Dec, 2004	Rev 11: March 2011	
Rev 2: Oct, 2000	Rev 7: May 2006	Rev 12: April 2012	
Rev 3: Oct, 2001	Rev 8: March 2007		
Rev 4: Oct, 2002	Rev 9: April 2008		
Rev 5: Oct, 2003	Rev 10: July 2009		

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Date: 4/30/12

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Date: 4/30/12

**Environment, Health, and Safety Division
Integrated Safety Management Plan**

Record of Revisions

Revision #	Description of Major Changes	Section(s)	Date of Revision
Rev. 0	Original	All	May 1998
Rev. 11	EHS Division mission and scope of work; authorizations; communication and feedback; organization chart	Sections 2, 5, and 7, Appendix I	March 2011
Rev. 12	Incorporate LBNL work alone policy; organizational structure and organization chart	All	April 2012

Environment, Health, and Safety Division Integrated Safety Management Plan

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Environment, Health, and Safety Division Integrated Safety Management Plan

1. Overview

The Department of Energy (DOE) and Berkeley Lab remain firmly committed to Integrated Safety Management since it was first defined in 1996. The objective of ISM is to perform work in a safe and environmentally sound manner. More specifically, as described in DOE P 450.4, Safety Management System Policy: "*The Department and Contractors must systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. This is to be accomplished through effective integration of safety management into all facets of work planning and execution.*" Berkeley Lab incorporates this policy into its institutional-wide Integrated Environment, Safety, and Health (ES&H) Management Plan.

Seven guiding principles set the fundamental policies for guiding Berkeley Lab's actions:

1. Line Management Responsibility for ES&H
2. Clear Roles and Responsibilities
3. Competence Commensurate with Responsibilities
4. Balanced Priorities
5. Identification of ES&H Standards and Requirements
6. Hazard Controls Tailored to Work Being Performed
7. Operations Authorization

Five core functions then provide the necessary structure for work activities that pose a hazard to the workers, public, and the environment:

1. Define the Scope of Work
2. Analyze the Hazards
3. Develop and Implement Hazard Controls
4. Perform Work within Controls
5. Provide Feedback and Continuous Improvement

In this plan, the following sections best describe the guiding principles and core functions:

Section 4 (*Roles and Responsibilities*)

Guiding Principles 1, 2, and 3

Section 5 (*Description of EHS Work and Associated Hazards*)

Guiding Principles 4, 5, and 6

Core Functions 1, 2, and 3

Section 6 (*Authorizations*) and 7 (*Work Performance Qualification and Training*)

Guiding Principle 7

Core Function 4

Section 8: (*Communication and Feedback*)

Core Function 5

2. Policy Statement

The Environment, Health, and Safety Division (EHS) will conduct all of its operations in a manner that protects the health and safety of employees and the general public, and does not adversely impact the environment. The activities are in compliance with the Lab's ES&H policies and requirements contained in the Regulations and Procedures Manual, the EHS Manual (PUB-3000), and the institutional Integrated ES&H Management Plan. This Plan has been developed and is updated annually to assist in ensuring that the Division's ES&H objectives are met. The Laboratory is committed to doing this while meeting the requirements of Clause I.86 of Contract 31 and implementing the policy provided in DOE P 450.4 (Safety Management System Policy).

Keys to implementing this policy are the following core safety values:

- The institution demonstrates a strong commitment to safety by integrating safety into all facets of its work.
- Managers, supervisors, and work leads are actively involved and demonstrate leadership in performing work safely.
- Individuals take ownership for safety and continuously strive to improve.
- Individuals demonstrate an awareness of and concern for the safety of others.

Revision 12 of this plan specifically incorporates recent updates to the Lab's working alone policy. To summarize this policy, workers at Berkeley Lab are not allowed to work alone when the mitigated hazards associated with their work could incapacitate them to such a degree that they cannot self-rescue or activate emergency services. See EHS Manual, Section 5.3, for additional details.

3. EHS Division Mission and Scope of Work

The mission of EHS is to keep the LBNL community and environment safe and secure as they explore the frontiers of science. EHS partners with scientists and stakeholders to maintain a high level of safety consciousness and performance by providing cost effective advice, processes, and tools. The EHS Division charter is found in the EHS Manual, Chapter 2.

The EHS Division is organized into four departments each containing various numbers of functional workgroups. The four departments are:

- Client Support Services
- Operations
- Security and Emergency Services
- Technical Program Management

The Client Support Services department includes:

- Associate Laboratory Director / Division Support
- Assurance Management / Occurrence Reporting and Processing System (ORPS)
- Communications
- Customer Service

The Operations department includes:

- Business Services
- Information Technology Systems
- Site Access (Foreign Visits and Assignments)
- Strategic Planning and Project Management
- Incident Investigations
- Training

The Security and Emergency Services department includes:

- Business Continuity
- Emergency Services
- Fire Protection Services
- Security Program

The Technical Program Management department includes:

- Authorizations
- Construction / Project and Field Support
- Environmental Services
- Health Services
- Industrial Hygiene
- Integrated Safety Management (ISM) / 10 CFR 851
- Occupational Safety
- Radiation Protection
- Requirements Management
- Waste Management

All workgroups are staffed by EHS personnel, with the following exceptions. Information management services are provided by personnel matrixed from the Information Technology Division, while Fire Department and site security duties are outsourced. Some of the workgroups are of sufficient personnel size to warrant being managed by a group leader. Appendix A contains the EHS Division organizational chart.

4. Roles and Responsibilities

All employees are accountable for the safe conduct of work for which they are responsible. The term “employees” used in this plan is all encompassing in that it includes all employee classes recognized by the Lab’s Human Resources, including students and subcontractors. All EHS employees are expected to follow the five core functions of ISM, mentioned above in Section 1.0 (*Overview*).

The following sections define the principal roles and responsibilities for implementing ISM in the EHS Division.

4.1 Division Director/Deputy Directors

The Division Director is responsible and accountable for assuring that all ES&H activities are carried out in a safe manner in accordance with all Laboratory requirements. The Deputy Directors of the Division assist the Division Director in attaining this objective. One mechanism used to emphasize the importance of performing the responsibilities of their position in a safe manner is by including reference to following the principles of Integrated Safety Management in an employee's position description and annual performance appraisal documents.

The Division Director is also responsible for the timely reporting of adverse or abnormal incidents that occur at facilities or operations controlled by the Division. The Division Director has overall responsibility for ensuring occurrence reporting procedures are properly implemented and corrective actions are instituted to prevent recurrence of an incident. The Division Director or their designee must concur that a given incident is a reportable occurrence through the DOE Occurrence Reporting and Processing System in order for it to be reported; and, if so, must approve the final ORPS report before it is submitted to the DOE ORPS database.

The Division Director and Deputies are required to carry out safety inspections of some division spaces at least once a quarter. This inspection includes discussions with employees about safety in their workspace and verification of safe working conditions.

4.2 Department Heads, Group Leaders, Supervisors, and Work Leads

Department heads, group leaders, supervisors, and work leads are required to assure ES&H requirements are integrated into their work activities and that the necessary resources and controls are provided in a timely manner to perform work safely and in accordance with all Berkeley Lab ES&H requirements. The following is a list of more specific ES&H responsibilities:

- Create meaningful and realistic ES&H expectations for staff and hold staff accountable in annual performance appraisals.
- Review the Job Hazards Analysis (JHA) process with staff annually or when duties change significantly.
- Review work authorizations within their authority on an annual basis.
- Use the JHA and work authorization processes as a mechanism to prohibit working alone for work under their control where the tasks, locations, and hazards have been properly analyzed and appropriate controls implemented, yet a worker would not be able to self-rescue or activate emergency services should they become incapacitated performing activities not commonly performed by the general public.
- Identify the training requirements for their employees, affiliates, contractors, visitors, students, and matrixed employees, and ensure such training is completed and documented.
- Conduct quarterly safety walkarounds to interact with staff in their workspaces, recognize safe work practices and conditions, and identify and correct unsafe work practices and conditions. The interaction should include observation, discussion and

inspection of each workspace on an annual basis. Ergonomic issues should be included in safety walkarounds.

- As part of the annual employee performance appraisal process, Supervisors and staff should use these interactions to identify safety hazards and environmental impacts and corresponding prevention or mitigation measures.
- Ensure that new or significantly modified projects and facilities are reviewed for potential hazards and environmental impacts in the planning stage.
- Annually review and update (as needed) the Division's hazards and equipment listed in the Hazard Management System database.
- Track compliance deficiencies in the Laboratory's Corrective Action Tracking System (CATS). Ensure and document that findings are reviewed, approved and closed in a timely manner. ES&H deficiencies that are not corrected on the same day that they are identified must be entered into CATS. As appropriate, corrective actions resulting from a Supervisor's Accident Analysis Report must also be entered into CATS or an equivalent tracking system, such as the Ergonomics database.
- Department heads, group leaders (and supervisors as appropriate) conduct periodic safety meetings, either as part of routine group meetings or as dedicated safety meetings. Appropriate meeting agenda topics can be obtained from resources such as the Berkeley Lab Lessons Learned or the One Minute for Safety websites.
- Group leaders designate a group representative to the Division Safety Committee. Each group shall have a representative present at monthly Safety Committee meetings. Small workgroups within the same department may be combined for representation on this committee.
- Ensure that each division employee, including each subcontractor, student and affiliate, has an ergonomic evaluation performed annually, or as required by the Laboratory Ergonomics Program. Department heads, group leaders, and supervisors are required to ensure that their staff's workloads are managed and distributed appropriately to avoid ergonomic injuries. Staff should be encouraged to take frequent breaks and mix work responsibilities, optimize the use of tools, equipment and software to reduce the risk of ergonomic injuries.

4.3 Workers

All workers (i.e., employees) are responsible for conducting their activities in a safe and environmentally responsible manner at all times, including adherence to all applicable institutional ES&H policies and procedures. Employees are to exercise prudent judgment when performing potentially hazardous work activities alone. All work must be performed as authorized by an employee's JHA, a Subcontractor Job Hazards Analysis (sJHA), or other work authorization. When tasks, hazards, or required controls differ from those approved in the work authorization, work must stop until the authorization has been updated.

4.3.1 Division Staff

ES&H responsibility and accountability is written into the position descriptions of all staff and is reviewed annually during the employee performance appraisal process.

Following Laboratory policy, RPM 2.23(D) (5), telecommuting is a viable work option under certain conditions. Once a telecommuting agreement is officially approved, the employee must maintain the employee's offsite workspace. Employees using a computer for telecommuting should take Web-based Remedy Interactive self-evaluation & training (EHS0059, *Ergo Self-assessment for Computer Users*).

4.3.2 Matrixed Staff

A matrixed employee's supervisor retains all ES&H responsibilities pertaining to that employee, except where any responsibilities have been transferred through a formal Memorandum of Understanding. When applicable, home and host supervisor identify employee safety responsibilities for the matrixed employee in the appropriate Memorandum of Understanding.

4.3.3 Students

ISM does not distinguish between students and other personnel working at LBNL. Students are afforded the same protections and assume the same duties and responsibilities as any LBNL employee or affiliate for safe work practices.

Before work begins, supervisors are responsible for assuring that each student possesses a thorough understanding of safe work practices. Supervisors are responsible for assuring that each student completes a Job Hazard Analysis, EHS0010 (*Overview of ES&H at LBNL*), and performs work in accordance with all ES&H policies and procedures, including those found in the Berkeley Lab Regulations and Procedures Manual, Chapter 7 (Health and Safety).

Supervisors and mentors of students participating in the Center for Science and Engineering Education program will execute an MOU with the Center that clarifies the responsibilities of supervisors, mentors, students, and Center personnel.

4.3.4 Subcontractors

Before non-construction hands-on work can be performed by a subcontractor in the EHS Division, an sJHA form must be completed, and the subcontractor must review the LBNL *ES&H Orientation for Non-Construction Subcontractors, Vendors, and Affiliates* pamphlet. A pre-job meeting between the Requester and the subcontractor must occur during which the sJHA and the ES&H non-construction safety expectations are discussed and the sJHA is signed by all parties. During the conduct of the work performed by the subcontractor, the requester provides oversight using a risk-based graded approach. For more information on the sJHA and the safety orientation, see EHS Manual, Chapter 31, *Non-construction Safety Assurance for Subcontractors, Vendors and Guests*. Construction work performed by subcontractors is normally managed through the Facilities Division.

4.4 EHS Division Safety Coordinator

The Division Safety Coordinator reports directly to the EHS Division Director and is responsible for administering the division's ES&H program. The coordinator also serves as a point-of-contact for all division staff for implementing and interpreting ES&H policies, procedures, and programs. As necessary, the Division Safety Coordinator facilitates JHA and work authorization activities that include working alone hazards assessments. The complete list of duties, roles and responsibilities of the Division Safety Coordinator is available in EHS Manual (Section 1.4.2.12, *Division Safety Coordinators*).

5. Description of EHS Work and Associated Hazards

EHS staff performs office work, laboratory work, environmental field monitoring and restoration, workplace monitoring, waste management and site security. Equipment service and repair is typically performed by non-construction subcontractors hired by the EHS or staff from the Facilities Division.

As noted in the roles and responsibilities section, workers are expected to follow the five core functions of integrated safety management: define work, analyze hazards, develop controls, perform work, and obtain feedback and improvement.

The following table summarizes the general hazards typically associated with each of the work types found in the Division.

6. Authorizations

Prior to commencing work, the appropriate Division staff (i.e., department head, group leader, supervisor, or work lead) will prepare necessary documentation and obtain required authorizations for potentially hazardous or regulated work using the guidance specified in Chapter 6 of the EHS Manual (*Safe Work Authorizations*).

At this time as well as when work activities change, authors and reviewers will determine whether and when a working alone restriction is necessary and include it within the controls listed in the documentation, consistent with the working alone policy found in the EHS Manual Chapter 5, Section 5.3. Any restriction will then flow down to individual workers through their JHA or other authorization.

In some cases, external authorizations (e.g., regulatory permits) may be required for activities with potential adverse environmental impacts. These are described Chapter 11 of the EHS Manual (*Environmental Protection*).

6.1 Formal Authorizations

The Division has only one Activity Hazard Document (AHD). AHD 2073 is for onsite transportation and desensitization of reactive hazardous and mixed wastes. The Waste Management Group administers this AHD through their standard operating procedure.

Summary of General Hazards Related to EHS Division Work Types

Work Type	Hazards
Office Work	<ul style="list-style-type: none"> • Ergonomic hazards
Laboratory Work	<ul style="list-style-type: none"> • Hazardous chemicals and waste generation • Radioactive materials and waste generation • Ergonomic hazards • Blood-borne pathogens (Health Services) • Compressed gases
Environmental Field Monitoring and Restoration	<ul style="list-style-type: none"> • Electrical and mechanical hazards • Hazardous chemicals and waste generation • Radioactive materials and waste generation • Elevated work locations • Ergonomic hazards • Traffic hazards • Venomous animals and biting/stinging insects • Compressed gases • Confined space • Biohazards • Ergonomics • Machine tools and equipment • Sun exposure and heat stress • Poison oak • Noise
Workplace Monitoring	<ul style="list-style-type: none"> • Hazardous chemicals and waste generation • Radioactive materials and waste generation • Compressed gases • Asbestos • Electrical and mechanical hazards • Elevated work locations • Confined space
Waste Management	<ul style="list-style-type: none"> • Electrical and mechanical hazards • Hazardous chemicals and waste generation • Radioactive materials and waste generation • Ergonomic hazards • Compressed gases • Machine tools and equipment
Site Security	<ul style="list-style-type: none"> • Ergonomics • Traffic hazards
Equipment Service and Repair (Non-construction subcontractors and Facilities staff)	<ul style="list-style-type: none"> • Electrical and mechanical hazards • Hazardous chemicals • Radioactive materials • Confined space • Elevated work locations • Compressed gases

The work alone policy is applicable to those activities in evaluating the specific container at the site of generation and during treatment at the HWHF. The policy will be included in the next scheduled update of the procedure and the renewal of the AHD, both set for June. Work alone issues at the HWHF are already addressed in the HWHF Health and Safety Plan, Rev 4.

The Division has Radiological Work Authorizations, Radiological Work Permits, Sealed Source Authorizations, Low Activity Source Authorizations, and Generally Licensed Source Authorizations, all of which are listed in the Hazard Management System database. Group leaders are responsible for the annual review of authorizations within their jurisdiction including verification that work is performed as authorized.

The Division also uses standard operating procedures as an administrative control to ensure that work is performed within ES&H conditions and requirements specified by LBNL policies. The Division self-authorizes work through its work procedures when hazards are below authorization thresholds. Throughout the Division, specific safety concerns and hazards are identified and controls, whether engineering or administrative, appropriate to the hazard and tailored to the work are described in the work procedures.

Building 85, the Hazardous Waste Handling Facility, operates under a Part B permit issued by the California Department of Toxic Substances Control. This facility's safety analysis is documented in the Safety Analysis Document, which cites Operational Safety Requirements. These requirements define the operating safety envelope for the facility. The Waste Management Group is responsible for operating the facility in accordance with its Operational Safety Requirements and all permit conditions. The Part B permit is renewed every five years.

EHS operations at the Hazardous Waste Handling Facility and Buildings 70 and 75A are categorized as Radiological Facilities under the requirements of 10 CFR 830 (Nuclear Safety Management), Subpart B, *Safety Basis Requirements*.

The Environmental Services Group operates and maintains a number of groundwater treatment systems that are permitted by the East Bay Municipal Utility District for water discharges and the Bay Area Air Quality Management District for air emissions. These permits establish operating, testing and reporting requirements regarding emissions into the air and discharges into the sanitary sewer. The Environmental Services Group is responsible for operating the treatment systems in accordance with the permitting conditions. Permits from these agencies are renewed annually.

6.2 Job Hazards Analysis

EHS Division employees and subcontractors are required to have a current work authorization based on an approved job hazards analysis before performing work at LBNL. Section 4, *Roles and Responsibilities*, provides further details on the importance of the JHA process.

7. Work Performance Qualification and Training

Division supervisors determine the requisite qualifications for all their employees to function safely and in an environmentally responsible manner. Supervisors document that employees possess these qualifications.

Qualifications include skills, certifiable work experience, knowledge, training and certifications required by regulation or by Berkeley Lab policy. They may be documented in any manner chosen by Division supervisors provided a copy is placed in the employees' personnel file. Group leaders or supervisors review JHAs annually and when staff job assignments change to assure JHAs are current and all required training is complete or scheduled. Compliance with JHA-mandated training will be reviewed and documented annually in each employee's performance appraisal documents.

Until such qualifications are established and documented, individuals are only allowed to work under the supervision of a qualified employee. Staff qualifications and training are reviewed as part of the self-assessment program to ensure that skills and talents are commensurate with the technical needs and workplace hazards.

7.1 Supervisor Training

1. All Division supervisors are required to complete EHS0042, *Implementing Safety: Supervisors and Work Leads*.
2. Group leaders and supervisors are required to complete EHS0027, *Performing an Effective Safety Walkaround*.

7.2 Ergonomic Training

1. All Division employees are required to annually complete EHS0059, *Ergo Self-assessment for Computer Users*.
2. Employees are required to complete an Ergonomic Workstation Evaluation when one of the following three conditions is met:
 - a. a rating of moderate to high risk results from EHS0059
 - b. an employee is in discomfort or has complex problems
 - c. there are ergonomic concerns related to non-computer use issues, such as laboratory tasks or tool use
3. Employees that routinely perform lifting activities with objects that weigh more than 20 pounds are required to complete EHS0062, *Worksmart Ergonomics*, although the course is open to all employees.

7.3 Work Lead Training

A work lead is an individual authorized by their line management to direct, train, or oversee the work and activities of one or more workers. Work leads provide instruction on working safely and the precautions necessary to use equipment and facilities, safely and effectively. They ensure that employees know how to perform the work safely and in conformance with applicable requirements, and must provide on-the-job training as needed.

Work leads are required to complete the same two courses as supervisors:

- EHS0042, *Implementing Safety: Supervisors and Work Leads*
- EHS0027, *Performing an Effective Safety Walkaround*

A work lead may also have other training requirements defined by their JHA.

7.4 Resource Allocation

The Division allocates appropriate resources to address ES&H concerns, consistent with Laboratory policy in the EHS Manual, Chapter 1, *General Policy and Responsibilities*. Protecting the public, the workers, and the environment shall be a priority whenever work activities are planned and performed.

8. Communications and Feedback

The last core function of integrated safety management is one of the most important: feedback and improvement. In order to achieve continual improvement, ensure that work activities are monitored, and effectively communicate lessons learned, the EHS Division implements a number of activities.

8.1 Improvements to ES&H Programs

Each year, the findings from the ES&H Self-Assessment are entered into CATS and inserted into this plan as goals for improvement. In FY11, the ES&H Self-Assessment targeted three focus areas:

- Field worker safety
- Lessons learned and near miss program implementation
- EHS Division Safety Committee effectiveness

From those three assessments, one finding (issue) and corrective action was identified.

Issue 8885: While the ES&H near miss program is mentioned in the EHS Division ISM Plan, there is no defined structure or means of implementation.

Corrective Action 8885-1: Develop a plan for structuring an improved near miss program that is accepted by the EHS Division Director.

8.2 Assurance Mechanisms

Annual Division Self-Assessment

The Division's self-assessment is a continuous process that evaluates its workers' safety plus the implementation and effectiveness of Integrated Safety Management within the Division. The self-assessment process uses a tailored, risk-based approach for assessing worker safety program effectiveness. Each year, an EHS Division Self-Assessment Plan is

prepared that identifies the focus areas selected, the methodologies used, and the evaluation frequencies. As members of the Division Safety Committee complete each focus area, a summary report is prepared for the Division Director to sign. Each report is then shared with the Laboratory's Office of Contractor Assurance. The self-assessment program follows the requirements specified in LBNL/PUB-3105, *Division ES&H Self-Assessment Manual*.

For FY12, the Division identified the following three areas of interest:

- RSIGuard ergonomic software
- Sustainable practices
- Safety walkarounds

ES&H Peer Review

The Division participates in the ES&H Peer Review that evaluates division's integrated management systems for Division Directors and identifies opportunities for improvement and noteworthy practices. The Peer Review focuses on two to five areas of concern that are typically high level management issues rather than detailed technical issues.

Technical Assurance Program

Division assessments performed under this program include regular evaluations of EHS programs, inspections of workplaces, work activities, and facilities. These assessments may be performed by Division subject matter experts or by outside parties commissioned by the Division for the purpose of conducting an independent review. These assessments document that the work is performed as authorized. This lab-wide program is governed by LBNL/913E, *ES&H Technical Assurance Program Manual*, and administered by the Office of Contractor Assurance.

The primary elements of these assessments are:

- Regulatory compliance
- Formal authorization compliance
- Program and process implementation and effectiveness
- Customer feedback and continual improvement

Performance Appraisals:

EHS Division employees receive annual performance appraisals. A portion of the appraisal is based on their ES&H performance, including their ability to identify safety hazards and environmental impacts along with corresponding prevention or mitigation measures.

8.3 Inspections/Safety Programs

Safety Walkaround Inspections

Safety walkaround inspections are performed to observe work, inspect the workplace, and talk with the employees about the safe performance of work. These inspections also assess and document that the work is performed as authorized. The EHS Division Director and Deputy Directors are required to inspect a sampling of workspaces once a quarter.

Department heads, group leaders, supervisors, and work leads are required to inspect all workspaces and workers once a year.

Supervisor’s Accident Analysis Reports

Workplace injuries and incidents within the EHS Division are investigated following the procedure stated in EHS Manual, Section 5.1, *Incident Reviewing and Reporting*. Reviews of work-related injuries and illnesses are owned by EHS line management. The LBNL incident review program assigns a trained investigator to support and facilitate the investigation and data collection, causal analysis, development of recommended controls to prevent recurrence, and report preparation for each review.

As part of the incident review process, line management shall identify underlying ISM deficiencies associated with occupational injury and illness causes. Line management shall also be active in designing and aligning the corrective actions to address the ISM deficiencies and prevent recurrence. Below is a table for use by management when analyzing injury causes and developing corrective actions.

Summary of Incident Causes Relative to the Guiding Principles (GP) and Core Functions (CF) of Integrated Safety Management

Roles and Responsibilities	Control and Mitigation Hazards
GP-1 Line Management Responsibility for Safety	CF-3 Develop and Implement Hazard Controls
GP-2 Clear Roles and Responsibilities	GP-5 Identification of ES&H Standards and Requirements
GP-3 Competence Commensurate with Responsibilities	GP-6 Hazard Controls Tailored to Work Being Performed
Work Planning and Prioritization	Work Authorization and Performance
CF-1 Define the Scope of Work	GP-7 Operations Authorization
GP-4 Balanced Priorities	CF-4 Perform Work within Controls
Hazard Analysis	Performance Monitoring and Feedback
CF-2 Analyze the Hazards and Environments	GP-1 Line
Other	
SI Supervision Issues	
DI Disciplinary Measures	
O Other	

Once recurrence controls have been recommended, EHS management is responsible for managing these issues through the LBNL Corrective Action Tracking System or an equivalent tracking system.

Safety and health incidents are discussed by the EHS Division Safety Committee. The Division Director is notified of all OSHA-recordable accidents. The Division Safety Coordinator tracks injuries and ensures that corrective actions are entered into CATS or an equivalent tracking system.

Corrective Action Tracking System

ES&H deficiencies that are not corrected on the same day they are identified must be entered into CATS.

8.4 Safety Communication

EHS Division Safety Committee

The Division's Safety Committee was established for the purpose of:

- providing a forum for EHS employees to exercise their responsibility to ensure a safe and healthy workplace for themselves, their co-workers, and the environment,
- advising and making recommendations to the Division Director on safety, health and environmental protection matters that may affect not only Division employees, but the general public or the environment as well, and
- conducting self-assessments of Division operations and activities as discussed earlier in Section 8.2.

The Safety Committee consists of a chair representing the Division Director and at least one representative from each group. Small workgroups within the same department may be combined for representation on this committee. The objective of the Committee is to meet monthly to carry out its charge. Committee members bring concerns and issues raised within their groups, as well as communicate conclusions and actions on raised concerns back to their respective groups. Committee attendance and participation is recorded in the minutes.

One of the three focus areas from the FY11 self-assessment of the Division was to assess the effectiveness of the Division Safety Committee. While no findings came out of that review, the following recommendations to improve the Committee were made:

- Review the Charter for the Committee and revise it as appropriate to incorporate new requirements that stem from this assessment.
- Increase the visibility of the Committee. Set goals consistent with the charter and Division and Laboratory needs. Invite guest speakers from within the Division or other divisions to discuss relevant safety topics at Committee meetings.
- Follow the Division Safety Committee charter and rotate committee membership bi-annually. Provide orientation to new members as they join the Committee.
- Include the minutes from Committee meetings as a standing agenda item on each Group's regular meeting agenda, which are generally held monthly. Create a standardized format for sharing Committee minutes and safety issues at group meetings. Empower Committee members to discuss Committee deliberations and solicit input to bring back to the Committee for discussion and action. Consider discussing Division Safety Committee activities at Division "All Hands" and Leadership Team meetings.
- Improve the content and ease of use of the EHS website to include a section dedicated to the Committee membership, minutes, initiatives, and charter. Ensure that content on Committee-related pages is current and concise. These pages or the Division's home page could also contain a link to solicit employee feedback on safety issues relevant to the Committee.
- Establish a quarterly presentation by the Chairman of the Committee to the EHS Leadership Team.

- Modify the self-assessment process to maintain the beneficial affects of focusing on specific topics, but also include a few general aspects from the older methodology, such as being familiar with the Division's ISM plan prior to a self-assessment.
- Recipients under the Division's new recognition and rewards program should receive a congratulatory letter from the Division Director (or higher) and this recognition should go into the employee's annual performance review.

Lessons Learned/Best Practices/Near Misses

The EHS Division participates in the Lab's Lessons Learned and Best Practices program, which is intended to ensure ongoing improvement of safety and reliability, prevent the recurrence of significant adverse events/trends, and determine implementation strategies that will help LBNL successfully meet the missions and goals set forth by DOE.

Lessons learned and best practices briefings can be prepared by anyone at the Lab. Briefings are distributed to Lab personnel and organizations that have signed up for this service and created profiles identifying the categories of briefings they wish to receive. EHS Division staff are both contributors and receivers of these briefings. The program also has a searchable web-based database available to all LBNL employees.

The Office of Contract Assurance manages and oversees this program, including development of program requirements and guidelines.

EHS Division implements a Near Miss Safety Program where all EHS Division employees are encouraged to inform group leaders or supervisors of near misses. The EHS Division also encourages employees to bring to the attention of their supervisors and group leaders or Division Safety Coordinator topics that could serve as possible lessons learned.

In response to the self-assessment conducted in FY11 that examined the EHS Division's lessons learned and near miss program, the Division Safety Committee will concentrate on improving the near miss program before the end of FY12 through the following specific actions:

- Develop guidance and tools that assist Division employees in identifying near misses and the criteria for reporting these.
- Encourage all Division employees to use these new resources by making them readily available in a dedicated safety section of the EHS website.

ES&H Communications and Awareness Program.

The institutional ES&H Communication and Awareness Program is led by EHS Division staff. The program's objectives are to reinforce safe work habits, reduce at-risk behaviors and increase awareness regarding ES&H by providing timely and concise reminders to Laboratory staff on ES&H principles, policies and procedures. The program also encourages integration of ES&H into Laboratory culture by providing information to the Divisions for use at their staff and safety meetings.

9. EHS Division Resources

To support the implementation of the Division ISM Plan, the following internal resources are made available. Note that these FTE allocations are for the performance of separate tasks under this plan, such as participating on the Safety Committee, conducting the annual self-assessment, and participating in the Incident Review Board. These allocations are not representative of routine work or management activities, such as routine walkarounds, updating work authorizations, training of staff, and monitoring of work activities.

EHS Staff Resources Required for Implementation of the ISM Plan

DISCIPLINE	FTE
Admin. Services/ Finance	0.07
Environmental Services	0.07
Health Services	0.07
Industrial Hygiene	0.07
Occupational Safety	0.07
Radiation Protection	0.07
Security & Emergency Ops	0.07
Waste Management	0.07
Division Office	0.07
Training	0.07
Subtotal	0.70
Safety Coordinator	0.30
TOTAL	1.0

Appendix A EHS Division Organization Chart

