

### Draft CAP for Finding D-1

**Finding Statement #D-1:** LBNL has not established and implemented a fully effective self assessment program with sufficient rigor to ensure that safety programs and performance are consistently and accurately evaluated with deficiencies identified to ensure continuous improvement, as required by DOE Order 226.1A, *Implementation of Department of Energy Oversight Policy*, and by DOE Order 414.1C, *Quality Assurance*.

**Causal analysis:**

1. Missed requirement: self-assessments did not sufficiently "focus on hands-on work" to fulfill the requirements of DOE Order 226.1A.
2. Insufficient formal procedures: formal procedures for conducting Management of Environmental Safety and Health (MESH) reviews are insufficient.
3. Poor communication: Division management did not see the value of self-assessment as an improvement tool.
4. Insufficient training: Division Self-Assessment teams, MESH review teams, and EH&S Subject Matter Experts (SMEs) lacked sufficient training to effectively perform their assigned reviews.
5. Insufficient feedback: OCA/EHS has not finished developing a feedback model. No effectiveness reviews of the Technical Assurance Program (TAP) have been performed.
6. Insufficient accountability: division management is not being held accountable for a quality self-assessment.

**Immediate/ Compensatory Actions:**

- D1-1.** EH&S division director directed ES&H personnel responsible for performing Technical Assurance Program assessments of LBNL's policy, as defined in the ES&H Technical Assurance Program Manual, Report 913E," to enter TAP findings into CATS.
- D1-2.** Divisions are required to develop division-specific ES&H self-assessment measures for FY09.

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#### Actions to Prevent Recurrence:

**D1-3.** Update ES&H self-assessment program guidance and manuals:

- a. Develop formal procedures for self-assessments.
- b. Focus division self-assessment and TAP assessments on observing work.
- c. Require division-specific measures/topical assessments.
- d. Divisions develop self-assessment plans incorporating self-assessment guidance.
- e. EH&S updates Technical Assurance Assessment Plans with greater emphasis on observation of work.

References: PUB 3105 *Division Self-Assessment Manual*, Report # LBNL-913E *ES&H Technical Assurance Assessment Program Manual*, PUB 5344 *ES&H Self-Assessment Program*, new manual for management assessments, and division self-assessment plans.

**D1-4.** Develop communication plan to regularly communicate expectations for ES&H self-assessment to line management and provide feedback on division assessment plans, schedules, and reports to improve accountability.

**D1-5.** Develop and deliver training plan for personnel performing ES&H self-assessments:

- a. Develop skills training on how to plan, conduct, and document general ES&H assessments, with a focus on observing work.
- b. Update division self-assessment training consistent with updates to PUB 3105 *Division Self-Assessment Manual*.
- c. Develop TAP training consistent with updates to Report # LBNL-913E *ES&H Technical Assurance Assessment Program Manual*.
- d. Develop a training plan for the management systems reviews.

**D1-6.** Evaluate the effectiveness and quality of ES&H self-assessment.

**D1-7.** Determine improvements for management systems reviews and implement as appropriate.

**D1-8.** Hold personnel accountable for conducting fully effective ES&H self-assessments.