

HSS Finding D2 Corrective Action Plan Summary
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Finding Statement D-2: The LBNL Issues Management Program is not fully effective in ensuring that ES&H related events, injuries, conditions and program and performance deficiencies are rigorously categorized, analyzed, and corrected, and recurrence controls are established as required by DOE Order 414.1C, *Quality Assurance*, and DOE Order 226.1A, *Implementation of DOE Oversight Policy*.

Root Causes:

1. OCA wanted to foster participation by the entire lab community and design a program to accommodate the varying needs of the 17 science and operations divisions.
2. End users did not sufficiently participate in the existing feedback mechanism for the Corrective Action Tracking System (CATS) database.
3. OCA has not considered developing a "at a glance" Issues Management Program tool for the CATS database.
4. In some instances, the established communication methods with regard to management expectation and the requirements of the Issues Management Program are not effective.
5. LBNL has not adequately established a defined requirements management system. (Corrective Actions for this root cause will be addressed under Finding C4)
6. Implementation of the Issues Management Program varies from division to division.
7. LBNL has approached Environmental, Health and Safety (EHS) issues management reactively instead of proactively.

Immediate/ Compensatory Actions:

- 1-1 OCA released the CATS Phase 2 database from development to production. (Ref. Root Cause #1)

Actions to Prevent Recurrence:

- 1-2 OCA will revise the Issues Management Program Manual to improve the following:
 - 1) how to develop corrective actions, including those that will prevent recurrence
 - 2) define requirements for the number of employees and organizational representation who will be trained in extent of condition based on the training model
 - 3) determination of issue risk level
 - 4) define the issue types
 - 5) clarify roles and responsibilities
 - 6) clarify when a formal Corrective Action Plan is required
 - 7) modify the issues management matrix to address apparent cause analysis
 - 8) reference other Issues Management documents that address apparent cause analysis
 - 9) document the process of how institutional issues are managed(Ref. Root Cause #1)
- 1-3 OCA will revise the Root Cause Analysis Program Manual to improve the following:
 - 1) define apparent cause analysis vs. formal root cause analysis
 - 2) define additional root cause analysis methodologies

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- 3) define requirements for the number of employees and organizational representation who will be trained in causal analysis based on the model addressed in CA 1-6.
(Ref. Root Cause #1)

- 1-4** LBNL will review and document the current feedback mechanism between IT and the end user as it relates to CATS to determine how effective it is, and revise the mechanism, if required. (Ref. Root Cause # 2)

- 1-5** Develop, document and implement a methodology to hold personnel accountable for implementing Issues Management Program requirements. (Ref. Root Cause # 4)

- 1-6** LBNL senior management will develop, and LBNL will implement a model for the following:
 - 1) root cause analysis and extent of condition review model that will include the following:
 - a. Determining which Divisions will allocate employees to be trained
 - b. Determine the number of Division employees to be trained
 - c. Ensuring Divisions allocate appropriate resources to train designated employeesNote: Cost implications for Divisions is dependent on the model

 - 2) consistent issues management administration and implementation model that will include the following:
 - a. Distribution of implementation between the Division's safety team and line management(Ref. Root Cause # 6 & 7)

- 1-7** OCA will develop and implement a plan to communicate the following Issues Management Program elements to the Lab:
 - 1) root cause analysis and extent of condition reviews
 - 2) corrective action development(Ref. Root Cause # 4, 6, & 7)

- 1-8** OCA will revise the BLI2000, *Issues Management Program*, course, to provide adequate guidance on how to develop corrective actions, including those that will prevent recurrence.
(Ref. Root Cause # 1)

- 1-9** OCA will develop an "at-a-glance" Issues Management Program tool for the CATS database.
(Ref. Root Cause # 1)

- 1-10** OCA will perform an effectiveness review of the Issues Management Program.
(Ref. Root Cause # 1)

- 1-11** OCA will provide additional subject matter expert resources to divisions for Issues Management Program training and technical guidance. (Ref. Root Cause # 1)