

Subject: ES&H Deficiency Reporting	Effective Date: Nov. 30, 1999	Initiated by: Head, ES&H and Infrastructure Support
	Supersedes: Rev. 1, dated Dec. 9, 1998	Approved: Director

Applicability

This procedure applies to all PPPL activities and facilities and is to be used by Laboratory personnel and subcontractors.

Introduction

Reporting of environment, safety, and health hazards increases the Laboratory's ability to take corrective and preventative actions. ES&H hazards include violations of the Occupational Safety and Health Act (OSHA) or other Federal, State or local regulations or potential environmental, safety, or health hazards. All Lab employees and subcontractors have the right and responsibility to report ES&H hazards. The preferred means of reporting hazards would be direct notification of the employee, supervisor or Facility Manager performing or responsible for the activity or location where the hazard exists. If such notification were not possible or proved ineffectual, then the next level line manager should be notified (e.g., the Project Manager, Principal Investigator, Department Head). The alternative to notification of line management is notification to the ES&H Division Head or ES&H and Infrastructure Support Department Head. Notification can be made by the most practicable means; telephone, e-mail, direct communication, or by submitting an *ES&H Deficiency Report* (see Attachments 1 and 2).

In addition to the above, all radiological deficiencies must be reported to the ES&H Division Head for consideration of reporting to DOE under the Price-Anderson Amendments Act (PAAA). As noted above, notification can be made by the most practicable means: telephone, e-mail, direct communication, or by submitting an ES&H Deficiency Report (see Attachments 1 and 2).

Attachment 1 provides a form that can be used by line managers and Facility Managers to report deficiencies that are discovered during the course of inspections, walk-throughs, and safety meetings. Attachment 2 provides a format that can be used by all employees to report potential environmental, safety, or personnel hazards. Both forms are available from the PPPL Web. Should employees contact the ES&H Division directly with concerns, the contacted ES&H person will inform the Facility Manager, Supervisor, or the Maintenance & Operations Division of the situation, as appropriate.

This procedure does not preclude immediately notifying Site Protection and/or ES&H when an imminent hazard or breach of security or safety is discovered, nor does it preclude employee rights to immediately stop work. In such cases, following this procedure becomes secondary or may be deferred to other more relevant policies or procedures (see Reference Documents). Individuals are encouraged to report ES&H hazards – minor incidents can be symptoms of more serious problems. Minor or trivial items, which are immediately corrected, need not be reported except as noted above for radiological deficiencies.

Reference Documents

GEN-006	Occurrence Reporting and Processing of Operations Information
O-027	Line Management Safety Organization
P-012	Stop Work Authority

Procedure

<u>Responsibility</u>	<u>Action</u>
Initiator	<ol style="list-style-type: none"> 1. Discovers an ES&H hazard or deficiency and either assures that corrective action(s) is performed or proceeds with this procedure to make appropriate notifications. Informs the ES&H Division Head if the hazard or deficiency is radiological in nature. 2. <ol style="list-style-type: none"> a. Notifies the involved worker(s), appropriate line manager, or Facility Manager; or b. Contacts the ES&H Division Head or staff member; or c. Completes the <i>ES&H Deficiency Report</i> (see Attachments 1 and 2) providing as much detailed information as possible. Transmits the Deficiency Report to the ES&H Division Head as soon as possible (via hand carrying, fax (Ext. 2525), e-mail).
ES&H	<ol style="list-style-type: none"> 3. Reviews any identified ES&H hazard or deficiency and assigns action(s) to appropriate cognizant individual(s) or to Maintenance & Operations for a Work Order to be placed. 4. Notifies cognizant individual(s) of assigned action(s) and sends this information to Quality Assurance (QA) for tracking. 5. Provides information on radiological deficiencies to the PAAA Review Committee Permanent Members for consideration for reporting to the DOE Noncompliance Tracking System (NTS).
Quality Assurance (QA)	<ol style="list-style-type: none"> 6. Tracks reported ES&H hazards or deficiencies to closure.
Cognizant Individual/ Line Manager/ Facility Manager	<ol style="list-style-type: none"> 7. Ensures that corrective action is performed and, when necessary, that action is instituted to prevent recurrence of the same or similar hazards. 8. Notifies QA when corrective action is complete - providing Work Order #'s when relevant.
QA	<ol style="list-style-type: none"> 9. Updates tracking records of reported ES&H hazards or deficiencies. 10. Includes information in the Tracking/Trending and "Open Items" reports.
Line Manager/ Facility Manager	<ol style="list-style-type: none"> 11. Assures that blank <i>ES&H Deficiency Report</i> forms are readily available. NOTE: Forms are available on the Web at URL: http://www-local.pppl.gov/pppl/services/forms.shtml 12. Performs random inspections to assure that corrective actions are being performed.

Attachments

1. ES&H Deficiency Report A (Typical Walk-through/Inspection Multiple deficiency listing)
2. ES&H Deficiency Report B (Typical Single deficiency listing)

ES&H DEFICIENCY REPORT B**USE THIS FORM TO REPORT ENVIRONMENTAL, SAFETY, AND HEALTH CONCERNS THAT DO NOT PRESENT AN IMMEDIATE DANGER****REPORTED BY:**
(optional)***DATE:****LOCATION:****DEFICIENCY / HAZARD:****INSTRUCTIONS:**

Fill out this form giving as much information as possible. For indoor locations give building and room number (if in a hall use number of nearest room. For outdoor locations give the closest stationary object - building, water tower, etc and a direction from that object (North, South, to the right etc). Be as detailed in describing the deficiency as possible.

SEND THIS FORM TO ES&H: HANDCARRY (ES&H Module VI), FAX(x2525), e-mail jlevine@pppl.gov

*** Names need not be given. Names will be kept confidential. ES&H will inform reporter of actions taken.**