

Contact Person	Shawn Nelson	Revision	5.0
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TREND ANALYSIS OF ESH&A CONCERNS

This procedure provides a description of the Ames Laboratory Trend Analysis of ESH&A Concerns, including analysis to be performed, trend comparisons to past years and corrective actions as a result of the analysis as required by the Ames Laboratory Environment, Safety, Health and Assurance Program Manual, Section 10, Assessments.

1.0 APPROVAL RECORD

- Reviewed by: Document Control Coordinator (Amy Tehan)
- Approved by: Environment, Safety, Health, and Assurance Manager (Tom Wessels)
- Approved by: Deputy Director (Tom Lograsso)

The official approval record for this document is maintained in the Training & Records Office, 151 TASF.

2.0 REVISION/REVIEW INFORMATION

The revision description for this document is available from and maintained by the author.

3.0 PURPOSE AND SCOPE

The purpose of the Trend Analysis of ESH&A Concerns Procedure is to determine causal categories of all ESH&A concerns and to target those issues in order to reduce or eliminate the concerns in a timely manner. The following are the feedback and improvement mechanisms utilized to identify ESH&A concerns:

- Independent Walk-Through Procedure ([10200.021](#))
- Accidents, Incidents and Employee Safety/Security Concerns: Classification and Investigation Procedure ([10200.038](#))
- Injury/Illness Data (CAIRS)
- Event Reporting Plan ([10200.002](#))
- Discrepancy Reports Procedure (10200.064)
- Causal Categories as identified via causal analysis.

The Trend Analysis of ESH&A Concerns Procedure is not intended to produce a burdensome administrative program or place unrealistic expectations on managers, supervisors, group leaders. However, systemic deficiencies identified during this analysis need to be resolved.

4.0 PERFORMANCE

4.1. Mechanisms to Identify ESH&A Concerns

4.1.1. Independent Walk-Throughs (Procedure 10200.021)

It is the responsibility of the group or program/department to perform the actions necessary to close-out the concerns identified by the Independent Walk-Through according to the requirements for the Quality Assurance (QA) rating assigned to the observation. The group or program/department responsible for the corrective actions taken to close-out the concern shall document the response on the Walk-Through

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Record Form ([Form 10200.026](#)) or other form. This information is sent to ESH&A for closure and a copy maintained by the group or program/department. Verification of the closeout shall be performed by the appropriate ESH&A Coordinator or QA Coordinator. All concerns are tracked utilizing the Ames Laboratory Corrective Action Tracking System (ALCATS) database.

4.1.2. **Accidents, Incidents, and Employee Safety Concerns: Classification and Investigations (Procedure 10200.038)**

Accidents, Incidents and Employee Safety Concerns: Classification and Investigations includes odor concerns, chemical spills, defective operation of equipment, housekeeping, public safety, employee observation, etc. This information is documented on the Incident & Concern Reporting Form (Form 10200.088). The concerns are investigated and corrected (if feasible). The results of the investigation are communicated to the individual(s) who raised the concern. All concerns are tracked utilizing the ALCATS database.

4.1.3. **Injury/Illness Data**

All injuries and illnesses are logged by Occupational Medicine. This information is used to complete the OSHA 300 Log of Recordable Injuries and Illnesses. The information can be manipulated by responsible manager, program, type of injury/illness, severity of injury and if recordable by OSHA. Injuries and illnesses are discussed by the Industrial Hygienist, Fire Safety Specialist, Industrial Safety Specialist, the Occupational Medicine Administrator and the Occupational Medicine Nurse on a monthly and annual basis for potential trends. Corrective Actions are tracked utilizing the ALCATS database.

4.1.4. **Occurrence Reporting and Processing of Operations (ORPS) Information**

Occurrence Reporting and Processing of Operations Information (ORPS) is to assure that Ames Laboratory management and DOE officials are kept fully and currently informed of all events and conditions which could affect the health and safety of the public, endanger the health and safety of workers, have a noticeable adverse effect on the environment or seriously impact the intended purpose of the laboratory. All concerns are tracked utilizing the ALCATS database as well as ORPS system.

4.1.5. **Noncompliance Tracking System (NTS)**

The Noncompliance Tracking System is used to document and communicate to Ames Laboratory management and DOE officials of a failure to comply with applicable Nuclear Safety or Worker Safety and Health requirements. All Notices of Violation are tracked on the NTS System as well as the internal ALCATS database.

4.1.6. **Incidents of Security Concern (ISC)**

Incidents of Security Concern are those actions, inactions, or events that pose a threat to national security and/or DOE assets, create potentially serious or dangerous security situations, degrade the effectiveness of the safeguards and security program or adversely impact the ability of organizations to protect DOE safeguards and security issues. All concerns are tracked utilizing ORPS system as well as the internal ALCATS database.

4.1.7. **Ames Local Events**

Ames Local Events are those not meeting the threshold of ORPS, NTS or ISC. Ames

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Local Events are tracked just as ORPS, NTS and ISC in the ALCATS database.

4.1.8. Discrepancy Reports (Procedure 10200.064)

Discrepancy reports are generated by the Plant Protection Section (PPS) during tours. PPS staff looks for both security issues and safety issues and report them daily. This information is categorized by the type of discrepancy and the responsible manager, supervisor or group leader. Examples of issues reported include, but are not limited to:

- Heat generating equipment left on unattended (coffee pots, soldering irons, hot plates, etc.)
- Unsecured gas cylinders
- Excessive combustible materials
- Unsecured doors
- Missing or outdated door cards
- Uncapped gas cylinders
- Etc.

Discrepancy reports are investigated and closed on a daily basis (M-F, normal hours) by the Fire Safety Specialist or the Industrial Safety Specialist. Discrepancy Reports are generated on a monthly and annual basis.

4.1.9. Causal Categories

Ames Local Events, ORPS, NTS, and ISC are assigned causal categories from the Causal Analysis Tree (DOE O 232, Attachment 5) which is used as another tool for review and analysis.

5.0 REVIEWS AND ANALYSIS OF DATA

The Safety Specialist prepares a trend analysis of the feedback mechanisms which denotes common occurrences or prevailing conditions with previous years for mid-year and year-end Self-Assessment Reports. In addition, per the DOE Occurrence Reporting and Processing of Operations Information (ORPS) Manual M 231.1-2 and Occurrence Reporting and Performance Analysis Guide G 231.1-1, quarterly performance analysis and identification of recurring occurrences are conducted for events during the previous 12 months. The quarterly performance analysis includes a review of data from Injuries and Illnesses, Occurrences (ORPS), Noncompliance Tracking System (NTS), Incidents of Security Concern (ISC) and Ames Local Events.

6.0 POST PERFORMANCE ACTIVITY

As a result of the review and analysis of data, corrective actions may be implemented to address the changes needed such as the implementation of written programs, revision of written programs, development or modification of existing training modules, completion of topical appraisals, performance of additional audits, further investigations, etc. The results of the review and analysis are tools utilized for measuring safety performance.

The analysis of data and the proposed corrective actions are communicated to the ESH&A staff, Executive Council and Chicago Operations.