



Meeting Minutes
Energy Facility Contractors Group (EFCOG)
Integrated Safety Management (ISM) Working Group (WG)
Occurrence Reporting Sub-Group (SG)
Spring Meeting – Atlanta, GA
May 2, 2007

I. Welcome and Introductions Rod Hutto, (Savannah River Site)

Rod Hutto welcomed the group and asked that everyone in the room introduce themselves and noted some changes to the day's agenda.

Presenters:

Boyle, Eugenia L.	Department of Energy, Headquarters, HS-31
Grant, Gary	CH2M Hill, Hanford
Harkins, Brian	Office of River Protection, Hanford
Hutto, Rod	Savannah River Site
Luce, Bill	Savannah River Site
McCarty, Kathy	Department of Energy, Headquarters, HS-41
Sierra, Ed	Brookhaven National Laboratory
Wagner, Al	Idaho National Laboratory

II. Presentations/Updates

A. Panel Discussion..... Bill Luce (Savannah River Site)
.....Al Wagner (Idaho National Laboratory)

Bill took the lead during the joint presentation on NTS interface with ORPS from different sites and the 10 CFR 851 roll out at each site.

- ORPS criteria and events are important
- Discussed ORPS associations, focusing on PAAA and WS&H (10 CFR 851).
- Any PAAA or 10 CFR 851 noncompliance is automatically NTS reportable.

B. DOE HQ 10 CFR 851 Enforcement Kathy McCarty (DOE HQ/HS-41)

- Kathy focused on 10 CFR 851 and what the community should expect regarding implementation expectations and actual enforcement by DOE:
 - The best tool available for understanding what DOE hopes to accomplish with 10 CFR 851 is "Appendix B."
 - PAAA's program for nuclear safety is fair. DOE hopes to mimic their program with 10 CFR 851.
 - DOE will start enforcement slowly.
 - It is DOE's expectation that 10 CFR 851 will end up about as "big" as nuclear safety.
 - The hope is to build trust across the sites; gain perspective; and understand and respond fairly to concerns.



- Appendix B – Enforcement is not meant to beat anyone up:
 - DOE uses the “carrot and a stick” approach to enforcement.
 - Reporting is voluntary; however, not reporting will have consequences.
 - Prompt reporting allows up to 50% mitigation, depending on how timely report was submitted.
 - DOE strongly encourages proactive reporting practices.
 - DOE looks broadly at the overall reporting history of individual sites and the number of events, and then proceeds with appropriate enforcement.
 - DOE has the discretion to act, and will do so as necessary.
 - DOE strongly suggests self-identification. Noncompliance found during an audit will not be considered a self-identification.
 - A self-identified event reported as a noncompliance will be enforced with a lighter hand.
 - Events that are identified as having an opportunity for human performance improvement typically take longer to investigate, resulting in delayed reporting and what appears to be noncompliance and not “self-identifying.” This concern was brought up and discussed. DOE agreed to use discretionary criteria to determine appropriate enforcement when reportable events are submitted late due to the more time-intensive HPI incident and causal analysis investigation approach.
 - The concern of undetected “latent” organizational weaknesses being discovered “after the fact” was discussed, but no real solution was identified around how those events are reported and at what level enforcement should/will occur.
 - The first place that DOE goes to look for data on a given incident is ORPS. DOE would like the community to be very clear on noncompliance issues. Corrective Action(s) need to be on the NTS report so that DOE can close them out.
 - NTS thresholds have been modified.
 - DOE is expecting increased NTS reporting as the May 26 10 CFR 851 implementation date approaches.
 - Kathy mentioned that DOE has seen some items in NTS that are not needed, but would rather more reporting than less.
 - There have been some errors, e.g., “construction” versus “general industry.” Errors are not good, but DOE would rather see some errors in reporting than no reporting at all. No one will be penalized for “minor” errors.
 - There was much discussion around disparities between NTS and OPRS reporting. The DOE reporting community is looking for guidance from DOE/HQ on the following issues:
 - Conflicting reporting requirements between NTS and ORPS
 - Rules and workarounds regarding self identification between the two reporting interfaces
 - When reporting into NTS, much more data is required, which results in a noticeable increase in work for SC2s and SC3s.
 - NTS and ORPS should be treated as two separate entities.
 - ORNL is in need of a more robust system and is working with a PSO to coordinate efforts with HSS to fix the issues.
 - It was clear by the discussion in the room that confusion and frustration around the differences in reporting requirements and enforcements for NTS reporting versus ORPSs reporting is Complex-wide. It was said more than once that a path forward to resolve the many issues and questions would be very beneficial.
 - Kathy mentioned that a good tool to help with understanding the requirements for reporting is the Enforcement Program Plan’s (EPP) section on “General Reporting



Clauses.” An updated Enforcement Program Plan is on the way. It has been delayed due to the new Enforcement Manager wanting time to review the security data. EPP has rolled in many documents to encompass and achieve a complete and comprehensive plan.

- She also suggested looking at local reporting systems against NTS reporting to establish mitigation and enforcement criteria locally.

C. Event/Issues Management Ed Sierra (Brookhaven National Laboratory)

- BNL has made tremendous scientific contributions in the past, but have not done well on the safety front, which goes to show even the smartest and brightest make mistakes.
- Be aware of fitness for duty – fatigue and sleep deprivation is a nation-wide problem and needs to be taken seriously.
- Event and issues will happen, and we need to learn from them.
- BNL’s previous issues management system was not effective. In response, BNL rolled out a new Event/Issues Management System four months ago to track ORPS Type A and B events and PAAA events under the ORPS threshold.
- Individuals known as “Categorizers” are volunteers in either high- or lower-level positions who, in addition to their regular job responsibilities, field calls to gather data which is used to determine the appropriate category of an issue or event. Categorizers do not hold sole accountability, and do not write reports. Facility Managers hold ultimate accountability. When DOE calls BNL with inquiries, those calls are routed to Facility Managers, not Categorizers.
- Events and issues are binned into one of three categories. The (original categorization) process was standardized and simplified through a conservative approach to produce one process that eliminates the subjectivity at BNL.
- Goals of the new management system are: continuous improvements to system; maintain a standardized baseline; ensure a continued valid and consistent categorization process; look at recurring events on a case by case basis, receiving data and making evaluations by on (??) categories; empower Categorizers to make decisions.
- Track Categorizers entries to the system and critique to ensure consistency.
- Due to Categorizers lack of professional knowledge in the field of event reporting, some entries need to be “checked out.” BNL uses “Fact Finders” to achieve this part of the process.
- Hired 60 Fact Finders at BNL who verify data entered by Categorizers. Once data is verified, the process proceeds to causal analysis, which takes into account human factors, or HPI.
- Causal analysis methodologies have been successful, to date. Human factors are now consistently looked at during analysis.
- Actions taken include: corrective actions; preventive measures; process improvement(s); and human performance improvement(s). Each is defined and tracked.
- Lessons Learned is also tied into the new Event/Issues Management System at BNL. All Lessons Learned are searchable in a database by category. The Web site allows anyone on site to submit a Lessons Learned electronically. The Lessons Learned Database Administrator edits the document, as needed, and publishes it to the Web site for all to view. Lessons Learned are tracked and reviewed/analyzed quarterly to understand and trend feedback.
- BNL’s overall message is that safety should be “personal” value.
- BNL has complete buy-in from management and Lab-wide, and the initiative is considered a performance expectation. BNL encourages open and honest communication.



- Currently, 10 CFR 851 is being reviewed.
- BNL's model for action is:

Vision + Action, and then Buy-In
-not-
Vision + Buy In, and then Action

D. Occurrence Reporting Ongoing Initiatives Jeannie Boyle (DOE HQ/HS-31)

- Jeannie updated the group on the status of ongoing initiatives and documents currently with DOE for review and/or finalization. The group had several issues to discuss:
 - Some individuals in the group would like to see more clarity in the ORPS Guidance document by adding a tool to Subgroup D, #1, #2, and #3. (Marla, I am not sure I understand this comment, it might need some amplification for those that did not attend the meeting. Jeannie or Rod might be able to help.)
- For those people with agenda items for the monthly ORPS conference call, please send your items to the call coordinator, Gary Branson (Gray.Branson@inl.gov).
- A request was made to clearly define the causal analysis process in the Guidance Document:
 - Need clarity on how to use the "tree" tool.
 - Expand guidance to identify causal analysis codes.
 - Add HPI-related codes
 - Clearly define A3 HPI codes and clarify how they relate to ORPS reporting requirements.
- Jeannie asked for an update from Connie De Grange on the status of the "white paper."
 - In Spring 2005 the draft was developed.
 - In Spring 2006 the final draft was posted to the Web site for review, after incorporating PAAA and adding nuclear safety requirements.
 - Currently, (Spring 2007), the final draft is awaiting input from Joe Yanek.
 - The previous draft version is available on the EFCOG F&I Web site for download.
 - As soon as Joe's input is received and incorporated, the document will go out for further review and comment. Jeannie will let you know when that happens.

E. Joint ORPS/HPI Task Team Meeting..... Gary Grant (CH2M Hill, Hanford)
..... **Brian Harkins (Office of River Protection, Hanford)**

- Gary Grant lead an interactive discussion on the application of HPI fundamentals and tools by describing four recent events and how HPI played a role in the investigation and corrective action to follow.
- Participation during the meeting was excellent.
- Brian Harkins followed with a brief overview of HPI from his operational perspective.
- As a result of the two discussions, some actions were generated, as well as some suggestions for the Fall 2007 EFCOG Meeting (see **IV. Discussion and Planning**, below).

III. Report Outs

Due to a long-running Joint ORPS/HPI Task Team Meeting, participation to the Report Out session was minimal. Participant who did attend discussed the following topics:



- Strategies for a better-planned schedule of sub/task group meetings to eliminate scheduling conflicts and low attendance.
- More discussion around the status of the white paper.
- Ideas for improved communications between DOE/HQ and sites (and vice-versa) with regard to the status of documents, ensuring feedback is delivered to appropriate occurrence reporting personnel, and that follow through is effective and timely.

IV. Planning:

Throughout the day, actions items were identified and suggestions noted, which will be carried out by or considered for discussion at the Fall 2007 EFCOG Meeting. Please see below:

ACTIONS FOR FOLLOW UP BEFORE THE FALL 2007 EFCOG MEETING

Connie De Grange Lawrence Livermore Nat'l Laboratory	Be prepared to discuss ORPS training at the Fall 2007 meeting, and build on the best model. Include HPI into training approach. (What training is this talking to? Does it match with the training we have been talking about on the last couple of conference calls? If so, we need to get Connie involved in the ORPS report writing training. Rod / Jeannie please provide Marla some help here)
Bill Luce Savannah River Site	Develop list of new ORPS reporting codes (Causes or Reporting Criteria? Either way we probably need to get it out sooner than the next meeting so it can be incorporated into the next revision or we will wait another four -five years before it gets in the manual.) for: 1) latent organizational weaknesses; 2) flawed defenses; and 3) error precursors. A good listing of numbers 1-3 have already been developed and is available inside the INPO handbook – perhaps a good place to start. (Is Bill planning on presenting this?)
Volunteers needed	A suggestion was made to develop lists of new ORPS reporting codes at 4-5 sites and then meet to discuss outcomes. Process would be to gather data; meet to discuss; define next steps; produce institutional documents; and eventually develop a final guidance document.
Joe Yanek Fluor Corporation	Training for ORPS folks in HPI fundamentals should be completed, if feasible, by the Fall 2007 EFCOG Meeting.

ITEMS TO CONSIDER FOR FALL 2007 EFCOG MEETING

Suggestion	Ensure that HPI and ORPS meetings do not conflict. Many ORPS Task Group members attend the HPI sessions, and vice-versa. Allowing a meeting-time conflict between the two Groups diminishes the value of Meeting attendance for some individuals.
Suggestion	Add discussion items to the HPI and ORPS agendas for the Fall: development of a charter for HPI and ORPS Task Group integration. (Do we know who made the suggestion so they can take the lead on this?)
