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## EH&S Reporting Activities for May 2004

### ➤ Key Activities

- As of May 31<sup>st</sup>, there have been **66** days without a lost-time injury. There was one recordable injury in May. A Physics Div. technician had a May 6<sup>th</sup> recordable eye injury.
- The May 5<sup>th</sup> discovery of a Test Lab Vertical Test Area (VTA) unauthorized safety interlock modification was reviewed for DOE occurrence reporting (ORPS) and Price-Anderson implications. The event was investigated by an Accelerator Div. team and Radiation Control. There was no personnel radiation exposure associated with this event.

The event was reported to the DOE Price-Anderson reporting system on May 26<sup>th</sup>. This event is the third Jlab Price-Anderson report since lab activities became subject to the DOE worker radiation protection rulemaking, 10 CFR 835, in 1996. The other two events were a May 1998 Hall C unplanned tritium release that resulted in unmonitored worker radiation exposure and two discharges in excess of environmental permit limits, and an August 2001 unposted high radiation area event in the VTA.

A DOE ORPS significance category 4 (lowest of the six levels) report was also submitted in the management concern category relating to this event. The event was screened for ORPS reporting under the 'near miss' and radiological categories but did not qualify under these criteria.

### ➤ Other Activities

- An EH&S Reporting analysis of recent JLab injury experience noted that five of the ten FY 2004 recordable injuries had a common factor of the injured worker not ***IMMEDIATELY REPORTING THE INJURY TO THEIR SUPERVISOR AND MEDICAL SERVICES***. While it is doubtful that all five injuries could have been treated as first aid cases, several would have only received simple first aid treatment if promptly reported and not have been classified as recordable injuries under OSHA guidelines. It is established Jlab policy that all Jlab staff (SURA, subcontractor, and physics users) shall promptly report all injuries.
- EH&S Reporting researched current OSHA recordkeeping regulations and interpretations for three May injury cases. This research resulted in two injuries being recorded as "first aid" cases, and the third injury's circumstances fell outside the DOE/SURA contract's injury reporting requirements.
- Recent safety & health publications were reviewed for contemporary information on improving worker safety awareness in response to a Public Affairs request.

- EH&S Reporting requested JLab Security & Services staff prepare a traffic safety article for the weekly “On Target Briefs” newsletter. This article was in response to three recent Jlab minor motor vehicle accidents.
  
- **Work Smart Standards (WSS) Set**
  - EH&S Reporting continued working with the Policy and Manuals staff to incorporate a review of WSS Set items along with EH&S Manual updates.
  - Proposed changes to EH&S Manual Chapter 2420 are being processed.
  - A new ANSI standard related to Lock, Tag & Try is being considered for addition to the Set.
  
- **National Environmental Policy Act (NEPA)**
  - The start of preparation of the CEBAF and FEL Upgrade Environmental Assessment (EA) is awaiting notice from DOE.
  - EH&S Reporting is working with other Lab staff to address other NEPA items, including actions related to the Physics Technical Support building.
  
- **Storm Water Permit Items**
  - Construction Activity under Permit VAR 103277
    - The Permit and Working Draft of the Storm Water Pollution Prevention Plan (SWP3) are accessible on the [jlab.org/ehs](http://jlab.org/ehs) web page.
    - The subcontractor for the North Connector Road project maintains a copy of the permit documents on site.
    - The application for the new permit is being prepared.
  - Best Management Practices under Permit VAR 040079
    - EH&S Manual Chapter 6733 is being revised to document a site Storm Water Management Program, which will address permit and regulatory requirements.
    - All key staff entered status updates to the BMP tracking system (thanks to excellent MIS support) that will be used for compiling the annual report.
  
- **Environmental Management System (EMS)**
  - The consultant provided the draft report on the initial gap analysis and a proposed implementation plan for comment.
  - The EMS Implementation Team and backups have met and aspect review teams are being formed.

## **EH&S Policies & Manual Group Highlights**

### **May 2004**

#### **➤ Policies & Manual Group Initiatives**

- ✓ Considerable progress was made in the EH&S Tracking System PMG module development. All the Work Smart Standards Hazards List and their corresponding Internal Sufficient Standards have been added and related to the chapter revisions functions. Christina and I will begin beta testing the functions in June.
- ✓ Christina completed a first draft of the Chapter Appendix Review SOP. The draft SOP is awaiting my review.
- ✓ Completed Work for Others evaluation for every author who had an EH&S Manual document undergoing review during the period May 1, 2003 – April 30, 2004.
- ✓ Developed a standardized performance objective for all EH&S Manual authors and sent a request to each author's supervisor to include the objective in the author's set of performance expectations.
- ✓ The PMG Manager worked on closing out PMG open items from the Office of Assessment's Independent Assessment reports.

#### **➤ EH&S Manual Authors - Non-EH&S Subject Matter Experts**

- ✓ Paul Powers is the new author for Technical Appendix 6210-T3, *Special Purpose Batteries*.
- ✓ Still awaiting a decision from Rusty about proposed author changes involving his staff.
- ✓ Compiled a spreadsheet for Sally Fisk with a listing all the required types of inspections performed at Jlab, related references, who performs, and where/how the inspection data is stored. I am awaiting her decision about becoming new author for Chapter 5100, *Inspections and Assessments*.

#### **➤ EH&S Manual Updates**

- ✓ The RadCon Manual Supplement was distributed for Level 2 review. Refer to [PMG-2004-17-01](#).
- ✓ Chapters 1200 and 6680 were sent to the Director's Council (DC) on May 25, 2004 for review and approval. At the author's request, Chapter 6420 was pulled from the DC package and redistributed for a Level 3C review due to the length of time that had transpired since the last review. See [PMG-2004-48-01](#).
- ✓ Updated Chapter 1100 – Lab Director's EH&S Policy Statement. Distributed all staff email notice on change. Received a couple inquiries about new language and why it came about.
- ✓ Chapter 5300, *Occurrence Reporting*, was distributed for Level 3 review. Comments due on June 11, 2004. See [PMG-2004-53-01](#).
- ✓ Chapter 6140, *Cranes & Hoists*, was distributed for Level 2 review.

## **EH&S Policies & Manual Group Highlights**

**May 2004**

- ✓ Chapter 4100, *Training*, review completed. Changes were minor so DC review/approval was not necessary. Changes were posted to the online and paper versions of the Manual.
  - ✓ Chapter 6210, *General Electrical Safety*, and its Appendices 6210-T1 and 6210-T2 were distributed for Level 3 review.
  - ✓ Chapter 6220, *AC Electrical Power Distribution Safety*, was distributed for Level 3 review. Comments are due by June 11, 2004.
  - ✓ Chapter 6160, *Confined Space*, began its triennial review. Chapter had dual authors listed. By agreement of the authors, John Kelly is the primary chapter author. See [PMG-2004-51-01](#). Other chapters that began their triennial review include Chapter 6311, *Prompt Ionizing Radiation Control*, Chapter 6132, *Ladders & Scaffolds*, Chapter 6131, *Trip & Fall Protection*, Chapter 3130, *FEL Experiment Review Process*, Chapter 2220, *Landlord & tenant Responsibilities*, and Technical Appendix 6760-T1, *Know Your Waste*.
  - ✓ Chapter 6630, *Respiratory Protection*, was distributed for Level 2 review. Comments are due back by June 17, 2004. See [PMG-2004-50-01](#)
  - ✓ Chapter 6440, *Static Magnetic Fields*, Level 2 draft is under preparation. Will be distributed for review in June. See [PMG-2004-49-01](#)
  - ✓ The PMG Manager sent a request to the ESS Chair to consider adding guidance in Chapter 6240, *Electrical and Electronic Equipment Construction and Maintenance Practices*, on vacuum/turbo pump cart construction in view of the lessons learned for the minor shock event. The guidelines should address the elements in the pump cart safety notice which can be viewed at: [http://docushare.jlab.org/Get/File-8529/Pump\\_Cart\\_Notice.pdf](http://docushare.jlab.org/Get/File-8529/Pump_Cart_Notice.pdf).
- **EH&S Manual Revision Status – Color Coded Table**
- ✓ The color coded table of EH&S Manual chapters and appendices can be viewed at: [http://docushare.jlab.org/Get/File-8112/Color\\_coded\\_table-4-29-04.xls](http://docushare.jlab.org/Get/File-8112/Color_coded_table-4-29-04.xls). The next quarterly update of this table will be in July 2004.
- **Issues/Concerns**
- ✓ Supervisors are not closing the loop with the PMG Manager in a timely manner with regard to proposed author changes.