

 <b>INTEGRATED SAFETY MANAGEMENT (ISM)</b>	Policy Number:	<b>ESH-100</b>
	Issued Date:	<b>September 11, 2014</b>
	Initiating Organization:	<b>Environment, Safety &amp; Health</b>
	Applicability:	<b>Employees, subcontractors, &amp; non-employees</b>

## POLICY STATEMENT

ORAU embraces the concept of Integrated Safety Management (ISM) in the conduct of daily operations. Safety is first in management and operational priorities and is everyone’s responsibility. Safety, health, and environmental protection are integrated into all ORAU activities. Every individual working at ORAU is expected to systematically define the scope of work and its hazards, analyze the hazards, develop and implement hazard controls, perform work within controls, and provide feedback for continuous improvement. In support of these efforts, ORAU fosters free and open expression of safety concerns without fear of reprisal, maintains safe and productive working environments, and holds managers, employees, subcontractors, and non-employees at all levels accountable for workplace safety.

## POLICY REQUIREMENTS

Every individual working at ORAU, regardless of employment status, will be involved in ensuring and improving safety. As such, all managers, employees, subcontractors, and non-employees are expected to:

- Have an attitude that nothing is more important than safety.
- Be aware of hazards and conditions that impact the ability to conduct work safely.
- Take action to mitigate those hazards by applying the functions and principles of ISM.
- Stop or suspend work, including the initiation of work, if an unsafe condition or serious hazard is suspected or discovered.
- Be familiar with and adhere to requirements detailed in this policy and attached handbooks, manuals, and plans.

In addition, all managers shall ensure that employees have access to them for the identification and resolution of safety issues.

To ensure a safety culture, all organizational units will:

- Provide a site safety representative in support of ES&H activities, as detailed on the Safety 1<sup>st</sup> website.
- Have department directors serve as members of the Safety Council.
- Ensure that employees understand and follow the ISM Core Functions and Guiding Principles.

The ORAU ISM System Program Description is a comprehensive plan for implementing ISM at ORAU. It explains how the ISM Core Functions and Guiding Principles flow down to unit-specific ISM plans, and it describes the administrative processes that must be followed to achieve the benefits of ISM.

## **RESPONSIBILITIES**

### **A. Employees, Subcontractors, and Non-employees**

- 1) Maintains a safe workplace by using prudent judgment in all matters related to the health and safety of fellow employees, subcontractors, non-employees, and members of the general public and in protection of the environment.
- 2) Follows established ES&H practices and standards in daily routines and in any new work that may develop.
- 3) Understands the potential hazards in the workplace, uses hazard controls as directed by the organizational unit manager, and assists in the development and use of Job Hazard Analyses (JHAs).
- 4) Understands the ISM Core Functions and Guiding Principles and employs them in day-to-day activities.
- 5) Participates in the ISM and Volunteer Protection Program (VPP) process by attending required training, performing inspections, reporting problems, offering suggestions, and other relevant activities.
- 6) Notifies cognizant supervisor immediately upon learning of any hazardous condition, occupational injury or illness, equipment failures, near-miss experiences, or other hazardous conditions.
- 7) Stops or suspends work, including the initiation of work, if an unsafe condition or serious hazard is suspected or discovered.
- 8) Maintains familiarity with and follows the provisions of ISM materials posted on the Safety 1<sup>st</sup> intranet site.
- 9) Uses the DOE Employee Concerns Management System in those situations that remain unresolved after notification of manager as described in the DOE Employee Concerns Reporting Form (Attachment 4).

### **B. Site Safety Representative (SSR)**

- 1) Coordinates activities involving the ES&H office personnel and the organizational units.
- 2) Disseminates ES&H information.
- 3) Reports problems and near-miss events to organizational unit managers and the ES&H office for action.
- 4) Monitors environmental conditions for hazards in the workplace.
- 5) Assists cognizant manager in conducting quarterly ES&H walkthrough inspections.
- 6) Serves on Safety Council and participates in regularly scheduled meetings and other activities.
- 7) Serves as a safety advocate in representing employee, subcontractor, and non-employee needs.
- 8) Assists in implementing ISM.
- 9) Assists ORAU in determining ES&H priorities for planning purposes.

### **C. Manager**

- 1) Notifies the ES&H director immediately upon learning of any event or condition that could adversely affect human health or safety or environmental quality.
- 2) Takes prudent measures to protect human life and property including stopping or suspending work if an unsafe condition or serious hazard is suspected or discovered.
- 3) Ensures that employees, subcontractors, and non-employees understand their stop-or-suspend work authority.
- 4) Involves employees, subcontractors, and non-employees in the JHA process to the greatest reasonable extent.

- 5) Develops, implements, and revises at least annually a unit-specific ISM plan that is consistent with the ORAU ISM System Program Description.
- 6) Ensures that employees, subcontractors, and non-employees comply with ISM plans and ORAU policies and procedures related to ES&H.
- 7) Holds staff accountable for worker protection practices.
- 8) Assists ORAU in determining ES&H priorities.
- 9) Encourages employee, subcontractor, and non-employee involvement in worker protection activities including development of goals, objectives, and performance measures.
- 10) Provides employees, subcontractors, and non-employees access to regulations, standards, written procedures, ES&H lessons learned, and reference documents including material safety data sheets (MSDS) and results of sampling, monitoring, and inspections.
- 11) Informs employees, subcontractors, and non-employees of their rights and responsibilities including the ability to accompany inspectors and to decline performance of a task when there is reasonable belief by the employee, subcontractor, and/or non-employee that both the circumstances of the task pose imminent risk of death or serious bodily harm and that there is insufficient time to seek effective redress through the normal hazard reporting and abatement procedures.
- 12) Provides employees, subcontractors, and non-employees worker protection training programs appropriate to the potential hazards and conditions.
- 13) Identifies existing or potential workplace hazards and evaluates the risk of associated injury or illness.
- 14) Reports and investigates all on-the-job injuries, illnesses, close calls, and near misses.
- 15) Reduces or eliminates hazards; substitutes hazardous substances with less hazardous substances in procurement actions.
- 16) Addresses hazard control and abatement in the selection and purchase of equipment, products, and services.
- 17) Communicates to employees, subcontractors, and non-employees within their work group the sound practices that ensure ES&H compliance.
- 18) Ensures employee, subcontractors, and non-employees complete required ES&H training.
- 19) Monitors employee, subcontractor, and non-employee ES&H practices and provides prompt corrective action when necessary.
- 20) Reviews annually employee's Physical Requirements and Working Conditions (PRWC) for accuracy of the actual working conditions and potential hazards.

**D. Occupational Health Nurse (OHN)**

- 1) Plans and implements the occupational health program to provide services as necessary for employees' protection and the promotion and maintenance of a healthful work environment.
- 2) Cooperates with other safety and health professionals to identify hazards and possible health risks.
- 3) Carries out programmatic duties as outlined in ORAU policy GP-1100, Occupational Medical Program.
- 4) Reviews PRWCs and schedules related pre-employment and mandatory physical exams and other health-care services as needed.
- 5) Works with ES&H staff and others in performing recordkeeping and reporting functions and in conducting quality checks to assure that the recorded data is thorough, accurate, and consistent.

## **F. Director, Environment, Safety & Health (ES&H)**

- 1) Has responsibility for safety, health, and environmental programs at ORAU.
- 2) Performs hazard assessments and ensures that appropriate controls are implemented at all worksites including the use of engineering and administrative controls and personnel protective equipment.
- 3) Promotes the development, maintenance, and use of JHAs throughout ORAU.
- 4) Ensures that managers, employees, subcontractors, and non-employees understand their stop-or-suspend work authority and also exercise stop-work authority when appropriate to discontinue suspected unsafe operations.
- 5) Submits to the ORAU president an updated ORAU ISM System Program Description annually or more frequently as needed.
- 6) Establishes written policies, goals, and emphasis programs as stated in the ISM Thrust Document.
- 7) Evaluates workplaces for hazards and assesses employee, subcontractor, and non-employees exposures as appropriate.
- 8) Assists managers in completing employee PRWC to assure documentation of potential workplace hazards.
- 9) Maintains effective liaison with managers to promote safety initiatives.
- 10) Meets routinely with the site safety representatives to discuss safety issues and initiatives.
- 11) Maintains knowledge of state-of-the-art technologies, legal interpretations, and current regulations.
- 12) Performs ES&H oversight of activities related to construction and maintenance work.
- 13) Participates with project managers in the review of plans and specifications for construction and renovation projects.
- 14) Conducts regular on-site inspections of major construction projects and completes a review with the project manager.
- 15) Ensures that ES&H awareness is promoted among managers, employees, subcontractors, non-employees, and the community at large through focused campaigns and training sessions as appropriate.
- 16) Investigates all reported hazardous conditions and takes appropriate action as necessary to eliminate or reduce the hazard.
- 17) Implements an effective surveillance program to determine if ES&H goals and objectives are being met.
- 18) Coordinates the Operational Awareness Visits by DOE representatives.
- 19) Ensures that standard operating procedures or similar directives regarding the manner in which work is performed include all appropriate ES&H requirements.
- 20) Notifies the ORAU president of any adverse event or condition that could significantly affect human health or safety, environmental quality, or continuation of operations.
- 21) Submits reports as required by law, regulations, directives, and ORAU policies and procedures.
- 22) Advises ORAU president and managers on ES&H matters including ISM and VPP.
- 23) Acts as gatekeeper for the Safety 1st website.
- 24) Analyzes safety-related data for patterns and trends, summarizes safety data quarterly, and makes data available on the Safety 1<sup>st</sup> website.
- 25) Advises management in the implementation of the DOE enforcement programs under 10 CFR 851, Worker Safety and Health Program, and the PAAA Program including maintenance of the NTS.
- 26) Oversees the ORAU Authority Having Jurisdiction (AHJ) to resolve implementation issues and approve equivalencies related to electrical safety/design as allowed by codes and standards. The

ES&H director may delegate to other qualified individuals such powers as necessary for the proper administration and enforcement of the ORAU electrical safety program. As appropriate, the ORAU AHJ consults with the AHJ for the City of Oak Ridge and DOE-OSO.

- 27) Conducts periodic, at least quarterly, quality checks of the recordkeeping and reporting program to verify that the information recorded and reported is thorough, accurate, and consistent with information contained in organizational records.
- 28) Assures this policy contains appropriate guidance for ORAU oversight and compliance responsibilities.

#### **G. President and Chief Executive Officer (CEO)**

Communicates and demonstrates a commitment to excellence for all ORAU ES&H activities.

#### **DEFINITIONS**

<http://intraweb.ora.gov/policies/safety/eshdefinitions.pdf>

#### **CANCELLATION**

This revised policy supersedes ESH-100 dated May 6, 2013.

#### **REFERENCES**

- 1) 10 CFR 851, Worker Safety and Health Program
- 2) 48 CFR 970.5223-1, Integration of Environment, Safety, and Health into Work Planning and Execution
- 3) Executive Order 13101, Greening the Government through Waste Prevention, Recycling and Federal Acquisition
- 4) Executive Order 13148, Greening the Government Through Leadership in Environmental Management
- 5) International Organization for Standardization (ISO) 14001: 2004, Environmental Management Systems
- 6) DOE O 151.1C, Comprehensive Emergency Management System
- 7) DOE O 210.2A, DOE Corporate Operating Experience Program
- 8) DOE O 225.1B, Accident Investigations
- 9) DOE O 231.1B, Environment, Safety and Health Reporting
- 10) DOE O 232.2, Occurrence Reporting and Processing of Operations Information
- 11) DOE O 410.2, Management of Nuclear Materials
- 12) DOE O 414.1D, Quality Assurance
- 13) DOE O 420.1B, Facility Safety
- 14) DOE O 435.1, Radioactive Waste Management
- 15) DOE M 435.1-1, Radioactive Waste Management Manual
- 16) DOE O 436.1, Departmental Sustainability
- 17) DOE M 440.1-1A, DOE Explosives Safety Manual
- 18) DOE O 440.2C, Aviation Management and Safety
- 19) DOE O 442.1A, Department of Energy Employee Concerns Program
- 20) DOE O 442.2, Differing Professional Opinions on Technical Issues Involving Environment, Safety, and Health Technical Concerns
- 21) DOE P 450.7, Department of Energy Environment, Safety and Health (ES&H) Goals
- 22) DOE O 451.1B, National Environmental Policy Act Compliance Program

- 23) DOE O 458.1, Radiation Protection of the Public and the Environment
- 24) DOE 460.1C, Packaging and Transportation Safety
- 25) DOE O 460.2A, Departmental Materials Transportation and Packaging Management
- 26) DOE M 460.2-1A, Radioactive Material Transportation Practices Manual for Use with DOE O 460.2A
- 27) ORAU Policy ADM-100, Issuing Policy
- 28) ORAU Policy ADM-104, Issuing Procedures Manual
- 29) ORAU Policy ES&H-112, Environmental Management
- 30) ORAU Policy GP-810, Quality Assurance
- 31) ORAU Policy GP-820, Assessment Program
- 32) ORAU Policy GP-830, Issues Management Program
- 33) ORAU Policy GP-840, Nonconformance Identification, Correction, and Prevention
- 34) ORAU Policy GP-1100, Occupational Medical Program
- 35) ORAU Emergency Preparedness Plan
- 36) ORAU Hazard Survey
- 37) ORAU Health and Safety Manual
- 38) ORAU ISM System Program Description
- 39) ORAU Radiation Protection Manual

#### **ATTACHMENTS**

- 1) [Objectives and Standards and Enforcement Programs](#)
- 2) [Procedures](#)
- 3) [ORAU Emergency Preparedness Plan](#)
- 4) [Employee Concerns Reporting Form](#)
- 5) [ORAU Health and Safety Manual](#)
- 6) [ORAU Radiation Protection Manual](#)
- 7) [ORAU Subcontractor and Non-employee Handbook](#)
- 8) [ORAU ISM System Program Description](#)

#### [Policy Changes](#)

**Policy approved and signed by H.A. Page, ORAU President and CEO, on September 11, 2014.**