

December 21, 1998

Mr. Richard Kiy
Technical Director
Environment, Health & Safety
Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0119

Dear Mr. Kiy:

Enclosed for your information and such follow-up action as you deem appropriate is a report by the staff of the Defense Nuclear Facilities Safety Board (Board) on a workshop sponsored by the Department of Energy (DOE) and the Energy Federal Contractors Group to address chemical safety issues.

Board Member Joseph DiNunno, who spoke at the workshop, encouraged the treatment and safety management of chemical hazards within the framework of the Integrated Safety Management concept DOE has endorsed. A copy of Mr. DiNunno's remarks is enclosed for your information.

Although the principles of Integrated Safety Management clearly place the primary responsibility for implementation of the concept with line management, few line managers attend and participate in initiatives of the Office of Environment, Safety and Health (EH) such as this workshop. If such efforts to improve safety practices are to be effective and useful to the line, it behooves EH to structure and pursue new safety initiatives in much closer collaboration with line management, and with recognition by all parties of the safety benefits likely to accrue. This chemical safety initiative and the EH-5 activity on job hazard analysis, as discussed at the workshop, are cases in point.

If you have questions on this matter, please feel free to call me.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.

Enclosures

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Staff Issue Report

November 19, 1998

TO: G. W. Cunningham

FROM: W. Von Holle

SUBJECT: Energy Federal Contractors Group/Department of Energy
Chemical Safety Issues Workshop

This report documents attendance at the Energy Federal Contractors Group (EFCOG)/Department of Energy (DOE) Chemical Safety Issues Workshop on November 3–5, 1998, by members of the staff of the Defense Nuclear Facilities Safety Board (Board) B. Von Holle, J. Roarty, and M. Moury.

Summary. The EFCOG and DOE held a workshop to identify DOE/contractor chemical safety issues and related concerns, for subsequent follow-up by line management. An additional objective of the workshop was formation of a DOE/Contractor Chemical Safety Interest Group to work with the newly formed EFCOG Chemical Safety Subgroup and others to promote complex-wide communication and cooperation. It did not appear that input had been received from the line organization on the issues that need to be addressed, and there were only a few line managers in attendance.

Discussion. All of the introductory speakers at the plenary session, including Bruce Twining and Joe Fitzgerald, endorse Integrated Safety Management as the vehicle for correcting deficiencies associated with chemical safety. However, none of the senior managers remained at the workshop to demonstrate their involvement in ongoing actions to this end. The fact that line managers were not present during most of the workshop may hinder communication and action related to the issues addressed. In addition, the breakout sessions were unevenly attended, with some sites being underrepresented at sessions where more interest might have been expected.

Board Member Joseph DiNunno outlined his expectations for the workshop in terms of Integrated Safety Management. Representatives from the Center for Chemical Process Safety and the Chemical Manufacturers Association gave their perspectives on chemical safety. They also explained how DOE could benefit from programs in place and from future cooperation with their respective organizations.

The workshop organizers preselected 10 issues to be discussed in breakout sessions during the first 2 days. (A list of these issues is included in the attached workshop agenda.) Each breakout session was introduced by one or more short talks by various contractor personnel. The

group then discussed its issue and identified the highest-priority concerns associated with that issue. Each group asked for a volunteer to “champion” its issue and concerns during the remainder of the workshop. In some cases no champions came forward, but for most of the issues, the champions then summarized their concerns in a plenary session. The concerns raised fell into two main groups: those requiring DOE “guidance” and those involving “technology” (i.e., communications or administrative assistance). A list of the final issues, reflecting associated concerns, is planned to be posted on the DOE chemical safety website. In addition, Ken Murphy of DOE’s Office of Environment, Safety and Health (EH) plans to write a report to inform line managers of the issues and related concerns for possible action.

The Board’s staff attended selected breakout sessions. During the session on integrating chemical safety into Integrated Safety Management, a presentation was made on the Management System Verification (MSV) process pilot performed at Hanford. Many MSV elements are similar to, and in fact redundant with, the Integrated Safety Management System verification. The staff encouraged the group to provide the best elements of the MSV to the Safety Management Implementation Team (SMIT) personnel who are revising the Integrated Safety Management System Team Leaders Guide. Many issues identified during this session, although worth raising, were outside the scope of the EFCOG to correct. In addition, many comments made by participants displayed significant misunderstanding of Integrated Safety Management.

During the breakout session on work planning, EH-5 personnel made a presentation on a checklist for performing job hazard analysis that they are developing. Unfortunately, this initiative is not integrated with the work of the SMIT or with previous hazard analysis work performed under the Enhanced Work Planning initiative. It is also not clear who the customer for this product is since most sites already have a job hazard analysis process in place and are now refining those existing systems.

During the session on integrating chemical and nuclear safety, the discussion was dominated by frustration over the myriad of release criteria. There was little discussion of how the two elements are integrated, although the discussions on deficiencies and weaknesses in chemical dose guidelines compared with nuclear doses were beneficial.

Future Staff Actions. The Board’s staff will follow developments resulting from the workshop.