

# SAFETY ASSURANCE METHODS OF SELF- AUDITING

DOE/CAA CONFERENCE

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# INTRODUCTORY COMMENTS

## DEJA VU – THE REGULATORY PROGRAM

### Roadmap of Presentation

- Pre-Audit Considerations
- A Model Program – “SCWE”
- Effective Audit Tools

# INITIAL COMMENTS

- Audit Programs Should “Work” for Your Company
  - Enhanced Regulatory Compliance
  - Enhanced Safe Operations
  - Enhanced Worker Satisfaction
  - Enhanced Productivity
- Preemptive Actions

# PRE- AUDIT CONSIDERATIONS

## “KNOW WHERE WE ARE”

- Identification and Review of Existing Safety Protocol
- Conformity to Contract and Regulatory Requirements
- Compare to “Best Practices” of Industry and DOE Complex

# REVIEW OF PAST SAFETY DEFICIENCIES

- Nature, Scope, Significance And Timing
- Corrective Actions – Prompt, Responsive And Comprehensive?
- Success (or not) Of Past Corrective Action Programs

# A MODEL PROGRAM “SCWE”

- The Safety Conscious Work Environment Program (SCWE)
- A Success Story For Nuclear Navy, NRC Nuclear Power Stations and Material Licensees
- Applicable to 10 CFR 851.20

# WHAT IS SCWE ATTRIBUTE OF “SAFETY CULTURE”

- Employees Comply with Safety Rules
- Employees are Encouraged to Raise Safety Concerns without Fear of Reprisal (Retaliation)
- Concerns are Promptly Reviewed, Given the Proper Priority, and
- Appropriately Resolved with Timely Feedback.

## 851.20(a) AND SCWE

- (a)(4) - Worker Involvement
- (6) - Reporting without Fear of Reprisal
- (7) - Prompt Response to Reporting
- (9) - “Safety First”
- (10) - Training in Rights



# ELEMENTS OF SCWE

An Effective Processes for Problem Identification and Resolution including:

- SCWE Policy Statement
- SCWE Training
- SCWE Incentives
- Alternative Processes to Alert Line Management

# SCWE & 10 CFR 851.20(a)

- Contractor Maintains a Safety Program
- Employees are Free to Raise Safety Concerns Without Fear of Retaliation
- Contractor Maintains a Procedure for Reporting Safety Concerns
- Contractor Trains its Employees and Managers in the Rights and Obligations Pursuant to Regulation

# RETALITATORY - REPRISAL HR ACTIONS

- 10CFR851.20(a)6: Adverse Changes of the Terms, Conditions, or Benefits of the Employee's Work Resulting from Reporting Matters Covered by the Regulation.
- Examples: - Letters of Reprimand, Suspension, Discharge, Reduction of Compensation, or Reduction of Privileges of Employment

# SCWE AUDIT PROGRAM EFFECTIVENESS OF TRAINING

- Review of Contract Obligations and Regulatory Requirements
- Review of Pertinent Documents
- Conduct Interviews

# TOOLS TO ASSESS THE SCWE

- Lessons Learned
- Direct Observations
- Exit Interviews
- Surveys
- Audits
  - Internal
  - Independent

# BENEFITS OF AN INDEPENDENT AUDIT

- Provides Confirmation of Internal Audits
- Provides for “Fresh Eyes” Look at the Program
- Provides Additional Assurance of Adequacy of the Program to Government Inspection Teams
- Provides Bases for Mitigation of Civil Fines
  - Additional Evidence of Commitment of Contractor to the Program
- Provides an Additional Safety Check

# CONDUCT OF INTERVIEWS

- Interview Employees, Supervisors and Management
- Ascertain the Level of **Knowledge** of the Program
- Ascertain the Effectiveness of the Training
- Ascertain Knowledge of Employee's Role in Success of the Program
- Ascertain Understanding of "No Reprisal" Assurance
- Ascertain Commitment to the Program.

# REVIEW OF DOCUMENTS

- The SCWE Program, Policy, and/or Protocol
- The Training Modules
- Evidence of Who and When Trained
- Evidence of Dates of Employment (Payroll Records, etc.)
- Records of Safety Reports
- Records of Management Follow-up
- Records Generated by Trainers
- Prime and/or Sub Contractor Training Records
- HR Department Employee Exit Interview



# SUMMARY

- Pro-active Preparedness For Government Inspections
- Facility Self-assessment
- Implementation of SCWE
- Self Audit
- Independent Audit