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**WP 04-AD3031**

Revision 0

# Monitoring Operational Activities

Management Control Procedure

EFFECTIVE DATE: 12/31/10

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APPROVED FOR USE

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**CHANGE HISTORY SUMMARY**

REVISION NUMBER	DATE ISSUED	DESCRIPTION OF CHANGES
0	12/31/10	New management control procedure for the monitoring of operational activities.

## INTRODUCTION

This procedure establishes the Waste Isolation Pilot Plant (WIPP) Operations Department methodology for formal monitoring of operational activities at WIPP. Monitoring of operational activities is a requirement of WP 04-CO.01-1, Conduct of Operations Program - Operations Organization and Administration. This procedure describes the recommended format for formally documenting monitored operational evolutions (MOEs), provides instruction for performing Senior Supervisory Watch (SSW), and describes the experience requirements for personnel performing MOEs or as a SSW.

The purpose of the MOE is to establish, maintain, and document management presence in the field to improve operating performance by providing management oversight of work activities. MOEs are a form of self assessments specific to work activities meeting requirements. The MOE format can be used for management assessments as long as the criteria from WP 15-GM1000, Management Assessments, are met. The scope of the MOE can be broad or more focused and can encompass any aspects of Integrated Safety Management System (ISMS) and Washington TRU Solutions LLC (WTS) work activities. For example, MOEs can be used to assess the knowledge of workers and compliance with WIPP policies and procedures, identify and correct unsafe conditions/behaviors, and promote two-way communication between management and workers. Observations and communications with workers provide an important component to the ISMS Core Function 5, "Provide Feedback and Continuous Improvement." In addition, MOEs provide managers an opportunity to understand their own organization's influence on the conduct of field operations, maintenance, and construction activities, and how that support might be improved. Personnel expected to participate in this program are managers and other personnel, as assigned by the Site Operations and Disposal Manager or designee.

SSW is a work assignment established to provide management presence at the job site during selected work activities. The primary purpose of the SSW is to closely oversee on-going work and to serve as an active mentor and communicator to ensure safe, effective, and compliant work. The personnel assigned to perform SSW must be experienced and senior personnel, with a background in Conduct of Operations, who can provide an independent and objective view of an activity or operation.

Issues identified during monitoring of operational activities requiring corrective action(s) that are not immediately corrected during the monitoring activity will be documented on an Action Request in accordance with the work control process or a WIPP Form in accordance with WP 04-IM1000, Issues Management Processing of WIPP Forms, as appropriate.

Performance of this procedure generates the following record(s), as applicable. Any records generated are handled in accordance with departmental Records Inventory and Disposition Schedules (RIDS).

- Completed MOEs
- SSW Logbook

## REFERENCES

### BASELINE DOCUMENTS

- DOE Order 422.1, *Conduct of Operations Department of Energy Directives* (Replacement for DOE O 5480.19)
- Hazardous Waste Facility Permit, Identification No. NM4890139088-TSDF

### REFERENCED DOCUMENTS

- WP 04-CO.01-1, Conduct of Operations Program - Operations Organization and Administration
- WP 04-CO.01-12, Conduct of Operations - Operations Turnover
- WP 04-IM1000, Issues Management Processing of WIPP Forms
- WP 09, Engineering Conduct of Operations
- WP 10-2, Maintenance Operations Instruction Manual
- WP 13-1, Washington TRU Solutions LLC Quality Assurance Program Description
- WP 15-GM1000, Management Assessments

## PRECAUTIONS AND LIMITATIONS

- Management Assessments documented in the format of an MOE must meet the requirements of WP 15-GM1000.

## PREREQUISITE ACTIONS

- Personnel who perform MOEs should be WIPP managers who are familiar with the work or operational activity being monitored.
- Personnel who perform SSW are approved by the General Manager (GM) or designee, or Site Operations and Disposal Manager or designee.

## PERFORMANCE

### 1.0 MONITORED EVOLUTIONS

#### 1.1 Functional Area Manager, perform the following:

- 1.1.1 Develop lines of inquiry appropriate to the operating evolution or work activity to be monitored and document the lines of inquiry on the MOE form. Attachment 1 of this procedure provides guidance on developing lines of inquiry; Attachment 2 of this procedure provides a suggested format for a MOE.
- 1.1.2 Perform the MOE or assign a competent person who is familiar with the activity being monitored to perform the MOE.

#### 1.2 MOE Performer, conduct the following:

- 1.2.1 Prepare for the MOE by reading the applicable procedure or work package prior to conducting the MOE.
- 1.2.2 Notify the manager of the activity being monitored so that personnel performing the activity may be informed of the presence and function of the MOE Performer.
- 1.2.3 Monitor the assigned activity.
- 1.2.4 Take action to address any safety concern(s) observed during the monitored activity, including stop work, if necessary.
- 1.2.5 Provide feedback to the personnel being monitored and the manager of those personnel.
- 1.2.6 Document the observations on the MOE.
- 1.2.7 Initiate, as appropriate, an Action Request in accordance with the work control process or a WIPP Form in accordance with WP 04-IM1000, to correct issues that were not corrected during the performance of the work or activity.
- 1.2.8 Reference the work order or WIPP Form number on the MOE, if applicable.
- 1.2.9 Request that a Just-In-Time Lessons Learned be prepared and distributed from the Lessons Learned Coordinator in Performance Assurance, if appropriate.
- 1.2.10 Route the completed MOE to the Functional Area Manager for approval.

- 1.3 Functional Area Manager, perform the following:
  - 1.3.1 Review and approve the MOE, after resolving any questions with the MOE Performer.
  - 1.3.2 Route a copy of the completed MOE to Operations Support.
  - 1.3.3 Disposition the completed MOE in accordance with the RIDS.
- 1.4 Operations Support Manager (or designee), submit a periodic report of MOEs performed and the results to the Site Operations and Disposal Manager. The reports include the MOE topic, the participants, the functional area manager, the corrective actions taken, if any, including reference to the WF number, and reference to any lessons learned bulletins generated.

## 2.0 SENIOR SUPERVISORY WATCH

- 2.1 General Manager (or Designee) or Site Operations and Disposal Manager (or Designee), assign personnel to perform SSW after performing the following:
  - Conduct a (face-to-face) discussion with each SSW candidate prior to authorizing the candidate for assignment as a SSW. Candidate should demonstrate communication skills and knowledge of Conduct of Operations principles.
  - Verify that the WIPP SSW candidate has demonstrated satisfactory supervisory skills experience of at least six months at WIPP, preferably in WIPP Operations.
  - Verify that the SSW candidate, if using subcontracted support, has an appropriate experience and background in Conduct of Operations and nuclear facility operations.
  - Verify that the SSW candidate possesses sufficient knowledge of the assigned scope of work.
  - Generate a list of personnel approved to perform as SSW.
- 2.2 Site Operations and Disposal Manager (or designee), maintain the list of approved SSWs.

- 2.3 SSW, monitor the assigned operational evolution by performing the following:
- 2.3.1 Establish direct interface with the on-shift lead for the activity prior to commencement of work.
  - 2.3.2 Ensure the roles and responsibilities of each work group are communicated and understood prior to commencing work.
  - 2.3.3 Remain in a position to communicate with the personnel performing the task.
  - 2.3.4 Ensure work is being controlled and conducted in accordance with the released/controlling document.
  - 2.3.5 Ensure line management/supervision is exercising adequate control over the activity.
  - 2.3.6 Spot check hazardous energy control, switch positions, gauge/meter indications, etc., as appropriate.
  - 2.3.7 Provide coaching and mentoring, as appropriate, to line management, supervisors, and operators in areas of formality of operations.
  - 2.3.8 Maintain an oversight function unless problems occur (do not get personally involved in the performance of the work activity).
  - 2.3.9 If problems occur such as the equipment not performing as expected, the procedure cannot be performed as written, hazards exist that are not accounted for in the work package or procedure, stop work or suspend the activity. The CMR should be notified of abnormal equipment operation or unexpected hazards.
  - 2.3.10 If an involved worker is injured during the performance of work, stop work, and notify the CMR.
  - 2.3.11 Convey any safety or compliance issues observed with the work supervisor and Facility Shift Manager (FSM), as appropriate.
  - 2.3.12 Advise and inform the WIPP Site Operations and Disposal Manager, the WIPP GM and DGM, as appropriate, of any observations, conclusions, and recommendations.
  - 2.3.13 Document the SSW results in the SSW log in accordance with WIPP Conduct of Operations Manual, Operating Logs or on a MOE form. At a minimum, the SSW log will include: dates and

times in the facility or time spent assisting or providing oversight for improvements, assessments; Items or evolutions reviewed, assessed or evaluated; deficiencies and follow-up actions; good practices; and opportunities for improvement.

- 2.3.14 If using a MOE, forward the completed MOE to Manager of Operations Support and a copy to the Site Operations and Disposal Manager,
- 2.3.15 Initiate, as appropriate, an Action Request in accordance with the work control process or a WIPP Form in accordance with WP 04-IM1000, to correct issues that were not corrected during the performance of the work or activity.
- 2.4 If the SSW covers more than one shift, such that there is a turnover to the oncoming SSW, conduct the turnover in accordance with WP 04-CO.01-12, Conduct of Operations - Operations Turnover.
- 2.5 Manager Operations Support or designee, perform the following:
  - 2.5.1 Maintain a listing of SSW observations.
  - 2.5.2 Process the SSW MOE in accordance with the departmental RIDS.

## Attachment 1 – Guidance for Developing Lines of Inquiry for MOEs

Conduct of Operations modules, WP 04-CO.01-1 through 18, can be used as a functional area to be monitored, either by looking across the Operations Sections and Groups, or as the lines of inquiry to apply to a specific job.

Other documents that can serve as a basis for the development of MOEs include WP 10-2, Maintenance Operations Instruction Manual, WP 09, Engineering Conduct of Operations, safety programs, and training requirements. Areas to be considered for performance of a MOE include, but are not limited to the following:

- Procedural compliance – Is the procedure being performed as written? Do personnel refer to the procedure frequently during an evolution controlled by a procedure? Do personnel perform actions outside of the procedure that should be in the procedure?
- Control room operations
- Pre-job briefings – Do personnel ask questions? Are the hazards of the job adequately addressed?
- Use of Operating Experience documents – How are those documents communicated to personnel? Are they the topic of safety meetings, prejob meetings, or in required reading?
- Operating large tornado doors or roll up doors in the Waste Handling Building or Hoist Tower
- Preventive maintenance
- Corrective maintenance
- Modification maintenance
- Skill-of-the-Craft/Expedited work
- Radiological source control
- Radiological contamination control practices
- Safety Signage
- Radiological postings
- Logkeeping
- Operator training and qualification

## Attachment 1 – Guidance for Developing Lines of Inquiry for MOEs

- Maintenance personnel training and qualification.
- Timely incorporation of modifications that are field work complete into the drawings, particularly electrical distribution drawings such as Motor control centers, distribution panels, lighting panels?
- Are approved Engineering Change Orders (ECOs) available in the controlled drawing locations?
- Controlled document locations have up to date documentation
- Operator aids are clearly identified and current.

Attachment 2 is an example format for a MOE. Other MOE templates are available on [\\Gallina\Operations](#) or can be obtained from Operations Support.

Attachment 2 – Example Format for Monitored Operational Evolution

Activity Type: Monitored Evolution for <u>Shift Routines and Operating Practices</u>			
Functional Area Manager:	MOE Performer:		
<p>*Functional Area Assessed:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <input type="checkbox"/> Facility Operations  <input type="checkbox"/> Waste Handling - CH  <input type="checkbox"/> Waste Handling - RH  <input type="checkbox"/> Maintenance                             <ul style="list-style-type: none"> <li><input type="checkbox"/> Electrical</li> <li><input type="checkbox"/> Mechanical</li> <li><input type="checkbox"/> Instrumentation &amp; Control</li> </ul> </td> <td style="width: 50%; border: none;"> <input type="checkbox"/> Radiological Controls  <input type="checkbox"/> Underground Operations  <input type="checkbox"/> Hoisting Operations  <input type="checkbox"/> Mining Operations  <input type="checkbox"/> Geotechnical  <input type="checkbox"/> Security  <input type="checkbox"/> Emergency Services/Management                             </td> </tr> </table>		<input type="checkbox"/> Facility Operations <input type="checkbox"/> Waste Handling - CH <input type="checkbox"/> Waste Handling - RH <input type="checkbox"/> Maintenance <ul style="list-style-type: none"> <li><input type="checkbox"/> Electrical</li> <li><input type="checkbox"/> Mechanical</li> <li><input type="checkbox"/> Instrumentation &amp; Control</li> </ul>	<input type="checkbox"/> Radiological Controls <input type="checkbox"/> Underground Operations <input type="checkbox"/> Hoisting Operations <input type="checkbox"/> Mining Operations <input type="checkbox"/> Geotechnical <input type="checkbox"/> Security <input type="checkbox"/> Emergency Services/Management
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Involved personnel:			
Procedure or EA # and Title (If applicable):			
Assessment Results:			
Noteworthy Practices Observed:			
Assessment Lines of Inquiry			
No.	Description/Suggested Corrective Action		
1.	Observe personnel performing daily routines on day shift or back shift.		
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement			
Discussion:			
2.	Communication between crew members.		
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement			
Discussion:			
3.	Personnel safety/equipment/conditions.		
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement			
Discussion:			
4.	Personnel are aware of process and operating equipment in congested areas.		
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement			
Discussion:			

**Attachment 2 – Example Format for Monitored Operational Evolution**

5.	Personnel perform rounds/physical inspections of their areas of responsibility in sufficient detail to ensure that equipment/system/plant status is known.
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
6.	Personnel take appropriate action to correct or report deficiencies noted during rounds/physical inspections?
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
7.	Personnel wear required PPE and follow procedures and postings to keep their exposure ALARA to radiation, chemicals, toxic materials, or other personnel hazards.
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
8.	Can the workers identify any barriers or defenses in place for their work that helps prevent an event?
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
9.	Can the workers identify the critical steps in their job and how it is ensured that the critical steps are performed correctly?
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
10.	During the pre-job brief or prior to starting the job, were any error-precursors identified? Was anything done to mitigate them?
Results: <input type="checkbox"/> Finding <input type="checkbox"/> Opportunity for Improvement	
Discussion:	
Corrective Actions taken (Identify WIPP Form numbers or Work Order numbers, as appropriate)	
Assessment Approval	
_____ / _____	
Functional Area Manager	Date