

WP 04-AD3032

Revision 0

Hazard Review Process

Management Control Procedure

EFFECTIVE DATE: 02/07/11

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APPROVED FOR USE

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CHANGE HISTORY SUMMARY

Revision No.	Date Issued	Description of Changes
0	02/07/11	Initial issue

INTRODUCTION¹

This procedure implements the Hazard Review Team (HRT) process to assess the Integrated Safety Management System (ISMS) functions related to "Define Scope of Work," "Analyze Hazards," "Implements Controls." The purpose of the HRT is to provide independent technical work documentation reviews, mentoring, and feedback, with pre-review of work activity—the goal being to improve the quality of work documents, and to ensure that safety and quality are appropriately integrated into work packages.

The HRT process will be used as determined by the Site Operations and Disposal manager or designee. The HRT provides pre-review of work activity by experienced personnel. A graded approach is used to allow elimination of HRT reviews as a function of demonstrated performance.

The HRT process can be performed concurrently with the document review and approval process.

Performance of this procedure generates the following records, as applicable:

- EA04AD3032-1-0, Hazard Review Team Checklist
- Attachment 1 – HRT Activity Log

Records will be maintained in accordance with the Site Operations and Disposal Records Inventory and Disposition Schedule.

REFERENCES

BASELINE DOCUMENTS

- DOE P 450.4, *Safety Management System Policy*

REFERENCED DOCUMENTS

- EA04AD3032-1-0, Hazard Review Team Checklist

PERFORMANCE

1.0 TEAM SELECTION

NOTE

HRT members are chosen based on functional expertise and WIPP experience.

1.1 Site Operations and Disposal Manager, perform the following:

- 1.1.1 Select team representatives and alternates to serve on the HRT, giving full consideration to appropriate functional area representation, as appropriate.
- 1.1.2 Formally establish HRT membership with approved membership communication to members and management.

1.2 HRT Chairperson, perform the following:

- 1.2.1 Determine the required and optional attendees who constitute a quorum for each HRT meeting, considering the content of the work scope to be reviewed.
- 1.2.2 Appoint an HRT Coordinator (either ad hoc or standing) to document action items and to perform other administrative functions to support meetings.

2.0 CONVENING HRT MEETINGS

2.1 Work Group Manager, perform the following:

- 2.1.1 Contact the HRT Chairperson (or designee) when the need for a meeting is defined.
- 2.1.2 Provide the HRT Chairperson/Coordinator with the names of those to attend the HRT meeting and present work activity, including the Work Group Management and/or designees.

2.2 HRT Coordinator, perform the following:

- 2.2.1 Prepare an HRT agenda and attach to the meeting announcement. Include presenter names and subject of the technical work documentation to be presented.
- 2.2.2 Notify Work Window Coordinator (WWC) to include on plan-of-the-week or appropriate facility schedule.

- 2.2.3 Enter HRT presentation activity information to the master HRT Activity Log.
- 2.2.4 Contact the board representatives (or alternates) selected to serve on the HRT, and schedule a meeting.
- 2.2.5 Provide copies of the HRT Checklist (EA04AD3032-1-0) in the meeting announcement for completion by HRT presenters before the meeting.
- 2.2.6 Prepare an attendance roster for the meeting.
- 2.3 Work Group Management, when HRT Checklist is complete, provide work package information to the HRT.
- 2.4 HRT Chairperson or designee, conduct HRT meeting to review the selected technical work documentation as presented by the Work Group Management, or designee, focusing on the structure of the technical work documentation instructions to determine conformance to the attributes listed in the HRT Checklist.
- 2.5 Work Group Management, present the technical work documentation to the HRT. Include the completed HRT Checklist.
- 2.6 HRT Chairperson, perform one of the following:
 - 2.6.1 If technical work documentation is acceptable, or only requires completion of prerequisite actions prior to work, and the Work Group Management demonstrates the commitment to safety, procedure compliance, and ISMS, approve the work to be released.
 - [A] Document prerequisite actions for implementation prior to conduct of work, if applicable, in the Comments section of the HRT Checklist.
 - [B] Document "HRT Approved" in Package Comments section for work packages.
 - [C] If demonstrated performance of the activity has successfully been presented, determine the need for further HRT review.
 - [D] Forward the determination to the Coordinator for documentation in the HRT Activity Log.

- 2.6.2 If the technical work documentation is not acceptable or requires additional actions that will require additional presentation to the HRT, reject the work for release and provide feedback to the Work Group Management about the items that require further action, and document needed actions on the master HRT Activity Log.
- 2.7 HRT, for work approved for release, determine the need for a Senior Supervisory Watch (SSW), management observation, or additional oversight by safety professionals, for the performance of the work, and document this determination, if applicable, in the Comments section of the HRT Checklist.
- 2.8 HRT Coordinator, perform the following:
- 2.8.1 Collect and scan the completed HRT Checklists for work that has been approved for release, and send to the Facility Shift Manager (FSM).
- 2.8.2 Enter the approved work information for reference to the master HRT Activity Log, including elimination of further HRT review. Ensure any needed actions are documented on the log.
- 2.8.3 Scan attendance roster.
- 2.9 Work Control Manager, coordinate resources for SSW, management observation coverage, and additional oversight by safety professionals for selected work activities as designated by the HRT Chairperson.
- 3.0 AUTHORIZING PERFORMANCE OF REPETITIVE WORK ACTIVITIES

NOTE

Approved HRT work activities or PMs may be performed repetitively without reconvening an HRT as long as the work activities or PMs are on the HRT Approved Repetitive Work Master List and identified workplace hazards have not increased and the controls to mitigate these hazards have not been reduced.

- 3.1 Responsible Manager, present request to perform a review of repetitively performed work activity or PM to the HRT Chairperson.
- 3.2 HRT Chairperson, perform the following:
- 3.2.1 Review request and disciplines (e.g., Radiological Control, Safety, Engineering) represented during the initial review to ensure that:
- The work scope or application of work scope adequately defines the hazards and mitigative actions and does not introduce new workplace hazards.

- Repetitive work activity or PMs are the most current revision.
- 3.2.2 Include a copy of the completed HRT Checklist.
- 3.2.3 Document approval to perform repetitive work activity or PMs where the HRT was not reconvened on the HRT Checklist and provide information to the HRT Coordinator for inclusion on the master HRT Activity Log.
- 3.3 HRT Coordinator, enter document approval to perform repetitive work or PMs information on the master HRT Activity Log and update the "HRT Approved Repetitive Work Master List" on Gallina. Include any additional approval documentation to the FSM.
- 3.4 Work Control, verify the repetitive work activity (PM, MWI, IC) is the approved revision as posted on the HRT Approved Repetitive Work Master List posted on Gallina.
- 3.4.1 If the revision does not match, send the package back to the appropriate personnel to schedule an HRT review.

NOTE

If the repetitive work activity to be performed is on the list and is the approved revision as provided on the list, this work is exempted from further HRT review process.

- 3.5 FSM, verify the repetitive work activity (PMs, MWI, IC) appears on the HRT Approved Repetitive Work Master List posted on Gallina.
- 3.5.1 FSM, if the work does not appear on the HRT Approved Repetitive Work Master List or is a new revision, send the repetitive work package back to Work Control for HRT review.
- 4.0 HRT EVALUATION AND COMMUNICATIONS
- 4.1 HRT Chairperson, determine proper forum, timing, and extent of sharing of information for HRT reviews based on significance of the issue or lessons learned. Examples of forums are the WIPP Integration Call, Plan of the Day meetings, and Project Integration or staff meetings.
- 5.0 HRT EVALUATION FOR EMERGENT WORK OR OFF-SHIFT WORK
- 5.1 FSM, if an emergent work package has a work priority of 3A or higher, direct the Work Group Management to contact the HRT Chairperson/Coordinator to arrange a meeting to review the work package for approval. If the emergent work occurs on back shift or weekend, contact the on-call HRT representative from the EOC on-call list.

- 5.2 Work Group Management, complete HRT Checklist and discuss the activity with the HRT.
- 5.3 HRT Chairperson or Representative, perform one of the following:
- 5.3.1 If technical work documentation is acceptable or only requires completion of prerequisite actions prior to work, and the Work Group Management demonstrates the commitment to safety, procedure compliance, and ISMS, approve the work to be released.
- [A] Document prerequisite actions for implementation prior to conduct of work, if applicable, in the Comments section of the HRT Checklist.
 - [B] Document "HRT Approved" in Package Comments section for work packages.
 - [C] If demonstrated performance of the activity has successfully been presented, determine the need for further HRT review.
 - [D] Forward the determination to the Coordinator for documentation in the HRT Activity Log.
- 5.3.2 If the technical work documentation is not acceptable or requires additional actions that will require additional presentation to the HRT, reject the work for release and provide feedback to the Work Group Management about the items that require further action, and document needed actions on the master HRT Activity Log.
- 5.4 EOC Representative, perform one of the following:
- 5.4.1 If technical work documentation is acceptable or only requires completion of prerequisite actions prior to work, and the Work Group Management demonstrates the commitment to safety, procedure compliance, and ISMS, approve the work to be released.
- [A] Direct the FSM to document prerequisite actions for implementation prior to conduct of work, if applicable, in the Comments section of the HRT Checklist.
 - [B] Direct the FSM to document "Approval" in Package Comments section for work packages.

- [C] If demonstrated performance of the activity has successfully been presented, determine the need for further HRT review.
- [D] Forward the determination to the Coordinator for documentation in the HRT Activity Log.

5.4.2 If the technical work documentation is not acceptable and requires additional actions that will require additional presentation to the HRT, reject the work for release, provide feedback to the FSM and Work Group Management about the items that require further action; and direct FSM to document needed actions on the HRT Checklist.

