

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 1 of 10
--	---

Companywide	Management Control Procedure	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 11/12/09
-------------	------------------------------	--	--------------------------

Manual: 14A – Safety and Health Occupational Safety and Fire Protection      **USE TYPE 3**      Change Number: 328045

\*The current revision can be verified on EDMS.

### 1. PURPOSE

The purpose of this procedure is to provide for a safer work environment that protects employees, the public, the environment, and government-owned facilities and equipment from harm or damage by authorizing Idaho Cleanup Project (ICP) employees to *Step Back* (see def.) or *Stop Work* (see def.) in the event they become aware of a potentially unsafe condition.

### 2. SCOPE

This management control procedure (MCP) establishes the process for stepping back or stopping work when a potentially unsafe condition is identified. A potentially unsafe condition is a noncompliant condition, unsafe condition, or at-risk behavior or action associated with an item or work process, which, if not corrected, poses a threat to public or personnel safety, facility or process operations, quality (see Appendix A, Criteria for Evaluating Quality Stop Work Conditions), or the environment. A potentially unsafe condition can also exist when an employee encounters any situation, condition, or potential hazard not discussed in pre-job briefings, or if an employee has a concern about whether the job can be performed safely. [PDD-851, *Worker Safety and Health Program*]

This procedure begins when an employee becomes aware of any potentially unsafe conditions and initiates a Step Back or Stop Work action. It ends when the potentially unsafe condition has been corrected and normal work activities are resumed.

This procedure applies to all employees and all work activities at ICP, with the exception of emergency preparedness actions taken in connection with a response to an emergency.

### 3. RESPONSIBILITIES/PREREQUISITES

Performer	Responsibilities
All employees	Identify potentially unsafe conditions and respond in accordance with this procedure. Honor any Step Back or Stop Work declaration.
Line management	Honor a Step Back or Stop Work declaration and resolve them in accordance with the appropriate requirements governing the potentially unsafe condition.

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 2 of 10
--	---

Performer	Responsibilities
Concerned employee	Determine whether the potentially unsafe condition is readily fixable and within the performing employee's work scope and authorization to correct. Call a Step Back when the performing employee and/or the cognizant line management can correct the potentially unsafe condition with minimal effort and time. Otherwise, call a Stop Work action.
Manager of the concerned employee	Notify the cognizant foreman or manager and the appropriate Environment, Safety, Health, and Quality (ESH&Q) representative of the Stop Work action. Each Step Back or Stop Work represents a potential accident or injury avoided, and should be treated as a positive action.
Director/manager(s)	Notify appropriate individuals of Stop Work action and follow through with correcting the potentially unsafe condition.
Director/manager(s)	Notify other directors/managers of the Stop Work action and take appropriate measures to identify and fix related areas of concern.
Director/manager and ESH&Q representative	Assist in Stop Work action to resolve issues, set appropriate depth of defense ( <i>see def.</i> ), and initiate resumption of work.
Procurement agent	Assist with Stop Work actions specific with procurement issues and suppliers.

## 4. INSTRUCTIONS

### 4.1 Stepping Back

- 4.1.1 Concerned Employee: Determine if a potentially unsafe condition exists, which can be immediately corrected by you and your direct supervision and meets the definition for a Step Back, then proceed with section 4.1, otherwise for a Stop Work action proceed to section 4.2.
- 4.1.2 Concerned Employee: Step Back from the task if you're the employee performing the work, or ask the employee performing the work to Step Back. Raise your concern with the employee or their supervisor. When confident that the potentially unsafe condition has been corrected, verbally concur with the supervisor or performing employee.

**STEP BACK AND STOP WORK AUTHORITY**

Identifier: MCP-553

Revision\*: 12

Page: 3 of 10

- 4.1.3 Employee Performing the Work (if not the concerned employee): If another employee asks you to Step Back from a task due to a safety concern, honor the Step Back. Correct the condition that caused the Step Back. Inform the concerned employee who initiated the Step Back that the situation is corrected, and request their verbal concurrence with the correction.
- 4.1.4 Concerned Employee: When confident that the potentially unsafe condition has been corrected, verbally concur.
- 4.1.5 Employee Performing the Work: Resume work and exit this procedure.

**NOTE:** Actions taken under Step Back do not need a formal corrective action plan developed or tracked/trended, therefore they do not need to be addressed following MCP-598 “Corrective Action System”.

**4.2 Stopping Work**

**NOTE:** *Work that cannot be accomplished because of deficiencies in implementing documents or procedures does not necessarily constitute the need to Stop Work, but may be handled as a Step Back as long as the work activity is placed in a safe condition. These deficiencies are corrected either in accordance with MCP-135, “Documents Management,” or the work control process used to implement the work activity.*

- 4.2.1 Concerned Employee and Employee Performing Work: Determine if the potentially unsafe condition is a safety Step Back. If it is, proceed with Section 4.1; if not, continue with Section 4.2 and see Appendix A, Criteria for Evaluating Quality Stop Work Conditions.
- 4.2.2 Concerned Employee: When you become aware of a potentially unsafe condition, do the following:
- 4.2.2.1 Stop the unsafe work activities and that of any other individuals in the area who may be affected by the situation.
  - 4.2.2.2 Clear all at-risk personnel from the area, and post personnel to warn others trying to enter the area.
  - 4.2.2.3 Inform all affected personnel of the reason for the work stoppage, including the *process owner* (see def.) and immediate management responsible for the work.
    - 4.2.2.3.1 Responsible Director/Manager(s): If the potentially unsafe condition involves work

**STEP BACK AND STOP WORK AUTHORITY**

Identifier: MCP-553

Revision\*: 12

Page: 4 of 10

performed by a *supplier* (see def.), notify the cognizant procurement agent.

4.2.2.4 Concerned Employee: Inform your line foreman, supervisor, or manager of the situation.

4.2.2.5 Responsible Line Management: When necessary, take immediate and interim corrective actions to protect personnel and/or property.

4.2.3 All Employees: Honor Stop Work declarations by stopping work.

4.2.4 Responsible Line Management: When a Stop Work is in effect, only authorize work on other aspects of the assigned task or in the vicinity of the Stop Work task when certain that work activities will not interfere with, impact, or circumvent the Stop Work.

### 4.3 Resolving a Stop Work

4.3.1 Concerned Employee or Manager of the Concerned Employee: As soon as possible, contact (either by phone or in person) the cognizant foreman or manager and the appropriate ESH&Q representative, and describe the situation that resulted in the Stop Work.

4.3.2 Concerned Employee: Obtain Form 414.19, "Stop Work Action," from the Forms Index on the EDMS system and have it available for subsequent steps.

4.3.3 Responsible Director/Manager(s): Evaluate the Stop Work action to determine if this action also affects similar processes at other locations across the Site. If so, verbally notify the other affected directors and managers.

4.3.3.1 Affected Director/Manager(s): When the Stop Work action involves stoppage of work performed by a supplier, forward a copy of Form 414.19 to the Supply Chain Management & Contracts (SCM&C) Director, the Property Management Director, or the Subcontracts and Procurement Director.

4.3.3.2 Affected Director/Manager(s): Evaluate potential work processes in your area(s) related to the potentially unsafe condition, and take appropriate corrective actions.

4.3.4 Responsible Director/Manager(s): Follow up the verbal notification by completing Sections I and II of Form 414.19.

**STEP BACK AND STOP WORK AUTHORITY**

Identifier: MCP-553

Revision\*: 12

Page: 5 of 10

- 4.3.5 Responsible Director/Manager(s): In consultation with the process owner, concerned employee, and appropriate ESH&Q representative, determine the appropriate corrective action(s) to resolve the potentially unsafe condition based on the following criteria:
- 4.3.5.1 Depending on the condition, consider the following MCPs: MCP-538, “Control of Nonconforming Items;” MCP-598, “Corrective Action System;” MCP-2547, “Identification, Reporting and Resolution of Price-Anderson Non-compliances;” MCP-190, “Event Investigation and Occurrence Reporting;” and MCP-192, “Processing Lessons Learned and External Operating Experience Information.”
- 4.3.5.2 Proposed corrective actions should reduce or eliminate the risk, not introduce new or additional hazards.
- 4.3.5.3 Consider all immediate or interim corrective actions already implemented in Step 4.1.1.5.
- NOTE:** The employee(s) who issued the Stop Work must be aware of the corrective actions taken in Section 4.3.
- 4.3.6 Responsible Director/Manager(s): Implement the corrective action(s) decided upon.
- 4.3.7 Responsible Director/Manager(s): Complete Section III, “Mitigation,” of Form 414.19.
- 4.3.8 Responsible Director/Manager and ESH&Q Representative: Review the actions taken to resume work or restart operations as noted on Form 414.19.
- 4.3.9 Responsible Director/Manager(s): Obtain the needed signatures in Section IV, “Authorization to Start,” of Form 414.19 as follows:
- 4.3.9.1 Contact the concerned employee who reported the situation for an evaluation of the action(s) taken. If unavailable, select a peer of that employee to evaluate the action taken.
- 4.3.9.2 If the action(s) taken implements applicable requirements and agrees with the concerned employee, go to Step 4.3.9.5.
- 4.3.9.3 If the action(s) taken does not implement applicable requirements or satisfy the concerned employee, consult with the concerned employee, facility manager, and

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 6 of 10
--	---

appropriate ESH&Q representative as necessary to resolve concerns.

4.3.9.4 If necessary, progressively escalate the concern to the next level of ESH&Q management until resolution is achieved.

**NOTE:** *Based on evaluation, the Director of ESH&Q has the authority to restart operations, even though the corrective actions taken do not satisfy the concerned employee.*

4.3.9.5 Once the corrective action(s) is approved and completed, obtain the needed signatures in Section IV of Form 414.19.

4.3.10 Cognizant Director/Manager(s): Direct the personnel involved with the Stop Work to resume work.

4.3.11 Cognizant Director/Manager(s): Maintain the completed Stop Work Action form as a facility record in accordance with MCP-557, “Managing Records.”

4.3.12 Cognizant Director/Manager(s): Document the action in the ICARE system.

## 5. RECORDS

Form 414.19, “Stop Work Action” Refer to the Records Schedule Matrix to obtain Uniform File Code, Disposition Authority, and Retention Period.

**NOTE:** *The Records Schedule Matrix, located on the intranet at [http://edms.inel.gov/docs/matrix/mtx\\_menu.html](http://edms.inel.gov/docs/matrix/mtx_menu.html), and the applicable facility, organization, program, or project records management plan and records type list provide current information on uniform file codes, disposition authorities, and retention periods for these records.*

## 6. DEFINITIONS

*Depth of Defense.* The physical plant’s and administrative system’s built-in capacity to detect or prevent errors without suffering undesirable consequences; the multiple functions and associated techniques that exist within the human performance system to protect people from error and protect the physical plant from people’s actions.

*Process owner.* That person who is the most involved in and most responsible for implementing a given process and who has the authority to make process changes. In some cases the process owner may also be the facility manager or the cognizant foreman/supervisor.

**STEP BACK AND STOP WORK AUTHORITY**

Identifier: MCP-553

Revision\*: 12

Page: 7 of 10

*Step Back.* A Step Back is an action taken for a potentially unsafe condition that may be corrected by the performing employee and/or the cognizant line management with minimal effort and time. It can be as simple as an employee pausing to refocus on the task at hand after a break, or by asking for clarification about a task from an immediate supervisor. For a situation that is deemed a Step Back, the corrective action will have mitigated the risk. Step Backs can be called by any employee, any time, whenever they believe a job cannot be performed safely. If there is a need for any interim corrective action(s), then the situation is elevated to a formal “Stop Work.” Step Back examples include obtaining and using correct personnel protective equipment, repositioning an unbalanced load during a lifting operation, removing stored material that obstructs an exit path, cleaning up water spills in walkways, or eliminating an electrical cord tripping hazard. Examples of Step Backs in the environmental arena include securing the area, warning others, lack of accumulation start date on a drum, faded label on a waste drum, and an open bung on a drum in a satellite accumulation area. Procedural step back may occur when a work control document or other implementing procedure must be revised, but the work activity is maintained in a safe condition.

*Stop Work.* A Stop Work is a formal process to halt work in order to resolve safety issues or concerns that are not readily fixable by the performing employees and their first line supervisors.

*Supplier.* Individuals or companies under subcontract to furnish materials or services in accordance with procurement award documents. An all-inclusive term used in place of vendor, seller, contractor, subcontractor, fabricator, or consultant.

**7. REFERENCES**

PDD-851, *Worker Safety and Health Program*

**8. APPENDIXES**

Appendix A, “Criteria for Evaluating Quality Stop Work Conditions”

Appendix B, “Procedure Basis Document”

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 8 of 10
--	---

## Appendix A

### Criteria for Evaluating Quality Stop Work Conditions

1. A condition or practice exists that would put an individual in an imminent danger situation.
2. A condition exists that is hazardous to the safety and health of the workers or the public.
3. A condition adverse to quality is identified during the design, processing, manufacturing, installation, modification, or operation of an item.
4. The quality of scientific investigation results would be irreparably compromised.
5. A breakdown or failure in the implementation of quality assurance requirements would compromise the quality of items or activities important to safety, waste isolation or plant operability.
6. The condition evidences a deliberate disregard for safety or quality system requirements.
7. The condition could result in violation of the approved operational safety requirements of the Safety Analysis Report.
8. The condition could result in a major offsite release of radioactive or hazardous material or a spread of radioactive contamination off-site in excess of 100-times the surface radioactivity levels specified in DOE Order 5400.5.
9. The condition represents willful noncompliance with customer or regulatory specified safety or quality requirements.

If any one of the above criteria is met then contact the Quality Assurance Director and recommend issuance of a stop work. The Quality Assurance Director will issue the stop work per this procedure. Once appropriate actions are taken, it is necessary to obtain authorization from QA management to lift the stop work action (Cognizant ESH&Q representative signature block on Form 414.19, Stop Work Action).

Special circumstance: When a stop work is issued by Department of Energy Idaho Operations Office (DOE-ID) at a Nuclear Regulatory Commission (NRC) licensed facility, then DOE-ID must concur with the lifting of that stop work.

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 9 of 10
--	---

**Appendix B**

**MCP-553 Procedure Basis**

Step	Basis	Source Document	Citation
General	All employees are responsible for their own actions and the safety of themselves and their coworkers. Employees are responsible for performing their work in a safe manner.	<i>Safety and Health Policy &amp; Values</i>	
Section 4.1	Employees will report unsafe conditions to their managers and immediately stop unsafe work activities. Employees shall monitor their work conditions at all times and exercise their stop work authority as appropriate to maintain safety. If you (an employee) recognize an unsafe condition or observe an unsafe practice, you are authorized to implement the "STOP WORK" policy.	<i>Safety and Health Policy &amp; Values</i>  <i>PDD-851, Worker Safety and Health Program</i>	
General	The contractor shall implement procedures to allow workers, through their supervisors, to stop work when they discover employee exposures to imminent danger conditions and other serious hazards. The procedure shall ensure that any stop work authority is exercised in a justifiable and responsible manner.	<i>PDD-851, Worker Safety and Health Program</i>	

<b>STEP BACK AND STOP WORK AUTHORITY</b>	Identifier: MCP-553 Revision*: 12 Page: 10 of 10
--	--

Step	Basis	Source Document	Citation
General	Typical of various sections of <i>40 CFR 264 and 265</i> : The owner/operator must remedy any deterioration or malfunction of equipment or structures on a schedule that ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.	<i>40 CFR 265.15, 265.16</i>	
General	Work may be stopped because of an unsafe condition, the performance of unsatisfactory work, or a breakdown in the quality system. Employees are responsible for performing their work in a safe manner. If an employee observes an unsafe work practice, the employee should notify the person(s) involved to stop the activity and notify management of the unsafe condition. The manager of the work activity provides for the correction of the unsafe condition and obtains approval(s) if required, before allowing work to proceed.	<i>PRD-5071 - Quality Assurance Program</i>  <i>PDD-851, Worker Safety and Health Program</i>	
4.1 NOTE	Individuals shall comply with the implementing documents. However, when work cannot be accomplished as described in the implementing document, or accomplishment of such work would result in an unsafe condition or undesirable situation, the work shall be stopped as soon as it is safe to do so. Work shall not be resumed until the implementing document is changed in accordance with the appropriate procedures to reflect safe and correct work practices.	<i>PRD-5076, Instructions, Procedures and Drawings, Section 4.1.5</i>  <i>PRD-5086, Control of Nonconforming Items</i>  <i>PRD-5087, Corrective Action</i>	