

BROOKHAVEN NATIONAL LABORATORY

SBMS Interim Procedure

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Title: OSH Consultation and Communication

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Management System: Occupational Safety and Health

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Applicability: All BNL Organizations Participating in OHSAS 18001 Registration

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1. Purpose

- 1.1. This procedure is designed to ensure that senior management establishes communication procedures that will ensure pertinent occupational safety and health (OSH) information is communicated to and from employees. It is the intent of management to communicate OSH policies, hazard and risk identification and control procedures, objectives, procedures, roles, responsibilities, authorities, and other components of the occupational safety and health management system (OSH MS) so that an employee will safely complete an assigned task.

2. Goals

- 2.1. Make employees aware of the OSH policy and any procedures necessary to conduct their work.
- 2.2. Report back to employees on the results of hazard identification and risk assessment.
- 2.3. Involve employees to develop and review policies and procedures aimed at eliminating or reducing OSH risks.
- 2.4. Provide employees with an opportunity and mechanism to voice their concerns about OSH issues.
- 2.5. Inform employees about the overall performance of the OSH MS and the results of OSH MS monitoring, audits and management reviews.

3. Responsibilities

- 3.1. The OSH Management System Representative is responsible for ensuring their Department's/Division's OSH consultation and communication program is executed according to the requirements of this procedure.
- 3.2. For each BNL Department or Division, all personnel are responsible for participating in OSH consultation and communication.
- 3.3. BNL contractors, users, guests and visitors are responsible for participating in OSH consultation and communication.
- 3.4. Vendors and suppliers are responsible for OSH consultation and communication in the form of Material Safety Data Sheets (MSDSs) and information on machine guarding and safe operation of equipment.
- 3.5. The BNL Fire/Rescue Group is responsible for OSH communication and consultation by reviewing local emergency response plans and conducting Fire Hazards Analyses as per DOE Order 420.1A, Facility Safety.
- 3.6. BNL senior managers are responsible for communication and consultation as a result of inquiries made by corporate managers, regulators and public interest groups.
- 3.7. The Assistant Director for Environment, Safety Health and Quality (ESHQ) shall ensure recall information, Lessons Learned information, injury/illness statistics and DOE Occurrence information is distributed or accessible to BNL Departments and Divisions.

4. Scope

- 4.1. Providing OSH information to employees.
- 4.2. Providing OSH information to other interested parties

4.3. Receiving OSH information from employees.

4.4. Receiving information from other interested parties.

5. Procedure

5.1. Providing OSH Information to Employees

5.1.1. The BNL Training Manager shall ensure the following training programs communicate all relevant OSH issues in the workplace:

- General Employee Training (GET) – This course (GET) is required for all BNL permanent employees. Required before you can work unescorted in a lab or shop/factory area or operating facility.
- Emergency Planning and Response Training – Required for all BNL employees. (Contractors receive in BNL Contractor/Vendor Orientation (CVO) training and Guests receive in Guest Site Orientation (GSO); see Section 5.2).
- Reducing Injuries and Accidents in the Workplace Training – Required for all BNL employees participating in OHSAS 18001 registrations.
- Required BNL Training for Specific Hazards – Required of all BNL employees who have a specific training requirement listed in a Job Training Assessment. See Required Training at <http://training.bnl.gov/>.

5.1.2. All BNL Departments/Divisions/Offices (henceforth: organizations) Training Managers shall ensure the following training programs communicate all relevant OSH and emergency response issues in the workplace:

- 5.1.2.1. BNL General Employee Training or approved equivalent (e.g., Collider-Accelerator Access Training) – Required for all unescorted employees of the organization who access the organization's facilities.
- 5.1.2.2. Facility Specific User Training (e.g., C-AD Users Training) - Required of all the organization's unescorted users who use the organization's facilities (e.g., use of labs, use of particle beams, etc.). A graded approach to local training and training documentation for unescorted users shall be implemented by the organization. The graded approach shall take into account hazards, risks, complexity, security and size of the organization's facilities.
- 5.1.2.3. Critiques and Occurrence Reports – These reports are to be sent out to all employees as applicable; which is to say, a manager may send to persons or groups that he/she knows are potentially impacted or whose activities are germane to the report.

5.1.3. The BNL Laboratory Director shall ensure the [BNL Environment, Safety, Security and Health \(ESSH\) Policy](#) is posted throughout BNL facilities.

- 5.1.3.1. The BNL Director and the BNL Assistant Director for ESHQ shall effectively communicate the meaning and importance of the policy on a continuing basis.
- 5.1.4. The Assistant Lab Director for Community, Education, Government and Public Affairs shall use the BNL Bulletin to present OSH and OSH MS communications to employees and other interested parties.
- 5.1.4.1. Feature articles shall be used to highlight successful OSH projects being accomplished throughout BNL and the employees who made them possible.
- 5.1.4.2. Upcoming OSH initiatives and opportunities to get involved in OSH committees shall be publicized in the BNL Bulletin.
- 5.1.5. The Assistant Lab Director for Community, Education, Government and Public Affairs and the BNL Training Manager shall use internet and intranet applications including the BNL Web and e-mail to communicate OSH information to employees and other interested parties.

NOTE:

In cases where disciplinary action or significant injuries are the subject of OSH communication, forums where employees may ask questions are preferred. Written communications may not be able to answer all possible questions about an event and misperceptions may result. A question and answer session in these cases is a good way to communicate the details of an event and to encourage employees to report OSH concerns, near misses and minor injuries in the future without fear of unwarranted disciplinary action.

5.2. Providing OSH Information to Other Interested Parties

- 5.2.1. The BNL Training Manager shall ensure the following training programs communicate all relevant OSH and emergency response issues in the workplace:
- Contractor/Vendor Orientation (CVO) – CVO is required for construction and trade contractors, sub-contractors, consultants or vendors who perform work or provide a service to the Laboratory. It is required for individuals who will be on site for more than three days and who need unescorted access. For administrative contractors/drivers, the Guests Site Orientation web course may be taken instead.
 - If the contractor is a short-term consultant or visitor, a departmental ESH briefing may be provided in lieu of classroom training using the [Environment, Safety and Health Briefing Checklist Form](#).
 - Guest Site Orientation (GSO) - GSO is required for guests and users who perform work at the Laboratory. It is required for individuals who will be on site for more than three days and who need unescorted access.

- Required BNL Training for Specific Hazards – Required of all Guests and Users who have a specific training requirement listed in a Job Training Assessment. See Required Training at <http://training.bnl.gov/>.
- 5.2.2. All BNL Training Managers shall ensure the following training programs communicate all relevant OSH and emergency response issues in the workplace:
- Local Facility Specific Contractor/Vendor Training (e.g., Collider-Accelerator Access Training) OR BNL Contractor/Vendor Orientation Training – Required for all unescorted contractors, vendors or guests who access the organizations facilities. A graded approach to local training and training documentation for unescorted contractors, vendors and guests shall be implemented by the organization. The graded approach shall take into account hazards, risks, complexity, security and size of the organization’s facilities.
- 5.2.3. Where applicable, the Assistant Laboratory Director for F&O shall ensure unescorted contractors and vendors are provided with concise OSH information relevant to the work including maps and pictures that identify work site locations, safe work, travel and parking locations, entry and evacuations points and locations of emergency equipment.
- 5.2.4. The Assistant Laboratory Director for F&O shall ensure the details of BNL’s emergency response plan is communicated to external organizations such as off-site fire departments and local hospitals.
- 5.2.5. All BNL organizations shall ensure drawings for new facilities shall be sent to the BNL’s Safety and Health Services Division prior to release to a contractor.
- 5.2.6. All BNL organizations shall ensure that the scope of work is defined and ensure that hazards are characterized for contractors.
- 5.2.7. All BNL organizations shall ensure ESH competency requirements are provided for contractors
- 5.2.8. The BNL Procurement and Property Management Division Manager shall ensure OSH rules and requirements are specified in contracts and work orders.
- 5.2.8.1. General OSH information such as the [BNL ESSH Policy](#) and variable requirements such as specific training, monitoring or PPE requirements for the work to be done shall be included in the contract or work order.

5.3. Receiving OSH Information from Employees

- 5.3.1. The BNL Laboratory Director shall ensure employees are represented on the Directors Safety Committee and consult with these employees about the development of new OSH policies and procedures, and any changes that affect the health and safety of the workplace.
- 5.3.2. All BNL organizational OSH MS Representatives shall document arrangements their respective organizations make for employee involvement and consultation.

5.3.3. All BNL organizational OSH MS Representatives shall let employees know who their representatives to management on OSH issues are.

5.3.4. All BNL organizational senior managers shall enable and encourage employees to become involved in the planning for and the operating of OSH programs.

Approaches shall include the following:

- Employees shall be members of hazard identification, risk assessment and risk control teams used to create or update Job Risk Assessments or Facility Risk Assessments.
- Employees who are familiar with organizational processes shall work with professionals to review, revise or develop safe operating procedures, as well as general rules for safe work.
- Experienced organizational employees shall be used to train other employees in safe work procedures and rules.
- Organizational employees shall participate in Tier 1 safety inspections.
- Organizational employees shall participate in injury / illness investigations.
- Organizational employees shall participate in departmental/divisional critiques and DOE Occurrence Reporting System (ORPS) investigations.
- Organizational employees shall serve on BNL safety and health committees.
- Departmental-level self-evaluation programs.
- Organizational employees shall serve on their department's/division's safety and health committee(s) and programs (e.g., worker safety committees, department safety committees, safety observation programs, self-evaluation programs, safety message programs during daily and weekly meetings).
- Organizational employees shall participate on the OSH MS implementation teams.
- Organizational employees shall participate in off-site OSH conferences that share OSH information and that deal with common problems and concerns.
- Organizational employees shall be encouraged to suggest ways to improve the OSH MS or to improve hazard controls through suggestion programs, self-assessment programs, and work planning feedback programs. Reward and award programs shall be used to provide incentives for employees to contribute innovative ideas for improvement.
- An open door policy for an organizational employee's safety concerns; that is, organizational managers shall be accessible to employees so that they can discuss safety concerns.

- Managers shall take Stop Work notification seriously and make an evaluation as soon as practicable. The [Stop Work Procedure](#) provides a policy and process to stop work at BNL to mitigate imminent danger to personnel, equipment or the environment.
- Organizational employees shall be made aware that the BNL Conflict Resolution Committee is available to help resolve issues raised within the context of worker safety and health.
- Organizational employees may pursue a concern confidentially through the services of the [Brookhaven Advocacy Council](#) for personnel concerns or the BNL Employee Concerns Program (see BNL Employee Guide) for ESH, waste, fraud and abuse issues.
- IBEW members may have unresolved safety issues reviewed by the Joint Safety Committee (see Collective Bargaining Agreement 8-4-03 to 7-31-06 between BSA and IBEW Local Union 2230).

5.4. Receiving OSH Information from Other Interested Parties

5.4.1. Information from Contractors

5.4.1.1. Candidates for contract award will be required to submit the following documentation (see [Construction Safety Subject Area](#); the Property and Procurements Division shall maintain the documented qualifications of potential contractors consistent with the Construction Safety Subject Area):

- Comprehensive Corporate Environmental, Safety and Health Program
- Performance History
- Complex or Hazardous Activities Plan
- Administration
- Enforcement, Reporting, and Evaluation Program
- Project Environmental Safety and Health Plan

5.4.2. Information from Vendors

5.4.2.1. Candidates for contract award will be required to submit the following documentation (see [Construction Safety Subject Area](#); the Property and Procurements Division shall maintain the documented qualifications of potential contractors consistent with the Construction Safety Subject Area):

- New or revised Material Safety Data Sheets (MSDSs) for chemical products purchased by BNL. MSDS information shall be maintained by the Safety and Health Services Division.

- Information on the operation and maintenance of equipment, tools or machines purchased by BNL. This information will be maintained by the organization using the equipment, tools or machines.
- Product recall notices. This information shall be distributed to affected parties and employees by the ESHQ Directorate.

5.4.3. Communications from Regulatory Agencies

- 5.4.3.1. The ESHQ Directorate shall evaluate and translate OSH-related DOE Directives and Orders into the SBMS framework.

NOTE:

The function of the Standards Based Management System (SBMS) at Brookhaven National Laboratory (BNL) is to provide the overall framework for: (1) capturing all relevant regulatory and contractual requirements, (2) translating these requirements into policy, procedure, and practice, (3) developing a Laboratory level user-driven set of procedures and guidelines, and (4) providing an electronic delivery mechanism for ensuring current versions of all management system descriptions and underlying procedures and practices are readily available to personnel to ensure changes are tracked and documented, and to ensure BNL employees are notified.

- 5.4.3.2. The ESHQ Directorate shall map OSH-related contract clauses into SBMS.
- 5.4.3.3. The evaluation and analysis of other OSH requirements (e.g., Federal and State laws) shall be performed by Subject Matter Experts (see SBMS Subject Matter Experts list) who shall provide input to the SBMS Office.
- 5.4.3.4. Personnel within the SBMS Office shall ensure traceable management of all BNL requirements.

5.4.4. Communications from Corporate Management or from Other DOE National Laboratories

- 5.4.4.1. The evaluation and analysis of OSH policies, requirements or standard practices from Brookhaven Science Associates, Inc. shall be performed by Subject Matter Experts (see SBMS Subject Matter Experts list) who shall provide input to the SBMS Office.
- 5.4.4.2. The evaluation and analysis of lessons learned on how specific hazards have been eliminated, or of copies of training tools or of hazard analysis tools that have been particularly effective at other National Laboratories shall be performed by Subject Matter Experts (see SBMS Subject Matter Experts list) who shall provide input to the SBMS Office.

5.5. Commitment and Communications Tracking System (CCTS) for OSH Issues

- 5.5.1. The CCTS is used to track all commitments, including OSH commitments, made by members of the BNL Integration Council and is used keep the Integration Council fully informed of the nature and scope of existing commitments and communications.
- 5.5.2. The CCTS is used to assign lead responsibility for response, and inform others who may need to know about, review or concur on a response or commitment
- 5.5.3. The CCTS is cross-referenced with the Assessments Tracking System (ATS) system (see [ESH 1.2.1 Corrective Action Management and Tracking for External and Internal Assessments](#)) when the response or commitment is detailed or extensive (e.g., action plans), and therefore not suitable for tracking and control in the CCTS.

5.6. Corrective Action Tracking for OSH Issues

- 5.6.1. BNL Managers are responsible and accountable for ensuring that mitigating and permanent corrective actions generated in response to conditions identified through assessment activities are effective, efficient, timely, and tracked to completion.
- 5.6.2. All BNL organizations shall use the Family version of ATS or its equivalent. See [ESH 1.2.1 Corrective Action Management and Tracking for External and Internal Assessments](#).