

Safety and Occupational Health Action Plan Priority Recommendations: Policy Development Implementation Strategy Highlights

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SUMMARY

Policy and Administration's strategy will focus on timely implementation of the actions for which it has substantive responsibility. Many of the priority recommendations addressed below were initially assigned to Policy and Administration because they involved development of policies and directives and standards for the Safety and Occupational Health Program. However, for most of these policy development activities, the appropriate program office will take the lead, and Policy and Administration's role will be limited to advice and support to the subject matter experts in the process of Reclamation Manual release development. Shannon Rizzi will be the point of contact for this type of advice and support.

PRIORITY RECOMMENDATIONS TO BE ADDRESSED FOR POLICY DEVELOPMENT

CLARIFY ROLES AND RESPONSIBILITIES

[Recommendation #1]

In consultation with Bruce Muller, it was determined that the roles of SOH professionals and engineering/technical staff will be addressed through the definition of safety assessment. Once that is defined, P+A will assist in the development of a directive and standard (timeline and milestones TBD after safety assessment is developed.)

CLARIFY ROLES AND RESPONSIBILITIES

[Recommendation #21]

Address through the updating of SAF P01. This is being led by Shannon Rizzi. She provided the document to the RLT for review and has consolidated the comments. The next step is to review the comments with the SAB/SSLE to respond to the comments. The TRMR should be finalized by the end of September 2017. Note: The detailed role of the safety professionals will be addressed by Bruce Muller in defining the safety assessment. (Assigned to Shannon Rizzi.)

STOP WORK POLICY

[Recommendation #44]

Addressed through the formulation of a Reclamation Stop Work Policy. This is being led by Shannon Rizzi. She provided the document to the RLT for review and has consolidated

the comments. The comments have been reviewed with the SAB/SSLE with responses to the comments. The TRMR should be released by the end of September 2016 and finalized by the end of September 2017. (Assigned to Shannon Rizzi.)

DEFINE INCIDENT FOLLOW-UP PROCESS

[Recommendation #45]

Document accident follow-up processes. The initial step for this activity will be to reach out to the Safety Council and the Reclamation Partnership Council to get their input on this proposed action. Once these ideas are identified and better defined, timelines and milestones can be established. (Assigned to Karl Stock.)

INCORPORATING SAFETY REVIEWS WITH ASSOCIATED FACILITIES REVIEWS

[Recommendation #89]

Update existing D+Ss for Associated Facility Reviews and Power Facility Reviews to require participation of a safety professional. Coordination with facility review programs managers as well as Bruce Muller to ensure that safety professional roles, responsibilities and any necessary safety review requirements/criteria and associated checklists are defined. (Assigned to Karl Stock.)

CLARIFY AUTHORITY HAVING JURISDICTION RESPONSIBILITIES

[Recommendation #113]

Create a new D+S under SAF P01 identifying Authority Having Jurisdiction (AHJ) responsibilities. Engage Safety Team to better define necessary actions in order to develop a timeline and milestones. Per Bruce Muller, Michael Green of the Safety Office should be a team member. (Assigned to Karl Stock.)

FACILITY TRANSFER INSPECTIONS

[Recommendation #114]

Overall Recommendation #105: Review D+S FAC 01-05 related to transfer inspection teams to determine if overall scope/objective of these reviews is such that the addition of a safety professional is value added and if so, define the specific roles/responsibilities. (Assigned to Stock/Bauer.)

REFERENCES BETWEEN RECLAMATION MANUAL (RM) AND RECLAMATION SAFETY AND HEALTH STANDARDS (RSHS)

[Recommendation #9]

A memo to the RLT will be provided that clarifies to the RLT the link to the RM and the RSHS and thus its standing as directives as well as the potential for “temporary” standards including timelines, etc. (assigned to Jennifer Stussy)

CHEMICAL SPILL REPORTING

[Recommendation #65]

Review of reporting responsibilities for chemical spills. Outreach to the field through the Environmental Compliance program manager to better understand whether there is a training need or a need for an SOP or both. (assigned to L Vehmas.)