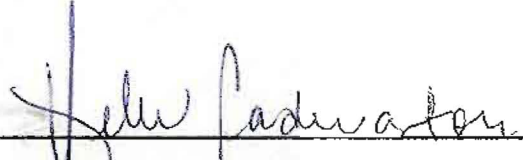


IT Division Safety Self Assessment

FY10

Measure 2: Effectiveness of Subcontractor Job Hazard Assessment and Work Authorization (SJHAWA) processes

Reviewed and Approved:

 9/29/10

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 9/29/10

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Effectiveness of Subcontractor Job Hazard Assessment and Work Authorization (SJHAWA) processes.

August 27, 2010

Executive Summary:

The Subcontractor Job Hazard Assessment and Work Authorization (SJHAWA) process was implemented lab-wide in October of 2008 for vendors or guests who will do onsite work at LBNL to assure their safety training preparedness. IT has about a dozen of these per year of which maybe one or two are high hazard. The requirements for how the process of obtaining and assuring that SJHAWAs are in place when needed has been, though ultimately the requester is the responsible party. IT has been assuring that SJHAs are in place, but it is a cumbersome and decentralized process, which regards to worker safety, yet has been challenged by the institutional requirements of the process. After review, IT needs to re-educate those who are required to administer this process but only after EH&S reengineers the process and communicates its new process and tools lab-wide.

Introduction:

The SJHAWA was instituted lab-wide in December of 2008. The IT division has roughly 25 to 35 service purchase orders per year. Out of these, roughly a third are for "Hands on Non-Construction," and require a SJHAWA. By following the SJHAWA program, IT helps ensure that even vendors, contractors and guests are working to the standards we expect our own employee to work.

Focus Area:

The overall level of compliance with the SJHAWA was identified as a deficiency during the Division's 2009 ES&H Self-Assessment. A number of pre-2008 SJHAWAs are now obsolete and it is recognized that there may be deficiencies in management of SJHAWAs in the Division. In this respect, maintenance and coordination of current SJHAWAs is unclear and may represent a liability.

This self-assessment will focus on the reviewing all subcontracts covered under the SJHAWA program, determining level of compliance with SJHAWA requirements, and identifying barriers (if any) to processing and maintaining SJHAWAs.

Current Requirements:

The institutional requirement for Non-construction Safety Assurance for Subcontractors, vendors and guests is discussed in Chapter 31 of Pub 3000.

31.2 Policy

Before Hands-On Work (see "Definitions," Section 31.4.3) can be performed by Subcontractors, Vendors, or Guests at LBNL facilities, the following activities must be completed,

- A Subcontractor Job Hazards Analysis and Work Authorization (SJHAWA) form must be completed, and the subcontractor, vendor, or guest must review the LBNL EH&S Non-Construction Safety Orientation.
- A pre-job meeting between the Requester/Division and the subcontractor, vendor, or guest must occur at which:

- The SJHAWA and the EH&S Non-Construction Safety Orientation is discussed and the hazard level for the work is determined.
- A work authorization is prepared and signed by the Requester/Division and the subcontractor, vendor, or guest, which summarizes the scope of the work, hazards, hazard controls, and any related conditions or constraints for the work.

During the conduct of the hands-on work performed by the subcontractor, vendor, or guest,

- The Requester/Division provides oversight of the subcontractors using a risk-based graded approach (see Section 31.6.3).

When a deviation to this policy is required, advance approval must be obtained from the Subcontractor Safety Assurance Program Manager in the EH&S Division. The process for these requirements is described in Section 31.6.

Assessment Scope:

IT reviewed all Service Purchase Orders from October 1, 2009 through June 15, 2010.

Assessment Results:

There were a total of 25 service Purchase Orders. Of these seven were deemed in need of an SJHAWA. We did not review SJHAWA for warranty orders as there was no way to quantify what may not have been captured.

- EH&S' SJHAWA Program Manager identified 7 Purchase Orders for which he felt IT should have SJHAWAs.
 - Of those there were two with actual SJHAWAs on record with EH&S and copies with the Division Safety Coordinator.
 - Of the two, one had the correct signatures.
 - One was with the work lead with digital signatures but neither SJHAWA Program Manager nor the IT Division Safety Coordinator had a copy. This has been rectified.
 - Of the remaining 4:
 - One had an expired SJHAWA from the previous year but hadn't done any subsequent work.
 - One was pending as no work had been performed
 - One had a LOTO on record but no SJHAWA
 - One had no documentation
- The Division Safety Coordinator had two additional SJHAWAs for the performance period not noted.
 - One was related to an LBL wide contract
 - One was related to a "demo" test and most likely was not necessary.
- There is confusion as to whether a "safety plan" can serve in place of an SJHAWA. This is especially true among long-term employees who have historically have managed safety in certain parts of the division. This was found to be true among Procurement staff with Safety Management oversight (when issuing POs) as well as with the IT staff requesting outside services.
- Record of oversight during work is unclear. Many staff think the pre-job review of the SJHAWA and signage of that document is sufficient.
- We observed that there has not been a graded approach by the institution to the SJHAWA process. The same considerable amount of paperwork is required for low hazard work as is required for high hazard work. This has lead, in our observation to some compliance issues in low hazard work.

- There is no clear way to track warranty SJHAWAs i.e. subcontractors/vendors/guests who come onsite to repair equipment for which warranties are included in the original purchase. The equipment is purchased on a PO and doesn't always have a clear service component at the time of purchase.
- Feedback and improvement is a component that needs more investigation. It would appear this is only an issue when there is a problem.
- There currently isn't a systematic approach for the annual renewal of SJHAWAs.

Findings:

IT has many opportunities to improve the implementation of the SJHAWA program, and based on interviews and surveys, we believe many of those involved with the process are making a sincere effort to implement the program efficiently. That said the entire process, cradle to grave, needs to be re-communicated and implemented so that each SJHAWA has clear and complete assurance as outlined in the policy stated in [Pub 3000, Chapter 31.2](#).

The distinction as to when a SJHAWA vs. a Safety Plan is needed is not clear and needs to be clearly defined.

Observations:

IT as a division needs to reinforce the SJHAWA process to the best of their ability, pending a larger re-education effort by EH&S.

IT strongly recommends that the lab consider a graded approach to the SJHAWA process.

Recommended Corrective Actions:

The Lab should offer online training either annually or semi-annually that requires requesters and preparers of requisitions to understand the general safety requirements associated with purchasing of services from subcontractors/vendors/guests and when documentation greater than an SJHAWA is needed and why. (CATS – 8189 not yet routed)

IT needs to get clarity from EH&S as to when a Safety Plan is required vs. an SJHAWA and clearly communicate it to the stakeholders in the Division.

Noteworthy Practice:

None.

Lines of Inquiry

1. Is work process review properly defined? By who?
2. Are hazards properly identified? By who?
3. Are hazards properly controlled? By who?
4. Is work performed consistent with requirements? How?
5. Does feedback and improvement occur? How?
6. Have SJHAWA paperwork been submitted? How?

Self-Assessment Methodology:

1. Person(s) conducting self-assessment: Division Safety Coordinator
2. Techniques to be used during the self-assessment. Possible techniques include but are not limited to:

- Documentation Review
- Sampling (i.e., selective evaluation of a widely-distributed process, hazard, etc.),
- Personnel interviews/questionnaire
 - i. Questionnaire for preparers, requesters and line managers
 - ii. Interviews of SME and super-users

Conclusion:

Use of the SJHAWA has addressed compliance concerns within the Laboratory. IT has managed to keep subcontractors safe to date. There is a concern though that compliance may be a bit heavy handed in low hazard work, causing challenges in providing customer support in a timely manner. Further development of both the process and expectations on Divisions need to be communicated concisely in layperson terms. Guidance on how to continue increasing demands on those managing this process as well as the work that needs to be done should be reviewed at both a Divisional and Institutional level.

References:

Review of Service Purchase Orders Identified in FMS for October 1, 2009 – June 15, 2010.

Survey of preparers, requesters and line managers who had service Pos in the performance period reviewed.

Interviews with:

E. Ritenour and D. Edgar of IT Division - who have worked with the SJHAWA process including issues related to high hazard and safety plan work.

M. Ruggieri Program Manager of SJHAWA – re: clarification of Chapter 31 including Appendix A, flowchart A-2 for distinction of process.