Introduction

The Facilities Division uses a number of processes for managing issues from discovery to closure verification. This procedure outlines the Facilities Division’s activities to capture, trend, and manage reportable and near miss events.

Purpose

This document will capture and combine the various processes followed within the Division that pertain to Issues Management and assign responsibility for their implementation. It will serve as a reference for these procedures.

Process

This procedure consists of four major components:

- Incident Notification as outlined in Facilities Procedure EMRG-001
- ORPS/subORPS Process
- Corrective Action SMART review and CATS input
- Corrective Action Adequacy and Effectiveness

Scope

This procedure applies to all Facilities Division employees.

Procedure

Incident Notification

Facilities maintains a policy that directs all Division employees to immediately report all incidents to the Work Request Center during normal working hours or to a “responsible individual” after hours. The Work Request Center will immediately inform Division Senior Management and designated fact finders who develop details necessary to provide information to support an Occurrence Reporting decision by Facilities management in a timely manner. Facilities management will then decide if the incident warrants full scale response and investigation by the larger EHSS fact finding team and will forward notification as appropriate. Facilities management will also decide if the incident meets the reporting criteria for occurrence reporting or if it is of sufficient concern to be entered into the Institutional Reporting (subORPS) system.
The after-hours responsible individual will decide if the immediate notification of management and the fact finding team is necessary. This policy and procedure is captured in LBNL Facilities Division Procedure EMRG-001 Incident Notification.

All Facilities employees are trained in this procedure and these requirements are outlined in the Division’s new hire safety orientation. Facilities Safety will track the number of incident notifications.

**ORPS/subORPS Process**

DOE O 232.2 Occurrence Reporting and Processing of Operations Information requires the investigation and reporting of “One or more (i.e., recurring) events or conditions that adversely affect, or may adversely affect, DOE or contractor personnel, the public, property, the environment, or the DOE mission” via an Occurrence Report (ORPS) that may require an apparent or root cause analysis.

Based on the information received from the Incident Notification Process, Facilities Safety, in consultation with EHSS and the BSO, will advise the Planning, Process and Safety Manager on the proper classification of reportability if the circumstances of the incident fall within the ORPS reporting criteria. If the Deputy Director agrees, this information is forwarded to EHSS for official notification to the BSO.

Facilities also classifies events that don’t meet any of the specific ORPS Reporting as a subORPS. If the initial investigation of the circumstances of the incident reveal that the incident is below the reporting threshold (i.e., is not ORPS reportable), Facilities Safety enters details of the incident into the EHSS Sub-ORPS data base and records the incident type, assumed cause code (derived from DOE O 232.2), and current disposition of the incident (i.e., compensatory corrective actions, trending only, or further analysis necessary). Minor incidents not included as subORPS, as defined by Facilities Management on a case by case basis, and incidents that are captured and trended through other processes such as Traffic Safety and Injury Reporting, are generally not considered within Facilities for reporting through this process to avoid duplication.

**Causal Analysis**

The responsibility for the management of Apparent Causal Analysis, Root Cause Analysis, and Effectiveness Reviews are assigned to Facilities Safety. Facilities Safety will recommend to Division management the composition of the analysis team and monitor the progress of the analysis according to LBNL Pub-5519 (2), Causal Analysis Program Manual.

As part of performing Causal Analysis, goals and expectations will be presented to analysis teams, emphasizing the requirement for SMART (Specific, Measurable, Accountable, Reasonable, and Timely) corrective actions that are designed to prevent recurrence at all Causal / Root Cause Analysis kick off meetings. The person assigned as the Responsible Individual for
a corrective action will complete a SMART form for each assigned recommended corrective action. Analysis teams are required to complete a RACI Chart (Responsible, Accountable, Consulted, Informed) for each recommended corrective action. The completed RACI and SMART charts will be uploaded into the corrective action database along with objective evidence of completion.

Corrective Action SMART review and CATS input

Facilities Safety and the Deputy Division Director will check that all recommended corrective actions follow the SMART format. Once recommended corrective actions are reviewed and accepted by the assigned responsible individual, Facilities Safety will enter the issue into the Corrective Action Tracking System (CATS).

Corrective Action Verification

Facilities Safety will close all corrective actions by the due date by uploading objective evidence into the Corrective Action Database after the evidence is verified to demonstrate the issue is resolved in a manner that addresses the intent of the corrective action, and that the corrective actions are sustainable and measurable. In cases where evidence is lacking, or if the evidence suggests the corrective action was not implemented as intended, action is taken to correct the deficiency.

Corrective action implementation is reported to Division Senior Management and to the KFA metrics meeting monthly.

Trending and Analysis

Occurrence reports, cause codes, incident type, assumed cause code of subORPS (based on DOE O232.2 codes), and corrective action verification are trended and reported to Division management by Facilities Safety on a monthly basis. If a trend is identified, Division Senior Management may elect to initiate causal analysis or other investigation to isolate causes and to develop corrective actions. Corrective actions are entered into the Corrective Action Database (CATS) and the assumed cause codes amended in the subORPS database as necessary.

RESPONSIBILITIES AND CONTROLS

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<td></td>
<td>Safety Manager</td>
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