

 <b>INTEGRATED SAFETY MANAGEMENT (ISM)</b>	Policy Number:	<b>ESH-100</b>
	Issued Date:	<b>NOVEMBER 2020</b>
	Initiating Organization:	<b>Environment, Safety &amp; Health</b>
	Applicability:	<b>All Employees</b>

## **POLICY STATEMENT**

ORAU embraces the concept of Integrated Safety Management (ISM) in the conduct of daily operations. Safety, health, and environmental protection, all components of ISM, are integrated into all ORAU activities.

## **POLICY RATIONALE**

The purpose of this policy is to create and foster a safety-minded environment at ORAU and in all aspects of employee life to better promote their well-being.

## **POLICY REQUIREMENTS**

Every individual working at ORAU, regardless of employment status, will be involved in maintaining and improving safety. As such, all employees are expected to:

- Have an attitude that nothing is more important than safety.
- Be aware of hazards and conditions that impact the ability to conduct work safely.
- Take action to mitigate those hazards by applying the functions and principles of ISM.
- Stop or suspend work, including the initiation of work, if an unsafe condition or serious hazard is suspected or discovered.
- Be familiar with and adhere to requirements detailed in this policy and attached handbooks, manuals, and plans.

In addition, all managers will be accessible to employees for the identification and resolution of safety issues.

To ensure a safety culture, all organizational units will:

- Provide a site safety representative in support of ES&H activities, as detailed on the Safety 1<sup>st</sup> website.
- Have department directors serve as members of the Safety Council.

## **RESPONSIBILITIES**

### **A. Employee**

- 1) Maintains a safe workplace in all matters related to health and safety and in the protection of the environment.
- 2) Follows established ES&H practices and standards in daily routines and in any new work that may develop.
- 3) Understands the potential hazards in the workplace and uses established hazard controls.
- 4) Assists in the development and use of Job Hazard Analyses (JHAs).

- 5) Understands the ISM Core Functions and Guiding Principles and employs them in day-to-day activities.
- 6) Participates in the ISM and Voluntary Protection Program (VPP).
- 7) Notifies manager immediately of any identified hazardous or potentially hazardous conditions.
- 8) Follows HR-1310, Internal Concerns and Complaints, to report those situations that remain unresolved after notification of manager.
- 9) Stops or suspends work, including the initiation of work, if an unsafe condition or serious hazard is suspected or discovered.
- 10) Maintains familiarity with and follows the provisions of ISM materials posted on the Safety 1<sup>st</sup> intranet site.
- 11) Uses the DOE Employee Concerns Management System in those situations that remain unresolved after notification of manager as described in the DOE Employee Concerns Reporting Form (Attachment 4).

**B. Site Safety Representative (SSR)**

- 1) Coordinates activities involving the ES&H office personnel and the organizational units.
- 2) Disseminates ES&H information.
- 3) Reports problems and near-miss events to organizational unit managers and the ES&H office for action.
- 4) Monitors environmental conditions for hazards in the workplace.
- 5) Conducts quarterly ES&H walkthrough inspections.
- 6) Serves on Safety Council and participates in regularly scheduled meetings and other activities.
- 7) Serves as a safety advocate in representing employee, subcontractor, and non-employee needs.
- 8) Assists in implementing ISM.
- 9) Assists ORAU in determining ES&H priorities for planning purposes.

**C. Manager**

- 1) Notifies the ES&H director immediately upon learning of any event or condition that could adversely affect human health or safety or environmental quality.
- 2) Takes prudent measures to protect human life and property.
- 3) Communicates to employees, subcontractors, and non-employees authority to stop-or-suspend work.
- 4) Involves employees, subcontractors, and non-employees in the JHA process to the greatest reasonable extent.
- 5) Develops, implements, and revises at least annually a unit-specific ISM plan that is consistent with the ORAU ISM System Program Description.
- 6) Verifies that employees, subcontractors, and non-employees comply with ISM plans and ORAU policies and procedures related to ES&H.
- 7) Encourages employee involvement in worker protection activities including development of goals, objectives, and performance measures.
- 8) Provides employees, subcontractors, and non-employees access to regulations, standards, written procedures, ES&H lessons learned, and reference documents.
- 9) Informs employees, subcontractors, and non-employees of their rights and responsibilities.
- 10) Provides employees, subcontractors, and non-employees worker protection training programs appropriate to the potential hazards and conditions.
- 11) Conducts hazard assessments and establishes appropriate controls in conjunction with ES&H.

- 12) Reports and investigates all on-the-job injuries, illnesses, close calls, and near misses.
- 13) Monitors employee, subcontractor, and non-employee ES&H practices and provides prompt corrective action when necessary.
- 14) Reviews annually for needed changes to employees' Physical Requirements and Working Conditions (PRWC) form.

**D. Occupational Health Nurse (OHN)**

- 1) Cooperates with other safety and health professionals to identify hazards and possible health risks.
- 2) Works with ES&H staff and others in performing safety/ISM-related recordkeeping and reporting functions and in conducting quality checks to assure that the recorded data is thorough, accurate, and consistent.

**F. Director, Environment, Safety & Health (ES&H)**

- 1) Oversees safety, health, and environmental programs at ORAU.
- 2) Oversees hazard assessments and the implementation of appropriate controls at all worksites.
- 3) Promotes the development, maintenance, and use of JHAs throughout ORAU.
- 4) Submits to the ORAU president an updated ORAU ISM System Program Description annually or more frequently as needed.
- 5) Establishes written policies, goals, and emphasis programs as stated in the ISM Thrust Document.
- 6) Evaluates workplaces for hazards and exposures as appropriate.
- 7) Assists managers with employee PRWCs to assure documentation of potential workplace hazards.
- 8) Maintains effective communication with managers to promote safety initiatives.
- 9) Meets routinely with the site safety representatives to discuss safety issues and initiatives.
- 10) Maintains knowledge of state-of-the-art technologies, legal interpretations, and current regulations.
- 11) Performs ES&H oversight of activities related to construction and maintenance work.
- 12) Promotes ES&H awareness among managers, employees, subcontractors, non-employees, and the community at large through focused campaigns and training sessions as appropriate.
- 13) Investigates all reported hazardous conditions and takes appropriate action as necessary to eliminate or reduce the hazard.
- 14) Approves individual organizational unit ISM plans and procedures.
- 15) Notifies the executive leadership of significant ES&H concerns.
- 16) Submits reports as required by law, regulations, directives, and ORAU policies and procedures.
- 17) Advises executive leadership and organizational unit managers on ES&H matters including ISM and VPP.
- 18) Approves the content of the Safety 1st website.
- 19) Analyzes safety-related data for patterns and trends, summarizes safety data quarterly, and makes data available on the Safety 1<sup>st</sup> website.
- 20) Advises management in the application of contractual implementation plans.
- 21) Serves as the ORAU Authority Having Jurisdiction (AHJ) to resolve implementation issues and approve equivalencies related to electrical and fire safety/design as allowed by codes and standards.
- 22) Conducts quarterly quality checks of the recordkeeping and reporting program to ensure accuracy.
- 23) Notifies the P&P Director of any stop work actions taken against subcontractors.
- 24) Coordinates the Operational Awareness Visits by DOE representatives.

25) Advises management in the implementation of the DOE enforcement programs under 10 CFR 851, Worker Safety and Health Program, and the PAAA Program including maintenance of the NTS.

## **CANCELLATION**

This revised policy supersedes ESH-100 dated September 11, 2014.

## **REFERENCES**

- 1) 10 CFR 851, Worker Safety and Health Program
- 2) 10 CFR 835, Occupational Radiation Protection
- 3) 48 CFR 970.5223-1, Integration of Environment, Safety, and Health into Work Planning and Execution
- 4) Executive Order 13101, Greening the Government through Waste Prevention, Recycling and Federal Acquisition
- 5) Executive Order 13148, Greening the Government Through Leadership in Environmental Management
- 6) International Organization for Standardization (ISO) 14001: 2015, Environmental Management Systems
- 7) DOE O 151.1D, Comprehensive Emergency Management System
- 8) DOE O 210.2A, DOE Corporate Operating Experience Program
- 9) DOE O 225.1B, Accident Investigations
- 10) DOE O 231.1B, Environment, Safety and Health Reporting
- 11) DOE O 232.2A, Occurrence Reporting and Processing of Operations Information
- 12) DOE O 410.2, Management of Nuclear Materials
- 13) DOE O 414.1D, Quality Assurance
- 14) DOE O 420.1C, Facility Safety
- 15) DOE O 435.1, Radioactive Waste Management
- 16) DOE M 435.1-1, Radioactive Waste Management Manual
- 17) DOE O 436.1, Departmental Sustainability
- 18) DOE O 440.2C, Aviation Management and Safety
- 19) DOE O 442.1B, Department of Energy Employee Concerns Program
- 20) DOE O 442.2, Differing Professional Opinions on Technical Issues Involving Environment, Safety, and Health Technical Concerns
- 21) DOE O 458.1, Radiation Protection of the Public and the Environment
- 22) DOE O 460.1D, Hazardous Materials Packaging and Transportation Safety
- 23) DOE O 460.2A, Departmental Materials Transportation and Packaging Management
- 24) DOE M 460.2-1A, Radioactive Material Transportation Practices Manual for Use with DOE O 460.2A
- 25) ORAU Policy ESH-112, Environmental Management
- 26) ORAU Policy RCPE-100, Quality Assurance
- 27) ORAU Policy HR-1000, Occupational Medical Program
- 28) ORAU Policy HR-1310, Internal Concerns and Complaints
- 29) ORAU Hazard Survey

## **ATTACHMENTS**

- 1) ISM Functional/Program Areas
- 2) Employee Concerns Reporting Form
- 3) ORAU ISM System Program Description
- 4) ESH-MAN-05, Health and Safety Manual
- 5) ESH-MAN-03, Radiation Protection Manual
- 6) ORAU Emergency Management Plan

Policy Changes

**POLICY APPROVED BY:**

---

ORAU President and CEO