

Facility: The guidance contained in this document is based upon feedback from the Office of Enforcement and practices used in the Contractor Community

Best Practice Title: Attributes of a Good NTS Report

Point of Contact: Sherry Kontes, (208) 526-1863, sherry.kontes@inl.gov

Brief Description of Best Practice: The guidance contained in this document is to improve the quality and consistency of information being provided in NTS Reports.

Why the best practice was used: The Office of Enforcement provided feedback to the Contractor Community regarding the quality of information being provided in NTS Reports. For example, description of noncompliance did not contain explanation of acronyms; corrective action statements were not written using an active voice.

What are the benefits of the best practice: Improve communications between the Contractors and the Office of Enforcement by providing clear and concise description of noncompliances; sufficient background information that provides context, demonstrate the appropriate application of worker safety and health, and nuclear safety requirements; generation of corrective actions that prevent recurrence.

What problems/issues were associated with the best practice: The Best Practice has not yet been published. However, as stated previously, implementation will improve communication between the contractor community and the Office of Enforcement.

How the success of the Best Practice was measured: This guidance document is new and does not have a history being used in the Contractor Community. However, the guidance given in the document are general issues management concepts used around the DOE complex. Much of the information provided in this document is also discussed during the regular EFCOG Working Group meetings, and feedback from the attendees at those meetings was positive.

Description of process experience using the Best Practice: This guidance document is new and does not have a history being used in the Contractor Community. However, the guidance provided in the document reflects best business practices used throughout the DOE complex.

GUIDANCE FOR DRAFTING NTS REPORT

(Nuclear Safety or Worker Safety & Health): Nuclear Safety (NUC), Worker Safety and Health (WSH) or combined NUC/WSH

(Name of Facility): Use same facility name in occurrence report, if this is associated with an event

(Facility Function): Use same facility function in occurrence report, if this is associated with an event

(Laboratory or Site): (Event POC Contact):

Name:

Title:

Telephone No.:

Email:

(DOE Field Office PAAA Coordinator):

Name:

Title:

Telephone No:

Email:

Title: A title that accurately describes the noncompliant condition

Occurrence Report Number: From associated event if applicable

Date Occurrence/Condition Discovered: If there is a noncompliance associated with an occurrence report the date of occurrence/condition discovered should be the same as reported in ORPS. When a noncompliance is a stand-alone condition use the date the condition was discovered.

Discovery Method: Internal Contractor Assessment, Internal Rollup, Contractor, Contractor As Found, By Event, External DOE Assessment, External Organization

PAAA Determination Date: When the noncompliance was determined to be NTS Reportable

Date Reported: When NTS report is submitted

DOE Program Office:

System, Building, or Equipment: Information can be obtained from an associated occurrence report if applicable or obtain from issue information

Description of Noncompliance Condition:

The description of the noncompliant condition(s) is to be a clear, concise write up that is accurate with the information known at the time; all acronyms spelled out the first time used; sufficient background information that provides context for a third party reader; identify noncompliance(s) and the circumstances that allowed the noncompliance(s) to occur. Supplement the description when new information is available. Occurrence report describes an event – NTS Report describes the noncompliance(s) associated with an event. Simply repeating the occurrence report may not provide enough context to describe the noncompliance.

CFR Requirement: (reference appropriate sections of 10 CFR 708, 820, 830, 835 or 851)

- Identify the regulatory requirements applicable to the noncompliant condition(s)
- Enter all regulatory noncompliance(s) including invoked requirements (1910, NFPA, etc.)

Implementation Plan & Section:

Include the implementation plan(s) and applicable section(s) from the following DOE approved plan(s): WS&H Plan for 851; Radiation Protection Program/Plan for 835; Quality Assurance Plan; Safety Analysis and Technical Safety Requirement Documents

Supplemental Worker Safety and Health Reports Only:

Noncompliance Duration: The period of time that the noncompliance remained uncorrected

Number of Workers Potentially Exposed: The number of workers who may have been exposed to the hazardous condition due to the noncompliance

Noncompliance Frequency: Indicate hourly/ number of times per day/ daily/ weekly/ monthly/ number of times per year

Worker Proximity to Noncompliance: The proximity of the worker(s) to hazard associated with the noncompliant condition

Extent of Conditions: Define the scope of the noncompliance and the extent to which it has affected other facilities' and functions. An Extent of Condition may be determined through causal analysis or conducted as separate evaluation.

Potential/Actual Injuries/Illnesses: Describe any injuries or illnesses that either occurred, or could occur, as a result of the noncompliance

Immediate Hazard Abatement/Compensatory Actions: Describe any immediate actions taken mitigate the hazard including any compensatory actions.

Corrective Actions:

The contractor's corrective action plan should address the identified causes. Corrective actions should be SMART (Specific, Measurable, Accountable, Relevant, Timely). Specific considerations include:

- Each action starts with an action verb
- Keep the action statement short if possible
- Ensure there is only one action per action statement. Don't group multiple tasks together.
- Action items must have a verifiable end point or end product (you must be able to demonstrate closure)
- Consider how you will document the completion of the action. What is the objective evidence for closure?
- Is the action within the capability to be implemented as written?
- Will the actions prevent occurrence or recurrence of an adverse condition (if required by the level of cause analysis performed)?
- Ensure targeted completion dates are based on resource availability
- Concurrence is obtained for assigned actions that cross organizational lines.

Additional corrective actions can be added as necessary

Effectiveness reviews

NOTE: Red text is guidance when drafting a NTS Report and should be removed