



Common Mistakes Application of a Risk Matrix

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Kelsey Forde, CIH CSP CHMM

- Owner of Parvati Consulting LLC & Parvati Government Services Inc.
- Principal EHS Professional & System Safety Engineer
- M.S. Environment, Health, and Safety from University of Minnesota, Duluth
- B.S. Cellular Biology (Chemistry & Pre-Pharmacy Minor) from University of Minnesota, Duluth
- Nearly 20-yrs experience as an EHS professional including performing and guiding hazards analyses that adhere to the principles in the Redbook
- Primary responsibilities and areas of expertise are centered around the identification of workplace hazards and development of consequence analysis associated with hazard analysis, safety assessments, primary hazard screens, readiness reviews, and compliance auditing techniques for a variety of clients including the DOE, commercial, industrial, and private industry clients.
- National Director for the Alliance of Hazardous Materials Professionals, Past-President for the New Mexico Chapter of the American Society of Safety Professionals, Past-President and Director at Large for the New Mexico Society of Hazardous Materials Managers, and historically served two consecutive mayoral appointed terms on the Albuquerque-Bernalillo County Joint Air Quality Control Board.



Timothy Stirrup, REM ASP CHMM

- Partner at Parvati Consulting LLC & Parvati Government Services Inc.
- Principal EHS Professional & System Safety Engineer
- B.S., Biology and B.S. Chemistry from the New Mexico Institute of Mining and Technology (NM Tech)
- Over 35-years of experience as an EHS professional including performing and guiding hazards analyses that adhere to the principles in the "Redbook."
- Primary responsibilities and areas of expertise are centered around establishing the framework for clients in Hazard Analysis within a diverse set of industrial facilities including nuclear facilities, accelerators, semiconductor facilities, R&D laboratories, and dynamic energetic materials testing facilities.
- Respected for his ability to create highly functional teams and solve diverse, complex problems.
- Provides direct input to Line/Executive Management and Regulators to ensure solutions for continued organizational success.
- Active officer/board member ~ NMSHMM, NM ASSP, & ISSS



Quick Overview

- Risk Matrixes are in the HA practitioner's toolbox to help make riskbased decisions to assign resources
 - Proper use of the risk matrix is a powerful tool
 - Helps to make "risk-based" decisions to assign resources
 - Helps to understand loss events and control strategies
 - Misuse of the risk matrix is dangerous
 - Yields a hollow promise of safety
 - Waste resources
- Understand development of risk matrices to support use
- Reflect lessons learned to aid the HA practitioner with addressing unmitigated risk, mitigated risk, and adequacy of safeguards

Hazard Analysis Fundamentals

$$HI + HE (+ QRA) = HA$$

Hazard Identification + Hazard Evaluation (+ Qualitative Risk Analysis) = Hazard Analysis

What Is A Qualitative Risk Matrix?

- Qualitative Risk Analysis
 - ✓ Process of grading **risk** in terms of likelihood and consequence using a predefined ranking system.
 - **Qualitative Risk Matrix**
 - ✓ Effective Tool to Make Risk Based Decisions
 - √ Visual Aid in Assigning Risk
 - ✓ Unmitigated Risk
 - √ Visual Aid in Deriving Control Adequacy
 - ✓ Mitigated Risk

Potential Screening Mechanism

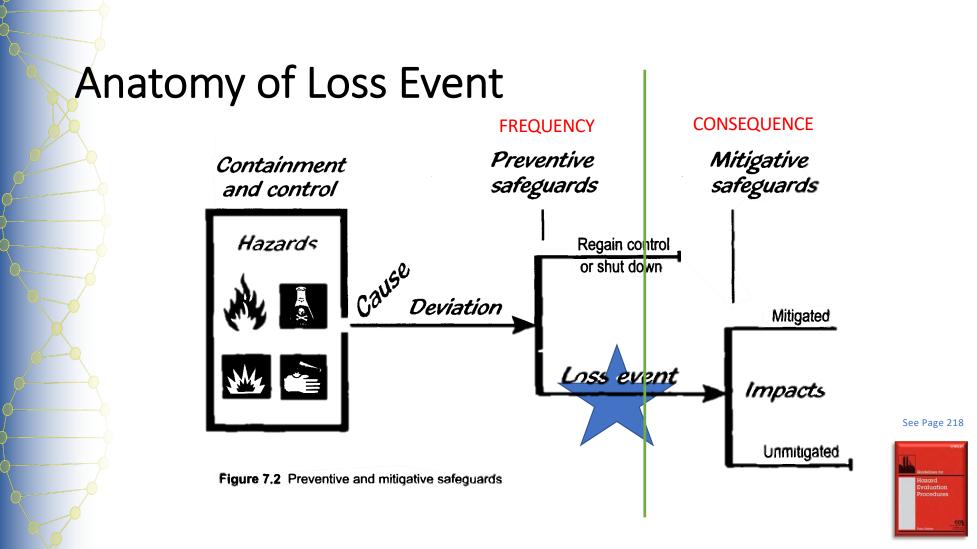
QRA Purpose

- Need Method to Rank Consequence ~ Focus Analysis
 - ✓ Unmitigated Consequence
 - ✓ Simple Consequence Ranking
 - ✓ Qualitative Assignment of Consequence
- Need Method to Derive Controls
 - ✓ Unmitigated Likelihood
 - ✓ Unmitigated Risk

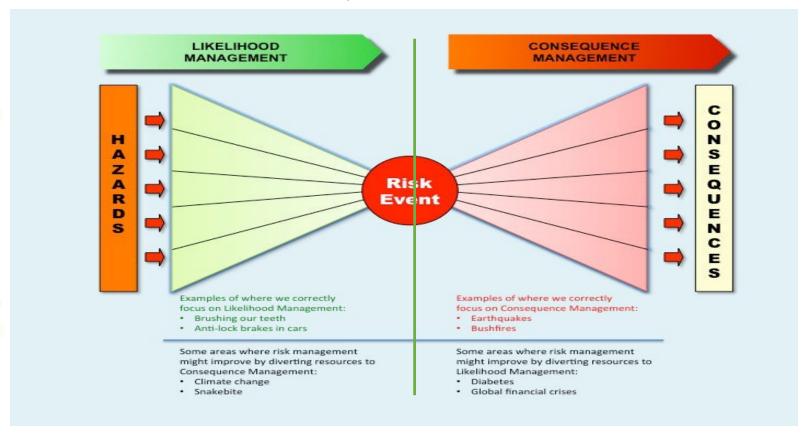
Potential
Unmitigated
Consequence
Screen

Potential Unmitigated Risk Screen

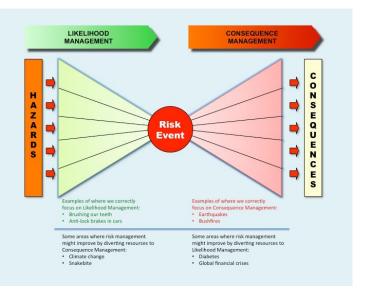
Consequence x Likelihood = Risk



Likelihood & Consequence



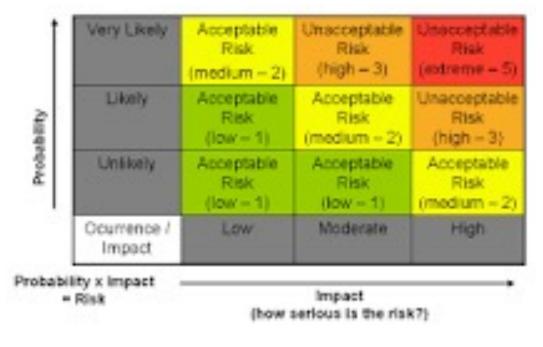
Likelihood & Consequence





Likelihood

Likelihood & Consequence



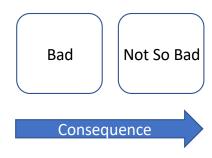
Unacceptable Risk

Acceptable Risk

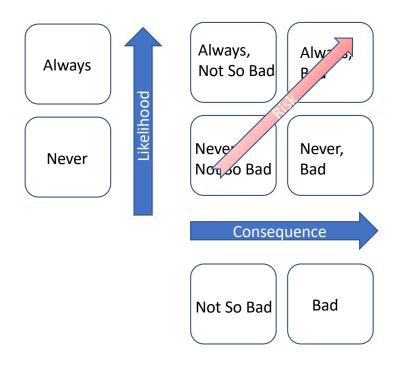
Consequence

Consequence x Likelihood = Risk

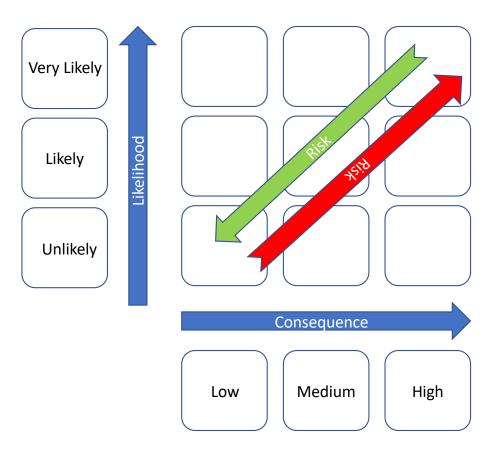
Matrix Development ~ Simple 1 x 2



Matrix Development ~ Simple 2 x 2 Increasing Risk



Matrix Development ~ 3 x 3 Reducing Risk



Acceptable Risk Vs Unacceptable Risk

Matrix Development Very Likely Likelihood Likely Unlikely Consequence Medium Low High

Matrix Development Very Likely Likelihood Likely Unlikely Consequence

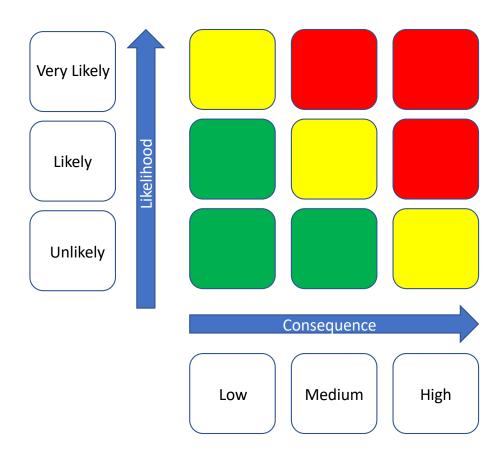
Low

High

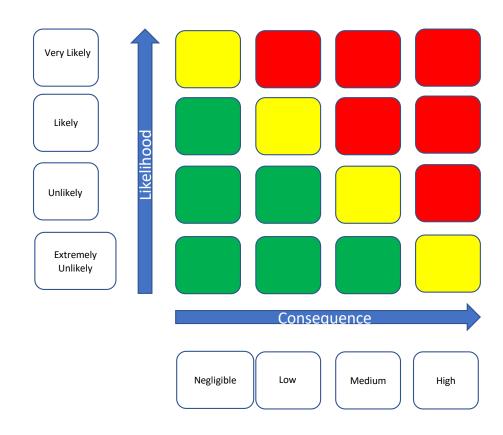
Medium

Matrix Development Very Likely Likelihood Likely Unlikely Consequence Medium Low High

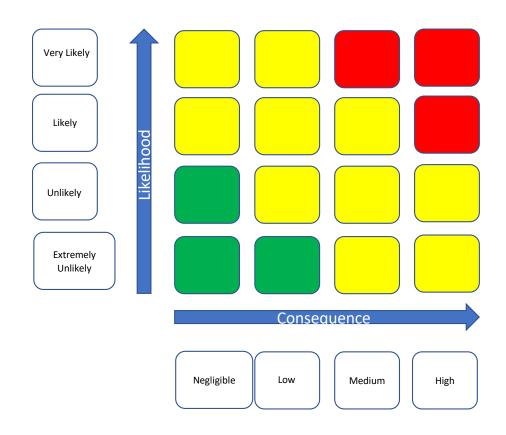
Matrix Development ~ Balance 3 x 3



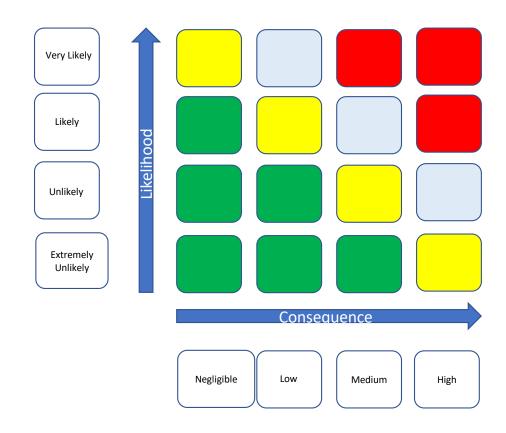
Matrix Development ~ Balanced 4 x 4



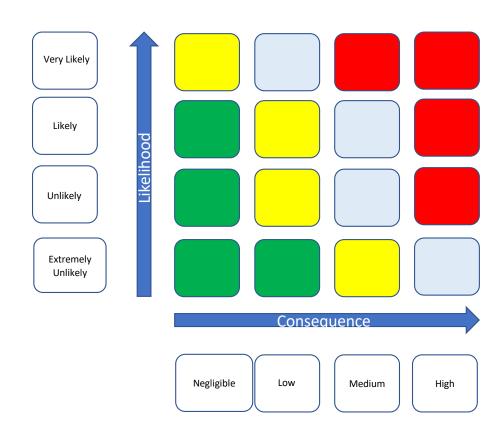
Matrix Development ~ Balanced 4 x 4



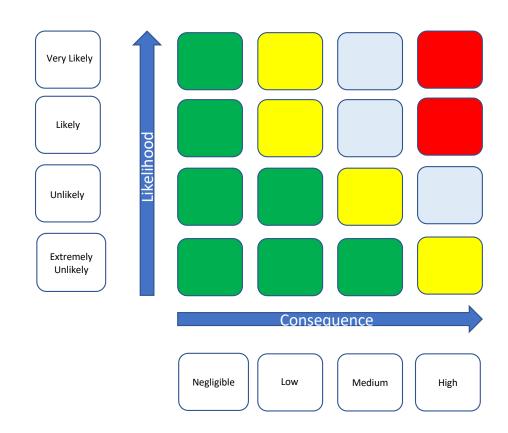
Matrix Development – Balance 4 x 4



Matrix Development ~ Risk Limiting



Matrix Development ~ Risk Taking

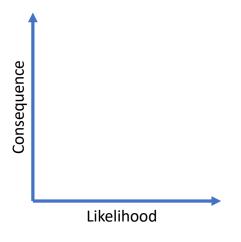


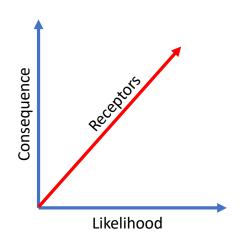
Matrix Development ~ Simplified Rules

- Develop Consequence Definitions
 - ✓ Gradient of Consequence
 - \checkmark Three = 3 x 3
 - \checkmark Four = 4 x 4
 - \checkmark Five = 5 x 5
 - ✓ Include Lowest
- ✓ Develop Likelihood Definitions
 - ✓ Match # Consequence
 - ✓ Include Lowest

- ✓ Colors
 - ✓ Three Colors Minimum
 - ✓ Maximum Colors Match Matrix
 - ✓ Don't Jump Colors with Adjacent Bins
- ✓ Determine Balance of Risk

Matrix Development ~ Z Axis Receptors





- Consequence of events change with receptors
- Likelihood of events does not change with receptors

DOE STD 3009 Compare '14 vs '94

DOE-STD-3009-1994 (Table A-1 Qualitative Risk Ranking Bins) ~ Example

Cons/Freq	BEU	EU	U	А
High	III	II	I	I
Moderate	IV	III	II	L
Low	IV	III	III	II
No	IV	IV	IV	III

DOE-STD-3009-2014 (Table A-1 Qualitative Risk Ranking Bins) ~ Example

Cons/Freq	BEU	EU	U	Α
High	III	II	l l	I
Moderate	IV	III	II	II
Low	IV	IV	III	III
Negligible	IV	IV	IV	N

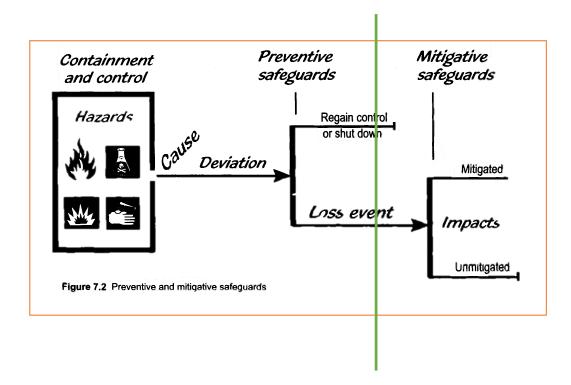
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QRA - Adequacy of Safeguards

- Estimate Scenario Risk Then Determine Acceptance
- ✓ Identification of Scenarios Using Scenario Based HE Method
 - ✓ Develop Cause-Consequence Pairs
 - ✓ Cause = Frequency
- ✓ Severity of Consequences
 - ✓ Remember Difference Between Loss Event & Impact
 - ✓ Loss Event ~ Irreversible Point in Event
 - ✓ Supports Prevention versus Mitigation of Event
 - ✓ Qualitative Versus Quantitative Assignment of Consequence Severity

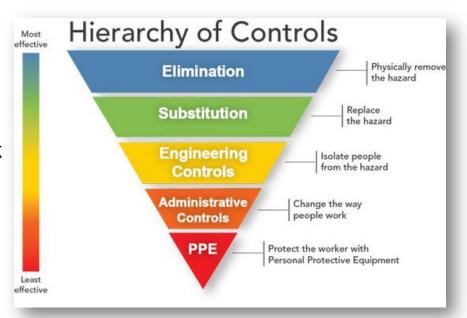
Adequacy of Safeguards

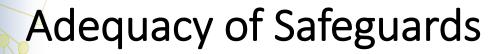
- ✓ Preventative Controls
 - ✓ Reduce Frequency
 - ✓ Prevent Loss Event
- ✓ Mitigative Controls
 - ✓ Reduce Consequence
 - ✓ Mitigate Loss Event

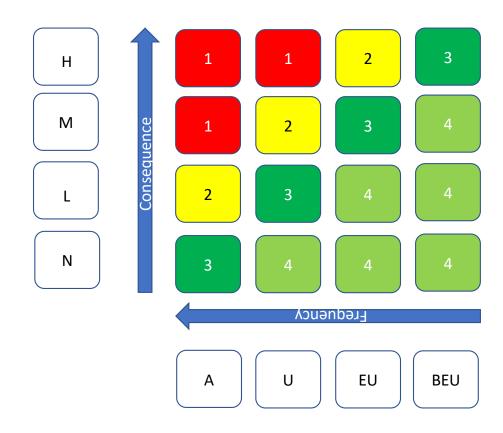


QRA - Adequacy of Safeguards

- ✓ Follow Hierarchy of Controls
 - ✓ Prevent vs Mitigate
 - ✓ Start with Preventative
 - ✓ Overlay Controls Until Acceptable Risk







Adequacy of Safeguards

Scenario	Consequence	Frequency	Risk	Controls	Consequence	Frequency	Risk
1	Н	Α	1	P-1 M-1	M	U	2
2	Н	EU	2	P-1 M-1	M	BEU	4
3	M	U	2	P-1 M-1	L	EU	4
4	M	EU	3	P-1 M-1	L	BEU	4
5	L	EU	4	P-1 M-1	N	BEU	4

Adequacy of Safeguards

Scenario	Consequence	Frequency	Risk	Controls	Consequence	Frequency	Risk
1	Н	Α	1	P-1 M-2	L	U	3
2	Н	EU	2	P-1	Н	BEU	3
3	M	U	2	P-1	L	U	3
4	M	EU	3	P-1 M-1	L	BEU	4
5	L	EU	4	-	-	-	-

Residual Risk ~ Unacceptable Risk

- Brainstorm Additional Controls
- Focused Efforts on Preventive
 - Interlocks?
 - Valve Redundancy?
 - Train Redundancy?

Control Adequacy

- Independent Protection Layers (IPL)
- Layers of Protection Analysis (LOPA)
- Safety Integrity Levels (SILs)

Over Complication ~ Weighting of Controls

- Giving Weight to Different Types of Controls
- Giving Weight to Different
 Controls within a Type

Control	Definition	tion Reduction and Risk Factor		Example	
	Design a task, step, equipment, material or tool to be eliminated before it is put into production or use.	0%			
Elimination Likelihood	• Eliminate human interaction	100%		Elimination (e.g., human interaction) may also eliminate Exposure. In this case, re-do the Risk	
	Replace/eliminate a reaction step, etc. Eliminate pinch points (increase clearance)			Assessment based on the new task.	
		0%		• Ex: replace oil with water, replace lifting 75 lbs w	
Substitution / Reduction Likelihood & Consequence	Reduce interaction with hazard (isolation, automated/remote handling, limit interaction time, etc.)	80%	Reduction of current hazards.	5 lbs, etc. • Ex: replacing flammable with no-combustible,	
	 Replace with less hazardous material Reduce hazard (speed, noise, weight, energy, etc.) 	90%	Substitution of current hazards with lesser hazards.	replace lifting 75 lbs with 20 lbs, etc. Ex: automate material handling where humans have been removed except for upset conditions, etc.	
	2000	0%			
	Barriers Interlocks Presence Sensing Devices (light curtains, safety mats,	40%	Engineering controls that require admin intervention to initiate.	Ex: LOTO where a physical device like a lock requires human intervention to initiate.	
Engineering	etc.) • Fixed machine guards, Emergency stops, etc.	50%	Single engineering control.	Ex: two hand control, light curtain, physical barrier, etc.	
Likelihood & Consequence	Non-skid floor coatings,	60%	Multiple separate engineering controls.		
	Local exhaust ventilation, containerization, etc. Two Hand Controls, etc.	70%	Redundant engineering controls.	Ex: Engineering controls like guards that also have interlocks	
	Safe work procedures Safety inspections Training	0%			
	Lights, beacons, and strobes Computer warnings Worker rotation	20%	Training, warnings signs, etc. without verification or inspections	Ex: Training that does not require verification or inspection that is was completed.	
	Alarms (gas meter, fire, etc.) Barrier tape, tags, floor markings, etc. Signs and Labels Beepers, horns and sirens, etc.	30%	Training, warnings signs, etc. with verification or inspections	Ex: Training plus inspection or verification to verify that procedures are being completed or followed.	
	Buddy Systems, attendants, observers, supervision, schedule limits, etc.				
Personal Protective	• Ear plugs, gloves, respirators, etc.	0% 5%	Single PPE	PPE must be specific to the hazard	
Equipment (PPE) Consequence	Safety Glasses, face shields, etc.	10%	Multiple PPE	Multiple PPE has to be for the same hazard.	
Consequence	Safety Glasses, face shields, etc.	10%	Multiple PPE	Multiple PPE has to be for the same hazard.	

QRA Lessons Learned – Risk Matrix Benefits

- ✓ Practical & Easy Tool to Support a Risk Management Program
 - ✓ Promote Robust Discussion
 - ✓ Provide Consistency Prioritizing Risks
 - ✓ Focus on Higher Priority Risks
 - ✓ Present Data in Easily Understood Format
 - ✓ Potential Systematic Screening Levels

QRA Lessons Learned – Risk Matrix Limitations

- ✓ Subjective Interpretation
 - ✓ Consequence
 - ✓ Frequency/Likelihood
- ✓ Misleading Rankings of Risk
 - ✓ Inexperienced
 - ✓ Biased
 - ✓ Agenda

QRA Lessons Learned – Risk Matrix Limitations

- ✓ Assign Identical Risks to Different Cause-Consequence Pairs
 - ✓ Frequency can Mask Consequence
- ✓ Static View
 - ✓ Risk of Event May Change Over Time
 - ✓ Material at Risk Increases
 - ✓ Receptor Encroachment
 - ✓ Exposure Standards Changes

QRA Lessons Learned – Risk Matrix Limitations

- ✓ Actual Events Not Incorporated into Risk
- ✓ Focusing on Probability Numbers Versus Comparative Value
- ✓ Subjective Assignment of Consequence & Frequency
- Two Different People Yield Comparable But Different Risks for Same Scenarios
- Not Assigning Frequency Controls Before Consequence Controls

Parvati Preferred QRA Methodology

- Perform Additional Hazard Evaluation and/or Accident Analysis If Necessary
 - Higher/Unacceptable Residual Risk
 - Unclear Control Strategies
 - Better Definition of Frequency or Consequence
- Use of Risk to Determine Control Adequacy
 - Standard Frequency, Consequence, & Risk Tables
 - Qualitative Analysis
 - Analyze Unmitigated Consequence & Frequency ~ Inherent Risk
 - Apply Identified Preventative/Mitigative Controls
 - Determine Mitigated Consequence & Frequency ~ Residual Risk

References

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- Guidelines for Risk Based Process Safety; CCPS 2007
- Layer of Protection Analysis: Simplified Process Risk Assessment; CCPS 2001
- Guidelines for Initiating Events and Independent Layers of Protection Analysis, 1st Ed; CCPS 2014
- Guidelines for Enabling Conditions and Conditional Modifiers in Layer of Protection Analysis; CCPS 2015
- System Safety Analysis Handbook "Big Green Book," System Safety Society
- System Safety for the 21st Century "Green Book," Richard A. Stephans
- ANSI Z590, *Prevention Through* Design Guidelines for Addressing Occupational Hazards and Risks in Design and Redesign Processes
- MIL-STD-882E, Department of Defense Standard Practice System Safety
- SEMI S10-0307E, Safety Guideline for Risk Assessment and Risk Evaluation Process
- OSHA 1910.119, Process Safety Management of Highly Hazardous Chemicals
- DOE-STD-3009-1994 CN3, Preparation of Nonreactor Nuclear Facility Documented Safety Analyses
- DOE-STD-3009-2014, Preparation of Nonreactor Nuclear Facility Documented Safety Analyses
- DOE-HDBK-1163-2020, Integration of Hazard Analyses



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- Program Development/Integration
- Expert Witness/Testimony

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