

EFCOG Integrated Safety Management Working Group FY2023 Annual Work Plan (October 1, 2022 – September 30, 2023)

Purpose

This document contains the Energy Facility Contractors Group (EFCOG) Safety Working Group (SWG) FY2023 Annual Work Plan (AWP). The approved AWP provides authorization for EFCOG members within the various Subgroups to work on activities identified in the AWP. Since the SWG has moved to a Task format for the AWP, it is possible that not all deliverables identified in the Plan will be completed by the end of the Fiscal Year. As a result, dates may not be provided for deliverables. While not consistently identified in the plan, all Subgroups meet or otherwise engage periodically throughout the year. In addition, due to the reorganization and refocusing of the SWG that occurred at the end of FY2022, the Subgroups, Communities of Practice, and emerging Task Teams will focus throughout FY2023 on institutionalizing these changes to assure EFCOG resources are effectively focused on tasks with the potential for high impact to the DOE/NNSA contractor community.

Working Group Mission and Scope:

The EFCOG SWG is chartered to support member companies in attaining and maintaining the highest levels safety and regulatory performance in the operation of Department of Energy (DOE)/National Nuclear Security Administration (NNSA) facilities/projects. The SWG will achieve this by:

- Advocating for strong, effective implementation of Integrated Safety Management across departmental activities.
- Seeking out, developing, and promoting best management and operating practices.
- Facilitating the exchange of operating experiences and information on safety/regulatory programs and their effectiveness and designing studies and developing position and technical papers to inform DOE/NNSA regulations and directives processes where appropriate.
- Providing DOE/NNSA and member companies with access to a network of subject matter experts.
- Assisting member companies in cost effective implementation of effective safety and regulatory programs through peer reviews and consultations;" and
- Arranging for training, exercises and/or awareness workshops to enhance the competency of safety professionals.

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To accomplish its mission, the SWG is subdivided into 5 Subgroups (effective for FY2023), which are listed below, and associated Task Teams. This AWP is similarly organized by Subgroup:

- Integrated Safety Management Systems (ISMS)
- Quality Assurance (QA)
- Regulatory & Enforcement (R&E)
- Contractor Assurance Systems (CAS)
- Worker Safety & Health (WS&H)

“Safety,” as it relates to the scope of the Working Group, is inclusive to the Department’s implementation of an Integrated Safety Management System. Safety includes several related functions such as worker safety and health, industrial hygiene, radiological protection, work planning and control, quality assurance, contractor assurance, and related regulatory programs.

FY2023 strategic focus areas identified by the EFCOG Board that are addressed in the Plan are:

1. Safe, Secure, and Effective Operations
2. Ensuring the Long-term Availability of Critical Equipment, Supplies, and Infrastructure
3. Assuring that Projects are Completed on Cost and Schedule
4. Recruit, Develop and Retain the Right People to Ensure Future Mission Needs are Met

Approved by: *Signature on file* Date: December 19, 2022
Jan Preston
Safety Working Group Chair

Approved by: *Signature on file* Date: December 19, 2022
Garrett Smith
Director, (EHSS-30)
Office of Nuclear Safety
Department of Energy, Safety Working Group Liaison

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Contractor Assurance System (CAS) Subgroup

Activity	Benefit(s)	Deliverable/Key Milestone
<p>CAS-23-01 – Restructuring the former CAS Task Team into a stand-alone CAS Subgroup</p>	<p>Improved effectiveness at identifying and addressing challenging issues and declining performance across the DOE complex via effective use of CAS</p>	<ul style="list-style-type: none"> • Identify issues for collaboration, development, and best practice sharing within the CAS Subgroup’s realm of influence (3/23 target) • Identify Community of Practice focal areas around the issues • Resource Subgroup leadership and COPs with SMEs across multiple CoPs, Subgroups, and Working Groups of EFCOG • Identify FY2024 CAS Subgroup Tasks/ Deliverables
<p>CAS-23-02 – Develop a White Paper on <i>Anticipating and Mitigating Operational Upsets</i></p>	<p>Realize opportunities to improve consistency across the DOE complex and improve the integration and effectiveness of similar organizations.</p>	<p>Publish White Paper (6/23 target)</p>
<p>CAS-23-03 – Develop a White Paper on <i>Integrated Trend Analysis Processes</i></p>	<p>Realize opportunities to improve consistency across the DOE complex and improve the integration and effectiveness of similar organizations.</p>	<p>Publish White Paper (9/23 target)</p>
<p>CAS-23-04 – Broaden participation and collaboration between Subgroups/other Working Groups</p>	<p>Ensure work products have a more balanced perspective by DOE/NNSA & Contractors representing all Program offices.</p>	<p>List of CAS Subgroup participating members, leadership, and their affiliation (9/23 target)</p>
<p>CAS-23-05 – Develop and distribute information on training opportunities in CAS arena (NTC, HPRCT, Conferences).</p>	<p>Assist in developing proficiency in CAS tools as the work force transitions to a less experienced labor pool. Support the DOE NTC in usage of complex-wide training programs.</p>	<p>List distributed to CAS Subgroup members (9/23 target)</p>

Integrated Safety Management Systems (ISMS) Subgroup

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<p>ISM-HPI-23-01 – Support EHSS-20 revision of DOE-HDBK-1028-2009, <i>Human Performance Improvement Handbook</i></p>	<p>Human Performance Tools for Individuals, Work Teams, and Management were written in June 2009. They have become the core reference documents for many users both within and outside the DOE complex. These updates will help expand the scope of the Department's HPI programs by encompassing Human and Organizational Performance.</p> <p>This effort will result in significant revisions to the Handbooks, with an estimated 25% change to Volume 1 and a 50% change to Volume 2. The content and the approach to the topics will be based on concepts and practices found helpful in the commercial nuclear power industry, electrical grid and distribution, national laboratories, and those adopted by other sectors.</p>	<p>The EFCOG HPI Task Team will collaborate with EHSS-20 to select EFCOG members for this Task Team</p> <p>EHSS-20 will identify the specific updates that will be made by the team revising the Handbooks. The team will be composed of a Federal Project Lead with academic and technical experts. Team members will include subject-matter experts from DOE’s M&O contractors and thought leaders from outside the DOE complex.</p>
<p>ISM-SC-23-01 – Initiate effort to develop a culture survey question bank and guidance document</p>	<p>Offers a resource of survey questions that have been found to be effective in practical application.</p>	<p>Initiate compilation effort and create a repository; this is expected to be long-term and potentially evergreen project.</p>
<p>ISM-SC-23-02 – Develop a White Paper offering an integrated approach to culture, linking safety culture to other organizational aspects, like security, quality, etc.</p>	<p>Advances a more interconnected perspective of organizational culture and its many aspects.</p>	<p>Publish White Paper</p>

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ISM-SC-23-03 – Develop Guide on managing culture through contract transition	Provide advice and good practice recommendations to many DOE-contracted sites that are facing the organizational challenges of contract transition.	Publish Guide
ISM-WPC-23-01 – Collaborate across the complex to streamline the Technical Work Document (TWD) and remove non-value added material	Increase throughput and first pass completion of TWDs	Develop a White Paper or a Best Practice of a template for an efficient, compliant TWD

Quality Assurance (QA) Subgroup

Activity	Benefit(s)	Deliverable/Key Milestone
QA-23-01 – Benchmark across the DOE complex to identify methods for controlling nonconforming items under a Conditional Release	Identify/share best practices within the DOE complex	Draft White Paper for the EFCOG Spring 2023 ISMS/QA Joint Meeting
QA-23-02 – Benchmark other sites to identify methods for qualifying auditors or lead auditors to various quality standards	Identify/share best practices within the DOE complex	Draft White Paper for the EFCOG Fall 2023 ISMS/QA Joint Meeting

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Regulatory & Enforcement (R&E) Subgroup

Activity	Benefit(s)	Deliverable/Key Milestone
<p>R&E 23-01 – Host a series of contractor information exchange phone calls to enhance peer-to-peer mentorship. The Steering Committee will: 1) monitor the discussions for topics of general interest that may be appropriate for a virtual meeting or conference call with the Office of Enforcement; 2) evaluate interest in these meetings at the end of the year; and 3) apply feedback to continue improving peer-to-peer mentorship.</p>	<p>Provide a forum in which to discuss common challenges in determining noncompliance and making decisions about reporting. The discussions will aid new enforcement coordinators and improve consistency across the enterprise.</p>	<p>Two or more conference calls or virtual meetings. Decision on conference call or virtual meeting frequency and forum (call or virtual meeting). Feedback from the participants.</p>
<p>R&E-23-02 – Pilot one or more virtual or conference call events with the Office of Enforcement in which the technical subgroup applies techniques to improve engagement with the Office of Enforcement in virtual meeting or conference call formats. The Steering Committee will collect data regarding the event and identify means to continue improving engagement with the Office of Enforcement.</p>	<p>Past attempts to meet virtually with the Office of Enforcement revealed a reluctance to engage on the part of our membership. This task is designed to test techniques for increasing engagement in virtual forums in the hope that we can build on the networking and engagement we achieve in our face-to-face meetings.</p>	<p>One or more conference calls or virtual meetings. Feedback from the participants regarding topics and techniques selected to encourage participation.</p>

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Worker Safety & Health (WS&H)

Activity	Benefit(s)	Deliverable/Key Milestone
<p>WS&H-IH&S-23-01 – Benchmark implementation of the new OSHA Silica Standards and develop a white paper along with a DOE-specific “OSHA Table” for Silica (continuing task: formerly WS&H-LS-22-01)</p>	<p>OSHA has promulgated two new standards related to silica – 29 CFR 1910.1053 and 29 CFR 1926.1153; one for general industry and one for construction. How these standards are implemented across the complex is important for consistency and ease of implementation.</p> <p>Collaborate with CoP Occupational Medicine Team.</p>	<p>Benchmarking completed in FY2022. In FY2023, issue White Paper on implementation of the new standards</p>
<p>WS&H-RP-23-01 – Develop a multi-faceted plan to address succession and development needs for Radiation Protection technicians and health physics professional staff</p>	<p>This is a very high priority initiative that is focused to address projected shortfalls of qualified Radiation Protection staff across the Complex</p>	<p>Publish a report looking at disparate approaches to staffing challenges, with a wide range of possible solutions to address current and projected future staffing needs</p> <p>Provide recommendations to the Radiation Protection (RP) Community of Practice March 2023 meeting</p>
<p>WS&H-RP-23-02 – Develop and Issue a Technical Position on the Use of Standard Health Physics and COTS Software Across the Complex.</p>	<p>Nuclear Safety Software has specific scope and definitions as defined in DOE O 414-1D and, while all Radiation Protection software must adhere to the 10 criteria specified in this order, the classification of this software under the definition of safety software as defined in NQA-1, Section 2.7 is, in most instances, an inappropriate classification since most, if not all, Radiation Protection</p>	<p>Provide recommended guidance on appropriate applications and classifications of Radiation Protection software</p> <p>The Radiation Protection CoP position paper will not only include differentiating software quality uses and application but will also suggest use of a Central Registry where frequently used consequence assessment software programs reside and can be used to meet appropriate QA software requirements as specified in DOE O 414-1D.</p> <p>There is continued confusion and misinterpretation of “what is safety software”, especially as it relates to</p>

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	<p>related programs do not perform any hazard control functions.</p> <p>Therefore, applying the safety software requirements to these programs represents an unnecessary and undue burden. This high priority initiative will address the disparate way individuals interpret NQA-1 Nuclear Safety Software requirements with other software QA requirements.</p>	<p>Radiological Protection activities. While all Radiation Protection related software must meet the 10 criteria listed in DOE O 414.1D, the issue is that most, if not all Radiation Protection software DOES NOT meet the NQA-1 definition of safety software, that is software that "performs a hazard control function": the vast majority of Radiation Protection software is post facto consequence management software. The issue is how this distinction is made and interpreted.</p>
<p>WS&H-LS-23-01 – Benchmark additional control requirements from ANSI Z136.1-2014 and Revise “<i>Guidance on Laser Safety Requirements</i>” documents to include these benchmarking efforts (continuing task: formerly WSS&H-LS-22-03)</p>	<p>Ensure a uniform interpretation of the standards by contractors. This new document will be called DOE Laser Safety Guide/ Handbook.</p>	<p>Publish and provide to EHSS-11 a White Paper (draft provided in FY2022) containing recommendations for meeting the reporting requirements of FDA Notice 25 (part of Policy Clarification #D20-09-001).</p> <p>Publish Best Practice in FY2023.</p>
<p>WS&H-LS-23-02 – Perform a crosswalk of the ANSI Z136.1 for Safe Use of Lasers to the newly released ANSI Z136.8 for Safe Use of Lasers in Research and Development (continuing task: formerly WSS&H-LS-22-06)</p>	<p>The ANSI Z136.1-2014 is used at the DOE Labs for flow down of controls into specific ES&H Manuals. The Z136.8 is more applicable for R&D work, but the initial release was not deemed an adequate standard in a previous crosswalk.</p>	<p>Publish report to the EFCOG-LSTT web page and submit abstract to present findings at the 2023 DOE Laser Safety Officer Workshop and the 2023 International Laser Safety Conference.</p>

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<p>WS&H-LS-23-03 – Evaluation of ANSI Z136.1-2021/2 and comparison with Z136.1-2014 and Z136.8-2021</p>	<ul style="list-style-type: none"> • Compare Z136.1-2021/2 (standard forthcoming) with Z136.1-2014 and with ANSI Z136.8-2021, Safe Use of Lasers in Research, Development and Testing. • Evaluate and summarize substantive differences between the 3 standards and determine if any changes should be developed as best practices [e.g., changes to Maximum Permissible Exposure (MPE) limits] <p>Currently, DOE labs have a regulatory requirement via 10CFR851 to abide by Z136.1-2014</p>	<p>Develop and publish a summary of all the changes in the document.</p>
<p>WS&H-LS-23-04 – Benchmark laser protective eyewear (LPE) use across the DOE complex (continuing task: formerly WSS&H-LS-22-05)</p>	<p>One of the largest issues with the use of administrative controls is laser protective eyewear. This will ensure that the Best Practices are shared across the complex and more uniform safe practices are implemented.</p> <p>Areas of concentration will include:</p> <ul style="list-style-type: none"> • The use of multiwavelength protection in a single filter (When does VLT become a hazard?) • The use of multiple filters in a single lab (i.e., how are multiple types of LPE filters, including 	<p>Publish report to the EFCOG-LSTT web page and submit abstract to present findings at the 2023 DOE Laser Safety Officer Workshop.</p>

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	alignment eyewear, in a single lab/facility controlled?) • Identification of proper LPE where specific wavelength/OD coverage is not printed on LPE by vendor	
ES-23-01 – Review and document the significant changes to NFPA 70 2023 National Electrical Code	Provides advice and recommendations to many DOE-contracted sites that are facing the challenge of transitioning to the latest edition of the NEC. Crosswalk of 2020-2023 changes will provide potential impacts to adoption and implementation across the complex.	Develop a best practice and crosswalk documentation of changes that most widely affect cost and operational impacts to DOE Facilities and Laboratories desiring to adopt the current standard
ES-23-02 – DOE-HNBK-1092 Revision Support	Provides consistent guidance for DOE representatives to locate safety related work practices necessary for DOE operations that are not covered by standards and codes implemented by 10 CFR 851	Continued support to EHSS-11 throughout RevCom. A successful release of the DOE Handbook published for use
ES-23-03 – Electrical Safety Month Materials	Provide training materials on one or more topics addressing electrical safety issues that are timely and pertinent for the DOE Complex	Topics to be selected in Q1 of FY2023 Posted to EFCOG website beginning of Q3 FY2023, allowing access and distribution to all DOE Sites
ES-23-04 – Best Practice for Capacitive System Grounding Sticks to compliment what DOE submitted and entered into NFPA 70E Chapter 3 Article 360 and Annex R. (2021)	Added safety related work practices and requirements for ground sticks where not currently identified in the standard.	Distribute Best Practice for Capacitive System Grounding Sticks. Submit for changes to NFPA 70E 2027