



LATA Environmental Services of Kentucky

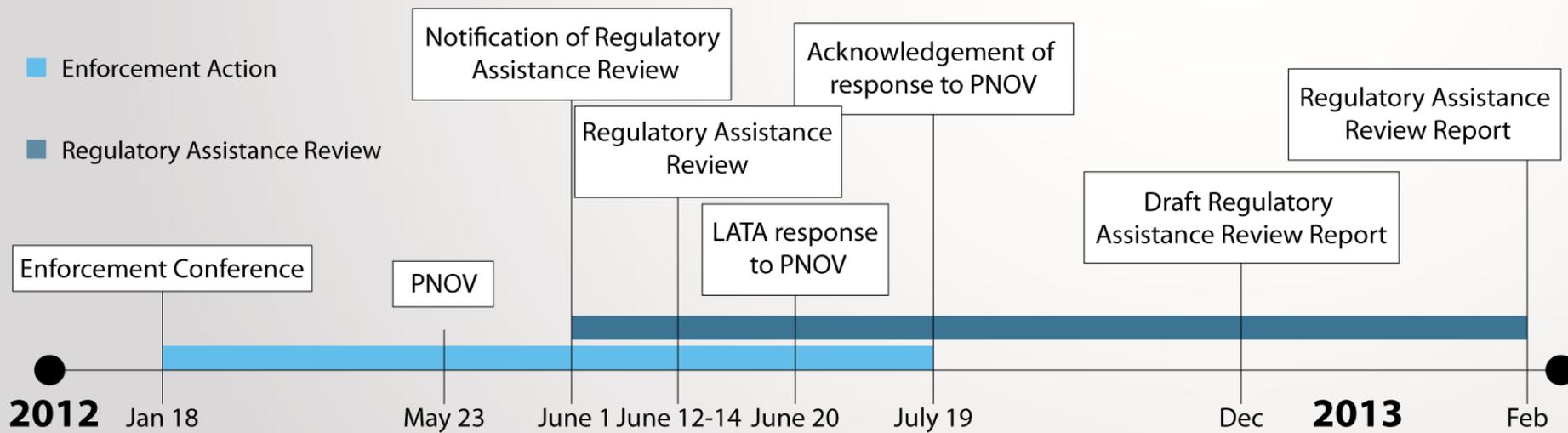
LESSONS LEARNED FROM WSH REGULATORY ASSISTANCE REVIEW

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CHRONOLOGY



WHEN TO REQUEST AN ASSIST VISIT



- When you are ready? = Never
- When management says so? = Never
- When its convenient? = Never
- How about right after an Enforcement Action?

Pain vs Gain



- Lots of preparation
- Scheduling & Logistics
- Presentations
- Resource commitments
- Engaging other departments
- Communication
- Understanding
- Teaming/Trust
- Training
- Highlight Success

Learning Curve



- Perception
 - Alignment of contractor/client expectations
 - First hand information
 - Reinforcement with contractor management
- Position
 - How do we compare with other contractors?
- Progress
 - Feedback on improvement efforts

Looking Back



- Timing
 - Is there a “right” time for an assist visit?
 - Right time for LATA Kentucky
- Outcome
 - Overall positive feedback on program
 - Identified strengths
 - Provided Opportunities for Improvement
- Report
 - Timeliness
 - No response expected

LL: Select recommendations (OFIs) from out brief to implement immediately while momentum is on your side.

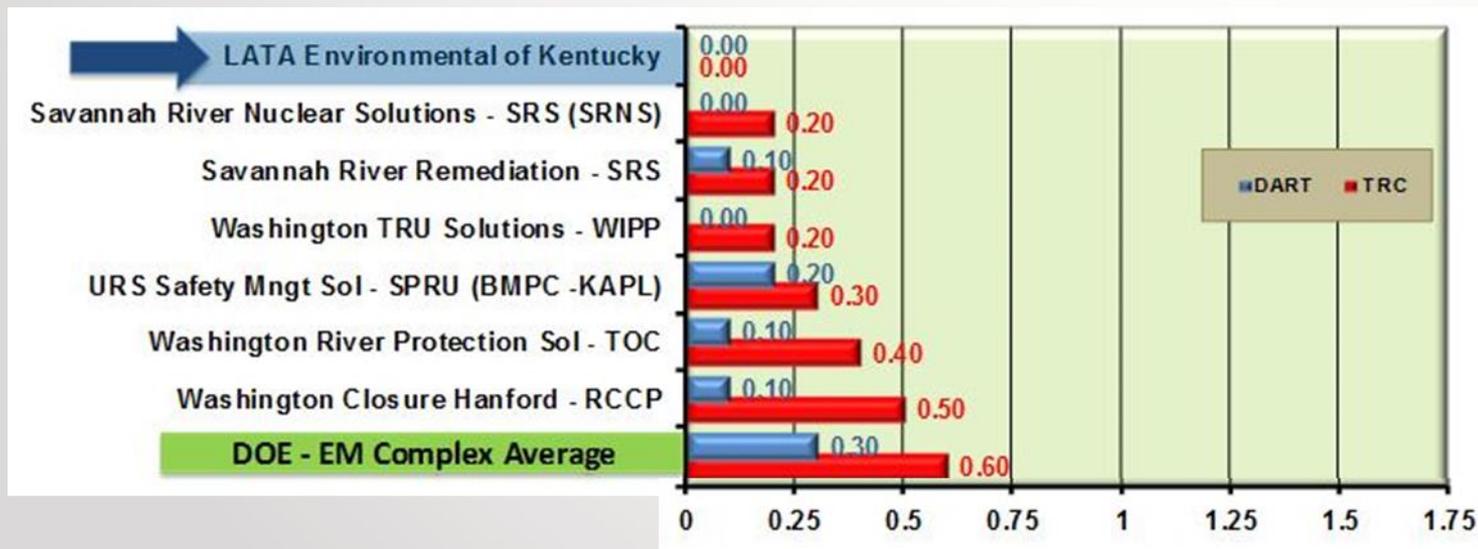
Recent History



For the last two fiscal years LATA Kentucky has led the DOE Environmental Management projects with the lowest DART and LWC rates

DOE- EM Prime Contractor Safety Ranking

FY2013 (Contractors with > 200 Direct Operations and Construction Employees & Subcontractors)



Ranked by Total Recordable Injuries per 200,000 Work Hours

[Based upon CAIRS as of 02/04/2014]

Recommendations



General Implementation

- Benchmark with more mature noncompliance reporting programs

Procedures and Training

- Implement updated regulatory compliance procedures and assess field performance. The resulting implementation data will either affirm the procedures as written or provide additional areas for improvement.
- Extend training to line management, subject matter experts, and other personnel to provide a better understanding to a broader population.

Identification and Screening

- Establish a process to review low level events in a systematic manner to identify those that represent repetitive or programmatic noncompliances.
- Screen for NTS reportability all industrial hygiene monitoring results in excess of regulatory limits regardless of the use of PPE.

Recommendations



Evaluation of NTS Reportability

- Maintain due diligence files documenting negative NTS determinations.
- Incorporate decision criteria for determining programmatic deficiencies and repetitive noncompliances in guidance documents. This will enhance the usefulness of the flowchart and better align it with DOE reporting expectations.
- Evaluate issues/events for NTS reportability based on inherent risk (i.e., the risk that exists without controls in place) rather than residual risk (i.e., after implementing controls).

Regulatory Noncompliance Issue Management and Trending

- Establish a formal process to track and trend data received from the site occupational medical provider to identify and report issues defined in the DOE *Safety and Security Enforcement Coordinator Handbook*, tables III-1 and III-2.

Assessments

- Enhance the value of informal oversight by focusing on regular safety topics and directly involving applicable SMEs to accompany the managers during the walks. This latter point will provide a technical resource to the manager during the tours and also help convey a mutually supportive relationship among organizations.

Risk



- Inherent Risk

What is the risk without any controls in place?

What is the risk if controls don't work or fail?

- Residual Risk

What is the risk after controls are implemented?

(Supposes that controls will not fail)

- Hierarchy of controls

Conclusion

- No regrets
- Would recommend a review again
- Review was straightforward and fair

