AHJ POLICY WORKING GROUP

RECIPROCAL AGREEMENTS FOR UTILIZATION EQUIPMENT INSPECTIONS

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The Goal

A bit about our process

Our recommendations

The Plan



Determine whether DOE-Wide acceptance of Equipment Field Evaluations is feasible

- If so:
 - Define the end state
 - Form a plan to get there

Note – It is understood that the decision on whether to participate in ultimately up to the AHJ's at the respective sites.

NO SHOW STOPPERS!

Applies going forward

Concerns include:

- Who provides funds for database and training development
- Database security

PROCESS

- 1. Defined the goal of our group
- 2. Brainstormed for issues
- 3. Categorized the issues
- 4. Divided into subgroups to based on categories
 - 1. Subgroups studied issues that affected their categories
- 5. Combined recommendations
- 6. Made Plan for Implementation

BRAINSTORMED ISSUES AND CATEGORIES

26 issues were identified

5 Categories

- Inspection Processes
- Training/Qualifications
- Receipt Processes
- Documentation
- Legal Issues

STANDARDIZED INSPECTION PROCESSES

Recommendations are:

- Standardize on inspection process
- Special "Reciprocity Approval" stickers
- Shared Quality Assurance and Peer Reviews

Sites would have to adopt the Reciprocity Program to participate.

UNIFORM QUALIFICATIONS AND TRAINING

Share training costs between sites

Consider challenges for small sites

Incorporate standards into training and qualification ie 790, 791, 508A etc.

DOE National Training Center might consider developing electrical inspector qualifications and training.

• Similar to reciprocity of rad worker qualifications

Train the trainer when appropriate

PRIOR EFCOG ESS WORK

A uniform Training program should include the following elements: (Taken from 2011 EFCOG working group on AHJ qualifications and training)

- Five years of field related experience -Electrical/Electronics experience examples include but are not limited to, equipment fabricator, design engineer, technician, electrician, certified inspector, technical Associate degree (can count for up to 2 years), technical bachelor degree or higher (can count for up to 4 years), military training, and approved apprenticeship.
- -Classroom (on or off-site) examples include applicable principles contained in standards e.g. NFPA 70E, 70, 79, UL 508A, 61010 series, OSHA 1910 section 303, 1926 section 403; Equipment specific training e.g. HV, Batteries, Capacitors, RF; DOE electrical Safety Handbook (as applicable); Suspect Counterfeit items
- -Hands-on examples include OJT, Mentoring, Job performance measure (evaluation)
- -Continuing education examples include applicable codes and standards updates, Site specific up-dates

RECEIPT INSPECTIONS

- Receiving labs perform brief receipt inspection
- Documentation is presented in similar format
- Acceptance by receiving lab is optional
- MOU establishes minimum requirements for inspection standards and Inspector training

DOCUMENTATION

Recommendations are:

- Implement a shared, common database
- Special "Reciprocity Approval" stickers

LEGAL ISSUES

Requires an MOU

- Pursue single agreement among all participating labs
- Identifies best practice documents
- Establishes commitment of cost
- Establishes right to withdraw

Sites would have to adopt the Reciprocity Program to participate

COST VS. BENEFITS

Costs:

- Establish Database (significant one time)
- Maintain database (significant on going)
- Develop best practices (we can do this ourselves one time)
- Develop and establish inspector training (significant one time)
- Support Peer Reviews (significant on going)
 Benefits:
- Fewer repeat inspections
- Less delay to users
- Improved quality and consistency
- Single stream-lined process for all sites
- Reduced engineering costs to manufacturers
- Easy adoption for new sites

Cost of avoiding inspections does not justify the effort. Intangibles like better efficiency, faster service, better consistency have great value

IMPLEMENTATION PLAN

Task	By When
Standardize Inspection Process	June 30, 2015
Standardize Documentation	January 31, 2015
Develop Receipt Inspections	January 31, 2015
Create MOU	March 31, 2015
Develop Labels	March 31, 2015
Develop Database	July 15, 2015
Establish Inspector Qualifications	October 31, 2014
Establish Training Best Practice	February 28, 2015
Training available	June 30, 2015
Develop QA and Peer Review Procedure	January 31, 2015

SUMMARY

Implementation of reciprocity:

- improves safety
- produces consistency,
- improves efficiency
- reduces cost, and.

Drives everyone to "improve their games"

The AHJ Policy Working Group strongly recommends proceeding with this plan.

BACKUPS BEYOND HERE

STANDARDIZED INSPECTION PROCESS

Participating sites would adopt NFPA 791 as the standard for conducting equipment inspections

- Incorporate 791, but write it like a manual with more explanations
- Add checklists
- Conditions of use must be specified
- Allow reduced (external only inspections) for "Reputable Manufacturers"

RECIPROCITY APPROVAL LABELS

- Special stickers would be attached that show that reciprocity is allowed and would provide reference into the common database
- All sites would use the same label
 - The labels would have a mark that shows which site did the inspection

COMMON DATABASE

Implement a single shared database that all participating sites could access

All participating sites would provide financial support for startup and for ongoing maintenance

Individual reports accessible by unique identifiers on "Reciprocity Approval Labels"

PEER REVIEWS

- Each participating site would send at least one person per year to another participating site to review quality
- Results would be reported to all participants