Working Group #3 – Subcontract Work

- Objectives (1 and 2 combined)
- 1 Electrical Safety Compliance Resource web site
 - a) Universal web-based tool for effective work planning
 - b) Build and Share Best Practices Collection for 851 Compliance
- 2 Proposal for Code and Standard updates to become the norm



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Objective 1.a

Universal web-based tool for effective work planning





Work Planning and Hazard Control Tool

- This tool is for demonstration purposes, it is not vetted for use by DOE contractors.
- http://apps.ctc.com/esafe-pro/



Strategy for 1.a

- Identify a DOE or M&O host
- Obtain the source code/platform for the DOD tool
- Identify an EFCOG team to load desired material and validate functionality
- Beta test resource at select sites, revise if needed
- Prepare for full release "press release" to sites, with POCs (AHJ or delegate) etc.
- Garner high level support and visibility through execution of Objective 2 using the Lab Management Council, PSOs and other executive level communications
- Long term management proposed as a NNSA "Corporate Behavior" activity.



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Objective 1.b

Build and Share Best Practices Collection for 851 Compliance





Vision of Objective 1.b

Compilation of tools, techniques and processes to utilize for continuous improvement of 851 compliant electrical (both M&O and Subcontracted) work

- Simple, "grab and go" type tools to aid ESOs, work planners, project planners and oversight personnel responsible for safe execution of electrical work
- The "go to site" for electrical work



Vision of Objective 1.b cont.

Examples

- Corporate (DOE Complex) bin
 - Severity Index Tool
 - Handbook
 - Safety Practices (supply and location of AEDs)
- Training Resources for Subs and others
- General Tools for work execution
 - Smart Card (cheat sheet from JHA for field use)
 - Hazard class specific "cheat sheets" (class-specific guide or checklist for work scoping and planning)
- Subcontract management tools
 - Training verification and validation tools
 - WSHP, LOTO, DOPs
 - Previous site/DOE experience of work provider
 - Equipment (Tools and PPE) validation for scope of work

Strategy for Achieving 1.b

- Subgroup 3 will build the initial collection, host on same web site with the tool
- Tools and other articles can be submitted to the subgroup, periodic updates
- Subgroup will revisit and review use of the tool each year at the EFCOG committee meeting
- All items will be provided with a short description and credits to the site/contractor that developed the item
- Options for hosting this document server:
 - NTC NNSA has a large IT contingency in ABQ and NTC already hosts the online training and reciprocity database
 - One of the NNSA labs, under the guise of the "corporate behavior incentive fee activities"
 - Other suggestions??



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Objective 2

Proposal for Code and Standard updates to become the norm





Vision of Objective 2

- All DOE sites are implementing either the latest versions of NEC and 70E, or one revision back
- Web based tool(s) available for use by all M&O and subcontract work providers
 - Implement and build on best practices already in place.
 - Streamline 851 compliance for consistently high performance
- Establish a basis for continuous improvement and a model for other 851/WSHP segments
 - Decision paper to Lab Management Council and DOE PSO's.



Road Map of Electrical Safety Requirements in 851

- 10 CFR 851 (2006)
 - NFPA 70 2005 (currently at 2014 2017 in process)
 - NFPA 70E 2004 (currently at 2015 2018 in process)
 - 70E-2009 requires revision of maintenance program to include overcurrent devices, 70B is a guide
 - 70E-2015 adds further standards as guides
 - 29 CFR 1910 (S) (operations)
 - 29 CFR 1926 (K) (construction)
- DOE G 440.1-1B (2011)
 - DOE HDBK-1092-2004 (superseded by 2013)
 - Each DOE prime contract WSHP



GOAL – Drive Consistent and Efficient 70 E

- Current DOE status of 70 E compliance
 - 2004 8 sites: SRS, SLAC, ORP, PNNL, ANL, BNL, ORNL (partially on 2012), FNAL
 - 2009 4 sites: JLAB, RL, INL, LLNL
 - JLAB =>2012
 - 2012 6 sites: NREL, PORTS, PTX, SNL, LBNL, PPPL
 - NREL, PTX, LBNL, PPPL, LLNL => 2015
 - 2015 5 sites in process (above)



GOAL – Provide existing data and business cases for efficient 70 E revision adoption

- Gather completed impact analyses from all sites on all revisions after 2004
- Maintenance Program Status relative to 70E?
 - Who does / does NOT have a documented maintenance program that is faithfully executed
 - Who is using or transitioning to 70B (Current Version – 2016)
 - ?? TBD for the Winter 2016/17 meeting
- Complex-wide metrics should be considered for this and other key program effectiveness.

Strategy for 2

- Include in next DOE Electrical Safety Handbook revision, a recommendation to update code and standard revisions at all sites as timely as possible, but no more than one revision back from the most recently released version.
- EFCOG leadership and DOE to garner high level support through NNSA/DOE and Office of Science federal and M&O staff engaged in EFCOG.



Focus on 2017

- Investigate the DTI/NTC as an accreditation mechanism for outside NFPA70E training
- Develop an implementation plan to stand up DOE HDBK Appendix D (Hazard Analysis) tool on NTI
 - Translate 'hazard' categories to 'risk' categories
 - Translate the risk categories into Work Authorization Levels (this should ultimately translate to the assumed liability on behalf of the subcontractor)
- *Consider* standing up a LOTO program (again, hosted by the NTC) that Subcontractors - especially those who deal frequently with the National Labs – could adopt