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CHAPTER 2: MANAGEMENT COMMITMENT

1. DEMONSTRATING COMMITMENT

The DOE FEOSH Program will be effective in reducing risks only if top management is truly committed to protecting employees. Top management support and commitment are required to:

- Provide leadership and direction for the OSH program.
- Provide OSH resources.
- Motivate DOE line management to implement OSH initiatives.

Top management sets the tone for onsite work. Management commitment to worker protection should be evident to the employee.

Walking the Talk

Management demonstrates commitment by taking an active role and setting a positive example. At a minimum, management should establish a written worker protection program, ensuring that it integrates all elements and functional areas required by DOE and Federal regulations. Real management commitment, however, requires more than a written program. Managers must actively demonstrate their concern for all aspects of safety and health.

This commitment also ensures that all employees understand that the organization considers safety and health to be a fundamental value with priority equal to or greater than other objectives. If management assigns top priority to OSH programs and principles, others in the organization will follow. No OSH program can succeed without demonstrated commitment of management at all levels.

Get Visibly Involved**Worksite Visits**

- Identify shortcuts that workers take to speed production. These shortcuts may increase risk.
- Compliment safe work practices.
- Discuss safety and health issues with supervisors and workers.
- Correct hazardous conditions and practices.

Formal Inspections

- Perform housekeeping inspections.
- Accompany safety and health inspection teams.
- Ensure that action is taken to correct deficiencies.

Be Accessible to Employees. Managers must be accessible to employees in order to address any FEOSH-related questions and issues. This includes listening and responding appropriately to employee concerns. Accessibility may be evidenced through the following activities:

- Take time during walkarounds and/or safety inspections to talk with employees about OSH issues.

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- Establish an “open door” policy that allows employees to express concerns and discuss OSH issues without fear of reprisal.
- Conduct periodic informal meetings between management and small employee groups to discuss and resolve OSH issues. A different group of managers and employees should participate at each meeting so everyone at the worksite becomes involved.

Set the Example. Managers at all levels must:

- Know, understand, and comply with safety rules and requirements.
- Publish frequent memorandums on safety and health issues and include safety and health topics in speeches or talks with internal and external groups.
- Ensure that subordinates know, understand, and comply with the FEOSH program.
- Take charge, becoming actively involved in site safety and health committees and other OSH-related activities.

2. ESTABLISHING A FEOSH PROGRAM

The establishment of a formal program is important to demonstrate how management, with employee involvement, will fulfill DOE requirements for OSH programs. The program should be communicated through an integrated system of site-specific policies, goals and objectives, program documents, and procedures. Chapter 3 provides guidance on establishing a FEOSH Program.

3. PLANNING AND BUDGETING

To meet the challenge of managing an adequate worker protection program with limited resources, it is imperative that DOE Elements request necessary funding to operate the facility and properly plan for the effective use of personnel, material, and other resources to support the worker protection program. Planning and budgeting exercises establish operations priorities to include worker protection and become the foundation for structuring an operational plan that provides adequate worker protection. Funding requirements are determined based on projected costs submitted in the annual operating budget.

Operational planning typically spans 1 to 5 years and focuses on specific functions, such as marketing, research and development, operations, finances, and worker protection. These are the elements necessary to ensure that adequate materials and supplies are allocated to support day-to-day operations. Likewise, facility requirements—including people, equipment, supplies, and resources necessary for worker protection—must be addressed in this planning. One vehicle for worker protection planning and budgeting within DOE is the ES&H Management Plan (formerly referred to as the Safety and Health Five-Year Plan).

Appendix 2-1 shows an example of an Activity Data Sheet (ADS) that could be generated as part of the ES&H Management Planning Process.

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These ADSs demonstrate the rationale for requesting funds to correct deficiencies and implement new programs required by regulatory requirements.

4. MEASURING PERFORMANCE

Managers must clearly communicate roles, responsibilities, authorities, and accountability of workers at all levels. Managers and supervisors must carry out their own responsibilities and expect employees to follow safe and healthful work practices. When held accountable for their worker protection responsibilities, managers and supervisors are more likely to press for solutions to safety and health problems. Managers are typically accountable for the overall worker protection program, including planning and allocating resources for the facility. Supervisors are accountable for ensuring that the worker protection plans, programs, and procedures, including hazard identification and abatement activities, are implemented daily on the front line. Employee accountability involves following procedures, using safe work practices, and reporting hazards.

Holding managers, supervisors, and employees accountable, relative to the expectations of their respective positions, greatly increases the probability of maintaining safe working conditions. The results of holding people accountable should be frequently communicated and thoroughly documented. The best way to include roles, responsibilities, and authorities for worker protection is in managers', supervisors', and employees' performance objectives. This can be done by establishing performance goals and objectives for personnel and evaluating the person against those elements periodically. The organization should have a process for measuring each individual's performance, including worker protection performance. These evaluations should be considered in the individual's ratings, promotions, and bonuses.

5. SAFETY AND HEALTH STAFF

Organizations should seek to hire and retain the most qualified worker protection professionals as needed and appropriate to the hazards at the site. Examples of these positions are OSH managers, safety engineers, construction managers, industrial hygienists, and health physicists.

Qualified Professionals

The Office of Personnel Management (OPM) has published position classification standards for the following positions: Safety and Occupational Health Managers (018), Industrial Hygienists (690), Safety Engineers (803), Health Physicists (1306), and Fire Protection Engineers (804). The OPM standards should be followed by DOE Federal managers when selecting and retaining worker protection personnel. In addition, DOE (in response to recommendations from the Defense Nuclear Facilities Safety Board) is developing Qualification Standards. OSH professionals should be involved in the development of these Qualification Standards, particularly those for workers who have collateral duty for safety and health.

These individuals may be employed directly, by contract, or as consultants, but they need to possess qualifications relative to the particular hazards at

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the facility. Hiring certified professionals [such as Certified Safety Professionals (CSP), Certified Industrial Hygienists (CIH), and Certified Health Physicists CHP)] may be appropriate. Specific training for personnel qualifications is addressed in DOE Order 361.1, *Federal Employee Training*, and its supporting implementation guide.

Staffing Levels

Providing sufficient qualified safety and health staff demonstrates management commitment for the FEOSH Program and ensures available support to supervisors and employees dealing with the complex hazards in today's workplace.

DOE has not established any official staffing standards for professional safety and health personnel. Many times, advice on staffing levels is based on organizational population only; however, use of population as the only workload factor can skew the results for low population organizations. Experience in developing Manpower Staffing Standards (MSS) for U.S. Army installations indicates that there are many core functions (tasks) required for a good FEOSH program where the population served has no influence. The U.S. Army MSS typically identifies a core Full-Time Equivalent (FTE) requirement of at least two professional safety and health personnel, and adds on for tasks that are related to additional workload factors, such as number of buildings to be inspected or number of Nuclear Regulatory Licenses held by the organization.

One straightforward methodology for determining staffing needs is a survey using the following steps:

- Break down the functions assigned to the FEOSH program into individual tasks (e.g., workplace inspections, responding to concerns, training, preparing and maintaining a written program, facilitating safety committees, developing and coordinating accident prevention initiatives, or recordkeeping). 29 CFR Part 1960 and DOE Order 440.1 identify the basic set of required functions.
- Using historical records (e.g., labor and production sheets) or best estimates on the time it takes to perform each task, determine the total number of personhours to accomplish all the tasks for a year.
- Divide the total number of personhours needed for the year by 1740 personhours/year to obtain the number of FTEs needed for the FEOSH program. The use of 1740 personhours/year takes into account nonproductive time due to sick, annual, and holiday leave and time for training.

Collateral Personnel

In some organizations, it may be appropriate to have collateral duty safety and health personnel to support the administration of the FEOSH program, especially if the organization's activities are of low risk. Where collateral duty personnel are used, it is extremely important to ensure that they have sufficient training (29 CFR Part 1960.58) to understand the program; report, evaluate, and assist in abating hazards; report allegations of reprisal; recognize hazardous conditions; and identify and use safety and health standards and other appropriate requirements. Collateral duty safety and health personnel do not supplant the need for qualified professional

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personnel in most field elements; however, they are very beneficial to augment the organization's FEOSH program. Qualified professionals should be made available for consultation to assist collateral duty personnel when needed. □

APPENDIX 2-1

| | | | | | |
|---|--|---|--|-----------------|---------------------|
| Ref. 8. 8/23/84 | U. S. DEPARTMENT OF ENERGY ES&H MANAGEMENT PLAN ACTIVITY DATA SHEET | Page 1 of 5 | | | |
| <div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div> <p>a. Facility Code</p> | <p>(For Data Entry Reference Use Only)</p> | <div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div> <p>b. ADS Number</p> | | | |
| <p>Activity Data Sheet (ADS) Identification Section (Attach additional pages if req'd) c. Date: <u>10/31/95</u></p> | | | | | |
| 1. Facility Code: _____ 2. Facility Name: <u>Nevada Operations Office</u> | | | | | |
| 3. ADS Title: <u>FEOSH Technical Assistance</u> | | | | | |
| 4. Data Sheet Status Code: (Select 1 only) <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Hold <input type="checkbox"/> Discontinued <input type="checkbox"/> Void | | | | | |
| 5. Budget Identifier: _____ | 12. Contractor Code: _____ | | | | |
| 6. Original Identifier: _____ | 13. Contractor Division: _____ | | | | |
| 7. Work Package No.: _____ | 14. Contractor Department: _____ | | | | |
| 8. Account No.: _____ | 15. Contractor Manager: _____ | | | | |
| 9. WBS Code: _____ | 16. Contractor Phone: _____ | | | | |
| 10. Reference ADS #: _____ | 17. DOE Manager: <u>Lester P. Skousen</u> | | | | |
| 11. Resp. SO Code: _____ | 18. DOE Phone: <u>(702) 295-0904</u> | | | | |
| <p>ADS Category Section</p> | | | | | |
| 19. Is ES&H activity an A-106 Plan Activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, complete A-106 Activity Data Section.) | | | | | |
| 20. Functional Breakdown (Attach additional pages if necessary) | | | | | |
| <u>Area</u> | <u>Sub-area</u> | <u>% Total Cost</u> | <u>Area</u> | <u>Sub-area</u> | <u>% Total Cost</u> |
| | | | | | |
| | | | | | |
| 21. Percentage of activity costs attributable to Training: _____ | | | 22. Percentage of activity costs attributable to Maintenance: _____ | | |
| <p>ADS Type Section</p> | | | | | |
| 23. ADS Type: (Select 1 only) <input type="checkbox"/> Core <input checked="" type="checkbox"/> Compliance <input type="checkbox"/> Improvement | | | | | |
| 24. Driver(s) (Attach additional pages as necessary) | | | | | |
| Driver Type <u>29 CFR 1960</u> <u>Primary Driver</u> Driver Code _____ Title _____ | | | Driver Type <u>DOE Order 440.1</u> <u>Other Driver(s)</u> Driver Code _____ Title _____ | | |
| 25. Compliance Comments (Attach additional pages as necessary) | | | | | |

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| ES&H MANAGEMENT PLAN ACTIVITY DATA SHEET | | |
|--|--|---|
| <div style="border: 1px solid black; width: 100%; height: 20px; margin-bottom: 5px;"></div> a. Facility Code | <div style="display: flex; justify-content: center; align-items: center;"> ← → </div> (For Data Entry Reference Use Only) | <div style="border: 1px solid black; width: 100%; height: 20px; margin-bottom: 5px;"></div> b. ADS Number |
| <p>26. ADS Description Section (Attach additional pages as necessary)</p> <p>Provide a description of the activity. Include sufficient detail to allow a reader not previously knowledgeable of the activity to understand the activity's scope and what it is intended to accomplish.</p> <p>Background: It has been several years since the Federal Employees Occupational Safety and Health (FEOSH) Program has had a thorough evaluation. The drivers for the program have recently changed from DOE Order 3780.1B prescriptive requirements to the new DOE Order 440.1 with its attendant implementation guide. The new requirements require the development of and the implementation of an effective FEOSH program. These new requirements are patterned like OSHA's Management Guidelines. This presents this Operations Office a unique opportunity to revitalize the FEOSH Program and establish goals and objectives that will lead to an improved class of protection for our employees.</p> | | |
| <p>27. ADS Milestones & Accomplishments Section (Attach additional pages as necessary)</p> <p>Describe the expected outcomes from implementation of this activity. Identify all significant milestone events and dates, and other expected accomplishments. Identify existing major or key commitments made regarding this activity. Note that additional, specific milestone dates are required for all A-106 ADSs; refer to the A-106 Activity Data Section.</p> <p>This request is for technical assistance in the form of external evaluations of the current FEOSH Program as measured against Department of Labor, OSHA criteria and the new DOE policy requirements. Once strengths and weaknesses have been identified as measured against this criteria, program revision development and implementation can begin. Facilitation of stakeholder meetings will maximize participation of the managers, supervisors, and employees in the development of the new program which will include; 1) a policy statement that optimizes the program's expectation, 2) goals and objectives necessary to implement the new program, which includes prioritization of initiatives to attain ultimate goals, and current year goals and objectives based on this prioritization, and goals and objectives for out years, 3) policy and procedural documentation necessary to implement the program, 4) follow on annual evaluations to assure progress is as projected and (see back)</p> | | |
| <p>28. ADS Appraisal Section (Attach additional pages as necessary)</p> <p>Describe the risks/impact of not implementing or continuing this activity, and then describe the benefits of continuing or implementing this activity, in the following categories: Public Safety & Health, Site Personnel Safety & Health, Compliance, Mission Impact, Cost-effective Risk Management, Environmental Impact. Also describe any other significant impacts or considerations.</p> <p>Public Safety and Health: Since DOE Order 440.1 required a motor vehicle safety program and this Operation's Office has a number of personnel who commute long distances via government vehicles in the public sector, failure to have an effective motor vehicle safety program could increase the risk to the public.</p> <p>Site Personnel Safety and Health: Since this program is a combination of federal, Department and office requirements, it is the protective program for DOE employees. Failure to have an effective program could have a direct and potentially perilous impact on the employees.</p> <p style="text-align: right;">(See attached)</p> | | |

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ADS MILESTONE AND ACCOMPLISHMENT SECTION (Continued)

5) revision of program elements and time lines as required to achieve ultimate goal of the worker protection program.

ADS APPRAISAL SECTION (Continued)

Compliance: This is a compliance issue for both regulatory requirements in 29 CFR Part 1960, and the Department in DOE Order 440.1. Since these are high level performance related criteria that need effective implementation at the local level in more detailed policy documents, failure to propose and implement an effective program could put us in noncompliance with federal and Department requirements. Since we are subject to enforcement activities by federal OSHA, non-compliances could prove to be an embarrassment to the office and the Department of Energy.

Mission Impact: Loss of key employees through senseless injuries and illnesses could affect the office's ability to perform its mission effectively. Failure to have a cost effective program could have a detrimental effect on budget dollars available for operational activities.

Cost Effective Risk Management: This approach will ensure that implementation will not correct things that aren't broke and focus resources in areas that will derive the greatest benefit. Failure to take a proactive approach could result in programs that have no effect on improving working conditions and could waste dollars.

Environmental Impact: None

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| ES&H MANAGEMENT PLAN ACTIVITY DATA SHEET | | | | | | |
|---|---|-------------------------|-------------------------|---|--|-------------------------|
| <input style="width: 90%;" type="text"/> | ← (For Data Entry Reference Use Only) → | | | | <input style="width: 90%;" type="text"/> | |
| a. Facility Code | | | | | | b. ADS Number |
| ADS Scoring Section | | | | | | |
| 29. ADS Scoring | | | | | | |
| | BEFORE | | | AFTER | | |
| | Consequence ¹ | Multiplier ² | Likelihood ³ | Consequence ¹ | Multiplier ² | Likelihood ³ |
| Public S&H | 3 | .03 | C | 3 | .003 | D |
| Site Pers. S&H | 6 | 1.0 | C | 7 | .001 | D |
| Compliance | 10 | 2.0 | B | 11 | .0001 | D |
| Mission Impact | 13 | .075 | C | 13 | .0075 | D |
| Investment Impact | 15 | .15 | C | 15 | .0015 | D |
| Environ. Impact | 18 | .2 | C | 18 | .002 | D |
| <small>1 - Enter the row number from the Risk-based Priority Model (RPM) 2 - Minimum multiplier value is 0.1; default value is 1.0. 3 - Enter "A" through "D" or a direct probability value between 0.0001 and 0.9999</small> | | | | | | |
| Before Score = 3.455 | | | After Score = .0151 | | | |
| 30. Scoring Adjustments: Contractor _____ Ops Office _____ SO _____ | | | | | | |
| 31. Other (Non-RPM) Numeric Score: _____ | | | | 32. Project Priority: _____ <small>(Req'd for A-106 ADSs. Allowable range, low to high, is 1.0 to 9.9)</small> | | |
| 33. Scored by: <u>DOE/NV Operations Office</u> | | | | 34. Date Scored: <u>November 2, 1995</u> | | |
| 35. Scoring Comments (Attach add'l pages as necessary) | | | | | | |
| Document the justification for scores and/or scoring adjustments. Consider the risks/impacts in the following categories: Public Safety & Health, Site Personnel Safety & Health, Compliance, Mission Impact, Investment Impact, Environmental Impact. Also describe any other significant impacts or considerations. | | | | | | |

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| ES&H MANAGEMENT PLAN ACTIVITY DATA SHEET | | | | | | |
|---|-------------------------------------|---------------------------|--------------------------------|----------------------------|------------------------------|---------------|
| | (For Data Entry Reference Use Only) | | | | | |
| a. Facility Code | | | | | | b. ADS Number |
| ADS Resource Data Section | | | | | | |
| 36. Budget Year Funding Case: () Target or (X) Unfunded | | | | | | |
| 37. Resource Structure Code (RSC): _____ | | | | | | |
| or | | | | | | |
| Allocable Cost Pool Identifier (Pool ID): _____ | | | | | | |
| NOTE: If the ADS is funded from an allocable cost pool, the Pool ID shown above must be consistent with the Pool ID shown on the Allocable Cost Pool Information Data Sheet. | | | | | | |
| 38. S&R Code (For ADSs direct-funded by a single RSC): _____ | | | | | | |
| 39. If ADS is Outside-Funded (e.g., WFO/Cost Reimbursable), Identify Funding Source: _____ | | | | | | |
| 40. Start Year: <u>1996</u> | | | 41. End Year: <u>1999</u> | | | |
| 42. Activity Cost Estimate | | | | | 43. FTE Requirements | |
| ← Estimated Implementation Cost in \$ (x 1,000) → | | | | | | |
| Fiscal Years | Operating Expense (OE) | Capital Equipment (CE) | General Plant Project (GPP) | Line Item Project (LIP) | FTEs (up to two decimals) | |
| | | | | | Federal | Contractor |
| Prior Year (PY) <u>1995</u> | | | | | | |
| Current Year (CY) <u>1996</u> | \$36K | | | | .24 | .48 |
| Budget Year (BY) <u>1997</u> | \$16K | | | | .12 | .24 |
| BY +1 <u>1998</u> | \$16K | | | | .12 | .24 |
| BY +2 <u>1999</u> | \$16K | | | | .12 | .24 |
| BY +3 <u>2000</u> | | | | | | |
| BY +4 <u>2001</u> | | | | | | |
| 44. Additional Out-year Resources to Complete Compliance Activities | | | | | | |
| BY +5 <u>2002</u> | | | | | | |
| Other outyears | | | | | | |
| 45. Cost Estimate Notes | | | | | | |
| Provide the basis, assumptions, and other information regarding the cost estimates provided for the activity. This should include an indication of whether the start year funding has been escalated and, if so, what escalation factors were used. A discussion of cost escalations resulting from delays in starting the activity may also be discussed here. | | | | | | |

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| Rev. 8. 9/23/84 | U. S. DEPARTMENT OF ENERGY ES&H MANAGEMENT PLAN ACTIVITY DATA SHEET | Page _____ P. 06 |
| <input style="width: 100px; height: 20px;" type="text"/> | (For Data Entry Reference Use Only) | <input style="width: 100px; height: 20px;" type="text"/> |
| a. Facility Code | | b. ADS Number |
| ADS Tracking Section | | |
| 46. Management Approval? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | 47. Activity In-process? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Activity Milestone Dates: (Required for A-106 activities. Date format month/year except FY Completed which is year only.) | | |
| 48. Design Plan Completion - _____ | | 51. Final Compliance Required - _____ |
| 49. Construction/Work Start - _____ | | 52. Fiscal Year Completed - _____ |
| 50. Construction/Work Completion - _____ | | 53. Year Funding Required - _____ |
| A-106 Activity Data Section | | |
| 54. A-106 Environmental Regulation Code: _____ | | Environmental Category Code: _____ |
| 55. A-106 Compliance Status Category: (Select 1 only) | | 56. A-106 Pollutant Types (Select all that apply): |
| Class 0 - <input type="checkbox"/> PGMT Class I - <input type="checkbox"/> CMPA <input type="checkbox"/> INOV <input type="checkbox"/> ESOP Class II - <input type="checkbox"/> ESDF <input type="checkbox"/> PSDF Class III - <input type="checkbox"/> ESRO <input type="checkbox"/> ESRE <input type="checkbox"/> POEF Class IV - <input type="checkbox"/> ESDL <input type="checkbox"/> OTHR | | <input type="checkbox"/> LLW <input type="checkbox"/> HAZ <input type="checkbox"/> MLLW <input type="checkbox"/> SAN <input type="checkbox"/> HLW <input type="checkbox"/> SNF <input type="checkbox"/> TRU <input type="checkbox"/> OTHER <input type="checkbox"/> MTRU |
| 57. A-106 Activity Progress Code: (Select 1 only) | | |
| <input type="checkbox"/> PP - Preliminary Planning <input type="checkbox"/> DISC - Discontinued <input type="checkbox"/> DES - Design <input type="checkbox"/> DEF - Deferred <input type="checkbox"/> CON - Construction <input type="checkbox"/> OTH - Other; identify in activity description <input type="checkbox"/> WRK - Work on-going, non-construction <input type="checkbox"/> CNTS - Continuous <input type="checkbox"/> CMPL - Completed | | |
| 58. A-106 Program Type Code: (Select 1 only) | | |
| <input type="checkbox"/> 1 - Compliance <input type="checkbox"/> 2 - Cleanup <input type="checkbox"/> 3 - Pollution Prevention <input type="checkbox"/> 4 - Conservation <input type="checkbox"/> 5 - Other | | |
| ADS Review/Approval Section | | |
| 59. ADS Reviewed by: _____ | | Date: _____ |
| (For data entry verification only; not captured in DOE ES&H Management Plan Information System) | | |
| 60. ADS Approved by: _____ | | Date: _____ |
| (For data entry verification only; not captured in DOE ES&H Management Plan Information System) | | |