

<b>HSS Independent Activity Report - Rev. 2</b>		<b>Report Number:</b> HIAR LANL-2012-07-11	
<b>Site:</b> Los Alamos National Laboratory (LANL)		<b>Subject:</b> Office of Enforcement and Oversight's Office of Safety and Emergency Management Evaluations (HS-45) Activity Report for the Initial Meeting of Representatives from LANL, LASO, and HS-45 to Review Progress and Issues with the Implementation of the LANL Worker Exposure Assessment Process	
<b>Dates of Activity :</b>	07/11/2012	<b>Report Preparer:</b>	James Lockridge, Certified Industrial Hygienist
<b>Activity Description/Purpose:</b>			
<p>Industrial hygiene (IH) representatives from the Department of Energy Office of Enforcement and Oversight's Office of Safety and Emergency Management Evaluations (HS-45) and the Los Alamos Site Office (LASO) met, at the request of LANL IH, to review and comment on recent developments in the LANL IH worker exposure assessment program to fully address weaknesses identified from the 2007 Office of Health, Safety and Security (HSS), Environment, Safety and Health Program Inspection.</p> <p>Background:</p> <p>In 2007, as part of a LANL-wide integrated safety management inspection, HSS evaluated environment, safety, and health programs and work planning and control systems as applied to various LANL facilities and organizations. The HSS inspection identified a number of findings related to deficiencies in implementation of integrated work management requirements, including Finding C-6 which stated that: "Many worker exposures to chemical, physical or biological hazards have not been adequately evaluated, assessed, documented, and/or communicated in both research activities and fabrication shop activities, as required by 10 CFR 851." Since the 2007 HSS inspection report, LANL has made significant improvements in the LANL exposure assessment process as documented in the HSS Independent Review Report, "Facility Centered Assessment of the Los Alamos National Laboratory Science and Technology Operations - Facility Operations Director Managed Facilities," dated August 2011. However, based on a limited sampling of completed health risk assessment reports and associated integrated work documents, the implementation of the LANL exposure assessment process is a work in progress, and continued improvement and management attention are warranted.</p>			
<b>Result:</b>			
<p>This was the first meeting of representatives from HS-45, LASO, and LANL to discuss that status of the LANL worker IH exposure assessment program. The intent of the meeting was to focus on current issues in implementing the LANL IH exposure assessment program.</p> <p>The LANL Exposure Assessment Program owner explained the improvements made to the exposure assessment process since August 2011. A risk-based process for prioritizing exposure assessments has been established and is now in use. IH has refined the exposure assessment software to a simple three-step approach based on identification of activities, assessment and control of exposure risk for those activities, and exposure monitoring for those activities, resulting in a similar exposure group approach. The ability for responsible line managers to access information pertinent to their activities has been added. This approach maximizes IH resources, provides further sustainability and defensibility, and will build additional worker exposure data. The revised software has been implemented, with further specific improvements being addressed as the software is used. There are still challenges, including ensuring that deployed personnel have sufficient time and priority to complete exposure assessments, ensuring that P300-required activity lists are available to identify activities that need an exposure assessment, and continuing efforts by the institution to unify work management data to provide readily available information on new and existing activities that require IH exposure assessment.</p> <p>The representatives discussed various possible mechanisms for integrating the IH exposure assessments with the current LANL work control process in order to provide first line supervisors with worker exposure data. The LANL Chemical Tracking System, which houses much of the IH exposure data, is not fully interfaced with the LANL work management system. Suggestions for improving this interface were also discussed.</p>			
<b>HSS Participants</b>		<b>References</b>	
1. James Lockridge PE, CIH, CSP		<ul style="list-style-type: none"> <li>• Inspection of Environment, Safety and Health Programs at the Los Alamos National Laboratory, January 2008</li> </ul>	

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|  | <ul style="list-style-type: none"><li>• Independent Review Report Facility Centered Assessment of the Los Alamos National Laboratory Science and Technology Operations – Facility Operations Director Managed Facilities, August 2011</li></ul> |
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| Were there any items for HSS follow up? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  |   |
| <b>HSS Follow Up Items:</b> <ul style="list-style-type: none"><li>• LANL requested that a follow-on meeting reconvene in the future for further discussion. Specific issues for discussion will be provided to the meeting attendees in advance by LANL.</li></ul> |   |