

**FY2015**  
**HEALTH, SAFETY AND ENVIRONMENT**  
**MANAGEMENT SYSTEM DESCRIPTION**  
**and**  
**WORKER SAFETY & HEALTH PROGRAM**

**Honeywell**  
**Federal Manufacturing & Technologies**

**HS&E Management System Description <sup>1</sup>**

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<sup>1</sup> Approval authority for the HS&E Management System Description lies with the Contracting Officer as specified in Contract No. DE-NA0000622. Revisions to this HS&E Management System Description are subject to formal change control procedures as delineated by the Contracting Officer.

<sup>2</sup> Approval authority for the Worker Safety & Health Program lies with the Head of DOE Field Element as specified in 10 CFR 851, §851.11. Revisions to this HS&E Management System Description are subject to formal change control procedures as delineated by the Contracting Officer.

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Federal Manufacturing & Technologies  
Date:**

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# 1.0 INTRODUCTION

This Health, Safety and Environment (HS&E) Management System (HSEMS) Description is prepared and maintained by Honeywell Federal Manufacturing & Technologies, LLC (FM&T) in accordance with the requirements of Contract No. DE-NA0000622. The HSEMS Description defines the overall scope of operations, risk, and systems implemented by FM&T to maintain worker safety and protection of the public and the environment. The following contractual and regulatory requirements establish system requirements:

- Department of Energy Acquisition Regulation 48 CFR 970.5204-2, Laws, Regulations and Directives: The Management System Description identifies those laws, regulations, and directives applicable to FM&T operations.
- Department of Energy Acquisition Regulation 48 CFR 970.5223-1, Integration of Environment, Safety, and Health into Work Planning and Execution: The Management System Description documents how FM&T integrates HS&E requirements into work activities.

The Management System Description defines FM&T's HS&E programs and processes which are employed to ensure that applicable standards are identified, communicated, implemented, and assessed.

The Worker Safety & Health Program (WSHP) identifies the specific FM&T Health and Safety programs and processes in place under the HSEMS to ensure work planning and control.

- 10 CFR 835 – Occupational Radiation Protection: The requirements of this rule assure protection of workers from exposure to radiation sources and are out incorporated into the radiation protection program.
- 10 CFR 850 – Chronic Beryllium Disease Prevention Program: The requirements of the rule are applicable to KC operations only and are specifically outlined in Attachment 2, “FM&T Chronic Beryllium Disease Prevention Program.”
- 10 CFR 851 – Worker Safety and Health Program: Specific to requirements outlined in 10 CFR 851, the Worker Safety and Health Program has been established for FM&T operations. Attachment 1 of this HS&E Management System Description outlines the 10 CFR 851 program compliance expectations and FM&T implementing mechanisms associated with Subpart C and Appendix A of the Rule. The FM&T WSHP represents the basis for compliance assessment and enforcement by DOE.

## 1.1 HS&E Policy

Senior leadership has established the following Operating policy to document its commitments relative to HS&E.

### ***OPERATING POLICY***

We will be preeminent in:

- providing products and services valued by our customers;
- complying with regulations and requirements;
- respecting individuals and preventing injury/illness;
- respecting the environment, preventing pollution and minimizing our environmental footprint; and
- continuously improving processes

## 2.0 SCOPE, OPERATING BASIS & REQUIREMENTS

Operating in Missouri, New Mexico, and Arkansas, FM&T is considered to operate one facility (for the purposes of the Management System Description) whose processes are accepted as low hazard and of the type found in general industry. Reference to FM&T locations and activities is defined as follows:

- Honeywell International – References to Corporate influence or performance expectations are identified as Honeywell.
- FM&T – References to FM&T are considered inclusive of all FM&T operations.
- Kansas City (KC) – References to KC are specific to operations performed at Kansas City, MO and by staff headquartered there. This includes locations at the Bannister Federal Complex (BFC) and the new National Security Campus (NSC).
- New Mexico (NM) – References to NM are specific to operations performed at Albuquerque, NM and by staff headquartered there.

### 2.1 Scope of Work

FM&T sites provide manufacturing and technical support to the NNSA's Nuclear Security Enterprise (NSE). Primary customers include the NNSA, Department of Defense, National Laboratories, and the Office of Secure Transportation. FM&T does not engage in special nuclear material handling, storage, or high-risk activities. FM&T-operated sites include:

- KC – The NNSA's KC's primary mission is the production of mechanical, electrical and plastic components that ensure a safe and effective stockpile.
- NM – NM provides technical products, services, production, and field support from its Albuquerque, NM, locations.

Note: KC operations began relocation during FY13 to a new campus setting within the Kansas City area. Relocation activities were completed in FY14; however, closure activities at BFC will extend into FY15. The HS&E Management System will not require changes and will be applicable at both locations where FM&T operations are in progress. NM completed moving the NC-135 operations from Kirtland Air Force Base to existing and new locations within Albuquerque during FY14.

Operations in both KC and NM occur in leased buildings. KC operations are an NNSA lease from General Services Administration which holds the lease from the building owner where NNSA and FM&T are not directly accountable for the facility maintenance. NM operations are a Honeywell lease with the building owner responsible for facility maintenance.

FM&T also performs work at other facilities.

- Work performed by FM&T employees at other DOE and/or NNSA facilities is covered by the safety and health programs of the host site/location in accordance with the following requirements.
  - 10 CFR 835, "Occupational Radiation Protection"
  - 10 CFR 850, "Chronic Beryllium Disease Prevention Program"
  - 10 CFR 851, "Worker Safety and Health Program"
- Work performed by FM&T employees at other locations including Department of Defense and other federal and private industry locations is typically under the control of the host locations.

## 2.2 Risk Assessment and Management

FM&T operations are managed to maintain general industry risk levels through the Management of Change (MoC) process, specifically, the Preliminary Hazard Analysis (PHA) tool. This change management process requires an HS&E review of new or higher-risk changes to operations prior to activity commencement and may include KCFO review in accordance with National Environmental Policy Act (NEPA) requirements.

The following documents serve as the baseline for risk identification and assessment at FM&T.

- KC
  - Site Safety Assessment (approved by DOE in September 1995): Classifies KC as a low hazard, non-nuclear facility. Imminent risks identified through the Site Safety Assessment have been addressed by elimination from FM&T operations or by the application of engineering controls
  - Hazards Survey (July 2011) and Emergency Planning Hazards Assessment (July 2011 approved by NNSA/KCFO): Quantitative analysis of potential hazardous material releases that could cause harm on and/or off site. The results are incorporated into the Emergency Plan with action plans identified for the higher risk hazards identified.
- NM Hazards Survey (August 2012 revision): Concludes that NM does not meet or exceed any thresholds that would require a hazard assessment, and is therefore a non-reactor, general industry facility.

The hazardous materials used or stored at FM&T are managed in accordance with appropriate federal, state and local regulations and applicable DOE Orders and Directives. Hazardous materials are divided into four categories, and thresholds are identified to determine when additional regulatory or program requirements may be required to ensure operations remain within acceptable risk limits.

## 2.3 HS&E Thresholds

HS&E thresholds are established, in lieu of Safety Basis or Safety Authorization requirements, and define the HS&E operating envelope for FM&T operations. FM&T is authorized to conduct activities as a general industry facility. HS&E thresholds are established and serve to define the operating parameters by which FM&T is authorized to perform work. "Performance of work" means (1) the handling, testing, use, (2) the direction or supervision of individuals handling, testing or using, and/or (3) the development of procedures or processes regarding the handling, testing and/or use of materials and chemicals subject to these thresholds.

The categories and thresholds for FM&T operations are listed below:

1. Energetic Material: The storage, handling, testing, use and shipping of explosives (energetic materials) by FM&T will be limited to materials shipped as United Nations Organization (UNO) Hazard Class 1, Divisions 3 (1.3) or 4 (1.4). Departmental explosive limits are established by whether the explosive device is non-propagating/non-mass detonating or propagating/mass detonating. If the explosive devices are non-propagating/non-mass detonating, department explosive limits are based on the number of devices needed to support production or development schedules. If a device is propagating/mass detonating, explosive limits are based on containing the maximum credible event within the operating area.
2. Radiological Material: FM&T operates a non-reactor, radiological facility. Limited quantities of radioactive material are maintained for equipment calibration, analytical use, non-destructive testing, and incorporation into product at FM&T. The FM&T inventory will not meet or exceed threshold quantities of radionuclides for higher hazard class categories 2 and 3. Table A.1 of the DOE-STD-1027-92, *Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports*, lists the threshold quantities by radionuclide.
3. Hazardous Chemicals: FM&T locations operate as general industry facilities by staying below hazardous chemical use/storage threshold amounts as defined in OSHA's Process Safety Management (OSHA

4. Biological Safety: FM&T does not perform work involving biological safety hazards. 10 CFR 851 Appendix A Section 7, *Biological Safety*, and DOE Policy 434.1, *Conduct and Approval of Select Agent and Toxin Work at Department of Energy Sites*, govern work at DOE facilities involving biological etiological agents, select agents, toxins, and biosafety programs.

Activities or operations that exceed these HS&E thresholds require: (1) FM&T President and (2) KCFO Field Office Manager (FOM) or his/her delegated representative review and approval prior to process start-up.

The HS&E thresholds are not applicable to work performed by FM&T at other DOE/NNSA locations when:

- FM&T is not directly responsible and accountable for an activity that reasonably could impact HS&E risk, and
- such work is covered by the host site's environmental, safety, and health programs.

Activities or operations performed at "Other" (non-FM&T or DOE /NNSA facilities) locations requires (1) FM&T President and (2) KCFO FOM or his/her delegated representative review and approval prior to process start-up where:

- FM&T is responsible for the "performance of work" as defined above, and
- HS&E thresholds are exceeded

## **2.4 Operating Requirements**

Compliance with federal, state, and local regulations represents the baseline for operations at FM&T facilities. FM&T's HSEMS, based on recognized management system standards (e.g., ISO 14001 and OHSAS 18001) and the Honeywell Corporate Governance Model, requires establishment of programs that assure compliance with regulatory requirements and promotes continuous improvement.

FM&T operates under agreed upon DOE and industry standards. These are defined in the FM&T Operating Requirements list. FM&T maintains the list in conjunction with KCFO following joint discussion and FOM decision on which requirements are applicable to FM&T operations. Maintenance of the Operating Requirements list is a contractual obligation.

## **3.0 HS&E Management Systems (HSEMS)**

### **3.1 Management Assurance System**

FM&T's Management Assurance System (MAS) provides a means for KCFO and FM&T leadership to monitor the health of the business and assure performance and customer expectations are met. Functional leadership flows from FM&T's parent organization, Honeywell International. FM&T applies Honeywell's leadership, core processes, policies, and recommended best practices.

The four key components of MAS are: Management Responsibility; Resource Management; Product / Service Realization; and Measurement Analysis & Improvement. The MAS provides the criteria and approach to identify, implement, measure, and sustain these components. FM&T provides the KCFO visibility to the MAS and uses internal audits, self-assessments, and third party assessments to validate adherence and performance. Third-party assessment reports are available in the Benchmark Data Warehouse and internal assessment reports are available in the electronic Internal Audit Management System (eIAMS).

HS&E performance and issues management are fully integrated to the MAS, which includes the following components.

- Management Operating System (MOS) – The MOS defines the functional execution of Management responsibility at FM&T. Systematic evaluation activities taken by leadership to determine the adequacy and effectiveness of systems are defined.
- Management Operations Review (MOR) – The MOR includes leadership review of performance and issues management information associated with functional performance at FM&T.

## 3.2 HSEMS Summary

FM&T has established and maintains an HSEMS that is based upon recognized management system standards (e.g., ISO 14001-2004 and OHSAS 18001-2007) and the Honeywell Corporate Governance Model.

- International Organization for Standardization (ISO) 14001-2004, Environmental Management System Standard – FM&T’s environmental management system is certified through an independent third-party registrar. Semiannual periodic and triennial certification assessments are performed to validate adherence to standard requirements. Specific ISO 14001 Environmental Management System documentation is contained in the FM&T Environmental Management System Manuals (KC and NM).
- Occupational Health and Safety Assessment Series (OHSAS) 18001-2007, Occupational Health and Safety Management System standard - FM&T’s health and safety management system is certified through an independent third-party registrar. Semiannual periodic and triennial certification assessments are performed to validate adherence to standard requirements. Specific OHSAS 18001 Health and Safety Management System documentation is contained in the FM&T Health and Safety Management System Manual (KC and NM).
- Honeywell Corporate Governance Model aligns FM&T with Honeywell HS&E policy, programs and management system requirements, providing industry-leading and best-in-class programs and opportunities for continuous improvement.

The HSEMS documents FM&T’s approach to meet the intent of DEAR 48 CFR 970.5223-1, Integration of HS&E into Work Planning and Execution.

The FM&T HS&E organization develops an annual strategic plan. This process is aligned with Honeywell Strategic Planning guidance and utilizes Honeywell tools (X-Matrix and A3 spreadsheet). This strategic planning is led by the Manager Sr., H S&E. During this process HS&E reviews:

- HS&E Vision and Mission,
- policies,
- injury and illness trends,
- legal and other requirements,
- OH&S risks and environmental aspects,
- technological options,
- financial, operational and business requirements,
- current improvement initiatives and issues,
- views of relevant interested parties, and
- plant strategic plans.

The outcome of this process is the identification of the top strategic actions for the HS&E organization to pursue. The strategic plan includes improvement plans for Honeywell and KCFO agreed upon Multi-Year Strategic Objectives. Reviews of the objectives are conducted at least quarterly.

The following tables (Table 1, Table 2, and Table 3) summarize the correlation of the DEAR 970.5223-1 safety management system requirements to the elements of ISO 14001 and OHSAS 18001.

**Table 2**

**DEAR  
970.5223-1**

**OHSAS 18001 Elements**

			Planning			Implementation and Operation							Checking					
	4.1 General Requirements	4.2 Health & Safety Policy	4.3.1 Hazard ID, Risk, Assessment, & Determining Controls	4.3.2 Legal and Other Requirements	4.3.3 Objectives and Programs	4.4.1 Resources, Roles, Responsibility, Accountability and Authority	4.4.2 Competence, Training, and Awareness	4.4.3 Communication, Participation, & Consultation	4.4.4 Documentation	4.4.5 Control of Documents	4.4.6 Operational Control	4.4.7 Emergency Preparedness and Response	4.5.1 Performance Measurement & Monitoring	4.5.2 Evaluation of Compliance	4.5.3 Incident Investigation, Nonconformity, Corrective Action & Preventive Action	4.5.4 Control of Records	4.5.5 Internal Audit	4.6 Management Review
Define Scope of Work	X			X	X		X	X										
Identify and Analyze Hazards			X				X	X				X						
Develop and Implement Hazard Controls		X	X	X	X		X	X	X	X						X		
Perform Work within Controls					X	X	X	X	X	X		X			X			
Provide Feedback and Continuous Improvement							X	X				X	X	X	X	X	X	X

Table 3																		
DEAR 970.5223-1	ISO 14001 Elements																	
	Planning				Implementation and Operation							Checking						
	4.1 General Requirements	4.2 Environmental Policy	4.3.1 Environmental Aspects	4.3.2 Legal and Other	4.3.3 Objectives, Targets and Programs	4.4.1 Resources, Roles, Responsibility and Authority	4.4.2 Competence, Training, and Awareness	4.4.3 Communication	4.4.4 Documentation	4.4.5 Control of Documents	4.4.6 Operational Control	4.4.7 Emergency Preparedness and Response	4.5.1 Monitoring and Measurement	4.5.2 Evaluation of Compliance	4.5.3 Nonconformity, Corrective Action and Preventive Action	4.5.4 Control of Records	4.5.5 Internal Audit	4.6 Management Review
Define Scope of Work	X			X	X		X											
Identify and Analyze Hazards			X				X					X						
Develop and Implement Hazard Controls		X		X	X		X	X		X							X	
Perform Work within Controls					X	X	X	X	X	X			X				X	
Provide Feedback and Continuous Improvement							X	X					X	X	X	X	X	X

### 3.3 HSEMS Certifications

KC

- VPP STAR certification – April 1996
  - VPP STAR recertification – August 1999
  - VPP STAR recertification – August 2002
  - VPP STAR recertification – May 2005
  - VPP STAR recertification – February 2009
- Note: The FM&T\KC is no longer a VPP STAR site.

- ISO 14001 certification – May 1997
- ISO 14001 certification extension – April 2000
- ISO 14001 certification extension – May 2003
- ISO 14001-2004 certification extension – May 2006
- ISO 14001-2004 certification extension – May 2009
- ISO 14001-2004 certification extension – May 2012
- OHSAS 18001 certification – February 2014

NM

- VPP MERIT certification – July 2004
  - VPP STAR certification at– April 2005
  - VPP STAR recertification – September 2008
  - VPP STAR recertification – January 2012
- Note: The FM&T\NM is no longer a VPP STAR site.

- ISO 14001 certification – June 2001
- ISO 14001 certification extension – May 2004
- ISO 14001 certification extension – May 2007
- ISO 14001 certification extension – May 2010
- ISO 14001 certification extension – May 2013
- OHSAS 18001 certification – February 2014

Burns & McDonnell, LLC (Facilities Engineering Services – subcontractor)

- VPP STAR certification – August 2006
- VPP STAR recertification – February 2009
- VPP STAR recertification – December 2012

### **3.4 HS&E Management System (HSEMS) Elements**

The HSEMS is comprised of the following elements. See Section 7.0, Work Planning and Control, for implementation details.

- 1. HS&E Policy** – The Honeywell Sustainable Opportunity Policy - Honeywell’s Commitment to Health, Safety & the Environment and the FM&T Operating Policy provide the foundation for the HSEMS. These policies are used to communicate the endorsement of leadership commitment, accountability, performance and continuous improvement to the workforce, contractors, stakeholders and the public.
- 2. Hazard Assessment** – Application of a hazard assessment methodology provides a pathway to define, evaluate, prioritize and control operational hazards. FM&T employs the Honeywell Aerospace Risk Assessment tool and a variety of internal hazard assessment methods to systematically identify hazards and assure appropriate controls and abatement actions are taken.
- 3. Legal and Other Requirements** – Legal and other HS&E requirements are identified and implemented to assure compliance. Compliance with legal and other requirements is the foundation of an effective HSEMS. Defining operational risk and associated requirements enables effective management of resources and a focused approach to establish and maintain the HSEMS.
- 4. Structure and Responsibility** – The establishment of clear HSEMS roles and responsibilities enables effective management system implementation; assures control of HS&E risks; and drives commitment and accountability throughout the workforce. Culture, behaviors and performance are enhanced by clearly defined roles, responsibilities and accountabilities.
- 5. Document Control and Records** – The effective management of HS&E documents and records assures the right information is available to those who need it, and is maintained according to legal and other requirements.
- 6. Operational Control** – Operational control is achieved by a variety of methods such as training, engineering specifications, preventive maintenance programs and documented operating procedures. FM&T uses the information gathered during the hazard identification and risk assessment process to identify and manage risk.
- 7. Management of Change** – Risks associated with temporary and permanent changes to the organization, materials, equipment, facilities, processes, and applicable requirements must be assessed to safeguard people, the environment

and property. The systematic involvement of personnel with appropriate knowledge, skills and tools in the design, analysis and execution of change is essential to hazard identification and risk management.

8. **Training** – Training is a necessary and fundamental component of an effective HSEMS, shaping employee behaviors and organizational culture. The systematic identification and delivery of HS&E training assures legal and other requirements are met and that employees are qualified to perform work in a safe manner. FM&T’s operations, risks, hazards, controls and legal and other requirements are considered in the identification of training needs.
9. **Communications** – Internal and external communication channels are effectively established at all organizational levels and include defined responsibilities. A consistent process to engage key internal and external stakeholders assures accurate and effective communications.
10. **Corrective and Preventive Action** – The systematic management of corrective and preventive actions assures effective and timely management of HS&E risk. Development and communication of lessons learned and analysis of data trends are key components of this system. A nonconformance is often an indication of weakness in the management system that requires corrective and/or preventive actions. It is critical that systems are established to assure the most effective and feasible corrective actions are selected, responsibility assigned, appropriate time frames defined and effective completion confirmed.
11. **Monitoring, Measurement and Self-Assessment** – A system to periodically monitor, measure and self-assess HS&E activities and performance is an essential element of an effective HSEMS. Feedback generated from these activities provides a mechanism to measure system effectiveness and management of significant HS&E risk. This process provides the means for detecting and correcting system or control weaknesses in order to prevent adverse events and regulatory non-conformances.
12. **Objectives, Targets and Management Plans** – HS&E objectives and targets are established at appropriate organizational levels and are derived from the FM&T and Honeywell Policies, performance trends, hazards and risks, and legal and other requirements. HS&E objectives and targets are integrated into the FM&T Management Assurance System to support worker safety and health and environmental protection.
13. **Management Review** – HS&E management review is designed to ensure Senior Leadership (FM&T President, Vice-President, and Division Directors/Managers) assesses continuous improvement opportunities for the HSEMS. FM&T has integrated the HSEMS management review into the Management Assurance System through Management Operations Reviews (MORs).

## 4.0 ROLES, RESPONSIBILITIES, & ACCOUNTABILITY

### 4.1 Roles and Responsibilities

Line accountability for HS&E performance and clear roles and responsibilities are key elements of the FM&T HSEMS. The FM&T designated representative responsible for HS&E issues is the FM&T President. The FM&T Director HSE&F has primary responsibility for FM&T HS&E activities and reports directly to the FM&T Vice-President ISC. The Manager Sr., HS&E reports to the Director HSE&F and has responsibility for NM HS&E activities.

FM&T’s leaders and employees at all levels have integrated HS&E into their work activities, including business planning and operations. The Honeywell Operating System (HOS) requires tier meetings to be conducted daily including HS&E topics. Responsibilities for each level are summarized below:

#### **President:**

- Providing a place of employment that minimizes and controls recognized hazards that have the potential to adversely impact the safety and health of workers, the public, and the environment.
- Adopting and ensuring adherence to policies, goals and objectives for HS&E performance.
- Maintaining a work environment wherein HS&E performance is recognized as a value.
- Supporting HOS deployment and participating in tier meetings.

**Vice-President:**

- Supporting the President in completion of responsibilities.
- Assuring proper organizational structure and responsibility for implementation of the HSEMS.
- Sponsoring and facilitating the Senior Leadership Team HSEMS ownership.
- Conducting comprehensive reviews of HS&E performance through Management Operations Reviews.

**Senior Leadership Team:**

- Building awareness by explaining and communicating its commitment to FM&T's policies and values relative to HS&E performance.
- Ensuring that activities conform to the HSEMS, HS&E related policies, laws, regulations, and internal procedural requirements.
- Assigning work and measuring performance.
- Supporting HOS deployment and participating in tier meetings.

**Director HSE&F:**

- Ensuring that HS&E system requirements are established, implemented, and maintained in accordance with the Operating Requirements and applicable laws and regulations.
- Providing mechanisms to involve workers and their elected representatives in development of the Worker Safety and Health Program, its goals, objectives, and performance measures.
- Providing mechanisms to involve workers and their elected representatives in the identification and control of hazards in the workplace.
- Establishing procedures for workers to report without reprisal job-related fatalities, injuries, illnesses, incidents, and hazards and make recommendations about appropriate ways to control those hazards.
- Providing for prompt response to such reports and recommendations.
- Using qualified worker safety and health staff to direct and manage the program.
- Reporting on the performance of the HSEMS to Senior Leadership for review and as a basis for improvement of the system.
- Providing regular communication with workers about workplace health, safety, and environmental matters.
- Establishing procedures to permit employees to stop work or decline to perform an assigned task because of a reasonable belief that the task poses an imminent risk of death, serious physical harm, or other serious hazard.
- Informing employees of their rights and responsibilities by appropriate means, including posting the DOE-designated Work Protection poster in the workplace where it is accessible to all workers.
- Providing a copy of the approved Worker Safety and Health Program, upon written request, to workers or their designated representatives.
- Supporting HOS deployment and participating in tier meetings.

**Functional Managers/Managers/Team Managers:**

- Accepting responsibility and accountability for HS&E performance associated with the work performed under their direct supervision.
- Determining and allocating the resources necessary to comply with HS&E related policies, laws, regulations, and program requirements.
- Ensuring that employees perform work in compliance with the policies and applicable procedural requirements in Command Media and other applicable work directions.
- Making employees aware of their roles and responsibilities relative to the HS&E programs, including emergency preparedness and response.
- Evaluating employee performance of roles and responsibilities relative to the HS&E programs and holding employees accountable for same.
- Determining and ensuring completion of training requirements for their employees.
- Encouraging employees to make suggestions to improve HS&E performance and recognizing associated improvements.
- Controlling processes, including suspension of operations for HS&E reasons.
- Supporting HOS deployment and participating in tier meetings.

**Employees:**

- Committing and adhering to HS&E related policies, values and requirements.
- Accepting accountability, within the scope of their responsibilities, for HS&E performance.
- Taking responsibility for HS&E improvements.
- Anticipating and initiating action including suspension of operations to preclude nonconformance to HS&E requirements.
- Identifying HS&E concerns.
- Initiating, recommending, or providing solutions within the scope of their responsibilities, to HS&E concerns and verifying the implementation of solutions.
- Accepting responsibility for making sure required training is completed on time.
- Controlling HS&E program activities related to an area of nonconformance until the deficiency or unsatisfactory condition has been corrected, and
- Complying with requirements applicable to their own actions and conduct, including participation in activities described in this section on official time; observing monitoring or measuring of hazardous agents; accompanying the Director (leader of FM&T business group) or his authorized personnel during physical inspection of the workplace for the purpose of aiding the inspection; requesting results of inspections and incident analyses; and declining to perform an assigned task because of a reasonable belief that the task poses an imminent risk of death or serious physical harm.
- Participating in HOS tier meetings.

**HS&E Management System Representative:**

FM&T has designated the Manager Sr., HS&E as the Management Representative for ISO 14001 and OHSAS 18001 purposes.

The HS&E Management Representative reports and has direct access to the President in matters relating to the HS&E Management System. Specific responsibilities of the HS&E Management Representative include:

- Ensuring the management system requirements as stated in this manual are established, implemented and maintained.
- Participating in the Management System Reviews, including making recommendations for improvements to the system.
- Overseeing the identification of HS&E objectives and targets, administration of HS&E programs, and preparation and implementation of plans to change the HS&E Management System.
- Assuring that trained personnel and adequate resources are available to manage and maintain the management system in a certifiable condition at all times.
- Assuring that employees understand the HS&E Management System at a level appropriate to job requirements.
- Assuring liaison is maintained with customers, regulatory bodies and registrar on matters that relate to the HS&E Management System.

Health Safety and Environment management system standard ownership and sponsorship is defined by position in Attachment 3 to this document.

## **4.2 HS&E Accountability Policy**

Employees are held accountable for adherence to established HS&E procedures and requirements. The HS&E Accountability Policy is designed to provide consistent corrective and disciplinary action guidelines associated with unsafe acts and conditions. Severity levels, accountability, and corresponding disciplinary actions are identified to assure consistent application of the policy. Disciplinary actions range from “coach and fix system issue” to “termination” based on severity of a given event.

FM&T adheres to the Honeywell Aerospace Accountability Policy and the Cardinal Safety Rules defined therein as a set of rules that if violated have a high potential for serious injury or environmental/property damage, including but not limited to:

- Actions or failure to act that endangers or injures employees and/or causes damage to company property or the environment.
- In accordance with Honeywell Violence Prevention Policy, bringing into any company-owned and/or operated facility and all company-sponsored events and meetings, or have in his/her possession; firearms, explosives or other weapons.
- Knowingly bypassing or operating equipment without established safety devices in place or removing safeguards during the course of normal operations.
- Not following Lock Out Tag Out procedures.
- Violation of any life safety permit procedure such as confined space, hot work, line breaking, etc.
- Ignoring or endorsing violation of any HSE procedure, directive, warning, training or compliance requirement.

## 5.0 HS&E BUDGET / FUNDING

NNSA allocates funding as directed by Congress and in accordance with NNSA programmatic objectives. The majority of the HS&E activities are funded through the primary funding source, Defense Programs (Readiness in Technical Base Facilities – RTBF). The labor and operating expenses for DP-funded HS&E activities are forecast through internal divisional budgets, which are consolidated into plant requirements.

Formulation of the RTBF budget involves development of a fiscal year Implementation Plan for HS&E. RTBF reports are prepared by FM&T and provided to NNSA throughout the fiscal year to ensure visibility of RTBF cost and performance.

HS&E workload prioritization is conducted to provide a defensible basis for funding decisions on HS&E programs and to effectively manage risk and achieve compliance. Budget estimates are prepared based on regulatory compliance, significant aspects, policy, and continuous improvement consistent with the HSEMS. HS&E funding targets are derived for each functional area by forecasting the operating expenses necessary to support programs. Funds are allocated to HS&E functions and issues based on KCFO and FM&T senior leadership priorities to maintain facilities in a safe, secure, and compliant status.

KC's environmental cleanup activities formally transitioned from DOE's Environmental Management Program to NNSA's Long Term Stewardship (LTS) program in FY2007. These activities are funded through NA-00. Funding will be received as a "fenced" line item under the Weapons Budget. Site Execution Plans fully describe the scope, cost, and schedule of the LTS program. The planning for KCRIMS raised the issue of environmental cleanup of the entire Bannister Federal Complex. To address this issue, an agreement was made between EPA, GSA, and DOE/NNSA to modify the current RCRA permit to include GSA as a permittee as a means to address the entire complex.

Long-term stewardship plans are reflected in the Twenty-Five-Year Site Plan (TYSP) which is updated annually. The TYSP provides the foundation for the NNSA's Strategic Plan for facilities and infrastructure. The TYSP incorporates the program's technical requirements, performance measures, and budget and cost projections within the Future-Years Nuclear Security Program constraints. The applicable major HS&E-related projects are reported annually in the HS&E Compliance Liability Statement.

## 6.0 EMPLOYEE INVOLVEMENT

Employee involvement at all levels promotes commitment, accountability, and overall performance of HS&E programs, initiatives and goals. The following programs and activities are examples of the manner and degree to which leaders and employees are involved in HS&E program development, implementation, review, and continual improvement at FM&T. Programs specific to only KC or NM are designated as such.

- **Honeywell Operating System (HOS):** A comprehensive and integrated business approach to managing and improving the business which drives accountability and recognition for good work across value streams and ensures sustainable improvements and sharing of successes across the enterprise. HOS consists of a series of standup tier meetings involving two-way communication among employees up to and including the President. HS&E topics are discussed and HS&E staff participates in various tiers. An escalation process is standard throughout the tier meetings to address and resolve issues.
- **Management of Change (MoC):** This program establishes the requirement that management or management designees describe and document proposed or modified work processes, equipment, and chemicals and then submit the documentation for review by HS&E subject matter experts for hazard identification and control prior to initiation of the work. Management is responsible for incorporating recommended controls prior to initiating work.
- **Six Sigma Plus:** Six Sigma Plus is an overall continuous improvement methodology used to accelerate process, product and service improvements at FM&T. This methodology includes HS&E processes and programs. Six Sigma Plus relies on teams to apply various process analysis tools to improvement opportunities.
- **Incident Analysis:** Natural teams are established to investigate events, such as recordable injuries and illnesses, near misses, and environmental excursions.
- **Job Hazard Analysis (JHA):** This program establishes the requirement to identify and document higher-risk work practices. The program requires development of appropriate JHAs or related documentation to ensure hazards are identified and controls are in place and communicated prior to work being conducted.
- **Safety & Housekeeping Implementation Needs Everyone (SHINE):** This program establishes scheduled, HS&E-related tours of department physical conditions. This assessment program requires involvement from HS&E, departmental management, and department employees. Employee work behaviors are also observed during the SHINE process. This program is an example of a mechanism to involve employees in the identification and control of hazards in the workplace.
- **GEMBA Walks:** This program, performed by management and employees for operations and office areas, includes HS&E and workplace organization/housekeeping components built on the principles of the Honeywell Operating System (HOS). The focus of Gemba walks includes communication, coaching and mentoring, HS&E issues and interventions, identifying continuous improvement opportunities, and 5S (Sort, Store, Shine, Standardize, Sustain) observations.
- **Safety & Health Committees:** These committees, as established for various shifts and topical areas, address current HS&E issues. The use of committees provides an opportunity to expand involvement in HS&E through increased employee participation; facilitate enhanced communication among parties involved in HS&E activities; and guide associated continuous improvement initiatives. Examples of active committees include the Safety 4 All Committee (KC), Division 100 Safety Committee (KC), BSAFE (Behavioral Safety for Everyone) Steering Committee (NM), and the Electrical Safety Committee.
- **HSEMS Council (KC & NM):** Senior managers, including the Vice-President ISC at KC and the Site Leader at NM, meet on a scheduled basis to assure continuous improvement of HS&E programs, overcome barriers, and recognize superior safety performance.
- **Chemical Management Committee:** This committee serves as the oversight for the chemical lifecycle management system and serves as the governing body for issues related to chemical management.

This listing of employee involvement activities is not all inclusive, but is representative of the type and nature of activities for which employees at all levels of the organization are involved in FM&T's HSEMS.

## **7.0 WORK PLANNING AND CONTROL**

The FM&T HSEMS assures effective application of work planning and control processes at the site, operation, and worker level. Utilizing a graded approach, commensurate with risk, FM&T has integrated the following work planning and control elements into processes and work performance:

- Define Scope of Work
- Analyze Hazards
- Develop & Implement Controls
- Perform Work Safely
- Feedback & Improvement

The following sections describe how work planning and control is integrated and managed at the site, facility, department, and subcontractor level.

### ***7.1 Work Planning & Control – Site Level***

#### **7.1.1 Define Scope of Work – Site Level**

The scope of work at FM&T sites is defined in the Performance Based Contract for the Management and Operation of DOE/NNSA facilities. FM&T operates within the assigned mission and adheres to requirements as defined in the contract. The KCFO's Performance Evaluation Plan expectations and objectives, and the Performance Evaluation Report are used to establish performance objectives and provide overall performance feedback, including HS&E operations.

#### **7.1.2 Analyze Hazards – Site Level**

FM&T operations are non-reactor and the operational hazards are classified as typical of those encountered in general industry.

Current operations have been described in the following Environmental Impact Statements:

- Kansas City activities are described in the Stockpile Stewardship Management Programmatic Environmental Impact Statement (SSMPEIS),
- Kansas City transition activities are described in the Environmental Assessment for the Modernization of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the Kansas City Plant (DOE/EA-1592), and
- New Mexico activities are described in the Sandia National Laboratories New Mexico Site-Wide Environmental Impact Statement (SWEIS).

KC completed a baseline Site Safety Assessment and received DOE approval of the assessment and conclusions in 1995. NM completed a Hazards Survey in 2002 as its baseline and has updated it triennially. FM&T used the PHA program to maintain these baselines. Starting in 2006, FM&T adopted the Honeywell Aerospace risk assessment approach to annually assess operational hazards and controls. Based on these assessments and incident analyses performed at FM&T operations, no Technical Safety Requirements, Safety Limits, Limiting Conditions for Operations, or Surveillance Requirements are applicable. Planned operational changes, including:

- facilities,
- equipment,
- chemicals/materials,
- processes, or
- development / evaluation activities

are reviewed in accordance with PHA criteria to ensure that FM&T operations do not exceed identified HS&E thresholds (Reference – Section 2.3 HS&E Thresholds).

Even though the SSA was developed specifically for operations at the KC Bannister facility, similar general industry type operations continue at the NSC facility. Technology advancements such as new equipment, materials, or parameter modifications along with other planned operational changes are addressed via the Management of Change program. Job Hazards Analyses were reviewed for operations moved to the NSC location.

FM&T operations are subject to requirements under the National Environmental Policy Act (NEPA). This requirement applies to planned operational changes which are reviewed in accordance with risk based PHA criteria. This ensures that the changes do not exceed identified FM&T NEPA Action Levels or are already pre-approved by KCFO under the Routine Operating and Administrative Activities (ROAA) or previous NEPA documents (e.g., SSMPEIS (KC), DOE EA-1592, or SWEIS (NM)). If these Action Levels are to be exceeded or the activity is not pre-approved, a KCFO NEPA determination to assess environmental impacts must be made prior to funds being expended on the project.

**NEPA Action Levels:**

The following tables identify how the Management of Change (MoC) process, including PHA tool and submittal criteria, has been developed to meet KCFO expectations for mandatory NEPA determinations, pre-determinations (Routine Operating and Administrative Activities), and oversight notifications.

A KCFO NEPA determination is requested by FM&T for planned changes that meet any of the following criteria or planned activities that do not easily fit into categories identified in Table 4.b or 4.c:

Table 4.a. – KCFO Determination Required	
Asbestos Containing Materials (ACM) Removal - B1.16	facility projects involving the removal of ACM at or above the limits defined by the PHA process (removal of 260 lf or 160 sq. ft. or more of ACM).
Environmental (WM/ER) cleanup projects - B6.1	excludes emergency response for spill mitigation
PCB removal – B1.17	projects designed specifically for removal of PCB containing items
Machinery & Equipment Relocation - B1.31	radiological/energetic/manufacturing processes to buildings not previously associated with those activities or the relocation of buildings containing those processes.
Classes of action:	that normally require Environmental Assessments (EAs) or Environmental Impact Statements (EIS) as identified by 10 CFR 1021.400 Subpart D, Appendix C and D:
Air Emissions	<ul style="list-style-type: none"> <li>▪ new permit / permit modification, or</li> <li>▪ new emission point, or</li> <li>▪ new process or activity change with the potential to emit pollutants which meet or exceed a combined total of 876 lbs. per year.</li> </ul>
Water Discharges	<ul style="list-style-type: none"> <li>▪ permit modification,</li> <li>▪ any new process/activity change that will result in a flow increase of &gt;10% above the current average plant flow, or</li> <li>▪ the discharge of any previously unreported pollutant.</li> </ul>
Solid Waste	<ul style="list-style-type: none"> <li>▪ RCRA permit modification,</li> <li>▪ new hazardous waste stream,</li> <li>▪ status change for RCRA 90-day storage facility, or</li> <li>▪ engineered remediation project for accidental spill(s) that require removal/disposal of contaminated media (engineered remediation project refers to a spill cleanup activity which is beyond the normal FM&amp;T response and/or capabilities to mitigate the contamination and requires the involvement of contracted engineering services to design and manage the cleanup).</li> </ul>

Resource and Energy Use	<ul style="list-style-type: none"> <li>▪ an activity that will increase by more than 10% the consumption of (excluding increased use due to seasonal or climatic weather conditions): <ul style="list-style-type: none"> <li>○ electrical power (baseline 114k MWH),</li> <li>○ natural gas (baseline 600k MCF),</li> <li>○ #2 fuel oil (baseline 20k gals),</li> <li>○ Potable water (baseline 170M gals);</li> </ul> </li> </ul>
Land Usage	<ul style="list-style-type: none"> <li>▪ a negative impact, subsequent to mitigating controls, to aesthetic, cultural, or historical features; ecology of the land; wetlands; or endangered species;</li> </ul>
Noise	<ul style="list-style-type: none"> <li>▪ an effect on people or the environment at or past the FM&amp;T property line <math>\geq</math> 60db(A) during the day and <math>\geq</math> 55db(A) during the night [10 min average];</li> </ul>
Thresholds	<ul style="list-style-type: none"> <li>▪ an activity or project that will cause FM&amp;T to exceed the thresholds identified in Section 2.3, HS&amp;E Thresholds.</li> </ul>

A KCFO NEPA determination will not be requested for planned changes that fall within the following Routine Operating and Administrative Activities:

<b>Table 4.b. - Routine Operating and Administrative Activities</b>	
<b>Categories</b>	<b>Typical NEPA Reference</b>
<b>Boiler house:</b> repair/replacement work not including treatment processes	B1.3
<b>Compressed gas systems:</b> repair/replacement work to plant nitrogen, carbon dioxide, liquid nitrogen, oxygen, & air	B1.3
<b>Computer/telephone/communications:</b> repair/replacement work	B1.3
<b>Computer/telephone/communications:</b> acquisition, installation, operation, and removal	B1.7
<b>Steam Plant and Cooling Water systems:</b> minor improvements or modifications	B1.5
<b>Decontamination (routine):</b> surfaces of equipment, rooms, or other interior surfaces of buildings	B1.3
<b>Decontamination (non-routine):</b> removal of contaminated equipment and materials	B1.3
<b>Demolition &amp; subsequent disposal:</b> of buildings, equipment, & support structures	B1.23
<b>Doors/windows/walls/ceilings:</b> replace or minor building repairs	B1.3
<b>Drain Systems:</b> repair drains not involving hazardous wastes	B1.3
<b>Ductwork:</b> repair/replacement work	B1.3
<b>Electrical:</b> repair/replacement work of distribution systems or distribution & lighting	B1.3
<b>Emergency:</b> repairs	B1.3
<b>Environmental Monitoring:</b> on or off-site characterization (well drilling, aquifer testing, air monitoring, sampling)	B3.1
<b>Equipment and Material Acquisition:</b> machine tool, process, & capital equipment purchases	B1.24
<b>Fencing:</b> installation	B1.11
<b>Fire:</b> repair/replacement work of suppression system	B1.3
<b>Floors:</b> concrete/topping, including replacement, aisle repair & resurfacing, carpeting & vinyl tile replacements	B1.3
<b>HVAC:</b> repair/replacement work	B1.3
<b>HVAC/Ductwork:</b> installation or modification	B1.4
<b>Information gathering:</b> data analysis, literature review, document prep, distribution, training, etc.	A9
<b>Instrumentation:</b> installation or improvements to building and equipment (alarms, monitoring, surveillance, control, fire, security, emergency)	B2.2
<b>Maintenance:</b> repair orders, corrective actions, debris removal, preventive, & predictive -- (building, structures, infrastructure, and equipment)	B1.3
<b>Outside:</b> roads/parking lot resurfacing, landscaping, lawn sprinklers, guardrail, barrier, fencing repair, debris removal, or erosion control	B1.3
<b>Painting/Repainting:</b> (lead based paint containment, removal, and disposal – B1.34)	B1.3, B1.34

<b>Production &amp; non-production equipment:</b> repair, maintenance, like kind replacement, or installation	B1.3
<b>Rearrangements (factory/office):</b> relocation and operation of machinery/equipment, minor construction for removal or installation	B1.31
<b>Research and Development:</b> small scale indoor projects using nanoscale materials (includes construction, modification, decommissioning, and operations)	B3.15
<b>Roads/Paths:</b> construction, acquisition, or relocation	B1.13
<b>Roofing:</b> repair/replacement	B1.3
<b>Service contracts, technical support, &amp; emergency management planning:</b> that do not impact the environment, human health or safety; includes engineering consultation support (both on-site and off) beyond awarding of contracts only	A8, A11, A12
<b>Stairways, ladder catwalks, structural platforms, frames, etc.:</b> repair/replacement/installation	B1.3
<b>Steam, condensate, chilled water, tempered water, RO/DI system:</b> repair/replacement	B1.3
<b>Support buildings/structures:</b> siting, construction, and operation (relocation – B1.22)	B1.15, B1.22
<b>Testing/Calibration (routine):</b> facility components, subsystems, or portable equipment	B1.3
<b>Utilities:</b> disconnection of utilities not needed for safety reasons	B1.27
<b>Utility piping:</b> repair/replacement, maintenance, relocation	B1.3
<b>Vehicle:</b> repair	B1.3

The following activities require KCFO notification but do not require a formal NEPA determination (not expected to exceed thresholds identified in Table 4.a.)

<b>Table 4.c. – KCFO Oversight Notifications</b>	
<b>Beryllium (Be) Operations:</b> new or modified process or equipment to be used in a Be process or decontamination activities of Be contaminated equipment or areas.	
<b>Equipment Acquisition:</b> machine tool, process, & capital equipment purchases which pose a new environmental impact.	
<b>HS&amp;E equipment:</b> new installation or improvements to hoods and/or exhausts which alter original functionality of exhaust.	
<b>Excavation activities (non-ER project):</b> located within a Solid Waste Management Unit (SWMU), contaminated site, wetland, or would encounter a contaminated groundwater plume.	
<b>PCB removal:</b> projects which include removal of PCB contaminated material or items or have encountered unknown PCBs during work activities.	
<b>Machinery and Equipment Relocation:</b> radiological or energetic processes relocated within existing structures currently associated with those processes.	
<b>Material Relocation or New Storage:</b> radiological, energetic, or unbound engineered nano-particles relocated to new structures not currently associated with those materials.	
<b>Wastewater Systems:</b> replacement or relocation of wastewater systems (industrial or storm water) or the major components which may interrupt treatment process.	

**NEPA No Action Levels:**

A KCFO NEPA determination will not be requested for planned operational changes that fall within an existing NEPA document or determination, such as a:

- o NEPA Compliance Record (NCR) listed in the FM&T NEPA Log (list of actions previously reviewed by KCFO),
- o Document signed by a NEPA Compliance Officer other than KCFO for activity being performed at a site other than an FM&T site,
- o PHA Determination which does not require the submittal of a full PHA to HS&E for review.

The above statements and tables are reviewed by the KCFO NEPA Compliance Officer (NCO) as part of the annual update, review, and approval process for this document and as such constitute KCFO NCO Approval.

### 7.1.3 Develop and Implement Controls – Site Level

Federal, state, and local regulations, DOE Orders, and industry standards (including ISO 14001 and OHSAS 18001) collectively define the HS&E operating requirements and hazard controls for FM&T operations. FM&T is also governed by Honeywell International and Aerospace requirements for HS&E management. Change management for regulations includes HRRB and ORRB.

- **Honeywell Regulatory Requirements Review Board (HRRB) – Aerospace Communication**  
The primary responsibility is to understand and comply with regulatory changes and manage their impacts to the business (codes, standards) at individual sites. This includes monitoring Federal, Country, State, Province and local HSE and Product Stewardship requirements. Monthly, Aerospace conducts a review meeting (HRRB) with Subject Matter Experts (SMEs) and staff that participate in Corporate Functional Groups (Governance, Safety, IH, Facilities, Product Stewardship, etc.) Aerospace is communicating the content of the HRRB meetings to supplement the site’s regulatory change management process.

At the site level, regulatory permits are also a part of the HS&E operating requirements and assure environmental controls are in place. These permits are generally KCFO held, but apply to operations of FM&T. FM&T’s major environmental permitting activities are summarized as follows:

Sanitary/Industrial Wastewater and National Pollutant Discharge Elimination System (NPDES) Permits:

- The KC Bannister Sanitary/Industrial Wastewater Discharge Permit issued by the City of Kansas City, Missouri, is a comprehensive wastewater permit addressing plant discharges to the sanitary sewer system. These discharges, systems and facilities, include routine sanitary wastewater and the Groundwater Treatment Facility.
- The KC NSC Sanitary/Industrial Wastewater Discharge Permit issued by the City of Kansas City, Missouri, is a comprehensive wastewater permit addressing plant discharges to the sanitary sewer system. The permit includes discharge limits for the total facility discharge and the Industrial Wastewater Pretreatment Facility. In addition, compliance with applicable sewer use ordinance limits apply. Wastewater discharges associated with systems operated and maintained by the Developer (e.g., cooling tower and boiler blow down) must comply with ordinance limits.
- The NPDES Permit issued by the Missouri Department of Natural Resources (MDNR) addresses Bannister plant discharges to the storm sewer system through four permitted outfalls. Only uncontaminated rain event runoff, fire protection system test flows and air conditioning condensate are authorized to be discharged.
- Stormwater discharges from the NSC are addressed with a No Exposure Certification. The No Exposure Certification is facilitated through the application of a Stormwater Pollution Prevention Plan that has been approved by the Landlord and NNSA.
- NM operations do not require NPDES or sanitary sewer wastewater discharge permits. No wastewater permits are specifically required for NM operations conducted at remote locations.

Air Operating Permits:

- KC Bannister has an annual permit to operate issued by the City of Kansas City, Missouri. This permit applies to existing air pollution sources at the KC. A KC Title V Air Operating Permit Application has been provided to the MDNR and the Kansas City, Missouri, Health Department for approval and issuance of the operating permit and operates under this permit application.  
KC NSC has an annual permit to operate issued by the City of Kansas City, Missouri. This permit applies to new air pollution sources at the NSC.
- KC NSC has an Air Construction Permit issued by MDNR. KC has requested an amendment to this permit for additional emission limitations.

- NM operations in Bernalillo County are included as Volume III of NNSA/Albuquerque’s permit application. NM operations outside of Bernalillo County do not require an Air Operating Permit. NM has a Source Registration.

Waste Management Permits:

- KC Bannister operates as a 90-day RCRA Large Quantity Generator. A Missouri Hazardous Waste Management Facility Permit was issued by the MDNR. This permit requires post-closure care of three RCRA hazardous waste management units and addresses the continuing implementation of RCRA corrective action requirements to address releases from other solid waste management units.
- KC NSC operates as a 90-day RCRA Large Quantity Generator. A Missouri Hazardous Waste Management Facility number was issued by the MDNR.
- NM operates as a Small Quantity Generator which does not require a RCRA operating permit.

FM&T does not manage environmental permits at its off-site locations.

In lieu of the Annual Site Environmental Report, FM&T provides an Annual Site Environmental Summary to KCFO containing relevant environmental monitoring data.

### **7.1.4 Perform Work Safely – Site Level**

FM&T’s HSEMS provides the overall systematic approach and elements to assure HS&E is systematically integrated across the business.

The FM&T Leadership Team is ultimately responsible for ensuring that FM&T is operated in a safe and environmentally protective manner. Employees, at all levels, are responsible for their own safety and the protection of the environment.

### **7.1.5 Feedback & Improvement – Site Level**

KCFO provides a Performance Evaluation Report annually with interim reports also provided to FM&T. These reports provide feedback at the site level detailing any problems, concerns, or issues and also document accomplishments.

DOE-HQ and NNSA-HQ audit the operations for HS&E Management System implementation and compliance. KCFO performs HS&E program reviews to identify system deficiencies and opportunities for improvement. Honeywell conducts HS&E compliance evaluations on a three-year cycle to assess individual site performance against regulatory and Honeywell requirements. Independent, third party assessments are also performed on the HS&E management system, such as ISO 14001 and OHSAS 18001.

FM&T senior leadership holds “All Employee” meetings for plant personnel to share site performance and plans. FM&T employees are encouraged to listen to Honeywell leadership Town Hall meetings where business operations are discussed.

HS&E performance data and issues are shared quarterly in the Management Operations Review (MOR) meetings with FM&T senior leadership. An HSEMS Council meeting is held monthly for Senior Leadership during the Vice-President, ISC, meeting. Consideration is given, but is not limited, to the items from the following list in selecting topics.

- HSEMS and changes to the system,
- HS&E requirement changes,
- HS&E performance data relative to objectives, targets and metrics,
- changes to HS&E programs,
- changes in FM&T activities affecting HS&E programs,
- corrective action and lessons learned from HS&E incidents,
- advances in HS&E technologies,
- internal audit results,

- concerns of customers or other interested parties,
- HS&E awards and recognition

In FY15, FM&T will continue working to address the proper and timely implementation of the revised OSHA Hazard Communication regulation referred to as the Global Harmonization System. Efforts will focus on three elements: training, safety data sheets, and labeling.

A monthly Environmental Issues Briefing is conducted with KC and KCFO ES&H and Legal staff.

Honeywell Aerospace HS&E holds periodic (minimum monthly teleconferences or face-to-face) meetings with the FM&T Director HSE&F, to review business-level performance against Honeywell Aerospace (HS&E) Annual Operating Plan goals at the site level.

## **7.2 Work Planning & Control – Facility / Operations Level**

### **7.2.1 Define Scope of Work – Facility / Operations Level**

The Design Agencies/National Laboratories provide the traditional scope of work in support of NNSA nuclear weapon mission work. This constitutes the major mission function for FM&T. Non-Traditional work is typically conducted for other government agencies outside the NSE.

FM&T operates under agreed upon DOE and industry standards. These are defined in the FM&T Operating Requirements database.

FM&T's President and Senior Leadership, including the Director HSEF, develop an annual Strategic Plan. The Strategic Plan documents the strategies and tactics developed to improve FM&T performance, including performance against the KCFO contract. HS&E strategies, tactics and objectives are then developed to support the Strategic Plan and are derived from consideration of relevant legal and other requirements, environmental aspects analysis, and safety and health focus areas. FM&T HS&E leadership considers technological options; financial, operational and business requirements; and the views of interested third parties prior to finalizing HS&E strategies, tactics and objectives. These objectives are assigned at the appropriate level and function of the organization and ultimately generate specific individual improvement actions. FM&T documents and maintains these strategies, tactics and objectives and monitors performance against them. The HS&E Management Operating System (MOS) documents the systemic, periodic evaluations to be conducted by HS&E leadership to determine system adequacy and effectiveness based on selected business indicators. HS&E is a core functional area of the MAS at FM&T.

Through this top-down approach, lower-tier actions are developed to ensure the HS&E organization is positioned to support plant goals. Tactics and actions flow down through the Honeywell Performance and Development process to ensure employees are establishing personal goals that support the overall HS&E mission. This process influences HS&E disciplines to tie improvement initiatives to the plant Strategic Plan, complete Honeywell objectives, and meet KCFO expectations. Responsibility is assigned, as appropriate, to each initiative. Periodic assessment of progress is conducted by HS&E and senior leadership. As a result of these assessments, lower-tier actions may change and resources may be reallocated as issues emerge or priorities change.

### **7.2.2 Analyze the Hazards – Facility Level**

The following processes / programs (examples, not all inclusive) are used to identify and evaluate HS&E hazards, risks, and impacts at FM&T.

- HS&E Risk Assessments
- Environmental Aspects Analysis
- Management of Change (Preliminary Hazard Analysis)
- Trend Analysis

- Safety and Health Focus Areas
- Exposure Assessments
- Emergency Management – Hazards Survey and Hazards Assessment
- Lessons Learned

**HS&E Risk Assessments** – FM&T conducts the Honeywell required annual risk assessments to identify aspects in higher risk activities. This process includes both the Honeywell Self-Assessment Tool and Risk Assessment and the Honeywell Aerospace HS&E Risk Assessment.

**Environmental Aspects Analysis** – FM&T conducts an annual analysis of environmental hazards through the HS&E Risk Assessment process. This satisfies the ISO 14001 environmental aspects analysis process requirements and results in the establishment of significant environmental aspects and performance goals. A team of FM&T environmental personnel participates in this analysis and prioritization process. This process is used to maintain the NEPA action levels.

**Management of Change (MoC)** – The focus of the MoC program is to identify and analyze hazards and develop controls to mitigate those hazards. This process is also a means of feedback to the individual as well as management. The PHA tool allows the customer (e.g., process owners, engineers, project coordinators) to describe proposed changes in their process so that HS&E can then communicate action items or information back to them. HS&E uses the PHAs to evaluate facility operations and worker safety (e.g. environmental aspects, pollution prevention, life safety, fire protection). Any operational level issues may be reviewed by management to assure safe performance of the work in accordance with the HSEMS.

**Trend Analysis** – Safety and health performance data is trended to identify statistically significant change in performance measures which is unlikely to be due to a random variation, or spike, in the related processes. Both leading and lagging indicators are reviewed, including incidents, near-misses, HS&E concerns, and audit data. The trending analysis data is used to understand current and past conditions of performance, to predict and improve future results, and to make business decisions on the best course of action to take and the level of resources required to address any area of concern.

**Safety and Health Focus Areas** – Target areas are identified based on trend analysis results, relying on data from OSHA recordable injuries and less severe injuries or illnesses. Teams analyze the data further to determine specific plans and actions designed to minimize and/or eliminate hazards.

**Exposure Assessments** – The purpose of this program is to define risk levels and develop and implement industrial hygiene controls based on exposure assessments. An exposure assessment program that is properly implemented and followed should protect employees who are required to comply with FM&T’s safety and health guidelines. This program includes documented evaluations of surveys conducted to determine occupational health hazards at FM&T. There are five different types of surveys conducted to determine occupational exposures: initial/baseline, periodic, change in process, government mandated, and employee concern. The frequency that evaluations are performed depends on the potential of exposure. Once controls for hazards are identified, operating department management implements the controls to ensure employees performing the work remain protected from unnecessary risks.

**Emergency Management** – Emergency planning is conducted based on hazard surveys and a hazards assessment which are reviewed annually. These documents identify the hazards associated with potential emergency events and the possibility of off-site release of hazardous materials and impacts to the surrounding community. The documents are then used to plan emergency response actions, train emergency responders (onsite and offsite, e.g., KC Fire Department), and ensure timely and appropriate responses in the event of a real emergency.

**NSC Chemical Management Process** – NSC Chemical Management controls the processes of managing chemicals introduced to FM&T facilities, including acquisition, distribution, reconciliation, and disposition. The NSC operations are subject to the International Fire Code (IFC), which impacts the way chemicals are managed. Each building at the NSC is divided into control areas. These control areas have assigned IFC physical and health hazards classifications which establish thresholds on the types of chemicals that can be used and stored within that control area.

**Lessons Learned** – The objective of the FM&T lessons learned program is to prevent occurrence of adverse events experienced at other locations and to share good-work practices. This program reviews and disseminates information

received from the DOE, Honeywell, or general industry. FM&T HS&E assesses the risk, determines the applicability, shares information, and facilitates development of actions where necessary.

### 7.2.3 Define and Implement Controls – Facility Level

Facility level compliance controls are documented by a set of procedures collectively titled Command Media.

The FM&T Command Media describes functional area procedures within FM&T and include HS&E. Each of these functional areas contains detailed procedures (process descriptions and work instructions).

- **Process Descriptions** – A high level document that describes general business practices or processes that establish “what” is to be accomplished.
- **Work Instructions** – A high level document that describes the minimum but essential details, or “how” a process is to be accomplished.

Associated documents, records, and forms provide a mechanism for recording required data. These documents are established to implement legal, regulatory, and other HS&E requirements to which FM&T subscribes and that are applicable to its operations and activities.

A numbering system has been devised to identify Command Media documents. Each document is identified by a three-set sequence of digits (the first set identifies Business Area; the second set identifies Process Description; the third set identifies Work Instruction).

x.	xx. (xxx.)	xx
Identifies Business Area	Identifies Process Description (xx. Processes used at KC or KC & NM) (xxx. NM Specific Process- used only at NM)	Identifies Work Instruction

Note: All documents contain a field on the cover page that identifies the applicable location(s).

When copies of the electronic Command Media are printed from the on-line display system, each document has a cover page including the document number and each page is numbered. The electronic system/database is the official reference.

HS&E uses internal procedures, job aids, and other types of controlled documents to support the management system. These documents are used as resources and tools.

Current versions of approved documents are made available to functions and/or operations where they are essential to the effective functioning of the HSEMS. Documents retained for legal and/or knowledge preservation are identified as obsolete or inactive or controlled within each system to prevent unintended use.

Records (in various types of media) are maintained to demonstrate conformance to specified requirements and the effective operation of the HSEMS. FM&T has established and maintains a Records Management process which has been certified under ISO 9001 and ISO 14001 that assures identification, collecting, indexing, accessing, filing, storing, maintaining, and disposing of records. The Records Management Handbook establishes the minimum required retention period for records across the full spectrum of FM&T business activities. Record legibility, identification to the activity, process or program involved, and storage arrangements to prevent damage or deterioration and to prevent loss are the responsibility of each respective department.

### 7.2.4 Perform Work Within Controls – Facility Level

The Director HSE&F has authority and responsibility for ensuring that HS&E system requirements are established, implemented, and maintained in accordance with the standards of the HSEMS. The Director HSE&F reports on the performance of the HSEMS to FM&T Senior Leadership and KCFO. The Director HSE&F has direct access to the President in matters relating to the HSEMS and uses forums such as MOR and HS&E Council meetings to communicate

with FM&T Senior Leadership. KCFO ES&H Staff and the FOM are kept apprised through performance metrics and updates, various meetings, and other daily or program interfaces.

The Director HSE&F and the HS&E organization have the organizational authority and responsibility to:

- administer and maintain the HSEMS and associated programs;
- initiate action to prevent non-conformance relating to the HSEMS by notifying appropriate employees;
- identify and record HSEMS problems;
- initiate, recommend, or provide solutions through designated channels;
- verify the implementation of solutions; and
- suspend an operation in the event of an out-of-control process, or to control further program activities related to an area of non-conformance until the deficiency or unsatisfactory condition has been corrected.

Line Management and employees are held accountable for HS&E at FM&T. HS&E requirements are communicated to employees and management through site-specific HS&E Process Descriptions and Work Instructions. These documents identify accountability and assigned responsibilities for employees and management to effect and maintain HS&E compliance. Identified deficiencies or non-compliant HS&E items are assigned to the responsible organization for corrective action. Responsibility and accountability for HS&E performance at FM&T is further reinforced through the following means:

- Objectives & Targets: FM&T establishes, documents, maintains and monitors performance toward HS&E objectives and targets at all levels of the organization. HS&E expectations, goals, and objectives are integrated and reviewed through the HS&E MOS.
- Salaried employee performance appraisals are conducted through the Honeywell Performance Development process which may include individual performance relative to HS&E goals and behaviors.
- Expected Conduct: Employees can electronically access FM&T guidelines and policies, which contains the disciplinary policy. Examples of unacceptable HS&E conduct that could result in disciplinary action include:
  - a. Non-compliance with HS&E policies, regulations, rules and work instructions;
  - b. Contributing to the falsification of records;
  - c. Failure to observe good housekeeping practices; and
  - d. Taking a negative action against an individual for exercising his/her right and responsibilities to report legitimate concerns, especially in the area of ethics, EEO, HS&E, and security.
- Collective Bargaining Agreements: Collective Bargaining Agreements, applicable only to KC, require that represented employees comply with HS&E requirements. Furthermore, collective bargaining unit contracts and the Labor Relations Manual describe general and specific provisions for progressive and non-progressive disciplinary actions for HS&E reasons.
- FM&T has instituted the Honeywell Aerospace HS&E Accountability Policy which describes expected behavior and progressive discipline for employees and managers regarding HS&E compliance.
- Management and employees participate in periodic HS&E self-assessment activities to ensure their areas and operations are properly maintained.
- Job Descriptions: HS&E responsibility is incorporated into job descriptions for bargaining unit and salaried employees.

New employees, visitors, and subcontractors at FM&T are provided general site orientation and/or other information relative to HS&E as summarized below:

- Visitor Orientation: Visitors to KC receive a brochure when entering the facility which covers security, safety and health, emergency evacuation and sheltering routes, general plant information, pollution prevention, and emergency and useful telephone numbers. Visitors at NM receive an orientation which covers similar topics. The visitor's host is responsible to ensure this communication is completed.

- New Hire Orientation: New hire orientation is provided to newly hired/rehired FM&T employees including a general HS&E information overview on regulatory requirements, emergency telephone numbers, responses to emergency announcements, HS&E incident reporting, and ISO 14001 and OHSAS 18001 information.
- Subcontractor Safety: HS&E requirements for construction and service subcontractors are summarized in separate Contractor and Service Subcontractor Safety Handbooks which are provided to subcontractors performing work at KC. Construction and service subcontractors at both KC and NM receive safety orientations, which address safety, including in-plant vehicle safety and emergency/evacuation procedures. Additionally, KC-specific LOTO and confined space safety requirements are provided to subcontractors performing this specific work.

## 7.2.5 Feedback and Improvement – Facility Level

Feedback to effectively improve performance and meet customer expectations is accomplished through the use of benchmarking, third party assessments, internal audits, self-assessments, and lessons learned.

Honeywell requires completion of an annual Self-Assessment Tool and Assurance Letter to assure compliance with regulatory and management system requirements. The Self-Assessment Tool is a comprehensive HS&E questionnaire based on site compliance to Honeywell HS&E procedures. The questions are based on regulatory and Honeywell expectations. Upon completion of the questionnaire, FM&T submits these questionnaires for KC and NM to Honeywell Aerospace. As part of the process, Assurance Letters are prepared and ultimately signed by the President of FM&T ensuring senior leadership awareness and concurrence. This package of letters outlines HS&E compliance issues requiring senior leadership attention and is submitted to Honeywell Aerospace for promotion upward through Honeywell management.

As a business driver, HS&E has established key performance indicators around safety and health, waste generation, environmental performance, and property loss. These measurements and associated trend data are monitored by FM&T, reviewed regularly by senior leadership and made available to the KCFO in accordance with the MAS.

FM&T also holds Management Operations Review meetings. The general purpose of these reviews is to assess and report on the performance of the management system to senior leadership, to ensure the continued suitability, adequacy, and effectiveness of the system in satisfying requirements and to serve as the basis for continuous improvement of the system. Assessment of the overall HSEMS is included in these management reviews. Continuous improvement activities are identified and tracked. Records of these management reviews are also maintained in accordance with the Records Management process.

FM&T plans, performs, and documents HSEMS audits in accordance with established procedures. Audits validate system and program-specific performance and identify opportunities for improvement. These processes cover the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results. These audits are carried out in order to:

- Determine whether or not the HSEMS:
  - a) Conforms to plans for HS&E management including the requirements of ISO 14001 and OHSAS 18001;
  - b) Has been properly implemented and maintained;
- Provide information on the results of the audit to management for review.

An audit schedule is maintained to ensure ongoing evaluation of the HSEMS.

Assessment of the HSEMS is also performed at FM&T through the following programs and processes:

- subcontract third-party assessments of specific functions as directed by HS&E management including ISO 14001 and OHSAS 18001 certification/periodic audits,
- DOE/NNSA audits and assessments,
- Honeywell HS&E compliance audits; and
- FM&T internal assessments.

FM&T has established and maintains procedures, programs and other formal mechanisms for internal and external communications of HS&E performance, goals, issues and general information. These mechanisms facilitate:

- internal communication between the various functions and levels of the organization (including HOS tier meetings), and
- external interactions, including receipt, documentation and response to communication received from external interested parties, for example, regulators.

Communication is accomplished using the following approaches:

- HS&E Concern Line (816) 488-3181: Phone line is available for employees to express concerns or ask questions regarding HS&E issues. Questions and/or concerns received via the concern lines are forwarded to the appropriate HS&E professional or facility subject matter expert for response and feedback. These systems are also available to employees electronically. (E2836)
- Emergency Management: FM&T coordinates with KCFO prior to release of documents, then communicates hazards assessment results and emergency plans to local agencies, response organizations and local emergency community planning committees as part of emergency preparedness.
- NEPA reviews: FM&T, in conjunction with KCFO, complies with NEPA requirements that provide for external stakeholder involvement in consideration of operational changes which could have a significant environmental impact.
- HS&E Committees: Committees address HS&E issues that impact FM&T providing an opportunity to expand employee involvement and facilitate communication among parties involved in HS&E activities.
- Community Involvement: FM&T participates in the Environmental Excellence Business Network sponsored by the local community environmental advocacy group, Bridging the Gap; the Blue River Watershed Association; and the annual Project Blue River Rescue.
- Agreement in Principle: The KCFO and the Missouri Department of Natural Resources have signed an Agreement in Principle which provides for additional state oversight of KC's environmental monitoring, environmental management, emergency response and public awareness programs. This Agreement can also be used to facilitate communication and coordination between the KCFO and various state agencies.
- Incident Analysis Program: Results of accident and incident (injury/illness, property damage, and near miss) investigations are shared with target audiences, using HS&E Manager's Communication packet, HS&E communication alerts, briefings, and team involvement.
- HS&E Web Page: The HS&E web page is located on the FM&T Intranet and provides access to listings of HS&E services, HS&E information, Command Media, lessons learned, HS&E performance data, safety alerts, HS&E plans, presentations, and HS&E contacts. It also provides a mechanism for employees to provide feedback to HS&E.
- Emergency Hotlines: At KC, hotline numbers are provided for spills (7745 or "SPIL") and other emergencies (3600 to reach Building Operations Center) which are answered 24 hours a day to facilitate immediate emergency response actions. Security and HS&E pager numbers are provided at NM for 24-hour notification and assistance. KC operates a Facility Manager program as part of the Emergency Management process for 24/7 event response notification and categorization/classification. This includes an Incident Command structure for formal response to HS&E events, as necessary including 24/7 notification to the FM&T President and the KCFO FOM.
- Information Centers and Federal Bulletin Boards: HS&E posters and information are displayed in information centers located throughout KC & NM including:
  - a) Poster for "Occupational Safety and Health Protection for DOE Contractor Employees at Government-Owned Contractor-Operated Facilities" which identifies employees' rights to report unsafe acts or conditions without fear of reprisal,
  - b) Posters for state workers' compensation programs encouraging employees to contact the state with concerns related to occupational injuries/illnesses including:
    - Missouri Department of Labor and Industrial Relations Division of Workers' Compensation (KC)
    - New Mexico Worker's Compensation Administration (NM)
    - State of Arkansas Workers' Compensation Commission (NM – Fort Chaffee operations)
  - c) The Honeywell commitment to Health, Safety & the Environment.

- d) Poster for 10 CFR 851 “Job Safety and Health – It’s the Law!”
- e) Notice of Availability of Medical and Occupational Health Records
- Complaints: If employees feel their concerns are not being adequately answered, they may either file a written complaint to KCFO and/or telephone the Office of the Inspector General and the Assistant Secretary for Environment, Safety, and Health, in Washington, D.C.
- Various other HS&E communication activities coordinated by the Communications organization:
  - a) Community relations, involving public release of information including publication of a *eConnections* newsletter which is widely distributed throughout the local Kansas City community and made available to employees;
  - b) Internal communication, including *Newsstand*, Web TV, Manager Connect, all employee meetings, information centers and bulletin boards located throughout the plant, and Comments\_Please and Ask Chris! email addresses where an employee may submit a concern;
  - c) Media relations, involving communication with external news media, including Emergency Press Center capabilities for emergency operations; and
  - d) Periodic special events and community involvement and awareness campaigns.

Positive feedback is provided on both a formal and informal basis. Employees are eligible to receive any number of awards under FM&T’s rewards and recognition program. HS&E performance and contributions are among the eligibility criteria for various types of the awards, including the following:

- Jack A. Knuth Award
- Significant Technical Achievement Rewards and Recognition (STARR) Program
- BRAVO

## **7.3 Work Planning & Control – Department / Task / Worker Level**

### **7.3.1 Define Scope of Work – Department / Task / Worker Level**

The scope of work at the department or activity level is well defined. The specific format for the scope of work depends on the organization performing the work. FM&T has three basic functions with defined scope of work formats.

**Production and related services:** Manufacturing, Engineering and associated support organizations are responsible for performing processes used to provide product and services to customers. This work is defined by the Program Control Documents (PCD) Schedule, work authorizations, design drawings in combination with the Solumina system, Process Engineering Specification (PES), and General Process Instructions (GPI). At NM, work is defined and authorized through funding documents and attached Scopes of Work. Additional project definition is developed through the Project Management and Engineering Processes and ultimately down to the task level.

**Maintenance and construction:** Facility Management Services performs maintenance and facility work, including construction and administration of construction subcontractors, at FM&T operations. Maintenance work is conducted at FM&T in accordance with the Maintenance Standard. Work is planned and executed through the electronic MAXIMO maintenance work request system. The requestor submits the request and a maintenance planner prepares a work order within the system identifying, as appropriate, HS&E concerns and personal protective equipment (PPE) needs. This system also initiates facility projects that require engineering design work. Third-party contractors working to a set of design documents typically perform facility upgrades. These design documents, the Construction Management Guide, the Contractor Safety Handbook, and the contractor’s job specific safety plan, define the scope of work for these activities.

**Analytical laboratory operations:** FM&T laboratory operations perform work specified in laboratory test requests and follow established laboratory test methods. These documents combine to define the scope of work.

FM&T employs a highly trained and skilled workforce commensurate with the level and complexity of assigned work. This training and skill set (“skill of the craft”) are relied upon on a daily basis to ensure safe performance of routine job assignments. Employees are encouraged to question the task/scope of work assigned to them should they have an HS&E

concern. The expectation is that each employee understands the scope of the work to be undertaken. Should the scope be unclear or perceived as outside the worker's knowledge, skills or abilities, the employee is expected to stop work and request additional guidance from management. Employees have the right to stop work if they believe the work is unsafe or could be performed in a safer manner. FM&T not only allows the "stop work" right but also encourages employee intervention if potential unsafe conditions or behaviors are observed.

FM&T has established an electronic Learning Management System (eLMS) to manage employee training. This system documents training requirements and training history including completion dates for training activities. Training assigned in the eLMS is categorized and defined as Qualification, Mandated, and Developmental for FM&T employees. Employees may be assigned Qualification training, which must be completed prior to performing the task at hand or, if Qualification training has not been completed, employees must adhere to a course-specific qualification training plan. This plan is prepared by the course owner and states the controls required for safe performance of work until the Qualification training is completed. Mandated training is training directed by management that employees must also complete by an assigned date, but which is not required to perform assigned tasks. The third category of training is Developmental training. This training is assigned to promote individual learning and career development. It is management's responsibility to identify training requirements and to monitor employee training records to ensure completion of qualification and mandated training.

Further, managers or their designees conduct HOS tier meetings, safety meetings, job orientations, or "tool box talks" to ensure a complete understanding of the scope of work. Managers are responsible for raising awareness to hazards employees might face in performing new, infrequent, or higher risk tasks. Work directions such as department safety procedures and task-specific "job aids" are also used by workers to supplement training and management direction.

### **7.3.2 Analyze the Hazards – Department / Task / Worker Level**

FM&T maintains an electronic MoC system used to store and deliver PHAs, NEPA compliance documentation, and on-site reviews requested by HS&E prior to process changes or start-up.

A requestor or employee (project leader) wanting to add or modify equipment, facilities, processes, or materials submits a PHA to HS&E for review. HS&E will review the request and determine what hazards might be present and identify the controls necessary to minimize risk. Implementation of the controls or elimination of the hazard is then the responsibility of the requestor or operating department with support from HS&E. Information related to the identification of HS&E hazards, risks and impacts is kept current through PHA reviews of new or modified processes, equipment and hazardous materials.

The JHA program documents hazards and controls that employees may encounter as they perform higher risk activities at FM&T. Risk is assessed across HS&E disciplines using professional judgment to determine the need for a JHA. JHAs offer guidance to line management in establishing training requirements for employees who are responsible to perform these tasks. Employees reading and following the guidance provided in the JHA can then control these risks through application of engineering controls, administrative controls, and/or wearing of PPE. These JHAs are provided to the workers electronically and may be linked directly to the Solumina system at KC. The Solumina system provides electronic instructions on how to perform the various manufacturing, testing and assembly operations within KC.

KC maintains Departmental Hazard Assessments (DHA) for KC production, engineering, and maintenance departments. This process is designed to systematically identify hazards and controls and document where hazards and controls are communicated to the employee(s) performing the activity.

NM performs hazard assessments of areas to identify or validate protective equipment requirements. This information is used to generate hazard awareness posters that are placed in work areas. Exposure assessments, surveys and evaluations have been, and continue to be, conducted. Assessments validate the effectiveness of controls and assure employee exposures are maintained as low as reasonably achievable (ALARA).

FM&T assessments include, but are not limited to, the following types of HS&E hazards, risks and impacts:

- Noise
- Lead in construction/maintenance

- Drinking water quality
- Asbestos
- Confined spaces
- Musculo-skeletal disorders
- Beryllium
- Carcinogenic materials

Employees have the right to observe monitoring or measuring of hazardous agents and have the results of their own exposure monitoring. FM&T takes prudent precautions to limit employee exposure.

KC maintains an Industrial Hygiene Exposure Assessment tool that lists use of chemicals (those with Occupational Exposure Levels, Permissible Exposure Levels, or Threshold Limit Values) by process and by facility areas. This tool summarizes the associated health hazards and prioritizes exposure monitoring by risk ranking.

NM maintains an Industrial Hygiene exposure assessment plan identifying areas in the facility where exposures to physical, chemical and biological health hazards may be encountered. The plan includes the frequency of necessary exposure monitoring.

Employees have the right to provide input as the scope of work is defined and hazards are analyzed prior to the commencement of work. Employees have the right to willingly participate in resolving safety and health issues including becoming actively involved to improve processes both from a quality and HS&E perspective. Hazard analysis programs are designed to identify hazards and controls for employees.

HS&E works with line management, technical support personnel, and the worker throughout the work definition and execution process to analyze hazards and incorporate hazard controls. HS&E personnel have the education, training, and experience, to provide effective support to FM&T's operations. In-house resources are augmented with subcontract personnel to meet certain requirements or special needs, such as non-routine HS&E sampling or special cleanup/decontamination work. Appropriate selection criteria are developed and applied to ensure that subcontractors hold the appropriate accreditations, licenses, certifications, or other prerequisite qualifications.

Chemical hazard information is readily accessible to FM&T employees through a variety of mechanisms. Workers have access to the on-line Safety Data Sheet (SDS) system. This system is updated whenever new chemicals are introduced into the operation. At NM, the system is updated through the Hazardous Material Acquisition Process. Employees can access SDSs for chemicals they will be in contact with and use the data to help analyze the hazards.

A revised OSHA regulation now requires that employers train employees on "new label elements and safety data sheets format to facility recognition and understanding." FM&T revised training to meet this new standard.

FM&T maintains approximately 130 HS&E-related training programs. Specific hazard analysis is an integral component of HS&E training as is hazard recognition and control.

FM&T also relies on the skill of the craft and experience of employees to perform low hazard routine work.

### **7.3.3 Define and Implement Controls – Department / Task / Worker Level**

Work direction systems for higher risk level activities in production, maintenance and construction include hazard control information. Department/task/worker level hazard controls, where appropriate, are defined and implemented in applicable FM&T systems including Solumina system, MAXIMO, laboratory test methods, JHAs, chemical hygiene plans, chemical safety plans, Waste Acceptance Certifications (WACs), and Waste Identification Tables (WITs).

The Solumina system work directives also contain warnings and controls for employees to follow while manufacturing product. MAXIMO work orders (maintenance) contain controls for identified hazards and PPE to be worn while performing the specific maintenance work. Laboratory test methods have limited controls built into the test methods to prevent adverse chemical reactions, chemical burns, inhalation of vapors, and other related safety and health concerns. Construction work performed by FM&T subcontractors is controlled through contractual language, the Construction Management Guide, the Contractor Safety Handbook, job specific safety plans, activity-level hazard analysis, and routine

pre-job safety briefings. Required permits for specific types of higher hazard work encountered during construction (and demolition) are also identified.

The JHAs define hazards and the controls to be implemented during the task performance such as training needed, personal protective equipment to be worn, chemical warnings, and proper equipment to be used.

Controls for chemicals are established within Chemical Safety Plans and a Chemical Hygiene Plan. The Chemical Safety Plans are documented within the Enterprise Content Management (ECM) system. The Chemical Hygiene plan pertains to laboratory operations and is available through Portal.

KC controls on disposal of chemicals are documented in Waste Acceptance Certifications (WACs) within the ECM system for operations or in Waste Identification Tables (WITs) for construction projects. Waste containers are issued for both types of activities through the Waste Management department. The containers are controlled with barcodes and issued based on the WACs or WITs previously prepared.

NM controls disposal of chemicals through their environmental staff and the generating department. An evaluation is conducted prior to waste being generated and containers are issued based on this evaluation. When the waste is ready to be shipped for disposal, the environmental staff and the generating department complete a Waste Evaluation Form.

Operational controls have been established within Process Descriptions and Work Instructions and routine monitoring is performed relative to HS&E hazards, risks and impacts.

Workers are expected to adhere to the controls defined in the department/task/worker level documentation. Part of this documentation includes Lockout / Tagout instructions, internal permits (e.g., Hot Work, Energized Electrical work, Excavation, Aisle Impairment), and HS&E/process control checksheets.

FM&T also relies on the skill of the craft, training, and experience to protect workers. The workers have the right to stop work and question the controls. Hazard identification and control is also supplemented through the use of job aids, safety briefings and meetings.

### **7.3.4 Perform Work Within Controls – Department / Task / Worker Level**

The responsibility, authority, and interrelationship of employees for HS&E performance is defined and documented. Employees are expected to follow the requirements set forth in Command Media.

Procedures associated with each of the established HS&E and related programs are delineated in Command Media including, but not limited to, the following:

<b>HS&amp;E Process</b>	<b>HS&amp;E Requirements for Equipment</b>
How to Assess Environmental Safety & Health Requirements using Safety & Housekeeping Implementation Needs Everyone (SHINE)	Lockout / Tagout (LOTO)
How to Maintain HS&E Awareness	Machine Guarding
Workers' Compensation	Hoisting and Rigging
Job Hazard Analysis	Ventilation
Incident Analysis and Reporting	Plumbed and Portable Emergency Wash Stations
How to Identify Issues Requiring Aerospace HS&E Alerts and DOE Lessons Learned	Laser Safety
Contractor Safety	Vehicles
Life Safety / Fire Extinguisher Inspections	Equipment Safety Controls
<b>Fire Protection</b>	How to Use Fall Protection per HS&E Requirements
How to Obtain / Issue a Hot Work Permit	HS&E Requirements for Elevated Platforms, Ladders, and Wall and Floor Openings
How to Obtain or Issue a Life Safety Aisle / Exit Impairment Permit	<b>HS&amp;E Requirement for the Facility</b>
How to Impair Fire Protection Equipment	Electrical Safety
How to Respond to Emergency Situations	Life Safety Program
How to Commission and Decommission Fire Protection Equipment	Confined Spaces
<b>HS&amp;E Requirements for Materials</b>	Pressure System Safety
Hazard Communication	Environmental Restoration – How to Perform Excavations in Solid Waste Management Units (SWMUs) under Institutional Controls
Laboratory Safety	<b>HS&amp;E Requirements for Personnel Protection</b>
Chemical Control Program	Personal Protective Equipment
How to Process Beryllium	How to Obtain and Use Chemical Protective Clothing and Equipment
Exposure Assessment	Respiratory Protection
Radiation Protection	Ergonomics
Controlling Explosives and Production Batteries	Noise Control & Hearing Conservation
Clean Air Act and Local Air Regulation Compliance	<b>Emergency Management Process</b>
Pesticides and Toxic Substances Control	How to Conduct Event Notifications and Reports
Wastewater Discharge	How to Report and Respond to a Severe Weather Condition
Waste Management at NM and KCP	How to Plan, Report, and Respond to Emergency Situations
Combustible, Flammable, and Hazardous Materials	How to Conduct Event Notifications and Reports at NSC
	How to Report and Respond to a Severe Weather Condition at NSC

Additionally, FM&T maintains a series of internal permits to ensure control of specific hazards during performance of work. Most of these permits are used exclusively at KC but those noted are also used at NM. These permits require HS&E approval prior to the work being performed. Permits or checksheets in use include:

Excavation permits/blind penetration	Permit for Energized Electrical Task (Electrical work permit – NM)
Construction safe work	Hot work (KC and NM)
Life safety aisle/exit impairment	Fire protection shutdown request (Impairment Permit – NM)
Confined space	Radiation work authorization
Drain connection/new discharge approval	Beryllium work
High Voltage Pre-Job Safety Briefing	Safety monitoring system (fall protection)

Honeywell has established clear expectations for employees to follow the documented procedures to assure compliance with HS&E requirements and the protection of employees, the plant, the community, and the environment. Employees have expectations established in their job descriptions that state:

“Conducts activities in a safe and healthy manner and works in accordance with established HS&E requirements to ensure protection of employees, the public, and the environment. Takes actions necessary to “stop” work when an unsafe condition or action is identified. Every employee has the right and responsibility to stop work when unsafe conditions or actions are identified.”

FM&T is committed to providing a safe and healthy environment for its employees. Employees are trained to do their jobs correctly, to use required safety and health equipment properly, and to perform work in a safe manner. Employees must follow HS&E requirements, which are identified in Command Media and specific instructions including JHAs, Process Engineering Specifications (PES), General Process Instructions (GPI), job aids, Safety Data Sheets, high voltage work switching instructions, and manufacturer’s operating instructions.

Disciplinary action – up to and including termination – may be taken for violations of HS&E regulations and work rules. The severity of the discipline is discretionary and will depend on many factors including the nature and cause of the violation. FM&T follows the Honeywell Aerospace HS&E Accountability Policy describing employee responsibilities to adhere to HS&E requirements and defining disciplinary guidelines.

Personnel whose work may present HS&E hazards, risks, or impacts receive appropriate training. Line management determines required training with the assistance of HS&E subject matter experts. The competency of personnel performing tasks which relate to HS&E hazards, risks or impacts is established on the basis of appropriate education, training, and /or experience. Associated training records are maintained.

Management emphasis has been placed on employee intervention regarding HS&E issues. FM&T employees have been trained on intervention skills and expectations when potentially unsafe behaviors or conditions are observed. The focus of this training program is to ensure employees know that safety intervention is a management expectation and that they are capable of giving and receiving this information when performing or observing a potential unsafe activity or condition. This training includes a skills practice component to ensure feedback, both given and received, is accomplished in a professional and non-punitive manner.

NM’s behavior-based safety, titled BSAFE (Behavioral Safety for Everyone) is a proactive program where employees regularly observe specific on-the-job behaviors that have the potential to be precursors to incidents and injuries. A “no name, no blame” system, this observation process strives to encourage safe behaviors and discourage at-risk behaviors. In this way, positive reinforcement is given with the intention to prevent incidents before they happen. The process involves a discussion and resolution of how to change at-risk behavior to a safe behavior.

### **7.3.5 Feedback and Improvement – Department / Task / Worker Level**

The Quality Assurance program includes auditing of FM&T’s HS&E programs. This includes independent oversight audits of HS&E activities and FM&T operations to assess adequacy and conformance to established requirements, procedures, specifications, and quality objectives. The frequency of these audits is based on applicable requirements, the importance of the activity concerned, identified needs of the organization to be audited, and the results of previous audits.

Each activity is audited against requirements found in the Operating Requirements Database and documented in Command Media. Audit results are documented in formal reports and associated records are maintained. Both management and responsible employees are notified of audit results and timely cause analysis and corrective action is required for deficiencies. Assessment results from the FM&T internal audit organization are transmitted to the KCFO via distribution lists based on the audited area. When corrective action is required, follow-up verification audit activities record the implementation and effectiveness in accordance with documented processes.

Corrective actions from compliance monitoring activities, external audits, and HSEMS self-assessments are formally identified, tracked and documented through the Issues Management Process. This process provides for team-based Root Cause Analysis, identification of related issues through assessment of global impacts, and the issuance and tracking of

Corrective Action Reports (CARs) through closure. Corrective action initiatives are made available to the KCFO through the internal electronic Corrective Action Tracking System (eCATS).

Procedures for corrective, preventive, or systemic action include:

- Effective handling of customer complaints and reports of HS&E nonconformities;
- Use of Rapid Problem Solving to quickly address issues and return work to standard;
- Investigation of the causes of nonconformities relating to HS&E concerns/near misses, personal injury, property damage, suspended operation or activity, permit excursions, fires, spills, HS&E physical condition inspections, self-assessments, internal/external audits, lessons learned, safety alerts, customer complaints and trends identified during the management review/Management Operations Review process;
- Determination of the corrective action needed to eliminate the cause of nonconformity;
- Application of controls to ensure that the corrective action is taken and that it is effective;
- Use of appropriate sources of information as needed to detect, analyze, and eliminate potential causes of nonconformities using a formal lessons learned process that ties to the DOE-wide lessons learned system;
- Determination of the steps needed to manage issues requiring preventive action;
- Initiation of preventive action and application of controls to ensure effectiveness;
- Confirmation that relevant information on action taken is submitted for management review; and
- Classifications of nonconformities based on severity to ensure the corrective actions are commensurate with the impact to the employees, facility, public, and environment.

Formal HS&E programs include many types of surveys and inspections and are designed to measure conformance and monitor activities relative to HS&E hazards, risks and impacts.

**Noise Evaluation:** Specific locations requiring use of hearing protection have been identified at FM&T. Routine monitoring is performed in production areas and after any change in production, process or equipment which could significantly change noise exposure. Monitoring results can initiate the requirement for additional area mapping or personal dosimetry to be performed.

**Lead in Construction/Maintenance:** At KC, comprehensive surveys and monitoring are conducted to assess exposure potential to lead from maintenance and construction activities. Results of the assessment are used to ensure identification and proper use of PPE or that engineering controls are implemented.

**Safety & Housekeeping Implementation Needs Everyone (SHINE):** These assessments are conducted by teams of HS&E, line management, and bargaining unit employees. These assessments include a walk-through of departments and areas to review the physical condition of the area and equipment and may include worker observation. Remarks and findings are documented on the SHINE Tour Checksheet.

**Gemba Walks:** Gemba Walks happen where the work takes place, are interactive with the folks who perform the work, and have a purpose such as behavior (what should I do when this happens or how do I handle this situation) or performance (individual, departmental, business unit, and ISC metrics).

**Subcontractor Safety:** Oversight, coordination and enforcement of subcontractor safety are managed by FM&T Facility Management Services and Facilities Engineering Services at KC and Facilities Maintenance at NM. The construction and facilities services subcontractors are also required to perform job-site inspections and to correct any violations.

**On-Site Reviews/Beneficial Occupancy Inspections:** After the completion of major renovations or construction projects, a multidisciplinary inspection involving HS&E may be performed prior to occupancy, depending on level of hazards associated with activity.

**Ventilation Reviews:** Health protection ventilation systems are surveyed for adequacy by the HS&E staff and Facilities Maintenance.

Radioactive Material/Ionizing Radiation: Users of radioactive material and ionizing radiation-generating devices at FM&T are subject to semiannual (radioactive materials) or annual (ionizing radiation-generating devices) surveys by Health Physics personnel.

Medical Surveillance Examinations: Medical surveillance examinations are conducted to address a variety of potential occupational exposures. In addition, consistent with the Americans with Disabilities Act requirements, physical examination and worksite evaluations ensure that work can be performed in a safe manner. The following are examples of surveillance examinations conducted for applicable workers:

- Beryllium
- Cadmium
- Chromium VI
- Hazardous Materials (OSHA Emergency Response)
- Laser (Eye exams)
- Lead
- Respiratory Protection
- Department of Transportation – driver
- Noise Exposure

NM contracts for medical surveillance at all locations Concentra, Albuquerque; Concentra, Los Alamos; Cooper Clinic, Ft. Chaffee. Similar surveillance activities are performed at NM based on employee exposure assessment data.

Exposure Assessments: At FM&T operations, substantive changes in processes, equipment and chemical use, as identified through the MoC process, are subject to an exposure assessment at the discretion of the HS&E subject matter experts. This process assesses the potential for employee exposure to chemical/physical hazards and identifies necessary controls such as PPE, engineering controls and/or personnel monitoring.

Environmental Monitoring: Routine monitoring is conducted with respect to environmental program activities at KC, including:

- Hazardous waste storage
- Wastewater discharges
- Air emissions
- Groundwater contamination

A review of occupational injuries/illnesses trend analysis is conducted on an annual basis to determine focus areas needed to further reduce injury/illness rates.

Employees are empowered to take immediate action to correct identified hazardous conditions, stop work, and to notify line management. Employees have the option of reporting directly to an HS&E employee, through the HS&E Concern telephone line (816) 488-3181, providing input via the HS&E web page (KC), submitting a written report to HS&E or line management, or submitting an online Concern/Near Miss form report.

Any time there is an HS&E concern, employees are encouraged to contact HS&E directly or through their management. HS&E uses the Issues Management process to prioritize, track and ensure responses are made when concerns are received. Concerns may also be directed to FM&T Senior Leadership through the Comments\_Please email process, directly to the FM&T President “Ask Chris” email process, or directly to the KCFO Employee Concern Manager, any KCFO ES&H Staff member, or the FOM.

Employees are encouraged to intervene when they see an unsafe act or condition and submit these interventions into an online database.

Maintenance employees have the opportunity to provide feedback on each maintenance work order within MAXIMO. At the completion of a work order, a feedback screen is available for the employee to input any issues, concerns, or suggestions that could be addressed the next time the work is to be completed.

Employees are required to complete an annual review of JHAs and associated HS&E documents that apply to their work. As part of this review, they have the ability to provide suggestions for modifications to assure the JHA or associated HS&E documents adequately cover the hazards and controls of the specified task.

## **7.4 Subcontractor Safety**

FM&T is responsible for the performance of contracted work activities performed at its locations. Flow down of KC HS&E requirements to on-site construction and service contractors is accomplished through standard Terms and Conditions language in accordance with KCFO and Honeywell contracting procedures. On-site contractors are contractually bound to adhere to specified FM&T HS&E requirements. For KC subcontractors that are subject to 10 CFR 851, either the Contractor Safety Handbook or the Service Subcontractor Safety Handbook serves as the implementing mechanism. Utilizing a graded approach, commensurate with risk, HS&E requirement flow-down varies based on HS&E risk with the subcontracted services provided. This philosophy is consistent with “balanced priorities” concepts as defined in referenced DEAR clauses. Subcontractors are included in the FM&T Worker Safety and Health Program and will not submit a separate Worker Safety and Health Program.

Construction contracts at KC specify HS&E requirements through the KC Contractor Safety Handbook, set forth in FM&T standard Terms and Conditions. In addition, each general construction contractor must provide a project-specific safety plan, subsequently reviewed and approved by KC that addresses the requirements of the Contractor Safety Handbook. Construction subcontractors entering the KC shall review the Subcontractor Safety and Security Orientation handbook prior to entry and sign and submit the “Orientation Completion Validation.” Flow-down of safety and health requirements to lower tier subcontractors is also addressed in the Contractor Safety Handbook. Details of contractor safety requirements are discussed in relevant sections of the HS&E Management System Description.

Infrastructure engineering services including facility and utility engineering, construction management, project management, and field work oversight responsibility are contracted by FM&T to Burns and McDonnell Facilities Engineering Services (FES), LLC. FM&T remains responsible for safety programs and the safety of personnel. FES has authority to stop work or direct others to stop work if they observe an imminent or serious safety hazard.

FES is contractually bound to perform this function in accordance with the Construction Management Guide to Effective Contracting. This Guide clarifies that KC “owns” safety initiatives within KC and FES supports the integration and contractor execution of those expectations in their routine project management role. FM&T HS&E provides guidance, clarification and oversight of construction subcontractor HS&E programs and on-site project execution.

Service contractors performing higher hazard work and/or longer term contracts are required to develop and submit a project-specific safety plan in accordance with the KC Service Subcontractor Safety Handbook. FM&T HS&E provides guidance, clarification and oversight of service subcontractor HS&E programs and on-site project execution. Service subcontractors entering the KC shall review the Subcontractor Safety and Security Orientation handbook prior to entry and sign and submit the “Orientation Completion Validation.”

Subcontractors follow a similar process at NM. The Contractor Safety and Health Program describes how NM addresses safety with its subcontractors at NM locations including Los Alamos and Fort Chaffee. Each contractor is required to complete a Contractor HS&E Questionnaire and a Health and Safety Plan prior to starting any work at NM. The contractor is also given written HS&E and Security Guidelines that they are contractually bound to follow. Once the questionnaire and Health and Safety Plan have been reviewed and approved by HS&E, the contractor must also sign a Contractor Environmental, Safety & Health Declaration certifying that they understand the hazards and controls associated with the work they are about to perform and have communicated those hazards and hazard controls to the persons that will be performing the work.

The sponsor (entity bringing in subcontractor to perform the work, e.g., Facilities Services) and HS&E monitor contractor activities to verify they are safely performing their work. Temporary contractors that do not have an on-site supervisor must receive a general orientation from the NM HS&E organization and a site-specific HS&E orientation from the manager the contractor will be working under using an HS&E Contractor Orientation Checklist. Contractors who employ on-site supervision are expected to flow down NM Contractor Safety and Health Program requirements through their management chain. The NM's Contractor Safety & Health Program serves as the implementing mechanism for contractors subject to 10 CFR 851 requirements.

## 8.0 REFERENCES

1. 48 CFR (DEAR) 970.5204-2, Laws, Regulations and DOE Directives (December 2000).
2. 48 CFR (DEAR) 970.5223-1, Integration of Environment, Safety, and Health Into Work Planning and Execution, (December 2000).
3. The International Standard ISO 14001-2004, (September 15, 2004).
4. The International Standard OHSAS 18001-2007
5. 10 CFR 851 Worker Safety and Health Program (February 9, 2006).

## 9.0 MAINTENANCE, CHANGE CONTROL, AND REVIEW PROCESS

The FM&T "HS&E Management System Description" (including the Worker Safety & Health Program) is developed, maintained, reviewed and approved in accordance with the requirements of Contract No. DE-A0000622. The following process documents the methodology by which FM&T maintains the "HS&E Management System Description" (Plan).

### A. Management System Description Maintenance

1. The Management System Description will be maintained in accordance with established procedures and controls outlined in the FM&T Business Model and Contractual requirements.
2. The Management System Description will be revised to reflect FM&T operations risk to the environment and safety and health of employees and the public, as necessary.
3. Revisions and/or modifications to the Management System Description will be reviewed and approved by the KCFO Assistant Manager, Office of Operations or his/her delegated representative prior to incorporation.
4. The KC HS&E Organization is accountable for maintaining the Management System Description.

### B. Management System Description Modification

1. Revisions to the Management System Description will be made, as appropriate, during the Fiscal Year to reflect ongoing modifications of the FM&T HSEMS.
2. Annually, the HS&E Organization will perform a comprehensive review of the Management System Description to ensure the Management System Description adequately reflects operations and controls.

### C. Management System Description Revision and Approval

1. The Director HSE&F will review and approve all modifications to the Management System Description prior to submittal to KCFO.

- a. Minor revisions – Editorial or minor process improvements that do not change context or concept will be reviewed, approved, and incorporated to the Management System Description without KCFO approval. Reference to these changes/revisions will be identified and communicated to the KCFO during the annual Management System Description review process.
  - b. Major revisions – Significant operational changes and/or issues impacting approved HS&E Thresholds will require written KCFO Assistant Manager, Office of Operations, approval.
  - c. Annual review – In accordance with contractual requirements, the Management System Description will be reviewed and submitted for KCFO Assistant Manager, Office of Operations, approval annually.
2. The Director HSE&F will transmit major revisions and annual Management System Description updates to KCFO for review and approval.
- a. Major revisions – Operational modifications or management system modifications that impact HS&E Thresholds or represent significant risk will be formally transmitted to KCFO for review and approval prior to implementation. The transmittal will include a summation of the process modification or operational change and mitigating factors and plans.
  - b. Annual review – The HS&E Organization will perform the annual plan review and submit a revised Management System Description or notification of no change to KCFO by July 15 of each year. The final Management System Description will be submitted by September 1, and will become effective on October 1, unless formally notified otherwise by the KCFO Assistant Manager, Office of Operations.
  - c. Incorporate any changes, conditions, or workplace safety and health standards directed by DOE consistent with the requirements of 10 CFR 851, Subpart B, and DEAR 970.5204-2, Laws, Regulations and DOE Directives (December 2000) and associated contract clauses.
  - d. As KC employs labor organizations, KC will:
    - 1. Give the labor organization timely notice of the development and implementation of the worker safety and health program and any updates thereto.
    - 2. Upon timely request, bargain concerning development and implementation of this Management System Description, consistent with the Federal labor laws, as necessary.

**Attachment 1**  
**FM&T Worker Safety and Health Program**

## **ATTACHMENT 1 - WORKER SAFETY AND HEALTH PROGRAM**

### ***EXECUTIVE SUMMARY***

Attachment 1 of the FY15 HS&E Management System Description is the Worker Safety and Health Program (WSHP) required by the Code of Federal Regulations (CFR) 10 CFR 851, §851.11. The HS&E Management System Description is the overarching, governing document which provides the framework for the implementation of safety and health requirements identified in the site-specific supplemental implementation matrices contained in Attachment 1.

Honeywell Federal Manufacturing & Technologies (FM&T) consists of two primary locations: Kansas City Plant (KC) and New Mexico (NM) operations. FM&T is committed to a safe and healthful workplace for all employees. Management and resources are dedicated specifically to provide a worker protection program that will reduce or prevent occupational injuries, illnesses, and accidental losses.

FM&T has developed and deployed an Environmental Safety and Health (HS&E) management system tailored to the hazards of the work performed at FM&T-managed locations.

The following documents are available to FM&T employees and Kansas City Field Office personnel on the Portal:

- Management Assurance System (MAS)
- HS&E Management System Description
- Worker Safety & Health Program
- Command Media

KCFO and FM&T management representatives are required to approve the Worker Safety and Health Program. Program revisions will be made in accordance with DOE guidance defined at 10 CFR 851.11 – Development and approval of the worker safety and health program.

### **KC**

Note: KC operations began relocation during FY13 to a new campus setting within the Kansas City area. Relocation activities were completed in FY14; however, closure activities at BFC will extend into FY15. The HS&E Management System is applicable at both locations where FM&T operations are in progress.

The KC consists of two locations. The Banister Federal Complex has 2.7 million square foot of buildings constructed primarily in the 1940s and located on the south side of Kansas City, Missouri. The buildings are owned by the DOE. The National Security Campus has 1.5 million square feet of buildings constructed in 2012 on the south side of Kansas City, Missouri. These buildings are owned by a private developer and leased by the Federal Government.

KC manufactures non-nuclear mechanical, electronic, and engineered material components for U.S. national defense systems.

FM&T has approximately 2,700 employees. KC has approximately 2,515 employees work in KC including scientists, engineers, manufacturing and maintenance specialists, technicians, and support personnel. This facility is a highly technical production plant with special humidity, temperature, and airflow controls and an advanced analytical science and physical testing laboratory.

KC produces more than 40 product lines, using 120 technical capabilities, for the nation's defense systems involving electronic, mechanical and plastics manufacturing technologies. In addition to production

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### **FM&T Worker Safety and Health Program**

capabilities, KC also provides technical support services for national laboratories and government agencies. These services include laboratory testing and analysis.

Approximately 70% of the business is for the Department of Energy with the remaining 30% for reimbursable work in general industry. The facility operates three shifts on a five-day work schedule. The majority of the production operation takes place on the first shift where approximately 2,420 employees are scheduled. The second shift has approximately 85 employees and the third shift has approximately 10 employees.

#### **NM**

Kirtland Operations (NM) consists of sites in Albuquerque, NM, with employees also located at other NNSA facilities that are managed by other contractor organizations such as Los Alamos National Labs (including NSTec Los Alamos, Sandia National Labs, and Fort Chaffee). Of the facilities NM directly manages, about 63,500 square feet are owned by DOE, and 78,100 square feet are leased.

The NM facilities design and manufacture mechanical and electronic components for U.S. national defense systems, including NNSA's Office of Secure Transportation (OST), NNSA's national laboratories, (Los Alamos and Sandia), and other government agencies.

NM employs approximately 182 scientists, engineers, technicians, and support personnel in Albuquerque, Los Alamos, and Fort Chaffee. The facilities contain light manufacturing and engineering spaces, and include capabilities in mechanical and electronic engineering, manufacturing, and software development.

NM provides engineering and light manufacturing for communications systems, as well as specialized vehicle modifications for OST and other government customers. In addition to production capabilities, NM also provides technical support services for national laboratories and government agencies. These generally consist of physics, software, and engineering support to Los Alamos National Laboratory and Sandia National Laboratory.

Approximately 90% of the business supports DOE with the remaining 10% supporting other government entities. The facility operates one shift on a five-day work schedule.

### ***SUMMARY DISCUSSION OF CONTRACTOR IMPLEMENTING PROCESSES USED TO ADDRESS CRITERIA CONTAINED IN SUBPARTS 851.10 – 851.27***

FM&T is responsible for the performance of contracted work activity performed at its locations. Flow down of KC HS&E requirements to on-site construction and service contractors is accomplished through standard Terms and Conditions language in accordance with KCFO and Honeywell contracting procedures. On-site contractors are contractually bound to adhere to specified FM&T HS&E requirements. For KC subcontractors that are subject to 10 CFR 851, either the Contractor Safety Handbook or the Service Subcontractor Safety Handbook serves as the implementing mechanism. Utilizing a graded approach, commensurate with risk, HS&E requirement flow-down varies based on HS&E risk with the subcontracted services provided. This philosophy is consistent with "balanced priorities" concepts as defined in referenced DEAR clauses. Subcontractors are included in the FM&T Worker Safety and Health Program and will not submit a separate Worker Safety and Health Program.

Construction contracts at KC specify HS&E requirements through the KC Contractor Safety Handbook, set forth in FM&T Standard Terms and Conditions. In addition, each general construction contractor must provide a Safety Plan, subsequently reviewed and approved by FM&T, that addresses the requirements of the Contractor Safety Handbook. Flow-down of safety and health requirements to lower tier subcontractors is also addressed in the Contractor Safety Handbook. Details of contractor safety requirements are discussed in relevant sections of the HS&E Management System Description.

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## **FM&T Worker Safety and Health Program**

Infrastructure engineering services including facility and utility engineering, construction management, project management, and field work oversight responsibility are contracted by FM&T to Burns and McDonnell Facilities Engineering Services (FES), LLC. FM&T remains responsible for safety programs and the safety of personnel. FES has authority to stop work or direct others to stop work if they observe an imminent or serious safety hazard.

FES is contractually bound to perform this function in accordance with the Construction Management Guide to Effective Contracting. This Guide clarifies that KC “owns” safety initiatives within KC and FES supports the integration and contractor execution of those expectations in their routine project management role. FM&T HS&E provides guidance, clarification and oversight of construction subcontractor HS&E programs and on-site project execution.

Service contractors performing higher hazard work and/or longer term contracts are required to develop and submit a project-specific safety plan in accordance with the KC Service Subcontractor Safety Handbook. FM&T HS&E provides guidance, clarification and oversight of service subcontractor HS&E programs and on-site project execution.

Subcontractors follow a similar process at NM. The Contractor Safety and Health Program describes how NM addresses safety with its subcontractors at NM locations including Los Alamos and Fort Chaffee. Each contractor is required to complete a Contractor HS&E Questionnaire and a Health and Safety Plan prior to starting any work at NM. The contractor is also given written HS&E and Security Guidelines that they are contractually bound to follow. Once the questionnaire and Health and Safety Plan have been reviewed and approved by HS&E, the contractor must also sign a Contractor Environmental, Safety & Health Declaration certifying that they understand the hazards and controls associated with the work they are about to perform and have communicated those hazards and controls to the persons that will be performing the work. The sponsor (entity bringing in subcontractor to perform the work, e.g., Facilities Services) and HS&E monitor contractor activities to verify they are safely performing their work. Temporary contractors that do not have an on-site supervisor must receive a general orientation from the NM HS&E organization and a site-specific HS&E orientation from the manager the contractor will be working under using an HS&E Contractor Orientation Checklist. Contractors who employ on-site supervision are expected to flow down NM Contractor Safety and Health Program requirements through their management chain. The NM’s Contractor Safety & Health Program serves as the implementing mechanism for contractors subject to 10 CFR 851 requirements.

### ***OFF-SITE WORK LOCATIONS – JURISDICTION AND RESPONSIBILITY***

#### **Kansas City Operations**

<b>Work Location</b>	<b>Description</b>	<b>Jurisdiction</b>	<b>Responsible CO/Field Office for WSHP</b>
Missouri Relay Station	DOE-owned facility	DOE/NNSA	NNSA/KCFO

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## FM&T Worker Safety and Health Program

### New Mexico Operations

Work Location	Description	Jurisdiction	Responsible CO/ Field Office for WSHP
NM Relay Site	The facility is owned by NNSA/OST but operated by NM under a Task Agreement	DOE/NNSA	NNSA/KCFO
Los Alamos	NSTec Los Alamos which is operated by NSTec but owned by NNSA	DOE/NNSA	NNSA/KCFO  The FM&T WSHP applies with respect to the safe work practices and behaviors of workers that occupy this leased facility; however, the physical components of this leased facility (structures, utilities, etc.) are covered by the NSTec WSHP.
SNL	Permanent work location established at SNL	DOE/NNSA	NNSA/Sandia Field Office  Generally, NM employees assigned to this off-site location are expected to comply with the Worker Safety and Health Program for the host site as well as the FM&T WSHP. The specific applicability of the FM&T and/or host site Worker Safety and Health Program to these off-site employees depends on the nature of the work being performed and the particular requirement under Part 851 and is outlined in the Implementation Matrix, "Applicability" column.
DOE	Permanent work location on Kirtland Air Force Base	DOE/NNSA	NNSA/KCFO (Facility) NNSA-HQ (Operations) Emergency response support for DOE
Fort Chaffee	The facility is owned and operated by NNSA/OST. Work is performed under a Task Agreement.	DOE/NNSA	NNSA/KCFO for aspects of work performed at Fort Chaffee which are covered by the FM&T WSHP including Engineering and technical field support provided for OST training activities and exercises and technical support provided to the OST vehicle fleet. Contractors Chugach and ITP are responsible for the physical maintenance (structures, utilities, etc.) and security at Fort Chaffee respectively. Accordingly, the FM&T WSHP does not cover these aspects of work performed at Fort Chaffee.
MEMF	The facility is on SNL property, but is operated by NNSA/OST. NM work is performed under a Task Agreement.	DOE/NNSA	NNSA/KCFO for aspects of work performed at the MEMF which are covered by the FM&T WSHP, including: OST vehicle electronic communication equipment testing, maintenance, and repair. Chugach is under contract with NNSA/OST to maintain the facility and, accordingly, the FM&T WSHP does not cover this aspect of work performed at the MEMF.

**Note**

There are KC and NM employees (e.g., engineers and planners) on **short-term** assignments or residencies at various DOE covered workplaces. Similar to those on permanent assignment at off-site locations, these employees are expected to comply with the Worker Safety and Health Program for the host site as well as the FM&T WSHP. The specific applicability of the FM&T and/or host site Worker Safety and Health Programs to these off-site employees depends on the nature of the work being performed and the particular requirement under Part 851. For example, employees are required to comply with the safety training requirements at FM&T, but may be required by the host site to complete additional training requirements related specifically to hazards involved in the work being performed at the host site. Also, the host site is responsible for the physical components of the off-site location and FM&T employees are expected to follow the host site safety and emergency evacuation procedures.

Non-FM&T employees that are in residence indefinitely at the KC or NM are required to comply with all relevant portions of the FM&T WSHP. Upon entry into the KC, visitors are presented a document entitled, *Health, Safety, Environment (HSE) and Security guide*. This document sets forth safety requirements regarding construction areas, vehicles, personal protective equipment, and hazardous materials. When visitors arrive at NM, they are given a safety briefing by their onsite sponsor.

**Attachment 1**  
**FM&T Worker Safety and Health Program**

**LISTING OF WORK PLACE SAFETY AND HEALTH  
REQUIREMENTS CONTAINED IN §851.23 AND §851.27)**

**§851.23 Safety and Health Standards**

- (a) Contractors must comply with the following safety and health standards that are applicable to the hazards at their covered workplace:

***Applicable at FM&T***

1. Title 10 Code of Federal Regulations (CFR) 850, "Chronic Beryllium Disease Prevention Program."
2. Title 29 CFR, Parts 1904.4 through 1904.11, 1904.29 through 1904.33; 1904.44, and 1904.46, "Recording and Reporting Occupational Injuries and Illnesses"
3. Title 29 CFR, Part 1910, "Occupational Safety and Health Standards," excluding 29 CFR 1910.1096, "Ionizing Radiation."
4. Title 29 CFR, Part 1926, "Safety and Health Regulations for Construction."
5. American Conference of Governmental Industrial Hygienists (ACGIH), "Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices," (2005) (incorporated by reference, see §851.27) when the ACGIH Threshold Limit Values (TLVs) are lower (more protective) than permissible exposure limits in 29 CFR 1910. When the ACGIH TLVs are used as exposure limits, contractors must nonetheless comply with the other provisions of any applicable expanded health standard found in 29 CFR 1910.
6. American National Standards Institute (ANSI) Z88.2, "American National Standard for Respiratory Protection," (1992) (incorporated by reference, see §851.27)
7. ANSI Z136.1 "Safe User of Lasers," (2000) (incorporated by reference, see §851.27).
8. ANSI Z49.1 "Safety in Welding, Cutting, and Allied Processes," sections 4.3 and E4.3 (1999) (incorporated by reference, see §851.27).
9. National Fire Protection Association (NFPA) 70, "National Electrical Code," (2005) (incorporated by reference, see §851.27).
10. NFPA 70E, "Standard for Electrical Safety in the Workplace," (2004) (incorporated by reference, see §851.27).

In addition, the following safety and health standards were reviewed and determined to be not applicable to FM&T operations.

***Not Applicable at FM&T***

1. Title 29 CFR, Part 1515, "Shipyard Employment."
  2. Title 29 CFR, Part 1917, "Marine Terminals."
  3. Title 29 CFR, Part 1918, "Safety and Health Regulations for Longshoring."
  4. Title 29 CFR, Part 1928, "Occupational Safety and Health Standards for Agriculture."
- (b) Nothing in this part must be construed as relieving a contractor from complying with any additional specific safety and health requirement that it determines to be necessary to protect the safety and health of workers.

FM&T recognizes the responsibility to comply with additional specific requirements necessary to protect the safety and health of workers.

**§851.27 Reference sources.**

- (a) *Materials incorporated by reference.*

- (1) *General.* The following standards which are not otherwise set forth in part 851 are incorporated by reference and made a part of part 851. The standards listed in the section have been approved for

## **Attachment 1**

### **FM&T Worker Safety and Health Program**

incorporation by reference by the Director of the Federal Register in accordance with 5 U.S.C. 552(a) and 1 CFR part 51.

(2) *Availability of standards.* The standards incorporated by reference are available for inspection at:

Specific website locations not included in this listing.

(b) *List of standards incorporated by reference.*

#### ***Incorporated at FM&T***

1. American National Standards Institute (ANSI Z88.2, “American National Standard for Respiratory Protecting,” (1992).
2. ANSI Z136.1, “Safe Use of Lasers,” (2000).
3. ANSI Z49.1, “Safety in Welding, Cutting and Allied Processes,” sections 4.3 and E4.3, (1999).
4. National Fire Protection Association (NFPA) 70, “National Electrical Code,” (2005).
5. NFPA 70E, “Standard for electrical Safety in the Workplace,” (2004).
6. American Conference of Governmental Industrial Hygienists, “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices,” (2005).
7. American Society of Mechanical Engineers (ASME) Boilers and Pressure Vessel Code, sections I through XII including applicable Code Cases, (2004).
8. ASME B31 (ASME Code for Pressure Piping) as follows:
  - (i) B31.1-2001-Power Piping, and B31.1a-2002-Addenda to ASME B31.1-2001;
  - (ii) B31.2-1968 Fuel Gas Piping;
  - (iii) B31.3-2002 – Process Piping;
  - (v) B31.5 – 2001 Refrigeration Piping and Heat Transfer Components, and B31.5a-2004, Addenda to ASME B31.5-2001;
  - (viii) B31.9 – 1996 – Building Services Piping;
9. DOE Manual 231.1-1A, Environment, Safety and Health Reporting Manual, September 9, 2004.
10. DOE Manual 440.1-1A, DOE Explosives Safety Manual, Contractor Requirements Document (Attachment 2), January 9, 2006.

In addition, the following safety and health standards were reviewed and no need was identified to incorporate these standards for FM&T operations.

#### ***Not Incorporated at FM&T***

1. ASME B31 (ASME Code for Pressure Piping) as follows:
  - (iv) B314.4 – 2002 – Pipeline Transportation Systems for Liquid Hydrocarbons and Other Liquids;
  - (vi) B31.8 – 2003 – Gas Transmission and Distribution Piping Systems;
  - (vii) B31.8S – 2001 – Managing System Integrity of Gas Pipelines;
  - (ix) B31.11 – 2002 – Slurry Transportation Piping Systems; and
  - (x) B31G – 1991 – Manual for Determining Remaining Strength of Corroded Pipelines.

## Attachment 1 FM&T Worker Safety and Health Program

The following table summarizes 10 CFR 851, Subpart C and Appendix A to Part 851 implementation requirements and corresponding implementing mechanisms at FM&T locations. On-site subcontractors subject to 10 CFR 851 meet the FM&T Safety and Health Program through the flow-down of requirements in the KC Contractor Safety Handbook and Service Subcontract Safety Handbook or the NM’s Contractor ES&H Safety and Security Guidelines.

**TABLE A-1 FM&T WORKER SAFETY AND HEALTH PROGRAM MATRIX**

Documents which are identified with three digits at the Process Description level are NM specific documents.

All documents contain a field on the cover page that identifies the applicable location.

Due to the magnitude, not all lower-tier documents are listed (e.g., Job Hazard Analyses, Job Aids).

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
<b>851.20 – Management responsibilities and worker rights and responsibilities.</b>	
851.20(a) – Management responsibilities	<ul style="list-style-type: none"> <li>➤ Honeywell Sustainable Opportunity Policy – Honeywell’s Commitment to Health, Safety and the Environment</li> <li>➤ Honeywell Aerospace Health Safety and Environmental Annual Operating Plan</li> <li>➤ Honeywell Performance and Development Process (HPD)</li> <li>➤ FM&amp;T Operating Policy</li> <li>➤ Health, Safety, and Environmental (HS&amp;E) Management System Description</li> </ul>
851.20(a)(1) – Policy, goals, and objectives	<ul style="list-style-type: none"> <li>➤ Honeywell Sustainable Opportunity Policy – Honeywell’s Commitment to Health Safety and the Environment</li> <li>➤ Honeywell Aerospace Health, Safety and Environmental Annual Operating Plan</li> <li>➤ Honeywell Performance and Development Process (HPD)</li> <li>➤ FM&amp;T Operating Policy</li> <li>➤ FM&amp;T Strategic planning process</li> </ul>
851.20(a)(2) – Qualified staff	<ul style="list-style-type: none"> <li>➤ Job descriptions</li> <li>➤ electronic Learning Management System (eLMS)</li> </ul>
851.20(a)(3) - Accountability	<ul style="list-style-type: none"> <li>➤ Honeywell Sustainable Opportunity Policy – Honeywell’s Commitment to Health, Safety and the Environment</li> <li>➤ Honeywell Performance and Development Process (HPD)</li> <li>➤ HS&amp;E Accountability Policy</li> <li>➤ FM&amp;T Operating Policy</li> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ HS&amp;E Command Media (Business Model)</li> <li>➤ Management Assurance System (MAS)</li> </ul>
851.20(a)(4) – Employee involvement	<ul style="list-style-type: none"> <li>➤ HOS Tier accountability</li> <li>➤ Safety 4 All Committee</li> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ HS&amp;E Concern / Near Miss reporting system</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ BSAFE (NM)</li> <li>➤ Interventions</li> <li>➤ Safety Committees</li> <li>➤ WI 5.14.8, Controlling Explosives and Production Batteries</li> <li>➤ WI 5.16.1, Electrical Safety</li> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.3, How to Assess Environmental Safety &amp; Health Requirements using Safety and Housekeeping Implementation Needs Everyone (SHINE)</li> <li>➤ WI 5.12.4, How to Maintain HS&amp;E Awareness (KC)</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ PD 5.112, Organizational Environmental, Safety and Health (ES&amp;H) Meetings (NM)</li> <li>➤ Maintenance work request systems</li> </ul>
851.20(a)(5) – Access to information	<ul style="list-style-type: none"> <li>➤ Management Assurance System (MAS)</li> <li>➤ Command Media</li> <li>➤ Federal bulletin board postings</li> <li>➤ Portal HS&amp;E web pages</li> <li>➤ HS&amp;E Documents (e.g., Job Hazard Analyses)</li> <li>➤ Required HS&amp;E program signage</li> <li>➤ HS&amp;E Alerts</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> </ul>
851.20 (a)(6) – Report events and hazards	<ul style="list-style-type: none"> <li>➤ Honeywell Code of Business Conduct; ACCESS “Our Integrity and Compliance Helpline”</li> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ Comments, Please! – email (general concern line)</li> <li>➤ Ask Chris (email the President of FM&amp;T)</li> <li>➤ HS&amp;E Concern / Near Miss reporting system</li> <li>➤ Interventions</li> <li>➤ WI 5.12.3, How to Assess Environmental Safety &amp; Health Requirements using Safety and Housekeeping Implementation Needs Everyone (SHINE)</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ Maintenance work request system</li> </ul>
851.20 (a)(7) – Prompt response to reports	<ul style="list-style-type: none"> <li>➤ Charter for BSAFE (NM)</li> <li>➤ HS&amp;E Concern / Near Miss reporting system</li> <li>➤ PD 4.2, Issues Management System: Cause Analysis / Mistake Proofing, electronic Corrective Action Tracking System, electronic Internal Audit Management System</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ Maintenance work request system</li> </ul>

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<b>Rule Section</b>	<b>FM&amp;T Implementing Mechanisms (References to Plans, Procedures)</b>
851.20(a)(8) – Regular communications	<ul style="list-style-type: none"> <li>➤ Management Operations Review (MOR) meeting</li> <li>➤ HS&amp;E Council Meeting (including packet distribution to Senior Leadership by Manager Sr., HS&amp;E)</li> <li>➤ HOS Tier Meetings</li> <li>➤ Manager Connect (distribution to managers by Communications)</li> <li>➤ Managers’ Communication Packet (distribution to managers by HS&amp;E)</li> <li>➤ WI 5.12.4, How to Maintain HSE Awareness</li> <li>➤ PD 5.112, Organizational Environmental, Safety, and Health (ES&amp;H) HS&amp;E meetings</li> <li>➤ Portal HS&amp;E web pages</li> <li>➤ HSE Required program signage</li> </ul>
851.20(a)(9) – Stop work authority	<ul style="list-style-type: none"> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ Contractor, HS&amp;E and Security Guidelines (NM)</li> <li>➤ Contractor Safety Handbook and Service Subcontract Safety Handbook (KC)</li> <li>➤ PD 4.2, Issues Management System</li> <li>➤ International Association of Machinists and Aerospace Workers (IAMAW) Contract, Article 19, HS&amp;E and Good Housekeeping (KC)</li> <li>➤ The International Union, Security, Police and Fire Professionals of America (SPFA) and its Amalgamated Local No. 251, Article 14, HS&amp;E (KC)</li> </ul>
851.20 (a)(10) – Inform workers of rights	<ul style="list-style-type: none"> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ Contractor HS&amp;E and Security Guidelines (NM)</li> <li>➤ Contractor Safety Handbook and Service Subcontract Safety Handbook (KC)</li> <li>➤ Federal bulletin board postings (DOE Worker Protection Poster)</li> <li>➤ Portal HS&amp;E web pages</li> </ul>
851.20 (b) – Worker rights and responsibilities	<ul style="list-style-type: none"> <li>➤ Honeywell Code of Business Conduct</li> <li>➤ Honeywell Sustainable Opportunity Policy – Honeywell’s Commitment to Health Safety and the Environment</li> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ FM&amp;T Operating Policy</li> <li>➤ Portal HS&amp;E web pages</li> <li>➤ WI 5.12.7, Incident Analysis &amp; Reporting</li> </ul>
851.20 (b)(1) – Participate on official time	<ul style="list-style-type: none"> <li>➤ Safety 4 All Committee</li> <li>➤ Safety Committees</li> <li>➤ BSAFE (NM)</li> <li>➤ WI 5.12.3, How to Assess Environmental Safety &amp; Health Requirements using Safety and Housekeeping Implementation Needs Everyone (SHINE)</li> <li>➤ WI 5.12.4, How to Maintain HS&amp;E Awareness</li> <li>➤ PD 5.112, Organizational Environmental, Safety, and Health (ES&amp;H) Meetings (NM)</li> <li>➤ International Association of Machinists and Aerospace Workers (IAMAW) Contract, Article 19, HS&amp;E and Good</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>Housekeeping</li> <li>➤ The International Union, Security, Police and Fire Professionals of America (SPFA) and its Amalgamated Local No. 251, Article 14, HS&amp;E</li> </ul>
851.20(b)(2) – Access to information	<ul style="list-style-type: none"> <li>➤ DOE web site (DOE safety and health publications)</li> <li>➤ Portal HS&amp;E web pages</li> <li>➤ HS&amp;E Documents</li> <li>➤ eCATS (electronic Corrective Action Tracking System)</li> <li>➤ HS&amp;E Concern / Near-Miss reporting system</li> <li>➤ Interventions</li> <li>➤ WI 5.12.4, How to Maintain HS&amp;E Awareness</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting (DOE F 5484.3)</li> <li>➤ Federal bulletin board postings</li> <li>➤ Area Hazard Awareness Signs</li> </ul>
851.20(b)(3) – Notification of monitoring results	<ul style="list-style-type: none"> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.6, Noise Control &amp; Hearing Conservation</li> <li>➤ Occupational Medicine Special Surveillance Program results               <ul style="list-style-type: none"> <li>• Clinical Protocols for Physical Exams</li> <li>• Medical Policy and Procedure Handbook</li> </ul> </li> <li>➤ Industrial Hygiene exposure monitoring results</li> <li>➤ Radiation Protection Program dosimetry results</li> </ul>
851.20 (b)(4) – Observe monitoring	<ul style="list-style-type: none"> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.14.7, Radiation Protection</li> <li>➤ WI 5.17.6, Noise Control &amp; Hearing Conservation</li> <li>➤ Occupational Medicine Special Surveillance Program               <ul style="list-style-type: none"> <li>• Clinical Protocols for Physical Exams</li> <li>• Medical Policy and Procedure Handbook</li> </ul> </li> </ul>
851.20 (b)(5) – Accompany inspections	<ul style="list-style-type: none"> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ WI 5.12.3, How to Assess Environmental, Safety &amp; Health Requirements using Safety and Housekeeping Implementation Needs Everyone (SHINE)</li> </ul>
851.20 (b)(6) – Results of inspections and investigations	<ul style="list-style-type: none"> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> </ul>
851.20 (b)(7) – Express concerns	<ul style="list-style-type: none"> <li>➤ Safety 4 All Committee</li> <li>➤ HS&amp;E Bill of Rights</li> <li>➤ Safety Committees</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ HS&amp;E Concern / Near Miss reporting system</li> <li>➤ Ask Chris (email the President of FM&amp;T)</li> <li>➤ Comments, Please!</li> <li>➤ BSAFE (NM)</li> <li>➤ Interventions</li> <li>➤ WI 5.12.4, How to Maintain HS&amp;E Awareness</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ PD 5.112, Organizational Environmental, Safety, and Health (ES&amp;H) Meetings</li> </ul>
851.20(b)(8) – Decline to perform in imminent risk	<ul style="list-style-type: none"> <li>➤ Health Safety &amp; Environment Management System Description</li> <li>➤ HS&amp;E Bill of Rights</li> <li>➤ Contractor Safety Handbook and Service Subcontract Safety Handbook (KC)</li> <li>➤ Contractor HS&amp;E and Security Guidelines (NM)</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ PD 5.17, HS&amp;E Requirements for Personnel Protection</li> </ul>
851.20 (b)(9) – Stop Work	<ul style="list-style-type: none"> <li>➤ Health Safety &amp; Environment Management System Description</li> <li>➤ NM HS&amp;E Bill of Rights</li> <li>➤ Contractor Safety Handbook and Service Subcontract Safety Handbook (KC)</li> <li>➤ Contractor HS&amp;E and Security Guidelines (NM)</li> <li>➤ WI 5.12.3, How to Assess Environmental Safety &amp; Health Requirements using Safety &amp; Housekeeping Implementation Needs Everyone (SHINE)</li> <li>➤ WI 5.13.1, How to Obtain/Issue a Hot Work Permit</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.4, How to Process Beryllium</li> <li>➤ WI 5.16.1, Electrical Safety</li> <li>➤ PD 5.17, HS&amp;E Requirements for Personnel Protection</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
<b>851.21 – Hazard identification and assessment</b>	
851.21 (a) – Identify and assess risks	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.3, How to Assess Environmental Safety &amp; Health Requirements using Safety &amp; Housekeeping Implementation Needs Everyone (SHINE)</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ PD 5.13, Fire Protection</li> <li>➤ PD 5.14, HSE Requirements for Materials</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.2, Laboratory Safety</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.4, How To Process Beryllium</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.14.6, Sanitation and Environmental Health</li> <li>➤ WI 5.14.7, Radiation Protection</li> <li>➤ WI 5.14.8, Controlling Explosives and Production Batteries</li> <li>➤ WI 5.14.13, Combustible, Flammable, and Hazardous Materials</li> <li>➤ PD 5.15, HSE Requirements for Equipment</li> <li>➤ WI 5.15.1, Lockout/Tagout (LOTO)</li> <li>➤ WI 5.15.2 Machine Guarding</li> <li>➤ WI 5.15.3, Hoisting and Rigging</li> <li>➤ WI 5.15.4, Ventilation</li> <li>➤ WI 5.15.5, Plumbed and Portable Emergency Wash Stations</li> <li>➤ WI 5.15.6, Laser Safety</li> <li>➤ WI 5.15.7, Vehicles</li> <li>➤ WI 5.15.8, Equipment Safety Controls</li> <li>➤ WI 5.15.9, Fall Protection</li> <li>➤ WI 5.15.10, HS&amp;E Requirements for Elevated Platforms, Ladders, Wall and Floor Openings, and Stairways</li> <li>➤ PD 5.16, HSE Requirements for the Facility</li> <li>➤ WI 5.16.1, Electrical Safety</li> <li>➤ WI 5.16.2, Life Safety Program</li> <li>➤ WI 5.16.3, Confined Spaces</li> <li>➤ WI 5.16.4, Pressure System Safety</li> <li>➤ PD 5.17, HSE Requirements for Personnel Protection</li> <li>➤ WI 5.17.1, Personal Protective Equipment</li> <li>➤ WI 5.17.3, How to Obtain and Use Chemical Protective Clothing and Equipment</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.5, Ergonomics</li> <li>➤ WI 5.17.6, Noise Control &amp; Hearing Conservation</li> <li>➤ PD 5.123, Respiratory Protection Program</li> <li>➤ PD 5.126, Dealing With Temperature Extremes</li> <li>➤ PD 5.130, Hazardous Material Control</li> <li>➤ PD 5.137, Driver Safety Program</li> <li>➤ PD 5.138, Fire Protection Program</li> <li>➤ WI 5.138.1, How To Determine Common Fire Hazards and Prevent Fires</li> <li>➤ PD 5.145, Machine Operation Safety Evaluation System (M.O.S.E.S.)</li> <li>➤ PD 6.62, Emergency Management Process</li> <li>➤ WI 6.62.1, How To Plan, Report, and Respond to Emergency Situations</li> <li>➤ WI_6.62.3 How to Report and Respond to a Severe Weather Condition at NSC</li> <li>➤ WI_6.62.10, How to Report and Respond to a Severe Weather Condition</li> <li>➤ PD_6.95, National Security Campus Chemical Management Process</li> </ul>
851.21 (a)(1) – Assess workers exposures	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety &amp; Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.1, Personnel Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> </ul>
851.21 (a)(2) – Document hazard assessment	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety &amp; Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.1, Personal Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> </ul>
851.21 (a)(3) – Record results	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety &amp; Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ WI 5.17.1, Personnel Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> </ul>
851.21 (a)(4) – Analyze designs for potential hazards	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> </ul>
851.21 (a)(5) – Evaluate operations, procedures, and facilities	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety &amp; Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.1, Personnel Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> </ul>
851.21 (a)(6) – Job activity-level hazard analysis	<ul style="list-style-type: none"> <li>➤ BSAFE (NM)</li> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.5, Exposure Assessment</li> </ul>
851.21 (a)(7) – Review safety and health experience	<ul style="list-style-type: none"> <li>➤ Management Operations Review (MOR) meeting</li> <li>➤ HSEMS Council Meetings</li> <li>➤ Management Review (NM)</li> <li>➤ All employee meetings</li> <li>➤ Portal HS&amp;E web pages</li> <li>➤ WI 5.12.4, How to Maintain HS&amp;E Awareness</li> <li>➤ PD 5.112, Organizational Environment, Safety &amp; Health (ES&amp;H) meetings</li> </ul>
851.21 (a)(8) – Consider other hazards	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ PD 6.62, Emergency Management Process</li> </ul>
851.21 (b) Closure	Not Applicable
851.21 (c) Identify and assess risks to obtain baseline and reassess as needed to ensure compliance with requirements in this subpart.	<ul style="list-style-type: none"> <li>➤ 1995 Site Safety Assessment (baseline)</li> <li>➤ Annual Honeywell HS&amp;E Risk Assessment</li> <li>➤ Management Operations Review (MOR) meeting</li> <li>➤ PD 5.12, HS&amp;E (Health, Safety &amp; Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1, Hazard Communication</li> </ul>

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Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.1, Personnel Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> <li>➤ PD 6.62, Emergency Management Process</li> <li>➤ WI_6.62.1_How to Plan, Report, and Respond to Emergency Situations</li> <li>➤ Departmental Hazard Analyses</li> </ul>
<b>851.22 – Hazard prevention and abatement</b>	
5 851.22(a) – Hazard prevention and abatement process	<ul style="list-style-type: none"> <li>➤ PD 4.2, Issues Management System</li> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1 Hazard Communication</li> <li>➤ WI 5.14.3 Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6 Noise Control and Hearing Conservation</li> </ul>
851.22(a)(1) – During design or procedure development	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6 Job Hazard Analysis</li> <li>➤ PD 5.16, HSE Requirements for the Facility</li> <li>➤ PD 6.407, Facilities Management</li> <li>➤ PD 6.408, Facility Services Work Control</li> </ul>
851.22 (a)(2) – Existing hazards	<ul style="list-style-type: none"> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.1 Hazard Communication Program</li> <li>➤ WI 5.14.3 Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.6 Noise Control and Hearing Conservation</li> </ul>
851.22(b) – Hierarchy of controls	<ul style="list-style-type: none"> <li>➤ WI 5.12.6 Job Hazard Analysis</li> <li>➤ WI 5.14.5, Exposure Assessment</li> </ul>
851.22(b)(1) – Substitution	<ul style="list-style-type: none"> <li>➤ PD 4.2, Issues Management System</li> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> </ul>
851.22(b)(2) – Engineering	<ul style="list-style-type: none"> <li>➤ WI 5.12.6 Job Hazard Analysis</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

<b>Rule Section</b>	<b>FM&amp;T Implementing Mechanisms (References to Plans, Procedures)</b>
851.22 (b)(3) – Work practices and administrative	<ul style="list-style-type: none"> <li>➤ PD 5.13, Fire Protection</li> <li>➤ PD 5.14, HS&amp;E Requirements for Materials</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ PD 5.15, HS&amp;E Requirements for Equipment</li> <li>➤ PD 5.16, HS&amp;E Requirements for the Facility</li> <li>➤ PD 5.17, HS&amp;E Requirements for Personnel Protection</li> <li>➤ PD 6.62, Emergency Management Process</li> <li>➤ WI_6.62.1_How to Plan, Report, and Respond to Emergency Situations</li> <li>➤ WI_6.62.10_How to Report and Respond to a Severe Weather Condition</li> <li>➤ WI_6.62.2_How to Conduct Event Notifications and Reports at National Security Campus</li> <li>➤ WI_6.62.3_How to Report and Respond to a Severe Weather Condition at National Security Campus</li> <li>➤ WI_6.62.9_How to Conduct Event Notifications and Reports</li> </ul>
851.22 (b)(4) – Personal protective equipment	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.15.9, How to Use Fall Protection</li> <li>➤ WI 5.17.1, Personal Protective Equipment</li> <li>➤ WI 5.17.3, How to Obtain and Use Chemical Protective Clothing.</li> <li>➤ WI 5.17.6, Noise Control &amp; Hearing Conservation.</li> </ul>
851.22 (c) – Purchasing equipment, products and services	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> </ul>
<b>851.23 – Safety and health standards</b>	
851.23(a)(1-14) – Safety and health standards	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ WI 5.12.9, Fire Protection Program Requirements Identification</li> <li>➤ WI 5.12.10, Contractor Safety</li> <li>➤ PD 5.13, Fire Protection</li> <li>➤ WI 5.13.5, How to Respond to Emergency Situations</li> <li>➤ WI 5.14.1 Hazard Communication</li> <li>➤ WI 5.14.2, Laboratory Safety</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.14.6, Sanitation and Environmental Health</li> <li>➤ WI 5.14.8 Controlling Explosives and Production Batteries</li> <li>➤ WI 5.14.9, Clean Air Act and Local Air Regulation Compliance</li> </ul>

## Attachment 1 FM&T Worker Safety and Health Program

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ WI 5.14.10, Pesticides and Toxic Substances Control</li> <li>➤ WI 5.14.12, Waste Management at NM and KC</li> <li>➤ WI 5.14.13, Combustible, Flammable, and Hazardous Materials</li> <li>➤ WI 5.15.1, Lockout/Tagout (LOTO)</li> <li>➤ WI 5.15.2, Machine Guarding</li> <li>➤ WI 5.15.3, Hoisting and Rigging</li> <li>➤ WI 5.15.4, Ventilation</li> <li>➤ WI 5.15.5, Plumbed and Portable Emergency Wash Stations</li> <li>➤ WI 5.15.6, Laser Safety</li> <li>➤ WI 5.15.7, Vehicles</li> <li>➤ WI 5.15.8, Equipment Safety Controls</li> <li>➤ WI 5.15.9, Fall Protection</li> <li>➤ WI 5.16.1, Electrical Safety</li> <li>➤ WI 5.16.3, Confined Spaces</li> <li>➤ WI 5.16.4, Pressure System Safety</li> <li>➤ WI 5.17.1, Personal Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.5, Ergonomics</li> <li>➤ WI 5.17.6, Noise Control &amp; Hearing Conservation</li> <li>➤ WI 5.17.7, Temperature Extremes</li> <li>➤ PD 5.111, Visitor and New Hire Safety</li> <li>➤ PD 5.112, Organizational Environment, Safety &amp; Health (ES&amp;H) HS&amp;E meetings</li> <li>➤ PD 5.114, Physical Examination</li> <li>➤ PD 5.123 Respiratory Protection</li> <li>➤ PD 5.126, Dealing with Temperature Extremes</li> <li>➤ PD 5.130, Hazardous Material Control</li> <li>➤ PD 5.137, Driver Safety Program</li> <li>➤ PD 5.138, Fire Protection Program</li> <li>➤ PD 6.55, Maintenance of Equipment and Facilities</li> <li>➤ PD 6.62, Emergency Management Process</li> <li>➤ PD_6.95, National Security Campus Chemical Management Process</li> <li>➤ PD 6.407, Facilities Management</li> <li>➤ PD 6.408, Facility Services Work Control</li> <li>➤ KC Utilities Operations Manuals</li> <li>➤ Facilities Specification 14601</li> <li>➤ Preventive Maintenance Plan 8085, Job Plan 147</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ FES Design Criteria</li> <li>➤ FES Construction Specs</li> </ul>
851.23(b)	<ul style="list-style-type: none"> <li>➤ None</li> </ul>
<b>851.24 – Functional Areas</b>	
851.24 (a) – Structured Program	<ul style="list-style-type: none"> <li>➤ HSE Management System Description and Worker Safety &amp; Health Program</li> <li>➤ Command Media</li> </ul>
851.24 (b) – Appendix A	<ul style="list-style-type: none"> <li>➤ See Appendix A below</li> </ul>
<b>851.25 – Training and Information</b>	
851.25 (a) – Worker Safety and Health Training and Information Program	<ul style="list-style-type: none"> <li>➤ Human Resources Web Page</li> <li>➤ PD 5.1, Human Resources Processes</li> <li>➤ electronic Learning Management System (eLMS – training records database)</li> </ul>
851.25 (b)(1) – Initial training	
851.25 (b)(2) – Periodic training	
851.25 (b)(3) – Changes requiring training	
851.25 (c) – Provide training to Safety and Health Program Owners	
<b>851.26 – Recordkeeping and reporting</b>	
851.26 (a)(1) – Hazard identification and control recordkeeping	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> <li>➤ WI 5.14..1, Hazard Communication</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ Emergency Planning Hazards Assessment (KC)</li> <li>➤ Hazards Survey</li> </ul>
851.26(a)(2) – Injury/illness occupational recordkeeping and reporting (DOE Manual 231.1-1A)	<ul style="list-style-type: none"> <li>➤ WI 5.12.7, Incident Analysis &amp; Reporting</li> </ul>
851.26(a)(3) – OSHA recordkeeping (29 CFR 1904)	
851.26 (a)(4) – Record integrity	
851.26 (b)(1) – Reporting & Investigation	

**Attachment 1**  
**FM&T Worker Safety and Health Program**

<b>Rule Section</b>	<b>FM&amp;T Implementing Mechanisms (References to Plans, Procedures)</b>
851.26 (b)(2) – Trends and Lessons Learned (DOE O 225.1A Accident Investigations)	<ul style="list-style-type: none"> <li>➤ HS&amp;E Concern / Near Miss reporting system</li> <li>➤ Interventions</li> <li>➤ BSAFE (NM)</li> <li>➤ eCATS</li> <li>➤ WI 5.12.7, Incident Analysis and Reporting</li> <li>➤ WI 5.12.8, How to Identify Issues Requiring HSE Incident Bulletin and Lessons Learned</li> </ul>
<b>851.27 – Reference sources</b>	(As listed in 851.23 section of this document, where applicable – See Listing of Workplace Safety and Health Requirements.)
<b>Appendix A to Part 851 – Worker Safety and Health Functional Areas</b>	
1. Construction Safety	<ul style="list-style-type: none"> <li>➤ WI 5.12.10, Contractor Safety</li> <li>➤ Contractor Safety Handbook and Service Subcontract Safety Handbook (KC)</li> <li>➤ Contractor HS&amp;E and Security Guidelines handbook (NM)</li> </ul>
2. Fire Protection	<ul style="list-style-type: none"> <li>➤ WI 5.12.9, Fire Protection Program Requirements Identification (KC)</li> <li>➤ PD 5.13, Fire Protection (KC)</li> <li>➤ PD 6.62, Emergency Management Process</li> <li>➤ PD_6.95, National Security Campus Chemical Management Process</li> <li>➤ PD 6.407, Facilities (NM)</li> <li>➤ PD 6.408, Facility Services Work Control (NM)</li> </ul>
3. Explosives Safety	<ul style="list-style-type: none"> <li>➤ WI 5.14.8, Controlling Explosives and Production Batteries</li> <li>➤ WI 5.17.1 Personal Protective Equipment</li> <li>➤ Manufacturing Execution System Specification 9957020-Static Protection</li> <li>➤ Letter dated December 21, 2001, to Beth Sellers, KCSO Site Manager, from DOE/NNSA Albuquerque Allan Herbach, subject: Lightning Protection. Letter states that determination has been made that no lightning protection is required for KC</li> </ul> <p><u>Applicable NM documents</u></p> <ul style="list-style-type: none"> <li>➤ PD 6.430, Explosives / Ammunition Process</li> <li>➤ WI 6.430.1, Receive and Review Explosives Tasking</li> <li>➤ WI 6.430.2, Receive Explosives / Ammunition</li> <li>➤ WI 6.430.3, Store Explosives / Ammunition</li> <li>➤ WI 6.430.4, Stage, Issue and Return Explosives / Ammunition</li> <li>➤ WI 6.430.5, Conduct performance Assurance for Explosives / Ammunition</li> <li>➤ WI 6.430.6, Dispose of Explosives / Ammunition</li> <li>➤ WI 6.430.7, Ship / Transport Explosives / Ammunition</li> <li>➤ WI 6.430.8, Access Control for Explosives Magazines</li> <li>➤ JHA 100612 -- How to Install, Remove, Handle and Store Explosive Devices in the LAT Area in Accordance with ES&amp;H</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<p>Requirements</p> <ul style="list-style-type: none"> <li>➤ JHA 100613 -- How to Setup Lasers and Laser Weapons for ESS Exercises</li> <li>➤ JHA 100614 -- How to Clean, Repair, Modify, and Field ESS Firearms</li> <li>➤ JHA 100615 -- How to Manage and Operate the ESS Magazine</li> <li>➤ JHA 100805 -- How to Load and Unload Pyrotechnics</li> <li>➤ JHA 100811 -- How to Handle Explosives in Shipping and Receiving</li> <li>➤ JHA 100822 -- How to Control Storage and Inventory at the Craddock Facility Magazine</li> <li>➤ JHA 100892 - How to Operate Hydraulic FPU and Six-Inch Tube Removal/Installation Equipment for SST</li> <li>➤ JHA 101167 -- How to Perform M-30 Pyrotechnic Testing</li> <li>➤ JHA 101171 -- How to Perform ESS Alignment and Testing on Blank Fire Weapons</li> <li>➤ JHA 101229 -- How to Handle and Disassemble SGAs</li> <li>➤ Job Aid 1 -- How to Field the Mine Simulation Unit (MSU) with Special Effects Hostile Fire Units (HFU's)</li> <li>➤ Job Aid 2 -- How to Operate the MG4 Machine Gun Sound Simulator</li> <li>➤ Job Aid 3 -- How to Field and Service the Vehicle Detection System (VDS) II</li> <li>➤ Job Aid 8 -- How to Field and Service the WALT Claymore and Mine Simulation Units</li> <li>➤ Job Aid 9 -- How to Load and Unload Pyrotechnic Devices in Vehicle-Mounted Hostile Fire Unit and the Training Tractor VDS-III</li> <li>➤ Job Aid 11 -- How to Maintain MILES and Compatible ESS Weapon Transmitters and Simulator Systems for DOE/TSD</li> <li>➤ Job Aid 12 -- How to Field and Operate the ATA Portable Infantry Target System (PITS)</li> <li>➤ Job Aid 14 -- How to Handle ATWESS Cartridges Safely</li> <li>➤ Job Aid 17 How to Set Up and Operate Training Tractor/Trailer Systems</li> <li>➤ Job Aid 20 How to Handle M-30 Pyrotechnic Cartridges</li> <li>➤ Job Aid 23 How to Set Up and Operate ATA Systems in Grenade Sensor / HFU Configuration</li> <li>➤ Job Aid 25 How to Set Up and Operate Car Bomb Simulator Vans</li> <li>➤ Job Aid 26 How to Set Up and Operate the Red Box Simulator</li> </ul>
4. Pressure Safety	<ul style="list-style-type: none"> <li>➤ WI 5.13.5, How to Respond to Emergency Situations</li> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.16.4, Pressure System Safety</li> <li>➤ WI 5.17.1 Personal Protective Equipment</li> <li>➤ WI 6.2.1, How to Prepare a Procurement Package for Capital or Low Value Equipment</li> <li>➤ FES Construction Specs</li> </ul>
5. Firearms Safety	<ul style="list-style-type: none"> <li>➤ WI 5.14.8 Controlling Explosives and Production Batteries</li> <li>➤ Physical Security Firearms Operating Procedures (FOP)</li> <li>➤ General Orders (GO) #3, 25 &amp; 26</li> </ul> <p><u>Applicable NM documents</u></p>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ PD 6.430, Explosives / Ammunition Process</li> <li>➤ WI 6.430.1, Receive and Review Explosives Tasking</li> <li>➤ WI 6.430.2, Receive Explosives / Ammunition</li> <li>➤ WI 6.430.3, Store Explosives / Ammunition</li> <li>➤ WI 6.430.4, Stage, Issue and Return Explosives / Ammunition</li> <li>➤ WI 6.430.5, Conduct performance Assurance for Explosives / Ammunition</li> <li>➤ WI 6.430.6, Dispose of Explosives / Ammunition</li> <li>➤ WI 6.430.7, Ship / Transport Explosives / Ammunition</li> <li>➤ WI 6.430.8, Access Control for Explosives Magazines</li> <li>➤ JHA 100612 -- How to Install, Remove, Handle and Store Explosive Devices in the LAT Area in Accordance with ES&amp;H Requirements</li> <li>➤ JHA 100613 -- How to Setup Lasers and Laser Weapons for ESS Exercises</li> <li>➤ JHA 100614 -- How to Clean, Repair, Modify, and Field ESS Firearms</li> <li>➤ JHA 100615 -- How to Manage and Operate the ESS Magazine</li> <li>➤ JHA 100805 -- How to Load and Unload Pyrotechnics</li> <li>➤ JHA 100811 -- How to Handle Explosives in Shipping and Receiving</li> <li>➤ JHA 100822 -- How to Control Storage and Inventory at the Craddock Facility Magazine</li> <li>➤ JHA 101167 -- How to Perform M-30 Pyrotechnic Testing</li> <li>➤ JHA 101171 -- How to Perform ESS Alignment and Testing on Blank Fire Weapons</li> <li>➤ Job Aid 1 -- How to Field the Mine Simulation Unit (MSU) with Special Effects Hostile Fire Units (HFU's)</li> <li>➤ Job Aid 2 -- How to Operate the MG4 Machine Gun Sound Simulator</li> <li>➤ Job Aid 3 -- How to Field and Service the Vehicle Detection System (VDS) II</li> <li>➤ Job Aid 8 -- How to Field and Service the WALT Claymore and Mine Simulation Units</li> <li>➤ Job Aid 9 -- How to Load and Unload Pyrotechnic Devices in Vehicle-Mounted Hostile Fire Unit and the Training Tractor VDS-III</li> <li>➤ Job Aid 11 -- How to Maintain MILES and Compatible ESS Weapon Transmitters and Simulator Systems for DOE/TSD</li> <li>➤ Job Aid 12 -- How to Field and Operate the ATA Portable Infantry Target System (PITS)</li> <li>➤ Job Aid 14 -- How to Handle ATWESS Cartridges Safely</li> <li>➤ Job Aid 17 How to Set Up and Operate Training Tractor/Trailer Systems</li> <li>➤ Job Aid 20 How to Handle M-30 Pyrotechnic Cartridges</li> <li>➤ Job Aid 23 How to Set Up and Operate ATA Systems in Grenade Sensor / HFU Configuration</li> <li>➤ Job Aid 25 How to Set Up and Operate Car Bomb Simulator Vans</li> <li>➤ Job Aid 26 How to Set Up and Operate the Red Box Simulator</li> </ul>
6. Industrial Hygiene	<ul style="list-style-type: none"> <li>➤ PD 5.12, HS&amp;E (Health, Safety, and Environmental) Process</li> <li>➤ WI 5.12.6, Job Hazard Analysis</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ WI 5.14.1, Hazard Communication</li> <li>➤ WI 5.14.2, Laboratory Safety</li> <li>➤ WI 5.14.3, Chemical Control Program</li> <li>➤ WI 5.14.4, How to Process Beryllium</li> <li>➤ WI 5.14.5, Exposure Assessment</li> <li>➤ WI 5.15.4, Ventilation</li> <li>➤ WI 5.17.1 Personal Protective Equipment</li> <li>➤ WI 5.17.4, Respiratory Protection</li> <li>➤ WI 5.17.5, Ergonomics</li> <li>➤ WI 5.17.6, Noise Control and Hearing Conservation</li> <li>➤ WI 5.17.7, Temperature Extremes</li> <li>➤ PD 5.114, Physical Examination Program (NM)</li> <li>➤ WI 6.55.11, How to Request a Workstation/Area be Cleaned after Processing Beryllium</li> <li>➤ electronic Learning Management System (eLMS)</li> </ul>
7. Biological Safety	Not Applicable
8. Occupational Medicine	<ul style="list-style-type: none"> <li>➤ Medical Policy and Procedure Handbook</li> <li>➤ Medical Care Services Staff Credentials Handbook</li> <li>➤ Clinical Protocols for Physical Examinations</li> <li>➤ HR Salaried and Hourly Time-Off Policies</li> </ul> <p><u>NM Applicable Documents</u></p> <ul style="list-style-type: none"> <li>➤ PD 5.114, Physical Examination Program</li> <li>➤ Occupational Medicine Guidelines found on, HS&amp;E web page, Portal, Communities, Kirtland Operations</li> </ul>
9. Motor Vehicle Safety	<ul style="list-style-type: none"> <li>➤ HS&amp;E Accountability Policy</li> <li>➤ WI 5.15.7, Vehicles</li> <li>➤ WI 6.41.5, How to Comply with Federal Motor Vehicle Safety Regulations</li> <li>➤ International Association of Machinists and Aerospace Workers (IAMAW) Contract, Article 12, Discipline and Article 19, HS&amp;E and Good Housekeeping</li> <li>➤ The International Union, Security, Police and Fire Professionals of America and its Amalgamated Local No. 251 (SPFA) Article 14, HS&amp;E, and Article 18, Discipline and Discharge</li> </ul> <p><u>NM Applicable Documents</u></p> <ul style="list-style-type: none"> <li>➤ BSAFE Program Critical Behavior Inventory and Observation check sheets posted on, Portal, Communities, Kirtland Operations</li> <li>➤ BSAFE website</li> <li>➤ PD 5.137, Driver Safety Program (NM)</li> <li>➤ JHA - 100400 - Fielding Target Systems in Support of DOE/TSTC Training Operations</li> <li>➤ JHA - 100919 - Operating a Forklift (Capacity 4,000 to 20,000 pounds)</li> </ul>

**Attachment 1**  
**FM&T Worker Safety and Health Program**

Rule Section	FM&T Implementing Mechanisms (References to Plans, Procedures)
	<ul style="list-style-type: none"> <li>➤ JHA - 100918 - Operating a Forklift (Capacity 4,000 Pounds and Under)</li> <li>➤ JHA - 101152 –Transporting Bulk Materials in Pickup Trucks &amp; Flat Bed Trucks</li> <li>➤ eLMS Course #1960, Driver Safety</li> </ul>
10. Electrical Safety	<ul style="list-style-type: none"> <li>➤ PD 5.12.10, Contractor Safety</li> <li>➤ WI 5.15.1, Lockout/Tagout (LOTO)</li> <li>➤ WI 5.16.1, Electrical Safety</li> <li>➤ WI 5.17.1 Personal Protective Equipment</li> </ul>
11. Nanotechnology Safety-Reserved	Not applicable.
12. Workplace Violence Prevention-Reserved	Not applicable.

**Attachment 2**  
**Chronic Beryllium Disease Prevention Program Plan**

**ATTACHMENT 2 - FM&T – 10 CFR 850, CHRONIC BERYLLIUM DISEASE PREVENTION PROGRAM PLAN (CBDPPP)**

FM&T has established and implemented a comprehensive Chronic Beryllium Disease Prevention Program Plan (the Plan), addressing potential beryllium exposure at the Kansas City Plant (KC). This Plan is prepared in accordance with the requirements of 10 CFR 850 Chronic Beryllium Disease Prevention Program (CBDPP). It applies to all processes that use beryllium, beryllium alloys, or beryllium compounds in a manner that could result in airborne exposure. It also applies to all equipment and areas that may be contaminated with beryllium from past processes. FM&T is committed to conducting its beryllium operations in a manner that ensures protection from beryllium exposure to all its employees, contractors, and the general public. To implement a comprehensive CBDPP, FM&T takes measures to ensure that no person takes any action inconsistent with the requirements of 10 CFR 850. FM&T's goal is to maintain exposures to beryllium below regulatory limits and to maintain exposures as low as reasonably and practically achievable. As a matter of policy, FM&T will try to find suitable, less toxic substances as an alternative for beryllium.

The following procedures are established and maintained to ensure compliance with the requirements of 10 CFR 850 and the protection of workers and the public.

Implementing Procedures

PD 5.14, HS&E Requirements for Materials

WI 5.14.3, Chemical Control Program

WI 5.14.4, How to Process Beryllium

WI 6.55.11, How to Request a Workstation/Area be Cleaned after Processing Beryllium

FM&T also operates on Kirtland Air Force Base in Albuquerque, New Mexico. Kirtland Operations (NM) is a logistics and manufacturing center for the Nuclear Security Enterprise; most of the work performed is for the DOE's Transportation Safeguards Division. Processes at NM do not use beryllium. However, FM&T employees working at NM who have had a past beryllium exposure or who may have potentially been exposed to beryllium in the past are offered enrollment into the beryllium medical surveillance program.

**Attachment 3**  
**HSEMS Standard Owners and Sponsors**

## ATTACHMENT 3 - HSEMS STANDARD OWNERS AND SPONSORS

All FM&T organizations and functions are responsible for supporting owners and sponsors in the implementation of these standards.

Corporate Standard / Aerospace Procedure	Owner	Name	Sponsor	Name
HSE Policy Standard 201 AP-1540 Aero Procedure for HSE Policy	Manager Sr., HS&E	Kevin Allgeyer	Vice-President ISC	Rick Lavelock
Aspects and Impacts 202 AP-1541 HSE Risk Assessment	Director HSE&F	Don Fitzpatrick	Vice-President ISC	Rick Lavelock
HSE Legal and Other Requirements 203 AP-1542 Legal and Other Requirements	Director HSE&F	Don Fitzpatrick	Acting General Counsel	Susan Anderson
HSE Objectives 204 AP-1550 HSE Objectives, Targets and Management Plans	Director HSE&F	Don Fitzpatrick	Vice-President ISC	Rick Lavelock
HSE Management Plans 205 AP-1550 HSE Objectives, Targets and Management Plans	Director HSE&F	Don Fitzpatrick	Vice-President ISC	Rick Lavelock
HSE Behavior/Culture 206 AP-1554 HSE Behavior Culture	Director HR	Susan Schwamberger	Vice-President ISC	Rick Lavelock
Structure and Responsibility 207 AP-1543 HSE Structure Responsibility	Vice-President ISC	Rick Lavelock	President	Chris Gentile
HSE Training 208 AP-1547 HSE Training	Director Associate Quality	David C. Martin	Director Quality	David Schoenherr
HSE Communication 209 AP-1548 HSE Communications	Manager Sr., Communications	Shaunda Parks	Director HSE&F	Don Fitzpatrick
Document Control and Records 210 AP-1544 HSE Document Control and Records	Director IT	Matt Decker	Acting General Counsel	Susan Anderson
Operational Control 211 AP-1545 Operational Control	Director ISC	Kurt Lorenzen	Vice-President ISC	Rick Lavelock
Monitoring, Measurement and Self- Assessment 212 AP-1549 HSE Monitoring Measurement Self- Assessment	Director HSE&F	Don Fitzpatrick	Director Quality	David Schoenherr
Corrective and Preventive Action 213 AP-1036-4 HSE Corrective Preventive Action	Director Quality	David Schoenherr	Vice-President ISC	Rick Lavelock
HSE MS Auditing 214 No AP	Director Quality	David Schoenherr	Vice-President ISC	Rick Lavelock
HSE Management Review 215 AP-1001-01 HSE Management Review	Director HSE&F	Don Fitzpatrick	Vice-President ISC	Rick Lavelock