
Ames Laboratory
Office: Environment, Safety, Health & Assurance
Title: Topical Appraisals
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Plan: 10200.022
Revision: 6
Effective Date: 2/01/11
Review Date: 12/01/13

TOPICAL APPRAISALS

This plan describes how the Ames Laboratory conducts topical appraisals. Comments and questions regarding this plan should be directed to the contact persons listed below:

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Approved by: _____ Date: _____
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Note: Original Sign-off Record with signatures is on file with ESH&A.

1.0 REVISION/REVIEW LOG

The authors will formally review this document once every three years at a minimum:

Revision Number	Effective Date	Contact Person	Pages Affected	Description of Revision
0	11/1/99	J. Withers	All	Initial Issue
1	04/01/00	T. E. Wessels	Section 5	Reference Independent Walk-Through Process
2	8/01/02	T. E. Wessels	All	G:\Document Control\Revision Descriptions\Plan 10200.022 revdesc.doc
3	12/01/05	T. E. Wessels	All	G:\Document Control\Revision Descriptions\Plan 10200.022 revdesc.doc
4	8/15/07	T. E. Wessels	All	G:\Document Control\Revision Descriptions\Plan 10200.022 revdesc.doc
5	12/01/07	T.E. Wessels	All	G:\Document Control\Revision Descriptions\Plan 10200.022 revdesc.doc
6	2/01/11	J. H. Withers	All	G:\Document Control\Revision Descriptions\Plan 10200.022 revdesc.doc

2.0 PURPOSE AND SCOPE

The Laboratory provides support for the development and implementation of the Laboratory's safety, safeguards and security, cyber security, and emergency management programs. Responsibilities for development and oversight of these programs reside in the Laboratory's Environment, Safety, Health & Assurance (ESH&A) office, Safeguards and Security (S&S) program, Cyber Security program (within Information Systems office) and the Emergency Coordinator (within Facilities Services office). Periodic validation of compliance with the Laboratory's and the Department of Energy's requirements is accomplished through multiple assessment mechanisms including the performance of topical appraisals.

3.0 RESPONSIBILITIES

Responsibilities for implementation of the Topical Appraisals program are as follows:

- 3.1 LABORATORY DIRECTOR – The Laboratory Director is ultimately responsible for ensuring that employees are provided a safe and healthy work place, secure work practices, and adequate emergency responses. Therefore the Director supports the various program functions and numerous surveillance activities including topical appraisals.
- 3.2 PROGRAM DIRECTORS / DEPARTMENT MANAGERS – Program Directors / Department Managers shall provide departmental specific information upon request and be responsible for the completion of any corrective actions identified from a topical appraisal within their program or department.

- 3.3 **GROUP / SECTION LEADERS** – Group / Section Leaders shall provide group-specific information upon request and be responsible for the completion of any corrective action identified from a topical appraisal within their group or section.
- 3.4 **SAFETY COORDINATORS / REPRESENTATIVES** – Safety Coordinators / Representatives shall serve as points-of-contact on ESH&A related topical appraisals and, at the direction of the Program Director / Department Manager or Group / Section Leader, facilitate correction of any identified deficiencies.
- 3.5 **ASSISTANT COMPUTER PROTECTION MANAGERS (ACPMs) and SYSTEM ADMINISTRATORS** – ACPMs and System Administrators shall serve as points-of-contact on cyber security related topical appraisals and, at the direction of the Program Director / Department Manager or Group / Section Leader, facilitate correction of any identified deficiencies.
- 3.6 **EMPLOYEES** – Ames Laboratory employees shall participate in the Laboratory’s safety, security, and emergency programs by performing work in accordance with established practices and procedures; employees shall interact with supervisory personnel, and program personnel on safety, security, and emergency issues, including topical appraisals.
- 3.7 **CHIEF OPERATIONS OFFICER (COO) and ENVIRONMENT, SAFETY, HEALTH & ASSURANCE (ESH&A) MANAGER** are responsible for coordination of the proposed topics list with Ames Site Office and communication of agreed-upon list to ESH&A, Safeguards and Security, Cyber Security, and Emergency Management specialists. These specialists are responsible for scheduling, performing, documenting, filing reports, and communicating results of topical appraisals.

4.0 PREREQUISITE ACTIONS AND REQUIREMENTS

The specialist conducting the appraisal shall provide advance appraisal information and requests to the appropriate personnel including topics to be covered, appraisal methodology, and timelines for performance and completion of the topical appraisal.

5.0 PERFORMANCE

Topical appraisals are performed on a periodic basis by program specialists. The frequency and rigor of appraisals is suggested by the specialist after consideration of statutory or DOE requirements, Walk-Through data, injury/illness data, lessons learned information, employee safety concerns and / or other “feedback” information. Each topical appraisal is documented via a written report that is kept on file in the ESH&A Office.

5.1 APPRAISAL TOPICS

Appraisal topics will be selected through discussions between the specialists and the ESH&A manager and/or the Chief Operations Officer, and then through discussions between the ESH&A manager and /or the Chief Operations Officer and the DOE Ames Site Office Facility Representative. A partial list of potential subjects is provided below.

INDUSTRIAL SAFETY

- Confined Space Entry
- Scaffolding Safety
- Fall Protection
- Powered Industrial Vehicles (forklifts)
- Stop Work Authority
- Means of Egress and Walking & Working Surfaces
- Vehicle Mounted Elevating & Rotating Work Platforms
- Personal Protective Equipment
- Machine Guarding
- Hand Tools and Portable Power Tool Safety
- Compressed Air
 - Welding, Cutting and Brazing Program
 - Electrical Safety & Electrical Related Work Practices
 - Lockout /Tagout
 - Eye Washes and Safety Showers
 - Ladder Safety
 - Hoisting and Rigging
 - Working Alone
 - Forklift Safety
 - Elevated Work – Platforms and Roof Work
 - Excavation and Trenching Program

HEALTH PHYSICS

- Review of Personnel Monitoring
- Review of X-ray program
- HP oversight of maintenance activities
- Review of Radiological Work Permit program
- Regulatory Requirements
- Administrative Controls
- Authorization Process
- Training Requirements
- Procurements of Radioactive materials and Radiation Producing Devices
- Radioactive Waste
- Personnel Exposure
- Emergency and Decontamination Procedures
- ALARA
- Radioactive Contamination Control
- Posting and Labeling for Radiological Control
- Sealed Radioactive Source Accountability and Control
- Materials Control and Accountability

INDUSTRIAL HYGIENE

- Magnetic Fields
- Management of Mercury
- Precursors for Improvised Explosive Devices
- Use of Cyanide-Containing Compounds
- Hazard Communication (Right to Know) Program
- Chemical Hygiene Program
- Exposure Assessments/Medical Surveillance
- Ergonomics
- Respiratory Protection
- Bloodborne Pathogens

- Asbestos
- Lead
- Laboratory Chemical Hood Testing Program
- Lasers
- Radio Frequency (RF) Radiation-generating Devices
- Ultraviolet (UV) Light-Generating Devices

ENVIRONMENTAL PROTECTION, Environmental Management System (EMS)

- Environmental Management System (EMS) Effectiveness
- Ozone Depleting Substances
- Hazardous Waste Generator Training
- Emission Points/Sources
- National Environmental Policy Act Management
- Protection of Groundwater and Surface Water Quality and Compliance with Spill Reporting
- Protection of Air Quality and Ozone Depleting Substances
- Waste Management
- Environmental Monitoring and Surveillance Program Management

FIRE PROTECTION

- Fire Prevention
- Hot Work
- Fire Detection
- Bypassing a Detection System
- Fire Annunciation
- Fire Suppression
- NFPA 704 (Iowa Responders Right to Know)
- Emergency Action Plans and Postings
- NFPA 75 Standard for Protection of Information Technology Equipment
- NFPA 110 Standard for Emergency and Standby Power Systems
- NFPA 232 Standard for Protection of Records
- NFPA 601 Standard for Security Services in Fire Loss Prevention
- NFPA 730 Guide for Premises Security

SAFEGUARDS AND SECURITY

- Foreign Visits & Assignments (FV&A)
- Property Protection
- Foreign Travel
- Export Control
- Badge Program
- PPS Post Orders
- Discrepancy Reports
- PPS Tours

CYBER SECURITY

- Cyber Security Incident Response
- Wireless Systems Management
- Sensitive Information Encryption Processes

EMERGENCY MANAGEMENT

- Notification of Injuries and Fatalities
- Emergency Notification System
- Accountability Protocol

5.2 APPRAISAL PROCESS

After selection of appraisal topics and selection of audit leads, the audit leads will submit a paragraph description outlining the scope of the topic and identifying several specific activities, processes, or organizational units to review as a sampling of implementation, if applicable. Upon approval of the topic scope statement by the ESH&A manager, assistant manager, or the chief operations officer, the appraisal process can be initiated. The report will address the following issues, as applicable.

Requirements: The requirements for the topical area are to be reviewed and updated as necessary to maintain the Laboratory's level of protection and compliance. This review should include the Federal, State, and Local laws; DOE directives; and other requirements as detailed in the Laboratory's Contract, or identified through elements of the Laboratory's Integrated Safety Management System, Environmental Management System, Worker Safety and Health Program, Quality Assurance Program, and Integrated Safeguards and Security Management System.

Program Documentation: All related local documentation that implements the requirements of the topical area should be reviewed for compliance, clarity, and effectiveness.

Training: All aspects of training related to the topical area should be review, including content and delivery of the training module, effectiveness of the training, and training statistics.

Performance: The appraisal should include a review of the performance related to the topical area, such as the level of application of the topical area to Laboratory activities and the numbers of related findings, incidents, or concerns.

Conclusions: Conclusions should include a discussion of the status of the elements reviewed. Issues resulting from observations and conclusions should be classified as findings, strengths, or noteworthy practices, as defined as follows.

Finding: A finding is a determination of deficiency pertaining to implementation of a requirement based on a recognized inadequacy or weakness. Findings are categorized as levels 1, 2, or 3. This categorization is necessary to identify the degree of management formality and rigor required for the correction, tracking to closure, and trending of findings.

Level 1 Finding: Determination of deficiency of major significance that warrants a high level of attention on the part of line management. Typically these reflect a gap in addressing requirements or a systemic problem with implementing requirements. If left uncorrected, this level of finding could negatively impact the Laboratory's mission.

Level 2 Finding: Determination of deficiency that represents a non-conformance and/or deviation with implementation of a requirement. Multiple determinations of deficiency at this level, when of a similar nature, may be rolled-up together into one or more Level 1 findings. Level 2 findings can be further qualified by noting the significance of the issue as: *Moderate*, conditions that could cause minor injury or minor environmental or programmatic impact; or *High*, conditions that could cause a severe injury or significant environmental or programmatic impact.

Level 3 Finding: Determination of deficiency where it is recognized that improvements can be gained in process, performance, or efficiency already established for meeting a requirement. This level of finding should also include minor deviations observed during oversight activities that can be promptly corrected and verified as completed.

Documentation of findings should include the statement of the specific requirement (e.g. regulatory citation, Laboratory policy, etc.), the description of a programmatic breakdown (if applicable), and objective evidence demonstrating the deficiency.

Strength: A mature process or activity that has consistently demonstrated the ability to meet expectations, or a process or activity that efficiently and effectively facilitates and integrates processes, activities, and resources.

Noteworthy Practice: A positive observation, based on objective assessment data, or a particular practice, procedure, process, or system considered so unique or innovative enough that other organizations within the Laboratory might find it beneficial. Mere compliance with mandatory requirements is not considered to be a noteworthy practice.

5.3 APPRAISAL REPORT

The appraisal report should follow the following format as applicable.

Report Header: Enter specific title of appraisal (centered), and date of report (centered under title)

1.0 Scope

Discuss the scope of the appraisal, including applicable appraisal criteria.

2.0 Dates: Record the primary dates of the appraisal. (Specifically note dates of observations and reports such as training status in the summary discussion section.)

3.0 Summary Discussion

Describe the observations and conditions related to the following areas of the appraisal:

3.1 Requirements

3.2 Program Documentation

3.3 Training

3.4 Performance

3.5 Conclusions

4.0 References

List any significant references utilized for the topical appraisal.

5.0 Personnel Interviewed

List all personnel who were interviewed, including name and organizational affiliation.

6.0 Assessment Results

List the assessment results in clear and concise text. Indicate corrective actions to be undertaken and the corresponding ALCATS tracking identification code (Obtained from the Laboratory's industrial safety specialist, Shawn Nelson, nelsons@ameslab.gov, 294-9769.) The results should be listed under the following headings:

6.1 Strengths

6.2 Noteworthy Practices

6.2 Findings

6.2.1 Level 1 Findings

6.2.2 Level 2 Findings

6.2.3 Level 3 Findings

7.0 Attachments

6.0 POST PERFORMANCE

- 6.1 Deficiencies and opportunities for improvement identified will be addressed according to Procedure 10200.030 *Corrective Action Development Tracking and Verification*, tracked in ALCATS (Ames Laboratory Corrective Action Tracking System), categorized for reportability according to Plan 40000.001 *Event Reporting Program*, and be reviewed as part of the annual trend analysis according to Procedure 10200.041 *Trend Analysis of ES&H, S&S, Cyber Security and Emergency Management Issues*.
- 6.2 Upon completion of the topical appraisal report and review by the ESH&A manager, assistant manager and / or the Chief Operations Officer, the specialist is responsible for ensuring that an electronic copy of the report is sent to the Laboratory's industrial safety specialist: nelsons@ameslab.gov.
- 6.3 The Laboratory industrial safety specialist will file an electronic copy of the appraisal report in the appropriate topical appraisal folder in the ESH&A Admin/Topical Appraisals directory, and a printed copy in the appropriate ESH&A file.