

All applicable procedures were reviewed and a checklist for key steps was established and posted at the workstation. Workers and supervisors flow-charted applicable procedures as a review to improve procedures when necessary.

ANALYSIS: The root and direct cause of this event was determined to be procedures controlling disposition of waste generated at CPF were not followed. Procedures require the operations supervisor to effect proper disposal of generated wastes by following the requirements for "Waste Certification." The procedure requires the waste generator to complete a request for disposal data package and provide the package to the Waste Coordination Organization for review. The Waste Coordination Organization authorizes disposition of waste through a job order. The job order, in conjunction with the appropriate work instructions or procedures, describes requirements that ensure the waste is properly handled, transported, stored, treated, and/or disposed. None of these procedure requirements were met.

These procedures are barriers used to ensure waste is handled safely, dispositioned to the appropriate facility, and meets regulatory requirements. These barriers were compromised. Fortunately, in this case, other barriers (PPE requirements at CPF and K-306-4, HP monitoring, packaging and survey requirements) were not compromised and this incident was a "near miss" with no personal injury, exposure, environmental insult, or regulatory noncompliance.

Contributing cause was the Pre-Job Briefing was Inadequate - Pre-job communication for cleanup of CPF needed improvement. The briefing consisted of verbal instruction to clean up area, contact HP, and remove drums. More detailed instructions were needed, along with discussions of hazards and controls and applicable procedures between supervisor and operators.

Also, Policy Not Adhered To - Policy "Importance of Procedures" states, "Operate With More Discipline - Have a procedure and follow it; change it if it's wrong." The policy also states, "if a procedure exists for the task you are performing, use it..." Not following procedures has been identified as a causal factor in recent occurrences. Based on the above, enforcement of policy concerning procedure use may need improvement.

RESOLUTION/RECOMMENDED ACTIONS:

- * Conduct knowledge-based information session(s) with appropriate personnel to discuss the function of job orders and why they are needed; to review this occurrence and focus on what may have happened; procedure use; worker participation in identifying hazards and implementing controls to address those hazards; and the need for thorough pre-job briefings and planning.
- * Conduct knowledge-based information session(s) with appropriate personnel to discuss safety basis authorizations and the flowdown of requirements through work instructions, procedures, etc. Discussions should include the hows and whys of safety basis documents, Unreviewed Safety Question (USQ) Determinations, USQs, Prescreening Safety Reviews, etc.
- * Provide personnel with the Progressive Positive Discipline Policy.

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PRIORITY DESCRIPTOR: Yellow/Caution

KEYWORDS: Near Miss, procedures, hazardous material, planning, barriers

REFERENCES: ORO--BJC-K25WASTMAN-1998-0007

DOE FUNCTIONAL CATEGORIES: Environmental Restoration and Waste Management,
Conduct of Operations, Packaging and Transportation

BJC FUNCTIONAL CATEGORIES: PC - Planning and Controls, WM - Waste Management,
OP - Conduct of Operations HAZARDS: Hazardous Material

WORK ACTIVITY: Material Storage, Material/Material Handling, Work Control, Waste
Remediation

FOLLOW-UP ACTION: Information in this report is accurate to the best of our knowledge. As means of measuring the effectiveness of this report please notify Joanne E. Schutt at (423)574-1248, e-mail at s6u@ornl.gov of any action taken as a result of this report or of any technical inaccuracies you find. Your feedback is important and appreciated.