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From "Eubanks, Cynthia M. (EUB) " [eub@bechteljacobs.org](mailto:eub@bechteljacobs.org)  
Subject- Yellow Alert- Noise Guidelines Exceeded

**TITLE- Yellow Alert-Noise Guidelines Exceeded**

IDENTIFIER L-2000-OR-BJCETTP-0201 DATE February 21, 2000

**LESSON LEARNED STATEMENT-** Activities/processes with potential hearing protection requirements, which are resumed after lapses in operation, should be carefully examined for changes in the process and overall work environment. Changes since the previous noise surveys were conducted may likewise alter applicable Hearing Conservation Program requirements for the activity/process.

**DISCUSSION OF ACTIVITIES-** During drum washing operations in K-1423, Container Processing Facility (CPF), noise dosimetry readings from two personnel were measured in excess of 85dB(A), exceeding American Conference of Governmental Industrial Hygienists exposure guidelines for noise. Drum washing activities were suspended until controls were implemented for adequate hearing protection.

**ANALYSIS-** The direct cause of this event resulted from a work planning deficiency. The work package failed to specify appropriate hearing protection in accordance with SH-A-5121, Occupational Noise Exposure and Hearing Conservation Program. SH-A-5121 requires the Industrial Hygiene (IH) subject matter expert (SME) to analyze noise survey data as the basis for their hearing protection recommendations. It also requires line management to notify IH of changes in work/facility conditions that might affect noise levels. However, no noise-related changes were made in the CPF since prior operations, nor were specified in the work instructions, nor were made in the operating procedure. Noise survey data obtained during prior CPF operations was available and did not indicate to IH the need for hearing protection devices. Later surveys indicated that the IH SMEs best judgement on the sufficiency of prior data, resulted in inadequate hearing protection being specified for the work package. Work planning under WM-B-1502, Preparation and Performance of Legacy Waste Project Activities, requires the best judgement of numerous personnel including SMEs. Root cause of the occurrence is human error in SME best judgement but not a deficiency in the work planning process.

**RECOMMENDED ACTIONS-** The corrective actions necessary for CPF to resume operations (pre-start) were

- \* placing applicable personnel in the Hearing Conservation Program;
- \* sending applicable personnel to the approved training; notifying personnel in writing as to their noise level exposures;
- \* obtaining IH recommendations for pre-start hearing protection, as well as engineering and administrative noise controls, and implementation as necessary; selection of approved hearing protection devices;
- \* posting CPF with hearing protection requirements; and,
- \* revising the work package to include Hearing Protection Program requirements.

Following resumption of CPF operations, additional corrective actions taken were to

- \* provide IH with written notification of facilities to be periodically assessed for noise levels;
- \* evaluate post-startup noise control recommendations with IH, and implement as necessary;
- \* require IH to develop a schedule for periodic noise assessment of applicable Legacy Waste facilities; and, verify that subcontractor requirements include an adequate Hearing Conservation Program.

**PRIORITY DESCRIPTOR** Yellow/Caution

**FUNCTIONAL CATEGORY(S)** (DOE) Occupational Safety & Health BJC TREND

**CODE(S)** (USER-DEFINED) SH - Occupational Safety & Health;

**ORIGINATOR** Bechtel Jacobs Company, LLC; E. J. Lavender; 865-576-4620

**VALIDATOR** Carolyn Slay; 865-241-6670

**CONTACT** Joanne E. Schutt, 865-483-0554

**NAME OF AUTHORIZED DERIVATIVE CLASSIFIER** J. S. Paris

**NAME OF REVIEWING OFFICIAL** Dick D. Holt

**KEYWORDS** noise, Hearing Conservation Program, hearing protection

**REFERENCES** Occurrence Report Number ORO-BJC-K25WASTMAN-1999-0024

**HAZARDS** Personnel Protection; Other

**WORK ACTIVITY** 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 (865) 483-0554, e-mail at [schuttj@pwtor.com](mailto:schuttj@pwtor.com) of any action taken as a result of this report or of any technical inaccuracies you find. Your feedback is important and appreciated.