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Subject Blue Alert- Improper Record Keeping

**Title: Blue Alert- Improper Record Keeping**

Date September 28, 1999 Identifier INEEL-1999-379

**Lesson Learned Statement:** Company procedures and employee training should include directions on how to replace an active damaged record (e.g., oil soaked, contaminated etc.). Clear concise and accurate record keeping is essential to maintaining the integrity of the work processes. It should be conveyed to all employees that the consequences for improper record/log keeping could lead to unsafe work conditions and/or result in violations (fines) under the Price Anderson Amendment Act.

**Discussion of Activities:** On May 26, 1999, a utility operator was performing a LOTO on a diesel fire pump. One isolation point the operator had chosen was removing the engine positive battery cable. The mechanic who was requesting the LOTO suggested an alternate isolation point, which later proved inadequate on a walkdown. The isolation point was returned to original choice and physically locked out. As a result, the LOTO record sheet had multiple corrections in the location block for this isolation point. The utility foreman and utility operator agreed that the LOTO record was hard to understand with the corrections and agreed that it should be replaced. Shift change was approaching and the utility operator requested the foreman have the dayshift operator rewrite the record sheet and initial for him in the "posted by" block for the engine battery cable isolation entry. The foreman explained to the dayshift operator what had transpired and directed the dayshift operator to rewrite the record sheet to clean it up. The day shift operator rewrote the LOTO record sheet and placed the initials of the original operator in the "posted by" block for the positive battery cables and the "lock box" block. The original record sheet was discarded. That day, a supervisory walkdown of the LOTO was conducted and found that a danger tag had not been posted on the engine positive battery cables when they were removed and locked (found danger tag laying on a control panel in the vicinity).

**Analysis-** Under the provision of the Price-Anderson Amendments Act, DOE can fine for-profit contractors and subcontractors for violations of Department rules, regulations, and compliance orders relating to nuclear or radiological safety requirements. Although this event does not fall into these categories, it is important from the standpoint of the safety implications and the legal requirements involved with managing company records. The record keeping practice associated with this LOTO evolution contained the following inaccuracies

The new record was not annotated to indicate the existence of an original, and the original record was subsequently destroyed.

The employee who created the new record transferred the initials for another individual without a clarifying annotation.

Additionally, it was discovered that the signed off (initialed) action had never been completed. Conduct of Operations Chapter 16, Logkeeping, provides instructions for transferring signatures in the absence of the originator. The utility foreman did not ensure the rewrite process was conducted in accordance with this procedure.

This event and a previous event (NTS-ID-LITC-ATR-1998-0001) involving backdating a completed action in a facility quality record demonstrate a weakness in the employees knowledge of the importance and legal aspects of document management requirements.

**Recommended Actions-** To ensure that company requirements for quality records are complied with by all employees, the following procedure reviews and training should be considered. A review of management control procedures governing quality records should be completed focusing on guidance for rewriting a lost or damaged (i.e., oil-soaked, torn etc.) quality record. Process and facility procedures that direct the creation of quality records should be reviewed for clarity and flow down requirements. Company-wide training on changes to the management control procedure for quality records that apply to all employees should be considered.

Priority Descriptor Blue

Functional Category(s) (DOE) Conduct of Operations, Maintenance, Quality, Safety, Training and Qual., Mgmt

Functional Category(s) (User-Defined) Conduct of Operations, Maintenance, Quality, Safety, Training and Qual.,Mgmt

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