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## NON-DOE ISMS INFRASTRUCTURE WORKSHEET

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Questions for framing non-DOE ISMS infrastructure adequacy	
Note 1: When INL activities are conducted at locations that are ISMS certified the responsible line manager must determine if the ESH&Q structure at the location is adequate to provide for the health and safety of employee(s) working on the activity. The line manager should, at their discretion, also evaluate activities for non-safety issues that may impact the INL (e.g., environmental, Price Anderson Act non-compliance, etc.).	

Note 2: Regardless of the location, facility, or institution where the employee is working, if at any time the employee discovers an unsafe condition, at-risk behavior, or an environmental or quality deficiency, they have an obligation to report it to responsible supervisory personnel and stop their work if they are impacted.

		Does the location have an ESH&Q process (e.g., safety manual, health and safety plan, or other documentation) to oversee/regulate activities conducted at the facility?
$\boxtimes$		Are personnel available to oversee and evaluate activities conducted at the facility? If No, further review may be necessary.
$\boxtimes$		Does the location have a process for approving and reviewing activities conducted? If No, further review may be necessary.
$\boxtimes$		Does the location have the necessary applicable local, state, and/or federal environmental and/or radiological permits to perform the proposed activities?
	☒	For chemicals, chemical products, hazardous agents, or radiological materials provided by the INL, does the facility have a program to manage and dispose of those materials per applicable local, state and/or federal regulations? If No, further review may be necessary.
	$\boxtimes$	Is work performed to establish technical standards and administrative controls using approved instructions, procedures, or other appropriate means? If No, further review may be necessary.
$\boxtimes$		Does the work management process incorporate the 5 steps of integrated safety management (identify the scope of work, identify the hazards, identify the mitigations for the hazards, conduct the work within the controls, and provide feedback about the work?
		Does the facility have a recent history (e.g., the past three years) of violations to environmental, safety, or health regulations? If Yes, has the violation(s) been properly addressed and dispositioned? If Yes, further review may be necessary.
	$\boxtimes$	Is research data collected in a log notebook, journal, or other appropriate means to ensure reproducibility/defensibility of research results when and if presented as an INL/DOE product?
$\boxtimes$		Is research data represented as INL associated work peer reviewed prior to publication?
$\boxtimes$		If the RD activity involves a product (e.g., data or hardware) that will be used at the INL, will the product developed from the activity meet the quality requirements for installation and use?

## Comments:

An evaluation of the Center for Advanced Energy Studies (CAES) with respect to Form 420.15 was conducted on or about February - March 2010 by Kenneth L. Gilbert, Ph.D., Quality Assurance Engineer at the request of Oren Hester, CAES Deputy Director. At that time it was determined that CAES complied with the requirements necessary for INL employees to conduct work at the facility as it was in concert with Integrated Safety Management principles.

On April 19-20, 2011 the requirements of the form were reassessed by Kenneth L. Gilbert, now BEA subject matter expert over LWP-21220, Work Management. Additional information was now available that the CAES process had significantly added to ISM's principle of "providing feedback and continuous improvement" through providing more information to the user and making requirements more robust.

Clarifications to the above questions are as follows:

Fifth question involving chemicals - Chemical products are purchased through ISU and Uofl and managed through Idaho State University (ISU). Disposal of the same is through ISU, in accordance with ISU waste management procedures.

Sixth question involving technical standards, etc. - This is not an ES&H issue. These are requirements imposed by and on a project or activity by the customer. CAES would have no responsibility over this issue.

Comment [ 1]: This is not an all inclusive list of questions for determining the adequacy of a non-DOE ISMS infrastructure and is provided only as a guideline. Other issues may need to be examined based on the uniqueness of the facility or location. The final decision is made based on the evaluation of whether the infrastructure is adequate to protect workers, equipment, and the environment.

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Seventh question regarding ISM - Although CAES does not use the language of ISM, it is clear that the principles of ISM are adhered to at the facility and fully incorporated into its work management processes.

Ninth question - This is not an ES&H question. This is the sole responsibility of the project/activity and is not a responsibility of CAES. Tenth question - This is not an ES&H question. This is the sole responsibility of the project/activity and is not a responsibility of CAES.

Eleventh question. This is not an ES&H question. This is the sole responsibility of the project/activity and is not a responsibility of CAES.

SUMMARY STATEMENT AND CONCLUSION

CAES file information is available through Kenneth L. Gilbert, Ph.D. Quality Assurance Engineer, LWP-21220 SME verifying the form's content and conclusion. Future projects being submitted for CAES do not require the responsible line manager to perform a Form 420.15 assessment as this review has covered the intent of the offsite work process. This has been done to eliminate redundancy.

Signature;

Responsible Line Manager (Kenneth L. Gilbert, Ph.D. Quality Assurance Engineer/LWP-21220 Subject Matter Expert)

April 20, 2011

Signature

Oren Hester, CAES Deputy Director

April 20, 2011