

Subject: Environmental Management Systems (EMS) Program Review of TJNAF, Causal Analyses for P2 findings

Objective: Complete causal analyses for EMS Program Assessment items P2-001 and P2-002. Use these causal analyses to develop a Corrective Action Plan (CAP) and their subsequent CATS items.

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Methodology: The causal analysis effort was conducted in two 1.5 hour events. The facilitator hoped to maximize the teams' time together, thus the appropriate references were provided, with relevant sections called out.

Findings and Causal Analyses:

P2-001 – EMS, while documented, is not being used as the primary system for accomplishing DOE goals.

DOE Assessment Report text:

A Priority 2 finding was noted regarding overall implementation of the EMS. Based on interviews with staff and review of documents, a general reluctance to participate in the EMS was noted. Staff appeared competent and generally embraced environmental improvement. However, contrary to the contractual implementation requirements and the stated intent of Executive Order 13423, the EMS, while documented, is not being used as the primary system for accomplishing DOE goals at JLab. For example, several environmental improvements are being implemented, but not documented within the framework of the EMS (**P2-001**).

Causal Analysis Determination:

P2-001a

- Why is the JLab EMS system not being used as the primary system?
 - Because E.O. 13423, the main DOE EMS driver, was not considered applicable by JLab personnel.
- Why did JLab consider E.O. 13423 not applicable?
 - Because E.O. 13423 was not considered to be nor communicated as part of JLab's contractual requirements.
- Why was E.O. 13423 not considered / communicated as part of JLab's contract?
 - Because Senior Management determined and communicated that the contractual requirements were fixed as of the contract approval date. This was communicated in general terms to the team. The team worked to this expectation.

P2-001b

- Why are JLab personnel not using the EMS System?
 - Because they don't see the value
- Why don't JLab personnel see the value in EMS?
 - Because EMS and its requirement / sub parts are not communicated adequately throughout the site.
- Why are they not communicated adequately?
 - Because EMS and all subparts are not a single, organized system that's easy to use or understand
- Why are the EMS / subparts not organized or easy to use / understand?
 - Because it follows ISO requirements but is not tailored to JLab's needs or culture.
- How is the EMS not tailored?

The following EMS-specific items are not communicated nor adequately identified for JLab personnel:

- *Expectations*
- *Knowledge of results*
- *Understanding of requirements*
- *Management Priorities*
- *“Individual” Impact*
- *“Planning” vs. “Doing” stages*
- *Training on site*
- *Feedback and incorporation*
- *Document Confusion / Overlap*

P2-002 – JLab has not met the Contract Implementation Action Plan for DOE O 450.1A, pursuant to contract modification A069.

DOE Assessment Report text:

Another Priority 2 finding was identified regarding failure to meet the Contract Implementation Action Plan for DOE O 450.1A, pursuant to contract modification A069. A commitment for full compliance by April 1, 2009 was not met (**P2-002**).

Causal Analysis Determination:

- Why did JLab not meet the requirements of their 450.1A implementation plan?
 - Because due dates for two manual chapters and the EMS plan were not met
- Why were the dates for these documents not met?
 - In the case of procedures, because the review requirements were not well known, understood or followed
- Why were the review requirements not met?
 - Because the requirements changed in November '08 but JLab did not implement these required changes when the actual implementation work was done in April '09.
- Why were they not followed in April '09?
 - Although requirements were known, they were not adhered to / followed up on / were forgotten

- Why was the EMS plan date not met?
 - Because the date change from the Audit CAP was not communicated properly to DOE
- Why was the date not communicated properly?
 - Because the significance level was not properly addressed
- Why the significance level was not properly addressed?
 - Because the significance level was not recognized
- Why was the significance level not recognized?
 - Because this information, with other information, is not consistently organized.
- Why all the information is not consistently organized?
 - **Because a tracking, or Issues Management Tool, for departmental deliverables does not exist.**