



Department of Energy
Thomas Jefferson Site Office
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Newport News, Virginia 23606

January 27, 2010

Dr. Hugh E. Montgomery
President and Laboratory Director
Jefferson Science Associates, LLC
Thomas Jefferson National Accelerator Facility
12000 Jefferson Avenue
Newport News, VA 23606

Dear Dr. Montgomery:

FY 2009 ANNUAL INTEGRATED SAFETY MANAGEMENT DECLARATION AND EFFECTIVENESS REVIEW

Enclosed is TJSO's FY 2009 Annual Integrated Safety Management (ISM) assessment of Jefferson Science Associates, LLC (JSA). The enclosed report has been reviewed by your staff, comments addressed, and copies of the final report previously provided. In summary, we have concluded that ISM is being effectively implemented at the Thomas Jefferson National Accelerator Facility.

The TJSO FY 2009 ISM assessment of JSA outlined areas needing improvement, a few of which are not sufficiently detailed and tracked elsewhere and thus are being highlighted in this letter. Specifically, as discussed on pages 6-7 of the assessment report:

- The Personnel Safety System (PSS): Recent PSS event investigations indicated needed improvement in a variety of areas including work planning, post maintenance testing, and preventative maintenance. However, as discussed in the investigation reports, configuration management (CM) is the central area of concern. As a result, JSA committed to review accelerator systems assurance and sustainability utilizing a high performance work team which we highly endorse (reference CATS No. NE-2009-14). Please ensure the team addresses the following:
 - Previously, TJSO clarified CM expectations via comment 7 of the Safety Assessment Document – Accelerator Safety Envelope TJSO SAD-ASE approval letter dated April 14, 2009. Specifically, the next major revision of the Final Safety Assessment Document is to reflect a commitment to JLab's CM program for credited safety systems. Related events have elevated the importance of addressing accelerator CM. As such, it is our expectation the above-mentioned high performance team will develop a path forward for formal configuration management for all the accelerators' credited controls. I have asked Mike Epps of my office to be fully engaged in the planning and execution of this effort; please ensure the team coordinates with him.
 - Areas of concern, which have previously been conveyed to Lab management, that need to be addressed include: accuracy of as-built drawings, prioritizing systems that need formal and corporate CM, maintaining as-builts (including through the work planning process and change control), periodic CM assessments, training of system owners and users, handling of engineering change notices, post maintenance testing (checklists, etc).

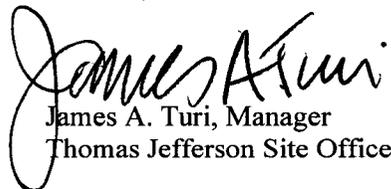
- Lastly, via this letter, TJSO is not formally requiring CM be applied to defense-in-depth controls (as previously required in comment 7 of the TJSO SAD-ASE approval letter dated April 14, 2009).
- The Need for Verification of Implementation of the Accelerator Safety Envelop (ASE): Due to the significant changes to the ASE in the April 2009 revision, I believe it is prudent for JLab, preferably jointly with TJSO, to review implementation of the ASE as indicated in the FY 2010 Integrated Assessment Schedule. At a minimum, the review should verify that ASE requirements and controls flow down to implementing procedures, personnel are properly trained, and the credited controls (both administrative and engineered) are in place, effective, and maintained.
- Concerning progress on the required opportunities for improvement (OFI's) transmitted in the TJSO SAD-ASE approval letter dated April 14, 2009, I am requesting JSA develop a path forward for completion of the OFI's, including a schedule and corporate-level tracking of actions. This plan should be provided to TJSO for feedback by March 1, 2010. It is noted that this due date supersedes the delivery date (i.e., the end of FY 2010) discussed in the last bullet of page six of the attached ISM report.

Looking ahead to next year, the next JSA declaration and effectiveness review will need to be issued no later than August 1, 2010. This is necessary so that the results of JSA's and TJSO's ISM effectiveness reviews are in better alignment with the PEMP process. The next JSA ISM Program Description, if an update is warranted, is due to TJSO by December 31, 2010. Except as noted above, TJSO's expectations regarding annual ISM deliverables have been conveyed to JSA via J. Turi to C. Leemann letter, subject: "Annual Integrated Safety Management (ISM) Expectations and Approval of Jefferson Laboratory ISM Program Description (PD)," dated March 27, 2008. We are in the process of updating the March 2009 letter and will be discussing with your staff.

In integrating safety management into all facets of work planning and execution, two of the guiding principals are: Line Management Responsibility for Safety and Clear Roles and Responsibilities, as such, it is our expectation that the Accelerator and Engineering Divisions line management play a prominent role in the above efforts.

On matters related to ISM, please contact David Luke at extension 7139. For matters related to Accelerator or Accelerator Safety, please contact Mike Epps at extension 5848, or myself.

Sincerely,


James A. Turi, Manager
Thomas Jefferson Site Office

Enclosure

cc w/encl:

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FY 2009 ANNUAL INTEGRATED SAFETY MANAGEMENT DECLARATION AND EFFECTIVENESS REVIEW SUMMARY REPORT

1.0 Executive Summary

In accordance with DOE M 450.4-1, *Integrated Safety Management System (ISMS) Manual*, the Thomas Jefferson Site Office (TJSO) conducted an Integrated Safety Management (ISM) annual effectiveness review of TJSO and Jefferson Science Associates, LLC (JSA) for the Thomas Jefferson National Accelerator Facility (TJNAF). The objective of the review was to provide a “snapshot” evaluation of the overall effectiveness of ISMS implementation.

In summary, the review indicates that Jefferson Science Associates (JSA) and the Thomas Jefferson Site Office (TJSO) are executing an effective ISM Program. Areas of high importance and significant change during FY 2009 include:

- Dramatic increase in 12 GeV Upgrade Project construction activities; preparation for Technology Engineering and Development Facility construction and renovation activities; and ARRA site infrastructure improvement projects;
- Development and implementation of Corrective Action Plans (CAPs) stemming from a 2008 HS-64 health and safety review of TJSO and JSA; and
- Issuance and implementation of a major revision to the Accelerator Safety Envelope.

Areas for improvement remain in each organization; however, there were no implementation gaps or breakdowns that indicate the ISMS programs are not satisfactory.

2.0 Introduction/Background

The effectiveness reviews were conducted using assessment reports of TJSO and JSA, including self-assessments and external assessments related to ISMS. As such, it represents a “look-back” of all events, assessments, operational awareness activities, and trends. This summary report includes two attachments:

- Attachment 1 contains TJSO’s ISM effectiveness review of JSA.
- Attachment 2 contains the ISM effectiveness review of TJSO.

The FY 2009 JSA ISM effectiveness review was submitted to TJSO in the letter H. Montgomery to J. A. Turi, “Annual Integrated Safety Management (ISM) Expectations and Declarations,” dated September 30, 2009. The JSA review concluded that the TJNAF ISM system is effective, based in part by the conclusion of an independent assessment team convened in late 2009: “The team’s overall conclusion is that the ISMS is in place and operating effectively. This conclusion is based on the following key results:

Lab leadership has inspired, built, and upholds a penetrating culture, which nurtures positive ES&H behaviors and practices;

- Management demonstrates a strong, genuine, continuous and personal commitment to ISMS elements;
- The workforce believe that the Lab is a safe place to work and they are responsible for their safety and those around them;
- Performance is being measured and trended consistently and leading to system improvements;
- Mission and operational changes are being properly evaluated and addressed within the ISMS.”

Future opportunities for improvement were identified by JSA:

- Planned trend analysis program improvements will include more targeted analysis for high risk activities, similar to efforts with hand and finger injuries, as well as deeper penetration of trending information to the supervisory workforce;
- Establishing metrics to measure the extent to which lessons learned are benefiting work planning activities;
- Continued development of the Employee Job Task Analysis process to facilitate employee-supervisor interaction to analyze position-specific hazards and establish and track required training;
- Clarification and communication of the issues reporting mechanism(s) and establishing an agreed timeline regarding incident related communication with TJSO; and
- EMS improvements will continue to be a focus area, with an emphasis on refining the revised processes, establishing and implementing appropriate improvement targets, communicating key EMS information to staff, users, and contractors, and improved integration of EMS elements into existing ISMS programs.

The next JSA declaration and effectiveness review is to be submitted no later than August 31, 2010. The next JSA ISM Program Description, if an update is warranted, is due to TJSO by December 31, 2010. Except as noted above, TJSO’s expectations regarding annual ISM deliverables have been conveyed to JSA via J. Turi to C. Leemann letter, subj: “Annual Integrated Safety Management (ISM) Expectations and Approval of Jefferson Laboratory ISM Program Description (PD),” dated March 27, 2008.

3.0 Integrated Safety Management Declaration

TJSO concludes that ISM is being effectively implemented by JSA at Thomas Jefferson National Accelerator Facility (TJNAF); areas needing improvement have been identified and are being addressed. The areas needing improvement are summarized at a high level in the following “Conclusions” section and discussed in greater detail in Attachment 1.

TJSO has reached an overall conclusion that ISM is effectively implemented within the Site Office; areas needing improvement have been identified and are being addressed. The areas needing improvement are summarized at a high level in the following “Conclusions” section and discussed in greater detail in Attachment 2.

4.0 Conclusions

4.1 JSA: ISM is being effectively implemented by JSA at TJNAF. Vulnerabilities identified in FY 2008 that have been deemed to be progressing to adequate performance include:

- JSA training requirements and implementation is undergoing a wholesale process change with the rollout of a new automated job task analysis program.
- High performing aspects of the Laboratory’s ISM program includes an active Operating Experience program that routinely contributes to the DOE lessons learned system.

Areas warranting improvement include the following:

- Transparency of Operations and Contractor Assurance System
- Material Handling Program*
- Accelerator Safety
 - Non-conservative determinations concerning Accelerator Safety Envelope (ASE) violations and Unreviewed Safety Issues (USIs)
 - Reliability of the Personnel Safety System (i.e., safety interlocks, sweep process, etc.)
 - Progress on the actions required from the TJSO SAD-ASE approval letter
 - Verification of implementation of the ASE
- Management of Pressure Vessel Inspection Records
- Fire protection

- Event investigation and reporting program (HSS programmatic Finding)*
- Assessments program (HSS programmatic Finding)*
- Issues management program (HSS programmatic Finding)*

*Effectiveness reviews scheduled for FY 2010 should validate closure of these deficiencies associated with the 2008 ES&H review by HSS.

4.2 TJSO: ISM is being effectively implemented by TJSO. Areas warranting improvement include the following:

- Issues follow-up
- Conduct of effectiveness reviews

ATTACHMENT 1
TJSO EVALUATION OF JSA PERFORMANCE AND ISM SYSTEM EFFECTIVENESS

The Lab's performance in safety, as measured through the lagging indicators of Total Recordable Case Rate (TRC), and Days-Away Restricted Duty (DART), was considered exceptionally good, based on comparison to both DOE goals and general industry performance. The PEMP goals for the TRC rate and DART rate were 0.65 and 0.25, respectively. There were three workplace injury events, inclusive of all workers, during FY 2009, and all were TRC cases. There were no DART cases during FY 2009, which is an exceptional accomplishment worthy of recognition.

The contractor's FY 2009 effectiveness review report identified that ISM is effective at JLab. The contractor identified ISM strengths such as consolidation of the Lab's work planning/control/authorization process with activity hazard analyses, issues management, event investigation & reporting, forklift operations, EMS, the assessments program, and safety metrics. The contractor has identified and scheduled the following opportunities for improvement: targeted trend analysis for high risk activities, establishing metrics to measure the extent lessons learned are benefiting work-planning activities, continued development of the Employee Job Task Analysis process, issues reporting mechanism(s), and EMS improvements.

1. EVALUATION OF CONTRACTOR WORK PLANNING, CONTROL & EXECUTION:

FY 2009 off-normal events: A non-inclusive list of off-normal events, most of which were minor and non-DOE reportable, are itemized below. The following were deemed worthy to mention in this report, as they required ORPS reporting, or were otherwise significant or indicated programmatic weaknesses:

- 10-1-08 – Test Lab electropolish system PLC valve controller error.
- 10-6-08 – Unreviewed Safety Issue. Discovery of Personnel Safety System (PSS) interlock jumper (was not removed after maintenance evolution).
- 10-9-08 – Free Electron Laser (FEL) vault access inconsistency as noted by Personnel Safety System (PSS) operator.
- 1-5-09 – Subcontractor hand burn in kitchen.
- 2-2-09 – Employee fall from ladder on slope – work not suspended, scene not preserved.
- 2-10-09 – Hall C beamline configuration control – ORPS negative but classification not timely.
- 3-19-09 – Injector gun ground lead failure.
- 4-1-09 – Excavated energized legacy electric line in old trailer city lot.
- 4-9-09 – Fire, cigarette butt can at CEBAF Center dock.
- 5-7-09 – Unauthorized access into radiation area by users without dosimetry – no internal notification to JLab ES&H reporting manager.
- 6-19-2009 - FEL left unattended while in Controlled Access.
- 5-8-09 – Unauthorized access into FEL vault by employee and guest without dosimetry.

- 7-24-2009 – Accelerator Safety Envelope (ASE) violation. FEL Waveguide PSS interlock inoperable.
- 8-20-09 – ASE violation. Personnel Entry to BSY and Dropping of PSS. Deficient PSS sweep procedure.

Material Handling: JSA developed and began executing corrective actions to address a material handling Finding issued during an FY08 HS-64 health and safety inspection detailing numerous issues with the JSA forklift program. All corrective action commitments associated with the 2008 HSS ES&H review are on-track and the effectiveness review will be completed in FY 2010.

Accelerator Safety:

- ASE violations: TJSO approved the first major revision to the accelerator’s Safety Assessment Document and Accelerator Safety Envelope (SAD-ASE) on April 14, 2009. Since then TJSO has identified that certain events were either ASE violations or USIs. After the third mis-categorization, TJSO met with ES&H and Accelerator Division personnel to convey concerns over JSA being non-conservative in their determination of ASE violations (i.e., determining whether events and as-found conditions were USIs or ASE violations). Since then, accelerator operations personnel have demonstrated conservative judgment in two recent occurrences, although timely DOE notification is still a problem (i.e., ASE violation of digging permit procedural error). The expectation is that the Laboratory will be able to successfully address both areas in FY 2010.
- Reliability of the Personnel Safety System. The hazards analysis located in the Safety Assessment Document credits the PSS with keeping the probability of many accidents in the “extremely low” category, meaning an accident should occur on average every 10,000 to one million years. However, twice this year both independent channels of safety interlocks at different locations have failed due to loss of configuration control. In one of the events, the only barrier preventing workers from potentially receiving RF burns was an announcement heard by workers that beam was about to enter the North LINAC, where they were working on an open RF waveguide. As discussed below, TJSO recognizes the need for protecting the accelerators’ credited controls, and has mandated configuration management of such in the April 14, 2009 SAD-ASE approval letter. TJSO anticipates progress by JSA in this area in FY 2010, as this is an area of concern.
- Progress on the actions required from the TJSO SAD-ASE approval letter. Eight actions were requested via the DOE SAD-ASE approval letter dated April 14, 2009. The actions were given a three-year lead-time because many require substantial effort (e.g., establishing configuration management for the credited controls). The site office’s expectation is that by the end of FY 2010, the laboratory will have developed a preliminary path forward, including a schedule and corporate-level tracking of actions.

- Verification of implementation of the ASE: Reviews were scheduled twice in FY 2009 that would have reviewed whether the revised ASE was adequately implemented. The reviews were to verify that ASE flow down procedures were updated as needed, personnel trained, and credited controls (both administrative and engineered) were in place, effective, and maintained. As of this date, JSA/TJSO re-scheduling has not occurred. Concerns mentioned elsewhere in this section indicate the value of conducting such a review in FY 2010.

Management of Pressure Vessel Inspection Records. Select stationary compressed gas storage tanks were found to lack pressure vessel inspection records, as required via local policy and 10 CFR 851.

Environmental Management System (EMS). As a result of a review and audit in FY 2009, TJSO has determined that the EMS is adequately integrated into the JSA ISMS Description.

- A joint assessment of the functional area of environmental authorizations was conducted by TJSO and JSA in the first quarter of FY 2009. The assessment focused on management, compliance, and oversight by the contractor and the site office. A significant finding was that the roles and responsibilities of the EMS were hard to differentiate and track.
- In the third quarter of FY 2009, TJSO participated in a validation audit of the TJNAF Environmental Management System. The audit was conducted to assess performance of the activities required by the EMS and to validate that the EMS continued to be implemented as required by the International Organization for Standardization (ISO) 14001, *Environmental Management System Requirements*. In addition, the audit assessed the implementation of Executive Order Requirements that are flowed down to DOE Order 450.1A, *Environmental Protection Program*, and DOE Order 430.2B, *Departmental Energy, Renewable Energy and Transportation Management*. The EMS audit found no major non-conformances. An aggressive corrective action plan was approved and implemented.

Fire protection. On June 30, 2009, TJSO granted extensions to all of the remaining corrective actions stemming from a March 2008 DOE Fire Protection assessment. Although extensions have been granted due to JLab resource loading issues, timely closure of these actions is still an area of concern.

Work planning tools. Continued use of work planning tools was evident, thereby promoting a more unified process of integrating hazard evaluation and ES&H support in work activities. There were repeat instances where it was communicated that Scheduled Accelerator Down (SAD) work activities would not be approved without having a corresponding electronic work plan (e.g., AtLis entry). Such work controls are expected to promote both worker safety, but also overall efficiency.

Trending: Through the Laboratory's quarterly trend analysis efforts, JSA determined that an excessive number of hand and finger injuries comprised the overall number of injuries

being recorded (both reportable and non-reportable). JSA's conclusion is consistent with TJSO's FY 2008 ISM Effectiveness review trending analysis on this matter. Resultantly, JSA sent out several different notices through different forums, alerting the general laboratory population to focus on prevention of hand and finger injuries through better work planning and use of PPE. The Site Office believes the JSA trend analysis and notification approach was appropriate.

The information below was extracted from Site Office assessment records in ORION. Site Office assessment activities and findings (issues) during FY 2008 and FY 2009 are furnished for relative comparison.

- Functional Areas evaluated that were found to have seemingly healthy programs:

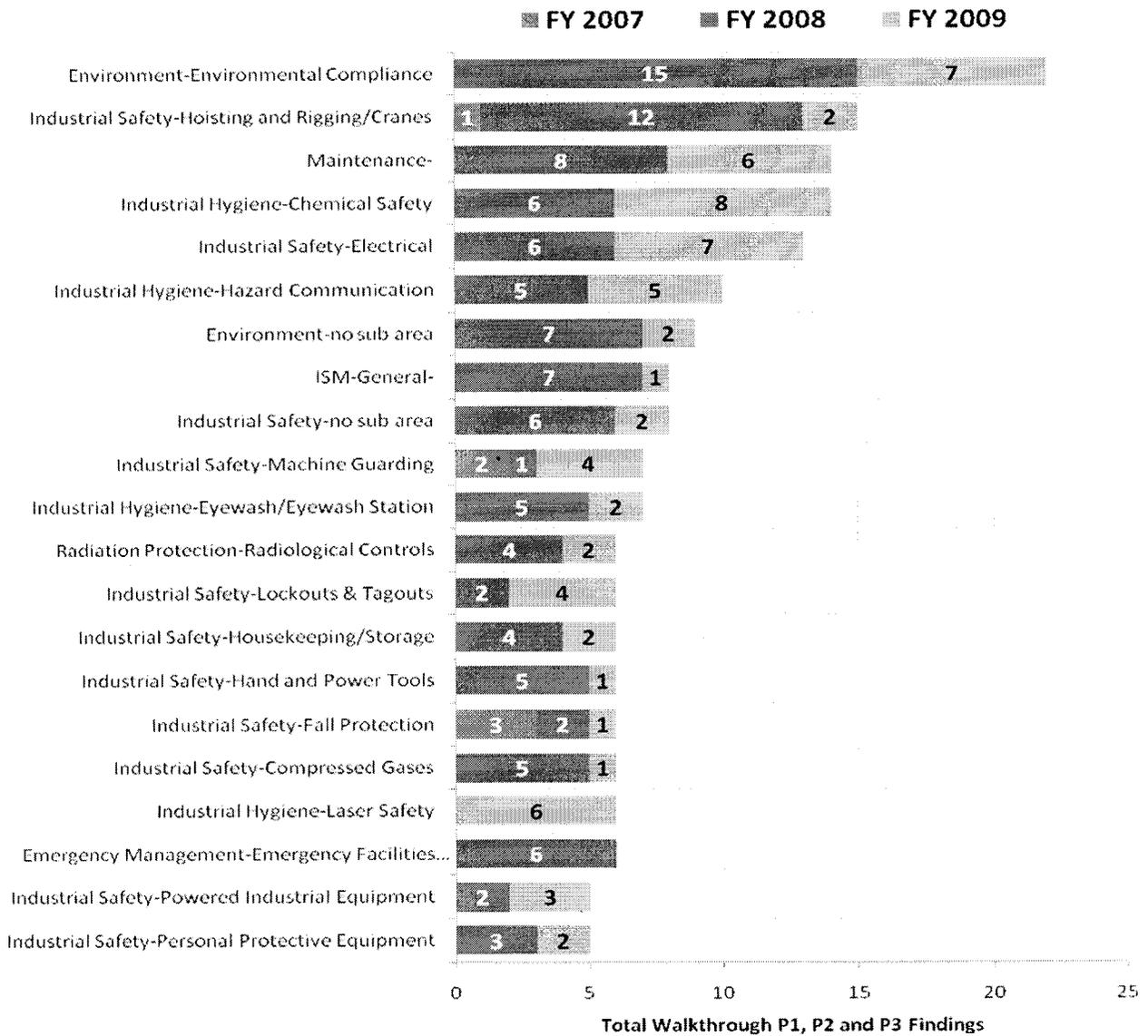
- Project Management (58 walkthroughs with 1 P-3 issue)*
- [2008 Project Management performance = 36 walkthroughs with 1 issue]
- Safeguards and Security/ISSM (5 walkthroughs with 0 issues)
- [2008 S&S performance = 35 walkthroughs with 0 issues]
- Conduct of Operations (10 walkthroughs with 2 P-3 issues)

*Does not include nineteen issues identified during a fire protection design review of TEDF project (30% design) and 12 GEV project (100% design) in August 2009.

- Functional Areas evaluated that were found to have largest number of Findings (none of these are considered significant at this time):
 - Industrial Safety (25 P-2s, 31 P-3s, 5 proficiencies)
 - Industrial Hygiene (5 P-2s, 26 P-3s, 3 proficiencies)
 - Environmental (2 P-2s, 18 P-3s, 7 proficiencies)
- While there was a relative up-tick in the number of IH/Laser Safety findings (FY 2008 = 0, FY 2009 = 6), there were no trends identified which are deemed significant enough to prompt "for cause" reviews in 2010.

The following table graphically illustrates those functional areas that have received the most TJSO Findings identified during walkthroughs. No conclusions have yet been drawn from the data.

Most Frequent Walkthrough Findings–Functional Sub-Areas Drilldown: FY 2007-FY 2009



2. EVALUATION OF JSA'S CONTRACTOR ASSURANCE SYSTEM (CAS):

Summary: Overall performance of JSA's Contractor Assurance System in FY 2009 is acceptable. Incremental improvements have been seen in aspects that support the CAS such as assessment planning. Upon reviewing the Lab's self-assessment of a QA procedure implementation, the Site Office found the assessment process to be executed in accordance with internal protocol, performed by qualified personnel, and the disposition of issues were processed in a manner considered commensurate with the significance. It is considered important that the Lab continue to promote awareness of its assessment procedures to sustain the use of qualified assessors, and ensure consistency and value-added outcome from these assessment activities. While the overall state of the Lab's CAS is deemed adequate, there were events and conditions where CAS performance did not meet expectations, and merit discussion and consideration for future improvement. These discrepancies have been documented in CAS performance during the rating period, and feedback has been systematically provided to the Lab when identified. JSA trending analysis is discussed in section 1. The Office of Science and contractors are evaluating improvements to CAS; accordingly, it is anticipated that TJSO and JSA will be collaborating in FY 2010 in revising the TJNAF CAS process.

In FY 2008, an HS-64 health and safety inspection provided an in depth analysis of CAS at TJNAF. As a result of this review, most CAS efforts in FY 2009 were focused on addressing three large, programmatic in nature, Findings and their causes.

Transparency of CAS/Operations: CAS transparency is an area warranting continued attention. Specific examples encountered during the year include: not being invited to a critique, pre-critiquing an event (holding an internal meeting prior to the fact-finding critique), and delays in conducting a critique. DOE notification and invitation to timely critiques is a basic expectation that DOE has of contractors, as TJSO is charged with ensuring events are thoroughly analyzed, the correct causes are identified, and appropriate corrective actions are assigned.

Event investigation and reporting.

- FY 2008 HSS Finding D-4: "TJNAF has not established sufficient processes nor implemented a fully effective event investigation and reporting program that rigorously identifies, investigates, reports, and prevents the recurrence of ES&H-related events and injuries..."

In FY 2009, benchmarking and subsequent corrective actions were generated. Draft procedures are in the review and approval process, to be followed by implementation and, lastly, an effectiveness review. TJSO has reviewed with comment all deliverables to date. All TJSO comments have been addressed and the effectiveness review is scheduled for FY 2010.

- Key JSA staff attended on-site ORPS and CAIRS training organized by TJSO. The training focused on classifying and reporting injuries and events, and obtaining practical experience in conducting query and sort routines within these DOE databases, thereby improving JSA's ability to monitor or detect trends.
- Causal Analysis and Corrective Action Plan (CAP) Development: Causal analysis is maturing and warrants continued attention. At least one instance arose during FY 2009 that warranted the Site Office to reject the Laboratory's initial CAP, as the plan lacked adequate interim control measures and contained unsupportable suspense dates to close some actions. Causals and CAPs may be improved by discussing the matters with the Site Office before official submissions. There were four DOE formal assessments last year, and TJSO was invited to only one of the Laboratory's subsequent causal analysis reviews.

Assessments Program.

- FY08 HSS Finding D-2: "The JSA assessment program is not fully effective to provide sufficient frequency, scope, and rigor and assurance of the adequacy of safety programs..." All identified corrective action commitments associated with finding D-2 are on track, and the effectiveness review is scheduled for FY 2010.

Issues management.

- FY 2008 HSS Finding D-3: "The TJNAF issues management program is not fully effective in ensuring that ES&H-related events, injuries, conditions, and program and performance deficiencies are rigorously categorized, analyzed, and corrected, and recurrence controls are established..." In FY 2009, benchmarking and subsequent corrective actions were generated. Draft procedures are in the review and approval process, to be followed by implementation and lastly an effectiveness review. TJSO has reviewed with comment all deliverables to date. All TJSO comments have been addressed and the effectiveness review is scheduled for FY 2010.
- During the fiscal year, the Site Office provided direction to the Laboratory that TJSO closure concurrence would be necessary for P-1 and P-2 findings issued to the Laboratory by the Site Office. This action was taken due to isolated, but repeat instances when the Laboratory prematurely closed-out actions or changed the terms of closure. The Site Office has still encountered instances where the closure of CATS findings by the Laboratory is not supported by objective evidence. This is an area warranting continued attention. The Site Office will continue to monitor the Laboratory's performance on closing corrective actions in a manner commensurate with the significance of the issue.

The Site Office is appreciative of the Laboratory's efforts to automate notifications when corrective actions are ready for TJSO closure verification. It is important that feedback be provided to the Site Office on the closure verification process to ensure our mutual interests are being met.

- At least one example was found in Laboratory's Safety Observation system that indicated lack of follow-up to a "Stop Work" situation for an immediately dangerous condition. Had the event been properly reported and processed, it would have required a Notable Event Investigation, ORPS classification, causal analysis, corrective action plan, etc. Background: TJSO reviewed a random sample of entries in the Safety Observation System and noted a Stop Work condition that was initiated by a Jefferson Laboratory employee for subcontractor work. The unsafe act was identified after work activities had been initiated, and described a Lock-out/Tag-out non-compliance in the midst of an open, energized electrical panel. While the field intervention taken by the observer was prudent, Stop Work events such as this are clearly outside the intended scope of the Safety Observation System, as defined in the protocol document that accompanies the on-line portal to the Safety Observation System. Stop Work events are to be processed using the instruction in Chapter 3330 of the Laboratory's ES&H Manual, and trigger follow up such as causal analysis review, corrective action plans, and screening for DOE Occurrence Reporting. Based on this instance, the Laboratory should consider refreshing the awareness of personnel using the Safety Observation System, so users understand its scope and limitations; furthermore, personnel screening these entries should be sensitized to look for events and actions that warrant additional hazard mitigation and reporting consideration.

Lessons Learned Program. Considerable contributions were made by JSA to the DOE-wide Lessons Learned/Operating Experience database and leadership was demonstrated during DOE's monthly Operating Experience Coordinator's forum. While the utilization of lessons learned information in work planning, which is the ultimate goal, still has room for maturation, there are clear indications that progress is being made to address the challenges of linking different electronic systems to this end.

The Laboratory's contributions to the DOE-wide Lessons Learned/Operating Experience database has greatly surpassed the PEMP benchmarks, and the recent volume of Lessons Learned submissions to DOE's Lessons Learned database (9 items) rivals that of most large, multi-program sites. Jefferson Laboratory's representation within DOE's Operating Experience community is likewise remarkable and demonstrates leadership among peers. Jefferson Laboratory has become a reliable source of information for the group, often initiating questions and relevant discussions that would otherwise go unaddressed. DOE HS-32, which serves as the focal point for the DOE Lessons Learned system and facilitates exchanges among the OPEX Coordinator community, has repeatedly voiced appreciation for Jefferson Laboratory's contributions, and often directs inquiries from other program offices to consult with the Jefferson Laboratory OPEX Coordinator for ideas and examples of OPEX best practice. This is a source of great credit to the Laboratory, and is fully appreciated by the Department.

3. EVALUATION OF THE ISM PERFORMANCE BY CONTRACTOR AGAINST THE FY 2009 PERFORMANCE EVALUATION MANAGEMENT PLAN (PEMP):

The balance of safety related performance tied to specific PEMP measures was likewise good, as reflected by the fact that there were no significant environmental releases or injuries.

4. EVALUATION OF THE CONTRACTOR ISMS DESCRIPTION:

JSA has not indicated the need for any further changes other than administrative. TJSO has reviewed the JSA ISMS Description and no significant opportunities for improvement were noted.