



SRS Citizens Advisory Board

Risk Management Working Group - Team A

Meeting Summary

November 17, 1999
District Office of DHEC
Aiken, SC

The Citizens Advisory Board (CAB) Risk Management and Future Use (RM&FU) Subcommittee Team A of the Risk Management Working Group met on Wednesday, November 17, 5:00 p.m., at the District Office of the Department of Health and Environmental Control (DHEC), Aiken, S.C. The purpose of the meeting was to review the risk analysis used in the Occupational Safety and Health Act (OSHA). Those attending the meeting were:

Stakeholders

Jennifer Hughes, DHEC
Jerry Devitt
Todd Crawford

DOE/Contractors

Roger Rollins, DOE
Jerry Nelsen, DOE
Steve Thomas, WSRC
Steven Jahn, WSRC
Kevin Smith, WSRC
Jim Moore, WSRC

Jennifer Hughes, Team A Lead, welcomed those in attendance, asked them to introduce themselves and reviewed the agenda. She introduced Steven Jahn, WSRC, to present the risk analysis used in OSHA at SRS.

Mr. Jahn explained that OSHA has an established rule making process. OSHA looks at a hazard, say a chemical that has produced illness in people, and establishes Permissible Exposure Limits (PEL) for that chemical. OSHA started in 1970. Since they were new, they looked to the National Institute of Occupational Safety and Health (NIOSH) and the American Conference of Governmental Industrial Hygienists (ACGIH) to develop their initial PELs. OSHA has since tried to update their standards, but the court vacated the effort. Effectively, only the 1970's standards are enforced. However, there have been a few emergency standards issued for a few substances, such as methylene chloride.

The NIOSH regulations are for the protection of people, while OSHA not only protects the people, but the standards must be legally enforceable. If the OSHA standard can't be measured, then the standard is no good.

DOE Order 440.1A establishes the WSRC responsibility for complying with OSHA or the ACGIH limits, whichever is more restrictive. The DOE Order makes the ACGIH standards enforceable at DOE sites whereas they are not enforceable in the commercial world. The WSRC role with respect to OSHA is to establish controls and assess exposures to assure compliance with the standards.

Mr. Jahn explained that at the site, no matter what area of work is reviewed, the same process is used when reviewing the safety factors. The process is the Integrated Safety Management System. The steps

in that system are (1) define the scope of work, (2) analyze the hazard, (3) develop/implement controls, (4) perform the work and (5) look at the feedback/improvement.

There was much discussion on the imperfections of the development of OSHA standards and the conflicts between commercial industrial hygienists and OSHA/ACGIH.

Ms. Hughes asked the members of Team A their opinion on the format of the final report that would be submitted to the CAB. It was felt that the final product should be a broadly based educational document rather than a how-to-do document. The goals and mission should be included along with the matrix and supplemental page as attachments. The final report should not be too long, too detailed, or too technical. It was determined that Todd Crawford would reissue the outline he previously developed incorporating the comments from this meeting.

In reviewing the path forward, it was decided that the December 8 meeting would include the permitting review as well as the Recap/Main Point discussion moved up from the January meeting. Consequently, the February and March subjects will be moved to January and February. Mr. Crawford said he would have the matrix and definitions available for the December meeting.

With no other comments, the meeting was adjourned.

Meeting handouts may be obtained by calling 1-800-249-8155.