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CP3-HS-2009 **FRev. 2**	**TITLE**: Stop/Suspend Work	Page 1 of 11

DOCUMENT CATEGORY: ☒ Administrative ☐ Technical

LEVEL OF USE: ☒ Information Level ☐ Reference Level ☐ Continuous Use

FUNCTIONAL AREA: Health, Safety, Security & Quality **SUBJECT MATTER EXPERT**: Safety and Health	**SUBJECT MATTER EXPERT**: Darryl Pea, Safety and Health
NUCLEAR SAFETY REVIEW DOCUMENTATION: FRNP-19-0195-D	**APPROVED BY/DATE**: (Signature on file) Rich Rhoads, Safety and Health Program Manager 3/26/19
REQUIRED REVIEW DATE: (or expiration date for temporary change) 3/26/2022	**EFFECTIVE DATE**: 04/01/19

REVISION/CHANGE LOG

Revision/Change Letter	Description of Changes	Pages Affected	Date of Revision/Change
FR0	Initial Release	All	10/20/2017
FR1	Non-intent Changes to Remove From Bluesheet	All	12/07/2017
FR2	Revise to address AI-0002341, Section 4.0 has been revised to refer to Section 6.0 for roles and responsibilities. Use of Work Pause has been included in the procedure. Procedure formatted to align with other implementing procedures.	All	3/26/19

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This document provides instructions for stop work (see definition) (imminent danger to workers, public, or the environment) and work pause (see definition) (possible unsafe condition). See definitions in Appendix A, *Acronyms/Definitions*. This procedure meets the intent of CP2-HS-1000, *Integrated Safety Management System Description*.

1.2 Scope

This document applies to all PGDP D&R employees and subcontractors performing work on-site or off-site where that work is believed to pose imminent danger to workers, public, or the environment and work pause (possible unsafe condition).

The Paducah Gaseous Diffusion Plant (PGDP) Deactivation and Remediation (D&R) Contractor Health, Safety, Security & Quality (HSS&Q) organization has organizational ownership and maintenance responsibility for this procedure. The approval authority for this document is the Safety and Health Program Manager.

EXCEPTIONS:

This procedure does **NOT** address situations when Department of Energy (DOE) has stopped work.

This procedure is **NOT** applicable in situations where re-start actions are identified in work controls, permits or procedures. An example of this would be where limiting conditions have been exceeded in a Radiation Work Permit (RWP).

2.0 REFERENCES

2.1 Use References

- CP1-EP-1000, *See and Flee Policy*
- CP1-HR-0131, *Employee Concerns*
- CP3-OP-2024, *Initial Incident/Event Reporting*
- CP3-QA-3005, *Occurrence Reporting*
- CP3-QA-3008, *Fact Finding*

2.2 Source References

- CP2-HS-1000, *Integrated Safety Management System Description*
- CP2-HS-2000, *Worker Safety and Health Program*
- CP2-QA-1000, *Quality Assurance Program Description*

3.0 COMMITMENTS

None

4.0 RESPONSIBILITIES

Responsibilities are outlined in Section **6.0**.

5.0 GENERAL INFORMATION

5.1 This document applies to the cessation of any work, activity, or process that jeopardizes personnel safety or health (imminent danger hazard) or that has the potential for significant insult to the environment.

5.2 Authority to stop or pause work is extended to all PGDP D&R Contractor personnel and subcontractors. Without fear of reprisal and/or retaliation, workers are encouraged to approach all work with a high degree of inquisitiveness and to satisfy themselves that it is safe to proceed.

5.3 Visitors to the PGDP are also encouraged to exercise stop work authority if they feel that the activity or operation in question is posing an imminent danger to the workers, public or environment.

5.4 PGDP D&R Contractor employees have the right and responsibility to report concerns relating to environment, safety, health, security, Equal Employment Opportunity/Affirmative Action (EEO/AA), harassment, ethics and other issues through CP1-HR-0131, *Employee Concerns*.

5.5 This procedure should **never** be used to address work jurisdictional issues or other non-safety related purposes.

5.6 DOE Facility Representatives will stop work according to DOE-STD-1063-2017, July 2017.

5.7 The Notification of Employee's Rights, listed in this procedure are implemented through posting of DOE Worker Protection posters, which are located in areas commonly occupied by workers. The poster also informs employees of how to submit concerns or inquiries.

5.8 Issues outside the PGDP D&R Contractor scope of responsibilities are forwarded to the appropriate contractor or DOE organization for disposition.

5.9 When stop work is invoked, there are very specific implications associated with restart authority and Occurrence Reporting and Processing System (ORPS) reportability; Stop Work is a very serious action, and is **NOT** to be taken lightly. See CP3-QA-3005, *Occurrence Reporting.*

6.0 INSTRUCTIONS

NOTES:

Anyone may declare a work stoppage that poses imminent danger to workers, public, or the environment without the fear of reprisal and/or retaliation.

For conditions that do **NOT** involve an imminent danger but involve an unsafe condition, utilize Section **6.3**, *Work Pause,* or Section **6.5***, Informal Work Pause,* is referenced as an alternate method of suspending work activities.

The Supervisor may make the prompt notification to the PSS on behalf of the employee performing the notification as soon as practical and **NO** later than 15 minutes after notification of an event.

Alarm notifications include:

- CP1-EP-1000, *See and Flee Policy*, is followed for chemical and/or radiological releases.
- Immediate evacuation for Criticality Accident Alarm System (CAAS) or Continuous Air Monitor (CAM) Alarms, etc.

6.1 Stop Work

Employee

6.1.1 Promptly report all work related events to the Supervisor and the PSS according to CP3-OP-2024, *Initial Incident/Event Reporting*.

NOTE:

Delayed egress to place work in a safe condition is **NOT** a priority, in the event that risk to self-preservation or notification of co-workers is jeopardized.

6.1.2 At first indication (such as, alarm notification) of a condition posing imminent danger/emergency to site personnel or the environment, perform the following:

A. Take immediate, necessary actions to stop work.

B. **If** harm to personnel safety is imminent and immediate, **then** exit work area. Otherwise place work in a safe condition and preserve the scene.

6.1.3 Contact the PSS by performing one of the following for emergencies and/or imminent danger to personnel or environment:

A. Use Radio – turn knob to position 16; call for Alpha 1. State “Emergency Traffic, Emergency Traffic.”

B. Pull Fire Alarm Pull Box (Caution – **NOT** for reporting a hazardous materials release).

C. Call PSS Emergency Phone - 333 (Bell) or 555 (PAX).

D. Call PSS Office - 6211, STATE “This is an Emergency.”

E. Call from a cell phone (270) 441-6333.

F. Notify Facility Manager (FM), Local Emergency Director (LED), or Warden.

6.1.4 **If** warranted, **then** direct evacuation **and** warn others **NOT** to enter the subject area, based on the severity of the issue causing a declaration of stop work.

6.1.5 Immediately notify Supervisor and/or FAM of the stop work and of any issue or event that precipitated the need for stop work.

6.1.6 Provide information to Supervisor and/or FAM as to the issue severity, number of personnel involved, and condition in which the job site was left.

Supervisor

6.1.7 Make notifications to the PSS **and** preserve the scene according to CP3-OP-2024, *Initial Incident/Event Reporting.*

6.1.8 **If** stop work is initiated, **then DO NOT** implement interim control measures.

6.1.9 Complete CP3-HS-2009-F01, *Stop Work/Work Pause*, **and** provide copy to PSS.

Functional Area Manager (FAM)

6.1.10 Initiate a fact finding meeting to determine the timeline of events, root, and contributing causes according to CP3-QA-3008, *Fact Finding*.

PSS

6.1.11 Take action(s) according to CP3-OP-2024, *Initial Incident/Event Reporting.*

FAM

6.1.12 Discuss concern(s) with the affected employee(s) **and** evaluate feedback.

6.1.13 Develop an action plan for resumption of work.

6.1.14 Discuss action plan for the concern (for example, corrective action) with affected employees, Senior Management, PSS, **and** obtain concurrence.

6.1.15 Obtain DOE concurrence.

6.2 Resumption of Stop Work

FAM

6.2.1 **When** the path forward is determined, work with the affected organizations to complete planned actions (for example: make necessary changes to work control documents or procedures).

6.2.2 Complete Actions Required/Completed to Restart Stop Work/Work Pause section of CP3-HS-2009-F01 **and** provide updated copy of form to PSS each time revised or completed.

6.2.3 Evaluate actions taken in coordination with impacted parties; to ensure work may be safely resumed.

Employee

6.2.4 Meet with supervisor to discuss actions taken to resume work safely and provide feedback.

Supervisor

6.2.5 **If** the work control document(s) or Job Hazard Analysis (JHA) are revised, **then** promptly re-brief) prior to restart of the activity regarding the changes made to correct and/or mitigate the unsafe condition.

6.2.6 Document that the affected employees were promptly briefed on the actions taken to resume work safely and feedback was solicited.

6.2.7 Resume work once FAM concurs that planned corrective actions are complete for restart.

6.2.8 Obtain FAM's and other required re-start approvals, as necessary.

6.2.9 Restart work.

6.3 Work Pause

NOTES:

A Work Pause may be declared if planned actions could result in the degradation of safety or health, or if performance of steps in a work package or procedure cannot be performed as stated and may result in an unsafe condition.

A Work Pause is less formal than a Stop Work; however, Senior Management, FAM, PSS, and DOE are made aware of the work pause event.

Anyone may declare a work pause for safety reasons.

The Supervisor may make the prompt notification to the PSS on behalf of the employee performing the notification as soon as practical and **NO** later than 15 minutes after notification of an event.

Employee

6.3.1 Promptly report all work related events to the Supervisor and/or PSS according to CP3-OP-2024.

6.3.2 **If** possible, **then** place the operation or activity in a safe condition **and** preserve the scene.

Supervisor

6.3.3 Notify the PSS of work related event and initiation of work pause, **and** preserve the scene according to CP3-OP-2024.

6.3.4 Complete CP3-HS-2009-F01, *Stop Work/Work Pause,* **and** provide a copy to the PSS and FAM.

6.3.5 Initiate a discussion with the work crew and other affected parties to determine resolution of the concern **and** evaluate feedback.

6.3.6 Develop an action plan for resumption of work.

6.3.7 Discuss action plan for the concern (for example, corrective action) with affected employees, Senior Management, PSS, **and** obtain concurrence.

6.4 Resumption of Work Pause

NOTE:

The following actions must be taken prior to restarting activities affected by the initiation of a Work Pause.

FAM

6.4.1 **When** the path forward is determined, work with the affected organizations to complete planned actions (for example: make necessary changes to work control documents or procedures).

6.4.2 Complete Actions Required/Completed to Restart Stop Work/Work Pause section of CP3-HS-2009-F01 and provide updated copy of form to PSS each time revised or completed.

6.4.3 In coordination with impacted parties, evaluate actions taken to ensure work may be safely resumed.

Employee

6.4.4 Meet with supervisor to discuss actions taken to resume work safely and provide feedback.

Supervisor

6.4.5 **If** the work control document(s) or Job Hazard Analysis (JHA) are revised, **then** re-brief the worker(s) prior to restart of the activity regarding the changes made to correct/mitigate the unsafe condition. Document re-briefing on applicable brief sheets and encourage feedback.

6.4.6 Document that the affected employees were briefed on the actions taken to resume work safely and feedback was solicited.

6.4.7 Resume work once FAM concurs that planned corrective actions are complete for restart.

6.4.8 Obtain FAM's and other required re-start approvals as necessary.

6.4.9 Restart work.

6.5 Informal Work Pause and Resumption of Work

NOTES:

Work pause events that are deemed “Informal” by the Supervisor can be resolved through discussion and communication within the group and affected personnel.

Observations/Events requiring Informal Work Pause can be reported either written or verbally communicated by the employee to the supervisor or documented using CP3-HS-2009-F01.

Employee

6.5.1 Promptly report all work related events to the Supervisor according to CP3-OP-2024.

6.5.2 **If** during the course of conducting work, it is determined that planned actions could result in a degradation of safety or if steps within a work package or procedure **CANNOT** be performed as written, **then** initiate an Informal Work Pause with the supervisor.

Supervisor

6.5.3 Determine resolution of the concern with affected parties **and** communicate planned actions to be taken.

6.5.4 Inform all affected parties of the resolution.

6.5.5 Document that the affected employees were promptly briefed on the actions taken to resume work safely and feedback was solicited utilizing CP3-HS-2009-F01.

6.5.6 Resume work.

7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

CP3-HS-2009-F01, *Stop Work/Work Pause*

Forms are to be completed in accordance with CP3-OP-0024, *Forms Control*.

7.2 Records Disposition

The records are to be maintained in accordance with CP3-RD-0010, *Records Management Process*.

Appendix A – Acronyms/Definitions

ACRONYMS

CAAS – Criticality Accident Alarm System

CAM – Continuous Air Monitor

D&R – Deactivation and Remediation

DOE – U. S. Department of Energy

EEO/AA – Equal Employment Opportunity/Affirmative Action

FAM –Functional Area Manager

HSS&Q – Health, Safety, Security and Quality

JHA – Job Hazard Analysis

LED – Local Emergency Director

ORPS – Occurrence Reporting and Processing System

PGDP – Paducah Gaseous Diffusion Plant

PSS – Plant Shift Superintendent

RMDC - Records Management Document Control

RWP – Radiological Work Permit

S&H –Safety & Health

DEFINITIONS

FUNCTIONAL AREA MANAGER (FAM) – For the purposes of this procedure, the FAM fulfills the responsibilities of the Facility Manager as defined in DOE O 232.2A. The FAM serves as the individual, or designee, with direct line responsibility for operation of a facility or group of related facilities, including authority to direct physical changes to the facility. A FAM could also be responsible for a program or activity (Functional Manager).

Event – For the purpose of this procedure, shall be an inclusive term, that includes work-related events that result in personal injury or illness, government property damage (including all PIT, golf/utility cart, and motorized/non-motorized vehicle accidents), accidents, incidents, environmental spills or releases, precursors, near misses, programmatic or regulatory requirement non-compliances, or other abnormal conditions that occur during the course of the D&R Contractor work activities at PGDP or Informal Work Pause.

IMMINENT DANGER CONDITION/CONCERN - any conditions or practices in any place of employment which are such that a danger exists which could reasonably be expected to cause death or serious physical harm "immediately" or before the imminence of such danger can be eliminated through the enforcement procedures.

Appendix A – Acronyms/Definitions (Continued)

INFORMAL WORK PAUSE - Declared during the course of conducting work if planned actions could result in the degradation of safety or health or if performance of steps in a work package or procedure cannot be performed as stated. Informal Work Pause events are minor in nature but should be addressed in a timely manner generally within the organization declaring the Informal Work Pause

REPRISAL/RETALIATION - Any action taken against an employee in response to, or in revenge for, the employee having raised, in good faith, reasonable concerns about any aspect of DOE-related operations. Reprisal/retaliation against FRNP employees and any of their subcontractors may lead to the imposition of penalties under the Price-Anderson Amendments Act of 1988 (Pub. Law 100-408; August 20, 1988), Implemented by DOE under 10 CFR Part 20 (Part 820), Pursuant to Part 820, to the extent a reprisal by a DOE contractor results from an employee's involvement in matters of nuclear safety in connection with a DOE nuclear activity, the reprisal could constitute a violation of a DOE Nuclear Safety Requirement.

RESOLUTION OF A CONCERN - Actions taken and decisions made that respond to the concern by verifying the concern and established plans to correct identified deficiencies, correcting the deficiencies, or determining the concern is not substantiated and no corrective action is required.

SENIOR MANAGEMENT - Managers of functional organizations that report directly to the Project Manager.

STOP WORK – Declared if a situation poses an imminent danger to the safety of workers, public, stakeholders, visitors, other site tenants, or the environment.

WORK PAUSE – Declared if situation poses no imminent danger, but requires an interruption of planned work activities/actions that could result in the degradation of safety or health, or if performance of steps in a work package or procedure **cannot** be performed as stated and may result in an unsafe condition. Work Pause may be referred to as Suspended Work.