ONTARIOPOWER GENERATION

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N-FORM-10134-R003*

Barrier Analysis Worksheet

Adverse Condition	Barrier(s) that should have precluded Condition	How the Barrier Failed	Why(s) the Barrier Failed
Confusion in preparing vendor PJB and notification forms	a) Process (Administrative Procedures) b) Personnel Awareness & Communications	a) The process for notification of site walkdowns and what was required to be documented for OPG was unclear. The vendor PJB process was also being utilized, which added another layer into the notification process. Responsibilities for who provided the PJB to the vendor staff attending the walkdown was also unclear. b) (1) The vendor staff attending the process had not yet gone on a walkdown at OPG so they were unfamiliar with the notification process. The notification process was rolled-out to the site reps, however this was not communicated down through the line. The vendor staff attending the walkdown were subcontracted, so they were also unfamiliar with the vendor PJB process. b) (2) Multiple individuals on the vendor side were involved with the completion of the form, and guidance was sometime provided with an incomplete picture of the situation.	a) (1) The process for notification of site walkdowns has been under development and has gone through a few iterations as the details have been worked out. No process existed previously. a) (2) The vendor PJB process is a requirement of the vendor company. The responsibilities and process of how the Field Level Risk Assessment (FLRA) and pre-job brief have been discussed and it is understood where in the OPG notification process this fits in. a) (3) The person providing pre-job briefs under OSHA must be a supervisor or delegate. It was unclear at the time whether the vendor site rep could be considered the supervisor providing a pre-job brief. This was not a specific responsibility of the vendor site rep. This responsibility has since been assigned to a single person within the vendor organization. b) (1) The subcontracted vendor staff were unfamiliar with the process and were attempting to complete the forms. Guidance was unclear since multiple indivduals were involved in the process. b) (2) It was unclear who had responsibility for each of the forms and who to seek clarification from for questions. Although the responsibility for different parts of the process lies with different individuals, ownership for these responsibilities is now defined. The site rep is responsible for the notification, while another vendor indivdual is responsible for the PJB and FLRA forms.

*Associated with N-STD-RA-0008, Incident Investigation

The process for walkdown notifications and pre-job briefing took a great deal of time and did not appear to support the task in a timely manner	a) Process (Administrative Procedures: Pre-Notification of Site Walkdowns at Station Expectatons)	a) (1) The number of steps in the process and number of individuals involved (i.e. walkdown particpants, vendor site rep plus additional vendor individuals for PJB & FLRA, OSS CA, CMO office, project manager) can require a great deal of coordination if there is confusion or additional information is provided to indivudals that do not require it. a) (2) The lead time to provide such information does not allow for timely walkdowns. (i.e. minimum 24 hours advanced notice to the CMO office and confirmation of reciept from the CMO office)	a) (1) The number of steps appears necessary to show due dillegence as an extended employer under OSHA. By providing forms to the correct necessary individuals, the amount of OPG resources involved in the process will be reduced. a) (2) The number of vendor walkdowns that are "urgent" at this stage of the project should be minimal. In these rare circumstances, the advanced notice requirements can be accomodated provided the CMO office confirms notification and can supply current field conditions. The vendor will still need to supply a timely PJB to their staff. For those walkdowns contingent on maintenance or radiation support that may change based on daily work activities, walkdown notification should be provided for the most likely date this will occur. If this date changes, then CMO office approval and will need to be obtained and the notification revised to reflect the new walkdown date as soon as this is known.
Confusion regarding the process and sign-offs required for obtaining TLDs and the length of time it takes to have a TLD issued.	a) Procedural (N-PROC-RA-0010 & N-FORM-10019) b) Communications with Rad Data Personnel	a) N-FORM-10019 asks for the OPG Supervisor/ Sponsor signature in Part B. N-PROC-RA-0010 states a facility sponsor must sign, which in the definitions section, clarifies that this must be a person whose primary work location is at the Nuclear facility. b) Information regarding the typical length of time the process takes and information regarding how to complete specific portions of the form were not provided to the extent needed.	a) This is a unique situation for vendor staff working on the Refurbishment project. Per the definitions section of N-PROC-RA-0010, the responsible refurbishment section manager or project manager cannot sign as a facility sponsor. The CMO office has agreed to take on this responsibility. b) Email communication did not provide all the information desired. Rad Data personnel were unavailable to respond to phone calls for more timely communication.

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