

PROCEDURE BULLETIN—TEXAS CITY PLANT

P-0112

PLAINTIFF'S EXHIBIT

MON-764

INJURY, ILLNESS, AND NEAR-MISS INVESTIGATION AND REPORTING

I. PURPOSE

It is the purpose of this bulletin to define the various classifications of injury or illness severities, to describe the procedure for reporting an injury or illness, and to provide for the investigation of those incidents resulting in injury or illness. Near-miss accident and incident investigations and reporting are also included.

II. POLICY

Any death, injury (no matter how small), or illness suffered by an employee which arises out of and in the course of his employment, must be reported immediately for treatment and investigation.

III. SCOPE

This procedure applies to all employees at the Texas City location. A similar procedure applies to injuries occurring to contractor employees (see P-0113). The classifications of injury or illness severity are as follows:

A. First-Aid Cases

These cases involve any injury which requires first aid or medical attention of any kind but is of such minor nature that it does not meet the criteria of other injury classifications.

B. Recordable Injury or Illness

Any injury or illness suffered by an employee which arises out of and in the course of his employment, while working on or off the Company premises, is recordable if it results in death, loss of consciousness, reduction of work or motion, diagnosed occupational illness, transfer to another job, or requires medical treatment other than first aid.

Medical Treatment

Medical treatment is that treatment administered by a physician, nurse, or other professional medical personnel under the standing orders of a physician.

First Aid

1. First aid is limited to one-time treatment and any follow-up visits for the purpose of observation. (Minor scratches, cuts, burns, splinters, etc.)

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2. Follow-up visits may include the changing of dressing or bandage, and additional cleaning and application of antiseptic.
3. First aid can be provided by a physician, nurse, or other professional medical personnel.
4. The nature of the injury or illness and the treatment required distinguishes between medical treatment and first aid.

C. Lost Workday Cases

There are two kinds:

1. Employee is absent from the job for entire shifts he would normally be scheduled to work. This is called days away from work case.
2. Employee is at work but is restricted from performing all of the normally expected duties of his/her next regularly scheduled work shift and all scheduled shifts thereafter. These cases are called "Restricted Duty Cases."

Examples of restricted work:

- a. Temporary transfer.
- b. Same job, but not all duties.
- c. Same job, but not full shift.
- d. Termination or permanent transfer.

Sometimes the restriction depends upon the nature of the work performed by an employee.

Injury Determination

Determination as to whether or not the reported injury should be considered a work injury is based on the evidence developed in an investigation.

Preponderance of Evidence

Evidence to be considered:

1. Facts about employee's work activities and working environment.
2. Statements of the injured employee, fellow workers, witnesses, and supervisors.

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3. Medical reports.

4. Facts about employee's work for others and other off-the-job activities, injuries and illnesses.

Supervisors have the primary responsibility for visiting the site, interviewing the injured, and investigation of circumstances leading to the illness or injury. Loss Prevention and Safety will assist as appropriate.

Exceptions will be judged in the usual way as in the past by recommendations from Loss Prevention and Safety and the Plant Manager making the final decision.

IV. RESPONSIBILITY AND PROCEDURE

The injured (unless incapacitated and additional help is required) is responsible for reporting his/her injury to the dispensary for treatment. The supervisor of the injured is responsible for the investigation of the events preceding the injury and for establishing immediate corrective measures. The general superintendent of the department in which injury occurs is responsible for the investigation of the incident; review, approval, and distribution of the reports; and for the corrective actions defined in the report. The Loss Prevention and Safety Department is responsible for the classification, recording, preparation and distribution of statistical reports compiled from this information.

For the purpose of reporting the occurrence of all injuries and subsequent investigation, the Accident and Injury Report form is used. This report is initiated by the Plant Nurse (or Night Supervisor) on any injury requiring treatment. She fills out pages one (1) and four (4) of the form. The injured employee, after treatment, will take the form to his immediate supervisor. Injuries are the direct concern of the supervision of the area in which the incident occurs, and the action needed to correct the cause must be initiated by that supervision. In addition, the report serves as the injured's claim for insurance benefits.

A. First-Aid Cases and Recordable - Medical Treatment Only

The investigation of the accident should be held by the immediate supervisor at the time he receives the notice of the injury preferably, but no later than the next working day. The report (pages 2 and 3) is completed by the supervisor and the form mailed to the Loss Prevention & Safety Department on completion of the investigation.

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An accident involving a slight injury may reveal as many constructive conclusions as the investigation of an accident involving a fatality. Whether or not the result is a scraped shin or a fractured skull is often a matter of chance. Many slight injuries could just as easily have been fatalities. That's why every accident must be investigated by a visit to the site to determine what has happened so that steps can be taken to keep it from happening again.

Loss Prevention and Safety will consult with the responsible Superintendent about the nature and extent of investigation of events that might have had more serious consequences than actually occurred.

B. Recordable Injuries -- Lost Workday Cases (both Restricted Duty and Days Away from Work)

The Loss Prevention and Safety Department will notify the general superintendent responsible for the employee who sustains a recordable injury that fits these categories. The General Superintendent will report verbally to the Plant Manager the preliminary results of the injury investigation with the Superintendent of Personnel and the Loss Prevention and Safety Superintendent in attendance.

A careful, complete, logical analysis of the events should be made a part of the injury investigation for possible impacts on persons or departments on a plantwide basis. Depending on the nature and extent of the investigation a managerial analytics specialist may be employed. A written report of the incident will be published within 5 working days after the incident by the person (or team chairman) assigned by the General Superintendent. The investigating person or team will be fixed at the time of the verbal review. In all cases copies of the report will be sent to members of the Plant Manager's Safety Board and the Plant Manager's expanded staff. TOUCH 85 may be used to notify plant personnel of the incident.

C. Near-Miss Accidents and Injuries

Near-misses include accidents and incidents which in the opinion of the injured person's department supervision or Loss Prevention and Safety Superintendent's opinion could have resulted in major injury, severe equipment damage or a catastrophic occurrence with but a slight reasonable change in immediate circumstances. These incidents must be investigated and reported according to the procedure outlined in Sections V and VI of this report.

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V. ACCIDENT AND INJURY INVESTIGATION AND REPORTING

Since every accident and injury represents a deviation from a planned result a careful analysis is required so that appropriate corrective actions can be taken to prevent a recurrence.

Managerial Analytics or Analytic Trouble Shooting (ATS) processes should be used to insure determination of most probable cause(s), to develop appropriate actions, and to define how the actions will be carried out. In complex investigations the services of a Managerial Analytics Specialist should be employed.

A. Investigation Procedure - Finding Cause(s) of Accidents

Every accident is the result of one or more causes. The purpose of the investigation is to determine the unplanned combination of actions and agents that determined the cause(s) of the accident.

The steps in finding the cause(s) of accidents should follow the Deviation Analysis of Managerial Analytics (MA) or Problem Solving Procedure of Analytic Trouble Shooting (ATS).

1. State the deviation for which the cause is unknown.
2. Get the facts necessary to fully specify the deviation. Determine what happened as well as what might have been expected to happen, but did not. Specify all that is known about the event including:
 - a. All available information about the injured person:
 - (1) What he was supposed to be doing.
 - (2) What he was actually doing at the time of the accident and how he was doing it.
 - (3) His training.
 - (4) His past record.
 - b. Results of a visit to the site for an examination of the following:
 - (1) Tools
 - (2) Machinery
 - (3) Protective equipment
 - (4) Other physical conditions as they existed at the time and place of the accident.

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Use the attached form or other appropriate specification sheet to record the available data.

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3. Look for, identify, and record the unique characteristics or differences between the items that were involved and those that might be expected to be but were not involved.

4. Look for, identify, and record the change events related to the deviation effect (accident or injury).

Note: In steps 2, 3, and 4, special effort should be made to try to find out all the contributing factors. Facts, as they are found, should be met and acknowledged face to face. An investigation should not be looked on as a necessary evil, but, rather in its true light, which is the opportunity to bring about better control of unsafe acts or conditions that could lead to injuries.

Don't take anything for granted. Every alleged fact must be challenged until the investigator is satisfied he knows just exactly what happened--which means who did or did not do something and why. Interview all witnesses, and ask the injured person:

- a. "What could you have done to prevent the accident or minimize the injury?"
- b. "What would you recommend for eliminating or controlling the hazard which caused the injury?"

5. Speculate as to the possible causes, that is the possible combination of actions and agents which could result in the observed deviation effect (accident or injury). In doing this focus on the unique characteristics or differences and change events to try to identify action/agent combinations which might have caused the accident or injury.

6. Test possible causes to determine which one of the possibilities developed in step 5 above fits all of the facts developed on the specification sheet.

7. Set priority on probable causes. Which probable cause needs to be checked first? If uncorrected which combination of agents/actions might cause additional accidental loss or personal injury?

8. Verification of cause requires a plan to verify the cause including:

- a. What will be done.
- b. Who will do it.
- c. When it will be done.

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Extra care may be necessary during the verification or investigation to avoid remaining hazards or new hazards created by the incident.

9. Summarize investigation by re-stating the deviation and the most probable cause(s) and the reasons for rejecting other likely causes. Recognize circumstances that may have increased or reduced the extent or seriousness of the event. Classify cause(s) as unsafe action, condition or both.
10. Recommend appropriate actions by making certain that the action/agent combination no longer exist or can re-occur. Be sure to consider the circumstances or conditions surrounding the event when developing action plans to prevent future events or to reduce their seriousness if they should occur. The MA processes of Action Planning or Potential Deviation Analysis are useful in developing appropriate plans in complex situations. If assistance is needed, contact a MA Specialist.

B. Reporting Procedure

1. First-aid and Recordable-Medical treatment only cases will be reported on the First-Aid form provided by the dispensary as indicated in Section IV.A. of this bulletin.
2. Recordable Injuries - Lost Workday Cases and Days Away from Work Cases will require a concise written report summarizing the results of the investigation and finding of most probable causes.
 - a. The person responsible for the investigation will prepare a rough draft according to the attached format.
 - b. The investigation report will be approved by the General Superintendent involved and the Plant Manager and will be distributed to all plant supervision.
 - c. In addition to the abbreviated report distributed it is expected that line supervision will be made familiar with the details of the accident through the line organization.
 - d. A report of status of recommendations will be issued within 5 working days by the supervisor involved to the concerned Superintendent and the Loss Prevention and Safety Superintendent. Supplementary monthly reports will be made until all recommendations have been answered.

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3. Distribution of Reports - Copies of all Incident or Injury Reports that are assigned to a number by LP&S will be sent to the MCI Plant Manager's Task Force members and Safety Superintendents listed in Appendix III.

IV. FORMAT

The format to be used in the preparation of the accident investigation is attached as Appendix P-0112-II.

Revised by:

J. A. Glass
J. A. Glass

Approved by:

G. L. Tromblee
G. L. Tromblee

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APPENDIX III
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INJURY, ILLNESS, AND NEAR-MISS INVESTIGATION AND REPORTING

REPORTING PROCEDURE

Distribution of Reports - Copies of all Incident or Injury Reports that are assigned a number by LP&S will be sent to the following MCI Plant Manager's Task Force members and Safety Superintendents:

Plant Managers and Guest Superintendents

△	D. W. Brubaker (Pensacola)	1690
	D. W. Haines (Soda Springs)	1850
	J. W. Molloy (W. G. Krummrich)	1740
	G. F. Knollmeyer (Queeney)	1760
	J. L. Rasmussen (Decatur)	1260
	Needham Coppedge (Columbia)	1220
	Baxter Tilford (Avon)	1090
	G. E. Davenport (Chocolate Bayou)	1200

Safety Superintendents

△	Ray Wilson (Pensacola)	1690
	Tom D. Filiput (J. F. Queeney)	1760
	Ralph Brown (Soda Springs)	1850
	Paul Heisler (Krummrich)	1740
△	Maurice M. Whitlow (Columbia)	1220
	Mayben Yount (Decatur)	1260
	John Ussery (Chocolate Bayou)	1200

Safety & Property Protection

Tom W. Lawrence (St. Louis)	F2WA
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Copies of all reports on Lost Work Day cases should be sent to the above listed plus:

E. N. Brasfield (St. Louis)	G4NE
J. R. Thurrott (St. Louis)	G4NH

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(Use of this form is optional)

ACCIDENT OR INCIDENT INVESTIGATION SPECIFICATION SHEET

DATE: _____

PREPARED BY: _____

INCIDENT: _____

QUESTIONS	COLUMN 1 WAS INVOLVED IN THE INCIDENT	COLUMN 2 MIGHT BE EXPECTED TO BE BUT WAS NOT INVOLVED
<u>WHAT</u> - WAS BEING DONE? - IS DEVIATION? - IS DEFECT? - IS OBJECT OF DEFECT?		
<u>WHERE</u> - ON PLANT? - ON EQUIPMENT? - ON PERSON? - IN PROCESS?		
<u>WHEN</u> - OBSERVED? - HAPPENED? - EVENTS BEFORE? - OTHER EVENTS? - EVENTS AFTER? - TRAINED ON THIS JOB?		
<u>WHO</u> - IS AFFECTED? - WITNESSED? - TRAINED INJURED? - IS SUPERVISOR?		
<u>EXTENT OF DEVIATION</u> - EFFECT? - INJURY? - PERSONAL PROTECTIVE EQUIPMENT USED?		SC 005440 LAM006650

(Use of this form is optional)

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APPENDIX I

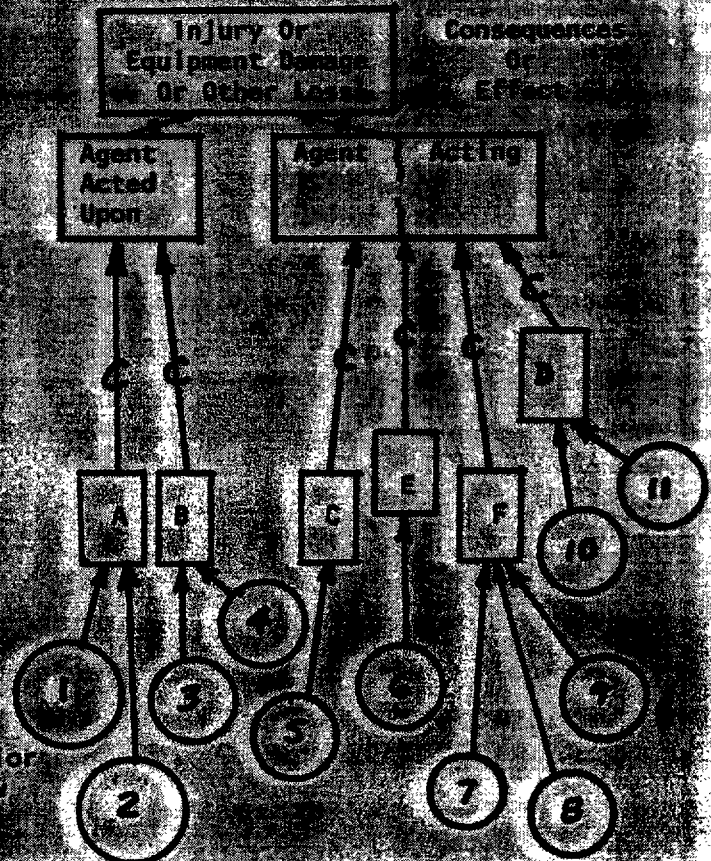
ACCIDENT OR INCIDENT INVESTIGATION SPECIFICATION SHEET

	COLUMN 3 UNIQUE CHARACTERISTICS OF THE INVOLVED DIMENSION	COLUMN 4 CHANGES RELATED TO THE INVOLVED DIMENSION
<u>WHAT</u> WAS BEING DONE? IS DEVIATION? IS DEFECT? IS OBJECT OF DEFECT?		
<u>WHERE</u> ON PLANT? ON EQUIPMENT? ON PERSON? IN PROCESS?		
<u>WHEN</u> OBSERVED? HAPPENED? EVENTS BEFORE? EVENTS AFTER? TRAINED ON THIS JOB?		
<u>WHO</u> IS AFFECTED? WITNESSED? TRAINED INJURED? IS SUPERVISOR?		
<u>EXTENT OF DEVIATION</u> EFFECT? INJURY? PERSONAL PROTECTIVE EQUIPMENT USED?	SC 005441	LAM006651

TO PREPARE A STAIR-STEP OR STEP-DOWN DIAGRAM

Basic Principle: Every loss incident (accident, injury or near miss) has one or more basic or contributing causes. The purpose of this diagram is to identify in a visible way the key elements of the causes of the incident.

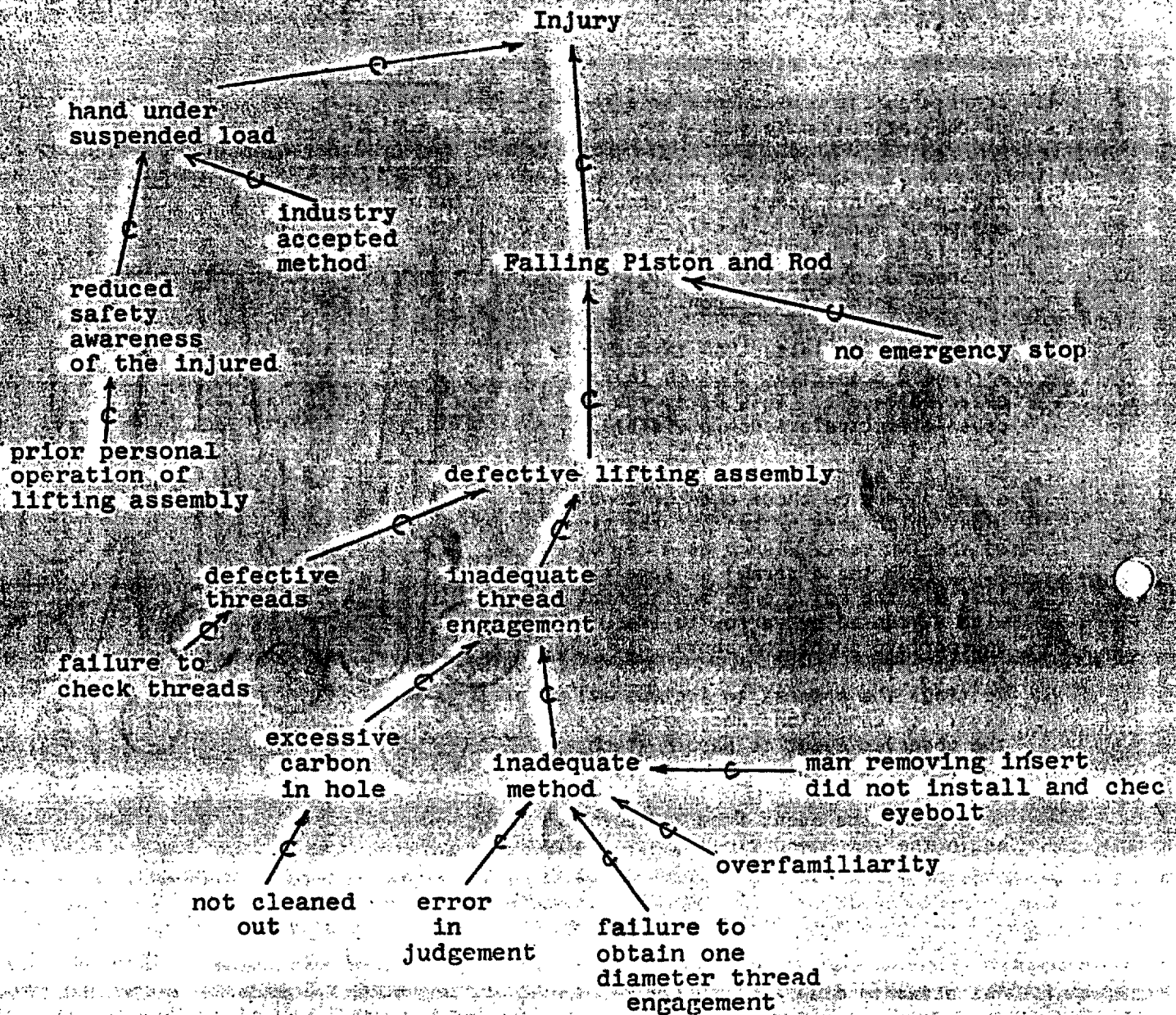
1. Start with the consequence or effect of the incident observed
2. List the agents (persons injured, equipment damaged) directly associated with the incident.
Show: agents acting and agents acted upon.
3. Draw line with letter "C" through the arrowhead connecting them to the observed result. This makes the cause-effect relationship visible.
4. Below the agents acting and agents acted upon show those acts or conditions which were present at the time of the incident. (such as A, B, C, D, E, F in the diagram) Be sure to list all the major ones and connect with a "caused by" arrow to the appropriate condition above.
5. Continue the process to include all prior events or conditions necessary to allow the observed event to happen (such as the numbered items in the diagram).
6. To prevent the event from happening again the recommendations must eliminate the unsafe acts, unsafe conditions, or unsafe personal conditions identified in the bottom row in each branch of the diagram.
7. See attached diagram for example.



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EXAMPLE STEP DOWN DIAGRAM OF
CAUSES AND CONTRIBUTING FACTORS



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Symbol  =

Event or
condition
above
was caused
by item
below

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APPENDIX II
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ACCIDENT INVESTIGATION REPORT NO. _____ (Call Loss Prevention and Safety, 2235, for the number assigned to this investigation)

ISSUE Date: _____

TO: PLANT MANAGER'S SAFETY BOARD and
CONCERNED SUPERVISION (As Specified by the Approving General Supt.)

SUBJECT: Investigation of _____ accident in _____
(or incident) Dept. & Unit
on _____
Date

(The first page of the report should be written so that it may be used alone as a Plant Safety Bulletin if considered desirable by the Plant Manager. It should contain the first three Sections only)

I. INCIDENT

This should be covered in one or two sentences including:

What the consequences were

What went wrong

What was going on

(omit person's name but identify by occupation, operator, technician, supervisor, office worker etc.)

II. CAUSE AND CONTRIBUTING FACTORS

Be sure to identify root cause (Stair Step) and significant contributing factors. These concise statements should indicate consideration of any unsafe conditions, unsafe personal factors, or unsafe act involved. Action-agent combinations responsible for the event should be clearly identified.

III. RECOMMENDATIONS

Care should be exercised to make the recommendations practical and specific to eliminate the causes and contributing factors identified. Following each recommendation, persons responsible for action must be identified and target date for completion must be set.

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IV. DETAILS OF REPORT

a. Description

A chronological narrative in the degree of detail necessary to present a clear understanding of the pertinent events leading up to, in the course of, and following the accident as reconstructed.

b. Findings

Pertinent facts and information collected by the author or the committee as a result of interviews, field observation and analysis of data should be included in this section. Use a Stair Step flow chart to identify root cause of incident.

The extent of the injury should be covered fully in this paragraph in language that can be understood by all. In most cases, this will consist of interpreting the plant physician's findings on the injured.

If the accident is of such a nature as to have involved equipment in addition to the injury to the man, this should be detailed under this heading.

c. Discussion

This section is reserved for any comments that the author or the committee feels is pertinent to helping the reader improve his understanding of the accident, or the recommendations.

V. DRAWINGS OR APPENDICES

Include any drawings, sketches or other material that would aid the reader to understand what went on and how to avoid a similar occurrence.

VI. PERSONNEL

Listed under this heading should be the names and occupation of all personnel involved either as witnesses, supervision or colleagues of the injured.

INVESTIGATORS

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CHAIRMAN

APPROVED BY: _____

General Superintendent

DATE: _____

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INCIDENT BULLETIN

Plantwide bulletin board notices of selected incidents, injuries, and near-miss events will be posted following review and approval of Superintendent of Manufacturing (or equivalent in other departments) of the affected area, the Superintendent of Personnel, and the Plant Manager using this form. If approved the first page of the report will be printed on this form.

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