December 21, 1992

To: Bill O'Brien - Calvert City Plant

Subject: Corporate E,H&S Audit Final Report

Enclosed is your copy of the final report concerning the Corporate E,H&S audit, conducted October 19-23, 1992.

Note the following requirements for developing and submitting your Corrective Action Plan Report:

1) A draft Corrective Action Plan is due to Mike Marshall before **January 22, 1993.**

2) **All findings contained in the final audit report must be addressed in your Corrective Action Plan. If the finding has already been corrected, include a description of what was done and the date it was completed.**

3) The Corrective Action Plan must include:

   a) Corrective actions for each unresolved, specific audit finding,

   b) The identification of the person(s) responsible for completing the corrective actions, and

   c) The expected completion date(s).

4) Following a review of your draft plan, the division is responsible for issuing your final Corrective Action Plan to Corporate.

5) Quarterly status reports will be required from you until all audit findings have been resolved. Notes will be sent by the division to the plant reminding them when these reports are due.

As a "BFG Restricted" document, this audit report should not be copied except where essential for the communication and resolution of the audit findings.

If you or your staff have any questions, please let us know.

R.J.Granek

cc: M.M.Marshall
C.J.Nosal
W.C.Holbrook
H.Waltemate
D.E.Gleghorn
D.Trimble - Bath

93/04

NGC 13179

AUDIT FILE

October 30, 1992

To: Bill O'Brian Calvert City

From: Herm Waltemate Cleveland

SAFETY AUDIT ITEMS TO BE CORRECTED

The following items were noted during the recent BFG Corporate Safety, Health and Environmental audit.

The format is laid out for you to write in your abatement program and indicate the status as Completed, In-Progress, or Incomplete. A progress report giving the status of the items requiring attention is due December 30, 1992 and each quarter thereafter until all items have been corrected. Also include all of the items from the July 30 - August 3, 1990 Safety Audit which have not already been reported as being brought to closure.

For your convenience, I have included the word processing disc on which you can enter your response.

H. Waltemate
H. Waltemate /

CALVITEM.HW/JS

cc: R. Grahek/M. Marshall
E. Martinelli/W. Patient
J. Gressler - Calvert City
S. Guidry/C. Nosal - Houston

NGC 13180

CALVERT CITY SAFETY AUDIT
OCTOBER 12-23, 1992

1992 Items to Be Corrected

SA-1992-1

A management system for the auditing of individual employees with regard to Lockout, Hot Work, Vessel Entry and Forklift Trailer Entry needs to be established. These audits need to be documented.

The individual lockout audits are a requirement of OSHA Standard 1910.147 Control of Hazardous Energy (Lockout/Tagout).

Plant
Response

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Status
______ Complete ______ In-Progress ______ Incomplete

SA-1992-2

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

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Status
______ Complete ______ In-Progress ______ Incomplete

NGC 13181

SA-1992-3

A written procedure for controlling the lifting of equipment over hazardous material process lines needs to be prepared. This item is also in the OSHA Directive on 29 CFR 1910.119 Management of Highly Hazardous Chemicals.

Plant
Response

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Status

______ **Complete** ______ **In-Progress** ______ **Incomplete**

SA-1992-4

A review of all exits need to be conducted. Lighted exit signs need to be provided where required. Exit signs in the Boiler House are not lighted. Also all fenceline gates need to be identified with a sign and because of the volume of Chlorine handled in the plant the gates need to have an unimpeded means of exit.

Plant
Response

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Status

______ **Complete** ______ **In-Progress** ______ **Incomplete**

NGC 13182

SA-1992-5

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventative measures. You need to audit the plant for hot surfaces and proceed with insulation, guarding or post warning signs.

Plant
Response

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Status

______ **Complete** ______ **In-Progress** ______ **Incomplete**

SA-1992-6

A plantwide audit on water outlets without proper identification needs to be conducted. Outlets which could be mistaken need to be identified as to the type of water (potable/nonpotable).

Several outlets in the E&E area need identification.

Plant
Response

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Status

______ **Complete** ______ **In-Progress** ______ **Incomplete**

NGC 13183

SA-1992-7

A management system which assures proper closure needs to be established. This should include issues identified in audits, narrative reports, IRI inspections, HAZOPS etc.

Plant
Response

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Status

______ **Complete** ______ **In-Progress** ______ **Incomplete**

calvitem.hw/js

NGC 13184