TO: MIKE MARSHALL

FROM: DAVID TRIMBLE DATE: 12/17/92

ENVIRONMENTAL, HEALTH, AND SAFETY ASSURANCE AUDIT

FINAL REPORT

Enclosed are two copies of the Calvert City, Kentucky October 19-23, 1992 Environmental, Health, and Safety Assurance Audit Final Report - one for the Division head and one for the facility.

Also enclosed is the EH&S Assurance Audit Documents Security Procedure and instructions for developing the EH&S Corrective Action Plan. The draft Correction Action Plan will be due within 30 days of receipt of the Final Report or by January 17, 1993; and the final Action Plan is due within 60 days of receipt of the Final Report or by February 15, 1993.

If you have any questions, please do not hesitate to contact me.

David /kp

David Trimble

DT/kp
CORPAUDS

Enclosures

cc: C. Mattia
B. O'Brien

NGC 13157

HS&E ASSURANCE AUDIT
DOCUMENTS SECURITY PROCEDURE

1. Working Papers

At the conclusion of a HS&E Assurance Audit, the audit program manager will affix a "BFGoodrich Restricted" cover sheet to each set of working papers. Included will be instructions for each auditor to send the working papers to the audit program manager after the Draft Audit Report has been completed. The audit program manager will keep the working papers until the acceptance of the Final Corrective Action Plan.

2. Exit Meeting Discussion Sheets

Exit meeting discussion sheets will be collected by the audit program manager from all auditors. A complete set of discussion sheets will be produced, will have the "BFG Restricted" cover sheet attached, given to the plant manager and then to the independent consultant. (The audit program manager will retain the original set.) Included will be instructions to destroy this document immediately after the Draft Audit Report has been received.

The audit program manager will retain these discussion sheets until the acceptance of the Final Corrective Action Plan.

3. Draft Audit Report

The Draft Audit Report will have a "BFG Restricted" cover sheet attached and will have limited distribution:

- Vice President, Environment, Health, and Safety Management Systems
- Division or Subsidiary HS&E Representative
- Manager of the Facility Being Audited
- Designated Plant HS&E Professional
- Add Other Persons as the Division May Request

Included will be instructions to destroy this document immediately after acceptance of the Final Corrective Action Plan. The independent consultant will also destroy any draft reports after acceptance of the Final Corrective Action Plan.

CORPAUDS

4. <u>Final Audit Reports</u>

Final Audit Reports will have the "BFG Restricted" cover sheet attached. Distribution of this report will be identical to the draft report. Included will be instructions to destroy this document after seven years, or after the facility has had a subsequent audit conducted.

CORPAUDS

EH&S ASSURANCE AUDIT

CORRECTIVE ACTIONS REPORT

An important element of the Company EH&S Assurance Audit Program is the Corrective Actions Report. This report is essentially an action plan that addresses the methods a facility has developed to correct deficiencies noted in the report of audit findings.

The following describes the requirements for the completion of a Corrective Actions Report:

1. The facility manager or his/her designee (a person who has the responsibility and the authority to implement corrective actions on behalf of the plant manager) is responsible to issue the Corrective Actions Report.

2. A draft copy of the Corrective Actions Report should be received by David Trimble for approval within 30 calendar days of issuance of the final audit report. The final Corrective Actions Report will be due 30 days following approval of the draft plan.

3. All findings contained in the final report must be addressed. If the finding was corrected prior to the issuance of the final report, include a description of what was done and the date it was completed.

4. Non-completed corrective action must include:

   - Expected date of completion.

   - Identification of the person(s) responsible to complete the corrective action.

5. A quarterly status report is required for all outstanding corrective actions. If the finding was corrected after issuance of the Corrective Action Report, include in the status report a description of what was done and the date it was completed.

6. Long range corrective action projects should be included in the annual EH&S Forward Plan and the Business Plan for the business.

David Trimble

6/26/92