# Work Instruction (WI)

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| **DIRECTIVE NO.** | 250-WI-8500.1.2C | **APPROVED BY Signature:** | |
| **EFFECTIVE DATE:** | 5/27/2016 | **NAME:** | Edward A. Connell |
| **EXPIRATION DATE:** | 5/27/2021 | **TITLE:** | Chief, Medical and Environmental Management Division |

**COMPLIANCE IS MANDATORY**

**Responsible Office:** 250 / Medical and Environmental Management Division

**Title:** Environmental Problem Reporting and Tracking

## PREFACE

### P.1 PURPOSE

The purpose of this document is to provide procedures for the management of environmental problems identified by Medical and Environmental Management Division (MEMD) personnel during routine compliance inspections.

### P.2 APPLICABILITY

This Work Instruction applies to all MEMD personnel at GSFC's Greenbelt Site only.

### P.3 APPLICABLE DOCUMENTS AND FORMS

a. Safety, Health, and Environmental Tracking (SHEtrak) Instruction Guide for Code 250.
b. NASA Procedural Requirements (NPR) 8553.1, NASA Environmental Management System.

### P.4 CANCELLATION

250-WI-8500.1.2B, Environmental Problem Reporting and Tracking

### P.5 TOOLS, EQUIPMENT, AND MATERIALS

Access to SHEtrak

### P.6 SAFETY PRECAUTIONS AND WARNINGS

None.

### P.7 TRAINING

No specific training is required.

## P.8 RECORDS

| Record Title | Record Custodian | Retention |
|---|---|---|
| No records are created as a result of this WI. | | * |

** NRRS 1441.1 – NASA Records Retention Schedule*

## P.9 MEASUREMENT/VERIFICATION

None.

Instructions

In this document, a requirement is identified by "shall," a good practice by "should," permission by "may" or "can," expectation by "will," and descriptive material by "is."

## 1. Method Summary

MEMD personnel identify environmental problems, risks, or deficiencies during inspections and other routine activities. The SHEtrak system is used to document and track these findings until their resolution. MEMD personnel conducting the inspections will be assigned the role of "Environmental Inspector" in the SHEtrak system. MEMD personnel assigned the role of Environmental Inspector should review and be familiar with the Environmental Reporting and Tracking System Work Instruction prior to entering inspections in to SHEtrak. Once an Environmental Inspector has completed an inspection in the field, they will create a record of that inspection in SHEtrak. Once an inspection has been created for a specific building or feature, the inspector(s) can then create and add findings for individual rooms or areas within the building. Inspections are created in SHEtrak by clicking on the "Inspections" tab of the main toolbar, and then selecting "Enter Inspection" tab from the drop down menu. You can add findings to an inspection by clicking on the "add finding" icon featured in the far right column labeled "Action." Findings, once released, are routed to the "Assignee" for review and processing. The finding Assignee will always be the lowest level Civil Servant Supervisor responsible for a given location or activity. System loading of contractor information does not result in correct organizational code. Code 250 findings shall be assigned to the appropriate Civil Servant Program Mangers; if we assign to contractors, appropriate Environmental Health &Safety (EH&S) reps and management will not get copies.

Once a finding has been released, the Assignee will receive an automated email notification that provides a link to the finding in SHEtrak. The finding will also be visible in the Assignee's homepage. Depending on the severity of the finding, the Assignee will have up to 60 days to submit corrective actions. The responsible Supervisor has the choice of submitting the closure actions for the finding or sub-assigning it to another individual for action. The Assignee, or designated Sub-Assignee, is responsible for determining and implementing the action(s) necessary to permanently close the finding. Once a closure action is submitted to MEMD, the Inspector, with the assistance of the appropriate Civil Servant Program Manager, will verify that closure actions satisfy all applicable laws and regulations necessary to close the finding. Upon approval of closure action(s) by Environmental Inspector(s), the finding is automatically archived as a record within SHEtrak and can be queried at any time.

All findings are assigned a risk assessment a code (RAC) by the Environmental Inspector based on the severity of the finding.

> *NOTE: Any finding with a RAC of 1 shall not be left unattended in the field until responsible management and personnel have initiated interim action to reduce the risk. MEMD civil servants shall be notified immediately if a RAC 1 finding is identified. Reference NPR 8553.1.*

Hazard Abatement Plans (HAPs) are required for any findings assigned Risk Assessment Codes (RACs) of 1 or 2 and/or any finding that cannot be resolved by the completion date assigned.

## 2. SHEtrak Access Rights and Users-

There are four classes of user: Environmental Administrator, Environmental Discipline Administrator, Assignee, and Environmental Inspector.

**2.1. Environmental Administrator:** The Administrator role controls the configuration of the database and has the ability to update user roles and the building/room information. Administrators can add or delete an inspector, email distribution of findings, and control the final disposition of an inspection before release.

**2.2. Environmental Discipline Administrator:** Discipline Administrator manages the code references for the specific disciplines or program areas they are assigned. Discipline Administrators can also update certain fields in a finding that have already been released.

**2.3. Assignee:** These individuals' rights are limited to the findings(s) they were assigned in SHEtrak. Assignees may enter closure actions or submit HAPs.

**2.4. Environmental Inspectors:** These individuals may add inspections/findings, review and edit inspections/findings, and produce reports within SHEtrak. Environmental Inspectors may also approve HAPs or closure actions which have been submitted by the Assignee. They may also manage their own profiles which include name, email address, phone number. Request access through the Environmental Contracting Officer's Representative to obtain the role of Environmental Inspector.

## 3. Procedures

### 3.1. Logging In

Before a finding can be entered into SHEtrak, the Environmental Inspector(s) must first log into SHEtrak (See Appendix C).

3.1.1. Log in to SHEtrak using the link https://safety.msfc.nasa.gov/tools/.

3.1.2. Click the launch button under the SHEtrak/SCRS box. **(Not all users will have the same information on their home screen).**

3.1.3. Use the drop down arrow to select the Environmental Inspector Role.

3.1.4. Click the "Select Role" button to finish the log in process.

### 3.2. Enter an Inspection

Once MEMD personnel have performed an environmental inspection or identified an environmental finding or deficiency during an inspection, the individual responsible for identifying the finding will then enter the inspection in SHEtrak (see Appendix D). All inspections will be entered by the associated building/feature. MEMD personnel must ensure that sufficient data is collected to complete the initial data entry into SHEtrak. **(All fields with a red flag icon are required fields.)**

3.2.1. To start an inspection click on the "Inspections" tab of the main toolbar.

3.2.2. Click on "Enter Inspection" from the drop down menu.

3.2.3. Use the calendar button to select the inspection start and end date.

3.2.4. Select the "Inspection Type"; the choices are:

a. Environmental Audit-External (Any inspection initiated outside of GSFC that is not a state or federal regulator)
b. Environmental Audit-Internal (Any inspection that is initiated within GSFC other than an FMD managed construction activity or an Oil Program Audit)
c. Environmental Audit-Regulator (Any inspection initiated by a state or federal regulator)
d. Environmental Construction audit (Any internal inspection or findings from an FMD managed construction activity)
e. Environmental Oil Program Audit

3.2.5. Select the applicable building associated with the inspection from the "Building" drop down menu.

3.2.6. The "Location/Operation" box can be used to add special notes about buildings (e.g., areas, outdoors, programmatic inspections covering more than one building, SWPPP Activity).

3.2.7. List individuals that accompanied you during the inspection in the "Accompanied By" box, with the exception of other inspectors (e.g., points of contact, lab managers).

3.2.8. To list inspectors who were present at the time of the inspection, check the corresponding box next the inspector's name. Also include the Civil Servant Program Manager as an 'Inspector.' Include in inspection comments: "not all inspectors were present at the time of the inspection; "XXX" conducted the inspection."

3.2.9. Enter any additional information that you would like to include in the official inspection record in the "Comments" box.

### 3.3. Enter an Inspection Finding

Once an inspection has been created in SHEtrak, individual findings can then be added to the inspection (see Appendix E). Findings are assigned to the lowest level Civil Servant line manager responsible for oversight of the operation. This is to ensure they are kept informed of the finding and need for corrective action.

Each finding will be assigned a Risk Assessment Code (RAC), between 1 and 7, based on the severity of the finding. For findings that are given a RAC of 1, the POC will be asked to respond within 5 days, for RAC of 2, 10 days, and for RACs 3 to7, the POC will be asked to respond within 60 days.

*NOTE: Any finding with a RAC of 1 shall not be left unattended in the field until responsible management and personnel have initiated interim action to reduce the risk. MEMD civil servants shall be notified immediately if a RAC 1 finding is identified. Reference NPR 8553.1*

3.3.1. Locate the inspection to which the finding must be added. Please note that only inspections that you have created or inspections in which you have been listed as an inspector will be visible to you.

3.3.2. Select the icon with a green plus sign under the "Action" column to enter a new finding.

3.3.3. Select the appropriate classification that best fits the finding to be entered from the "Classification" drop down menu.

3.3.4. Select the appropriate sub-classification that best fits the finding to be entered from the "Sub-Classification" drop down menu.

3.3.5. Select the "Continue" button. Once you select "Continue," all fields denoted with a red flag must be populated.

3.3.6. Select the "Show Rooms" hyperlink and select the applicable room(s). To select multiple rooms for a single finding, the rooms must be owned by the same organization.

3.3.7. Use the "Floor" field if describing a finding in a common space without a specific room number.

3.3.8. Use the "Equipment #" field, if equipment is involved and the equipment has a unique identifier.

3.3.9. Use the "Location" field to provide specific description of the finding (e.g., northeast corner of room).

3.3.10. Select an "Area Type" from the provided drop down menu. Select the area type that best describes the location of the finding. If several rooms have been selected, choose the most applicable area type.

3.3.11. Select the appropriate "Violation" from the provided drop down menu. Common violations have been pre-populated into SHEtrak by finding classification/sub-classification. If an Environmental Inspector determines that there are new common violations that should be added as a pre-populated finding, this should be done in coordination with the appropriate Civil Servant Program Manager and SHEtrak Environmental Discipline Administrator.

3.3.12. Provide finding details in the "Additional Recommended Actions" if the pre-populated, recommended corrective action does not adequately address the specific situation.

3.3.13. The RAC will be pre-assigned for all pre-populated violations. The RAC value can be changed manually to reflect the regulatory risk associated with the findings and the immediacy in which the finding must be closed.
*NOTE: Any finding with a RAC of 1 shall not be left unattended in the field until responsible management and personnel have initiated interim action to reduce the risk. MEMD civil servants shall be notified immediately if a RAC 1 finding is identified.*

3.3.14. Provide information for any interim actions that were implemented at the time of the inspection in the "Interim Action" field. This field can remain blank if the finding will be closed on issue. .

3.3.15. The Assignee is selected from the "Assignee Type" drop down menu. The "Assignee" should be the appropriate lowest level civil servant supervisor with some exceptions:
a. Code 250 findings shall be assigned to the appropriate Civil Servant Program Mangers (as directed by the 250 Division Chief).
b. Assign GEWA club findings to the club president. (Following Code 360 Safety's process for assigning GEWA findings).
*NOTE: Regardless of exceptions – assignment needs to always be to a civil servant. System loading of contractor information does not result in correct organizational code. If we assign to contractors, appropriate EH&S reps and management will not get copies.*
"Assignee Type" drop down menu options are:
a. Building Manager – for Code 220 building findings
b. Individual – use for all findings being assigned to an organization other than a Code 220 building manager.
c. Safety Rep. – Only use if being assigned to a designated organizational safety and environmental representative.

3.3.16. Select the "Status" of the finding. The status designates whether the finding is either open and requires closure actions, or closed on issue. Findings that are closed on issue were immediately resolved in the field and do not present a systemic problem. An entry into the "Actions Taken"

field will be required if the status is selected to be closed. Provide any details or pictures that support the closure actions and evidence that the finding will not be repeated.

3.3.17. Input any action taken at the time of the audit only if the finding is closed.

3.3.18. In the event that the finding has resulted in a work stoppage, select "Yes" next to the "Work Stopped" field.

3.3.19. To add an attachment select "Yes" next to the "Add Attachment" field and a browse function will become available.

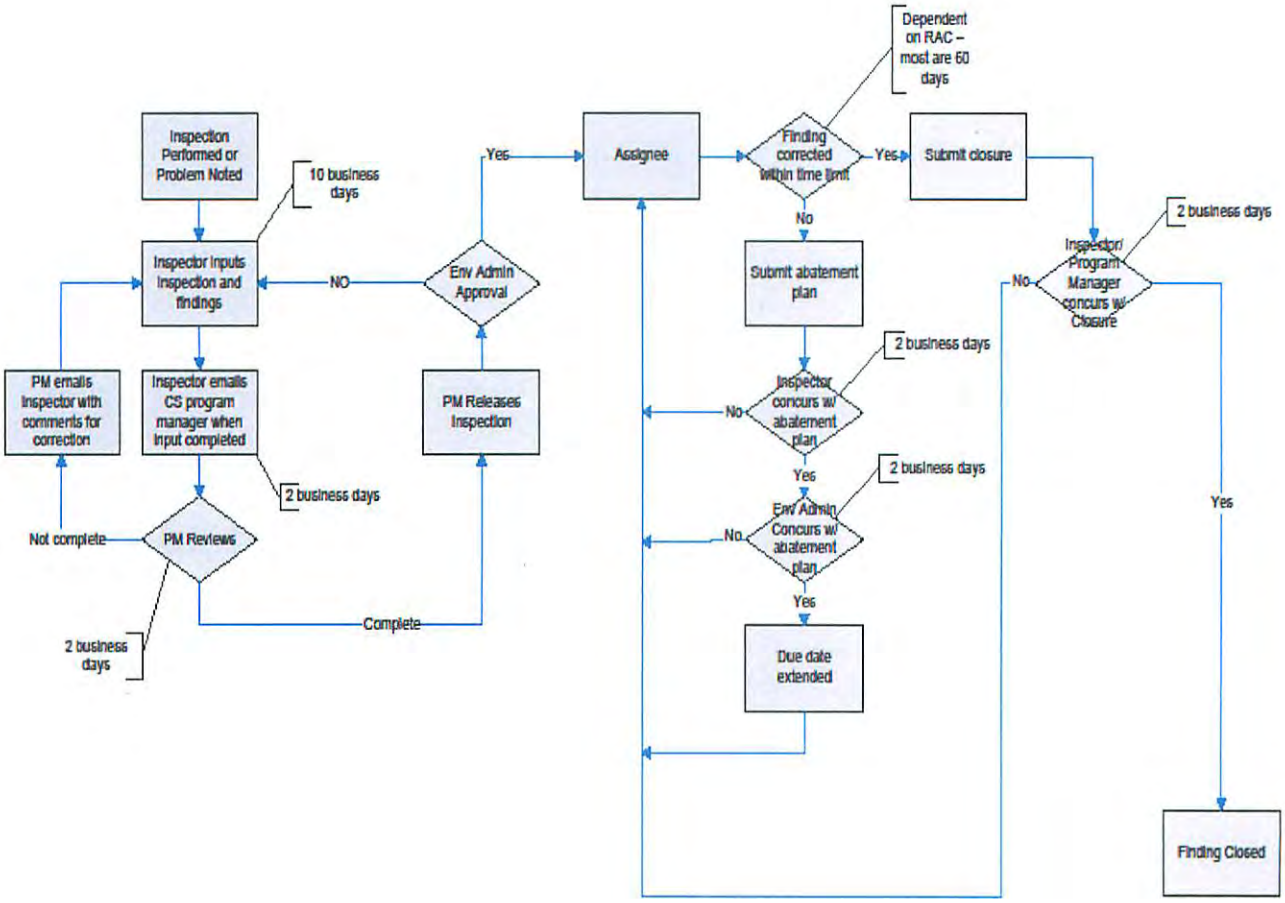
3.3.20. Select the "Save" button to save the entry otherwise all progress will be lost.

**3.4. Problems Not Resolved Within the Time Limit Determined by the RAC**. Unresolved problems will automatically trigger the need for a HAP within SHEtrak. The Environmental Inspector shall determine the appropriate Assignee and coordinate this determination with the Civil Servant Program Manager prior to making the assignment in SHEtrak. The Assignee will normally be the lowest level Civil Servant line manager. You can find the lowest level Civil Servant line manager by using the search box or select box drop down menu.

**3.5. Environmental Inspector Review of HAP**. Before approving the HAP, the Environmental Inspector shall coordinate the review of the HAP with the appropriate Civil Servant Program Manager. If the HAP is not approved, the reason given in SHEtrak shall provide clear direction to the Assignee as to actions needed to prepare an adequate HAP.

**3.6. Environmental Inspector Review of Problem Closure**. The Environmental Inspector approval is made with the concurrence of the Civil Servant Program Manager. If the corrective action does not fully eliminate the environmental risk, the Civil Servant Program Manager will provide direction regarding rejection of the closure. If any closure is not approved, the reason given in SHEtrak shall provide clear direction to the Assignee as to actions needed to complete the closure of the problem or specific reasons for rejection.

## Flow Diagram



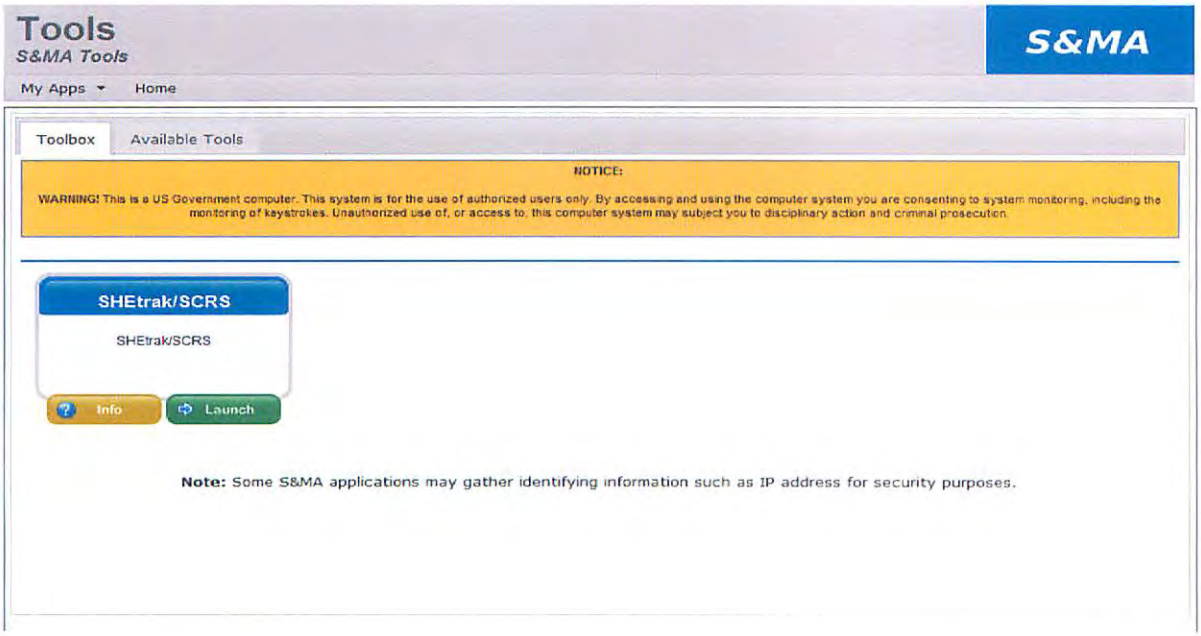
## Appendix A – Definitions

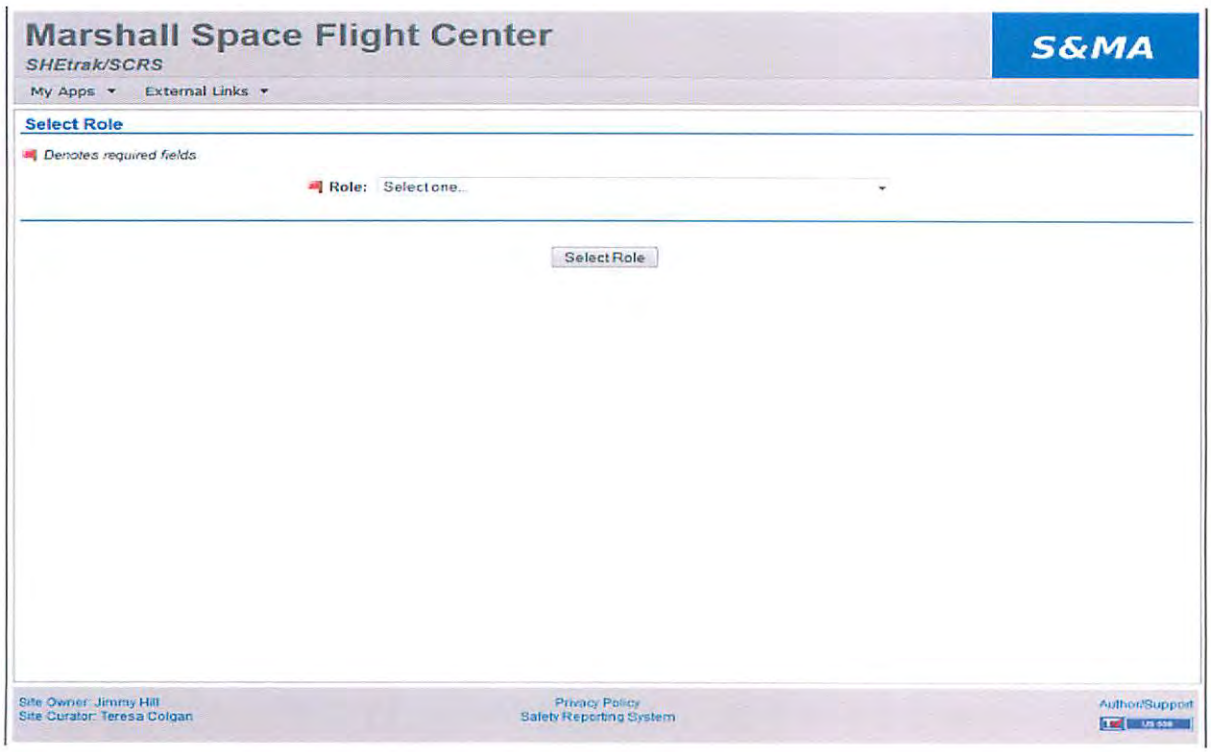
None.

## Appendix B – Acronyms

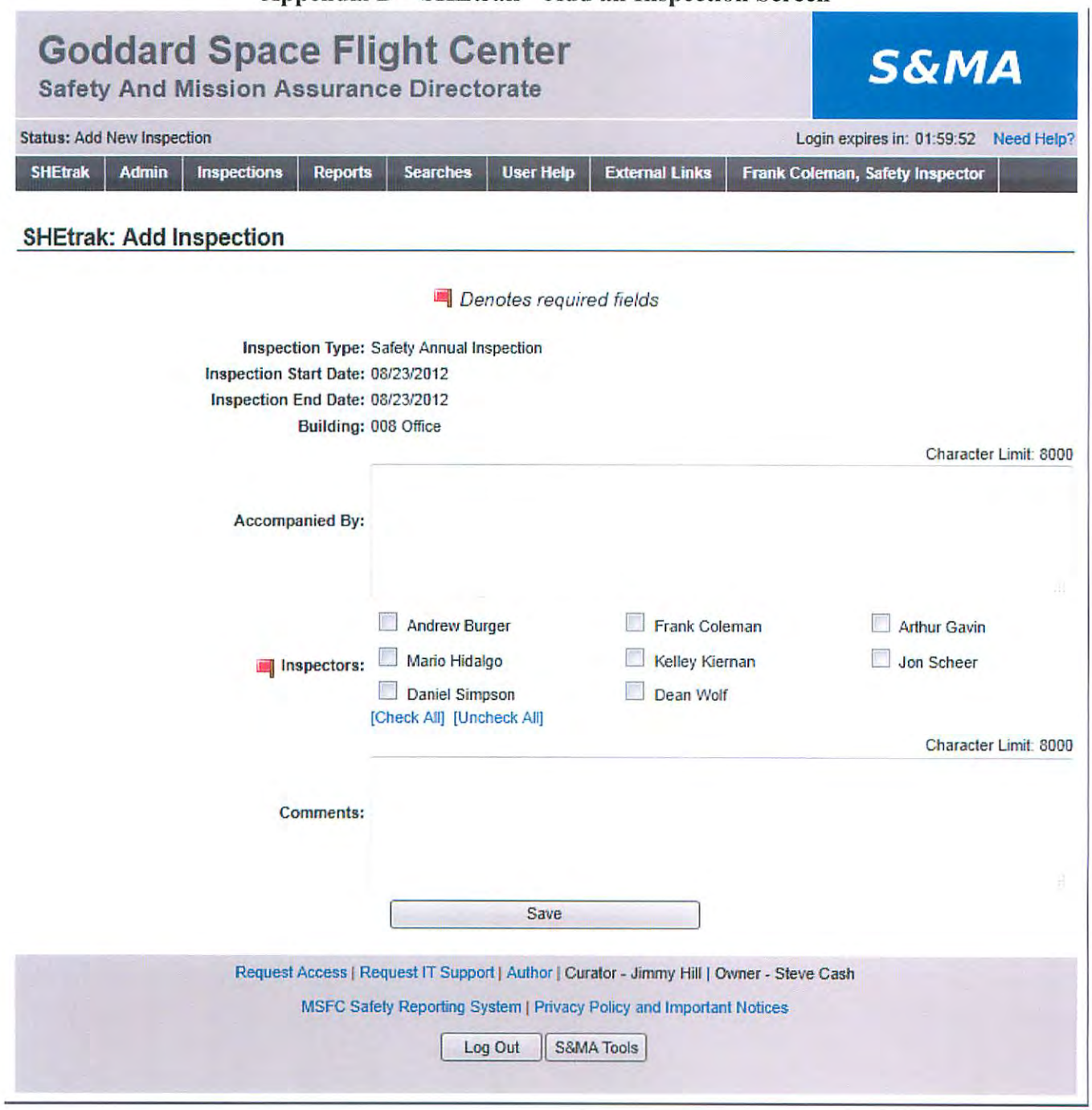
EH&S – Environmental Health & Safety
GSFC – Goddard Space Flight Center
HAP – Hazard Abatement Plan
MEMD – Medical and Environmental Management Division
NPR – NASA Procedural Requirements
RAC – Risk Assessment Code
SHEtrak – Safety, Health, and Environmental Tracking system
WI – Work Instruction

## Appendix C – SHEtrak – Log in Screen

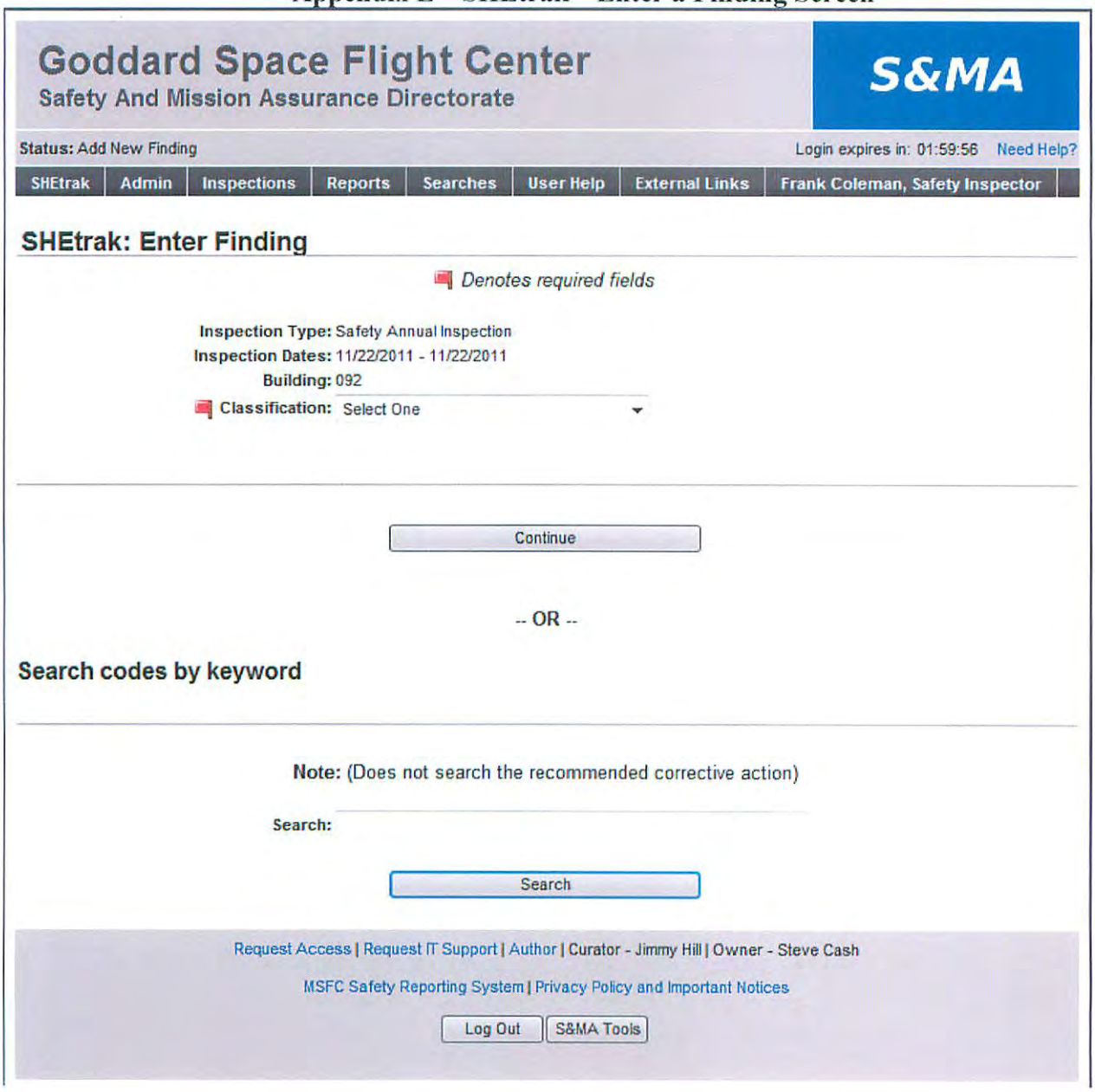


## Appendix D – SHEtrak – Add an Inspection Screen



## Appendix E – SHEtrak – Enter a Finding Screen



## SHEtrak: Enter Finding

**Inspection Type:** Safety Annual Inspection
**Inspection Dates:** 08/23/2012 - 08/23/2012
**Inspectors:** Frank Coleman
**Building:** 008

*Denotes required fields*

**Room:** Show Rooms **Floor:** **Equipment #:**

**Location:** **Area Type:** Select one...

**Classification:** Personal Protective Equipment
**SubClassification:** 243A Cryogenic-PPE

**Violation:** P3477 Personal protective equipment to include eye protection, hand protection,non-absorbent long-sl

**Recommended Action:** Provide required PPE.

Character Limit: 255

**Additional Recommended Action:**

Character Limit: 1000

**Additional Information:**

**Click here if the violation is not on the list:** ☐

**RAC:**
- ○ 1 (0 days)
- ○ 2 (15 days)
- ◉ 3 (30 days)
- ○ 4 (30 days)
- ○ 5 (30 days)
- ○ 6 (30 days)
- ○ 7 (30 days)

**Interim Action:**

**Assignee:** Select One

**Status:** ○ Open ○ Closed

**Is a cause and a Recurrence Prevention Plan required?** ○ Yes ◉ No

Character Limit: 8000

**Action Taken:**

**Work Stopped?:** ○ Yes ◉ No

**Add Picture?:** ○ Yes ◉ No

Save

## CHANGE HISTORY LOG

| Revision | Effective Date | Description of Changes |
|---|---|---|
| Baseline | | Initial Release |
| A | 01/20/2010 | Changed all references to Safety and Environmental Division (S&E) to Medical and Environmental Management Division (MEMD).<br>Updated MEMD chief name to Edward A. Connell. |
| B | 03/23/2012 | Changed title<br>Revised instructions to include how environmental problems are managed outside of GPRS-EM.<br>Simplified GPRS-EM instructions. |
| C | 5/27/2016 | Adopted work instruction for the new environmental tracking and reporting system, SHEtrak. All sections revised for new procedures in accordance with the new tracking system.<br>Appendix B - Added Environmental Health & Safety (EH&S).<br>Updated work instruction template. |
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