Notes for discussion at IPRH meeting to review the "Findings From the 2008 Inspection of Hazelwood Power Mining Operations, Morwell"

Ref: p:\documents and settings\john.robinson\my documents\worksafe audit actions july 08.doc

Executive Summary (from Work Safe report)

The following recommendations will be further discussed during future visits:

1.1   Hazelwood Power should review/ update drawing on the STD checklist, review/upgrade guarding in the winch brake area, clear backlog of ITNs and review process for tracking/ lagging such backlogs. (See safety device testing on Dredgers and guarding at the winch brake area).

Stan and Peter to modify the SDT procedural documentation and educate all users to ensure that all issues out of every test are put in Passport and uniquely identified as type SD. A routine report is to be developed and run monthly by the Asset Managers to review all outstanding issues. **Completed**

A summary of this report is to be incorporated in the Maintenance Monthly report prepared by the Maintenance Analyst. A trend of the Testing completion against Plan and the outstanding SD faults is to be included with the summary to allow simple review of progress by management. **Completed**

*Action: Asset Managers/
Maintenance Analyst*

Time frame – Dec 2008

1.2   Hazelwood Power should formalise operational inspections of the HSB to ensue that routine checks are being undertaken to the required standard. This may include but is not limited to; including the checks described in section 6 of the Hazelwood Slot Bunker procedure in a shift checklist/routine/shift log. The checklist should include sufficient information to describe what is required to be inspected, what condition would represent a pass or fail, and what condition was observed during the inspection. (See guard rails, grating and emergency rescue equipment at the Hazelwood Slot Bunker).

Routine inspections by the Fire Service Officers and Fire Service Supervisor for cleanliness are to be documented and placed in the CMMS (Passport at the moment). **Completed – 6-8 week inspection list has been developed & currently in operation Paradim document No.39562**

A shiftly checklist is to be developed as part of a Standard Operating Procedure. The Shift Manager Log is to be updated to incorporate a positive response on bunker cleanliness inspections. Initially, to reinforce this, at the Shift Change meeting, the Operations Management Rep is to question the result of the bunker inspection. **Shift Manager Report has been modified to contain SHIFTLY inspection report by HSB operators. Completed 06/02/09 (BE)**

Action: Operations Manager

Time frame – Feb 2009

1.3   Hazelwood Power should review procedures and practices to ensure that coal dust and spillages are cleaned up as required. That is, subjective controls such as housekeeping and operational inspection of plant need some level of guidance on when to clean to minimise the risks from explosion *[Note: with brown coal the risk is fire not explosion.]* and flammability hazards of coal dust, and how to identify deficiencies in equipment guarding etc. For example, how deep does a layer of dust on a hand rails, surfaces need to be before it is cleaned, and what deterioration of walkways integrity and machinery guarding is acceptable. (See coal dust and spillage clean up at HSB and conveyers).

Consider adding cleanliness as a specific item on the Fresh Eyes form to increase awareness of spill and dust build up. ***Rejected – Cleanliness is already adequately covered under housekeeping section of the Fresh Eyes form.***

Cleanliness is to be added to the Toolbox Topic list. ***Rejected – Toolbox topics cover the current hot topic rather than a recurring list.***

Add session on guarding to next ops training day to further educate operations and maintenance personnel on the guarding requirements for plant from the new standard. Reinforce that all guarding faults need to be reported via the CMMS (Passport). Check maintenance routines to ensure adequate guarding checks are included. ***Open: The next ops training day is due in March 2009 , a session on guarding will de delivered which will further educate operations and maintenance personell on the guarding requirements for plant from the new standard.***

Action: Operations Manager/
Maintenance Manager

Time frame – end Mar 2009

1.4   Hazelwood Power should consider options to improve: the overall system of recording and tracking training, recording competency assessments, auditing compliance, and consistency of rules and work practices conveyed by the training. (See training SMS element).

Chris upgrade to version 2 should cover most of this. We have recently employed new HR Officers. They are now responsible for the database and will be checking its integrity.Training Coordinator to be trained in the new version of CHRIS and to progressively move to using CHRIS rather than local spreadsheets, as the data is validated. ***Completed – Chris21 implementation has been delayed due to technical issues and the loss of key personell. The training and implementation will be completed by end of June 2009.***

Action: Jess Macri

Time frame – end June 2008

1.5   Hazelwood Power should use the upgrade to the Maximo system as an opportunity to fully integrate the maintenance management system. For example, ensure that scheduling, tracking and signing-off of all SDT issues are done through a single system (e.g. Maximo). (See maintenance and inspection SMS element).

This will be done as part of the CMMS upgrade and action for item 1.1. Maximo planned to go live Apr 2009. ***Open – Maximo implementation due May 09 and this is included in the scope.***

This large project has been delayed by the need to implement a new coding system for all station plant. The decision has also been made to move to Version 7 of Maximo due to technical issues with the software. This has increased the complexity of the project and affected the forecast completion date. Maximo may not be "live" on site until July 09. The program is under regular review.
Comment by Peter B 27/1/2009

Action: Asset Managers/
Laurie Jackson

Time frame – end July 2009

1.6   Hazelwood Power should review and revise the hazard identification and assessment processes as required by Reg 5.3.9.

Review options to integrate all hazard identification and risk assessment into the formal HERA process. Some process documentation would need to be developed but the HERA system is well defined risk assessment system that has a good base.

The process is currently linked to the Asset Management Plan where all significant risks are addressed and the defined strategy for each significant risk is documented.

A Value Management study may be appropriate to ensure all aspects of the regulations and Work Safe requirements are met by both practice and documentation.

The National Minerals Industry Safety and Health Risk Assessment Guideline will be reviewed, as part of this action, to ensure that our system is robust and achieves outcomes seen as current industry "Best Practice".

The processes used at other Major Hazard Facilities should be reviewed to determine a suitable and appropriate Hazard Identification process. Work Safe have agreed to help in gaining access to information from other sites.

A process map for our system is to be developed and reviewed by Work Safe to ensure conformity with the regulations and suggest possible enhancements.

Open – Extensive consultation is underway to develop a system that meets both site and regulatory requirements.

An initial meeting involving mine and station personnel outlined a significant number of areas that should be covered. The process is seen as complex and the time frame is suggested as long. To reduce the total effort it has been decided to limit the initial study to just the mine, with the option of extending the outcomes into the station later. A team of mine personnel has been formed to review this item. The first task of this group is to prepare an action plan and develop a program that will achieve the proposed date.
Comment by Peter B 27/1/2009

Refer to attached HEALTH AND SAFETY RISK MANAGEMENT AND COMPLIANCE DOCUMENTATION PROJECT

Action: Director Mining/
Asset Managers/
Health & Safety Manager/
Mine Business Analyst

Time frame –Dec 2009

1.6.1 The review should ensure that the methodology (including all sources of information) used for this review is transparent, systematic and involves relevant persons.

1.6.2 The review should provide clarity on the ranking of hazards and in particular the ranking of major mining hazards. This may include development of a methodology for ranking hazards as Major Mining Hazards and for conducting a comprehensive and systematic safety assessment.

1.6.3 The review and revision of the hazards register should provide clarity on the status and future application of the Semi Quantitative Risk Assessment (SQRA) methodology documented in the Qest Consulting report. That is, is the Qest report a one off document or will the SQRA results be recalculated periodically? (See hazard identification risk assessment and/or safety assessment SMS element).

HAZELWOOD MINE

HEALTH AND SAFETY RISK MANAGEMENT AND COMPLIANCE
DOCUMENTATION PROJECT

Legislation:

Acts: Occupational Health and Safety Act 2004 No 107

Regulations: Occupational Health and Safety Regulations 2007 No 54

Codes of Practice: as appropriate.

Industry Guidelines:
* National Minerals Industry Safety and Health Risk Assessment Guidelines Version 6 Jan 2007

Management:

Management Steering Committee - Health and Safety Risk Management and Compliance

Chairperson: Ian Quail Director of Mining
Secretary: Garry Mauger – Project Controls Manager
Members: Richard Polmear – Mine Engineering Manager
Bill Estrada – Mine Operations manager
Peter Brimblecombe – Representing the Mine maintenance Manager
Cheryl Blower Business Analyst
Jess Macri Health Safety and Training Co-ordinator

The Steering Committee will oversee all Health and Safety Risk management and Compliance including the documentation of the Safety Management System, conducting of performance monitoring, internal audits and subsequent action plans.

A **Project Manager** has been appointed to bring together, in a systematic statement, the health and safety risk management and compliance activities, documentation of the Mine safety management system currently in use, including details of the management, administrative and engineering tools, processes and systems in use within the system..

A Review Committee

A Review Committee(s) – vertical and horizontal representation of the mine workforce including:
* Operations, Maintenance, Mine Engineering and management reps.

- personnel charged with operation and reporting of the O H&S Risk Managing Tools
- other selected interested personnel possibly including H&S reps and area reps as appropriate

HEALTH AND SAFETY RISK MANAGEMENT AND COMPLIANCE
DOCUMENTATION PROJECT

DRAFT ACTION PLAN AND TIMELINE

NO	Task Description	Due Date	Remarks
1.	Identify the regulatory framework to be satisfied.	13 Feb 2009	
2.	Identify and document all current risk registers and risk assessments including major hazard studies.	27 Feb 2009	
3.	Identify the OH&S risk management processes and systems (tools) currently in operation or available in the mine eg HERA, HAZOPS, JSA, Take 5 etc.	13 Mar 2009	Note: This is a hierarchical grouping, so a progressive approach is indicated, from identification, applicability, and detail.
4.	Review with Management Steering Committee	27 Mar 2009	Review for completeness
5.	Report progress to OH&S committee monthly	Monthly	
6.	Use a matrix approach to document the applications and instances where each of the OH&S risk management processes and systems (tools) currently in operation or available in the mine, should be used.	29 May 2009	Note: Use the National Minerals Industry Safety and Health Risk Guidelines to assist with this categorisation Officers responsible for these systems/processes to report fortnightly to the Project Manager during this work phase.
7.	Report progress to OH&S committee monthly	Monthly	
8.	Collate and catalogue detailed documentation of each the OH&S risk management processes and systems (tools) currently in operation or available in the mine, detailing	31 Jul 2009	Note: Document the IT and paper based systems, where these are operated from/held. Officers responsible for these systems/processes to use the

		responsible officer, location usage guidelines, manuals, tables charts etc.		supplied proforma for documentation, and report fortnightly to the Project Manager during this work.
9.		Review with Management Steering Committee	7 Aug2009	
10.		Review with Peer Review Committee	14 Aug 2009	
11.		Document the framework of the safety management system as it currently exists within the mine.	23 Oct2009	
12.		Review with Management Steering Committee	30 Oct 2009	
13.		Report progress to OH&S committee monthly	Monthly	
14.		Finalise report	4 Dec 2009	
15.		Deliver report to Worksafe	18 Dec 2009	
16.		Perform GAP analysis, and recommend improvements or revisions.	TBA	Timing of commencement dependent on Worksafe comments of Risk Management/SMS documentation
17.		Report progress to OH&S committee monthly	TBA	"
18.		Review and upgrade mine OH&S Risk Management performance measures and monitoring regimen.	TBA	"
19.		Identify IT systems to assist with compliance activities, recommending any upgrades that may be required or opportune.	TBA	"
20.		Review with Management Steering Committee	TBA	"
21.		Review with Peer Review Committee	TBA	"
22.		Implement compliance monitoring and review	TBA	"
23.		Report progress to OH&S committee monthly	Monthly	