

Work scope details:

Title: EPSD's Support Role for the CY2018 Deer Hunts

Work Scope Summary: - The work involves EPSD supporting the annual deer hunt at the Oak Ridge Reservation, a joint effort between TWRA and ORNL. EPSD's role is to collect bone and tissue samples from harvested deer for immediate onsite analysis by CSD. Based on the analysis, deer are either released to hunters or retained for disposal due to radiological concerns. EPSD is responsible for processing and packaging retained deer for secure storage.

Key Work Scope Components: - Collecting bone and tissue samples from harvested deer using knives and lopping shears. - Immediate onsite analysis of samples by CSD to determine the release or retention of deer. - Processing retained deer by cutting them into sections no more than 35 lbs using knives, reciprocating saw, or hacksaw. - Packaging each section in a cardboard box with absorbent material, securing, and labeling it appropriately. - Storing the packaged sections in a secure freezer under CSD's custody.

Relevant previous events and lessons learned:

| Event Title | Event Summary | Lessons Learned | Reference link |
|--|--|---|--|
| Brookhaven National Laboratory Deer Population Reduction | In the late 1990s, BNL discovered elevated Cs-137 levels in deer meat from road-killed deer due to soil contamination. The NY State Department of Environmental Conservation initiated a deer population reduction program. Deer were collected, and meat samples underwent radiological analysis to assess potential human exposure. Despite contamination, no formal hunting restrictions or expanded disposal actions were implemented as exposures were below regulatory guidance. | The importance of radiological analysis in assessing potential human exposure and the effectiveness of regulatory guidance in managing contamination without imposing hunting restrictions. | BNL Deer Issues |
| NIST Deer Population Reduction Program | In early 2024, NIST, with USDA Wildlife Services, safely removed 60 deer from its campus. The operation included deer sample collection, secure handling, and safety oversight. The focus was on population and environmental management, with all venison packaged and donated to local food banks following regulatory safety measures. | Effective collaboration with wildlife services and adherence to safety measures can facilitate successful population management and community support through donations. | NIST Deer Population Reduction |
| No Recent Accidents Documented | No verifiable recent accidents involving radiological analysis, packaging/disposal, or secure storage linked to deer culling at laboratories or industry sites have been documented online. | Continuous monitoring and regulation can prevent accidents and ensure safe operations in deer culling programs. | N/A |

Missing Hazards:

| Hazard | Missing or Inadequate Mitigation in Current Work Control Document | Recommended Mitigation for Revision | Reference link | SBMS Link |
|------------------------------------|--|--|---|----------------------|
| Thermal Stress | Lack of specific controls for thermal stress beyond heat/cold stress | Implement detailed thermal stress management protocols, including environmental monitoring and acclimatization procedures | N/A | Link |
| Physical Injury from Cutting Tools | No specific mention of cutting tool hazards | Introduce guidelines for safe use of cutting tools, including PPE requirements and training | Safety Notes , HSE Blog , OSHA | Link |
| Improper Handling and Storage | General manual material handling controls may not cover specific storage hazards | Develop comprehensive storage guidelines for hazardous materials, including compatibility and environmental considerations | OSHA , Palmetto Industries , Chemtrec | Link |
| Time Pressure and High Workload | No specific controls for managing time pressure and workload | Implement workload management strategies and stress reduction techniques | N/A | Link |
| Distractive Environment | No specific controls for managing distractions in the workplace | Develop policies to minimize distractions and enhance focus, including workspace design and noise control | N/A | Link |

Failure mode analysis:

| Current control | Failure mode of the control | Effect of Failure | Cause of Failure | Recommended action |
|-------------------------------------|--------------------------------|---|----------------------------------|--|
| Written permits for work activity | Permit not obtained or invalid | Unauthorized work leading to safety hazards | Miscommunication or oversight | Ensure all permits are valid and reviewed before work begins |
| Personal Protective Equipment (PPE) | PPE not used or inadequate | Increased risk of injury or exposure | Lack of training or availability | Conduct PPE checks and training sessions |

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| Work instructions and safety procedures | Instructions not followed | Increased risk of accidents | Inadequate training or supervision | Regular training and supervision to ensure compliance |
| Administrative Control Codes (Training, Labeling, etc.) | Controls not implemented effectively | Increased exposure to hazards | Lack of awareness or enforcement | Regular audits and reinforcement of control measures |
| Engineering Controls (Ventilation, etc.) | Controls fail or are inadequate | Exposure to hazardous materials | Equipment malfunction or poor maintenance | Regular maintenance and checks of engineering controls |
| Worker rotation and limited stay time | Rotation not followed | Prolonged exposure leading to health risks | Poor scheduling or oversight | Implement strict adherence to rotation schedules |
| Hazard assessment and exposure rating | Incorrect assessment leading to inadequate controls | Increased risk of exposure | Inaccurate data or analysis | Regular review and validation of assessment data |
| Emergency response protocols | Protocols not followed during emergencies | Increased risk of harm or property damage | Lack of training or preparedness | Conduct regular emergency drills and training |
| Slip/Trip conditions and rough terrain | Inadequate footwear or terrain assessment | Risk of injury from falls | Poor assessment or equipment | Ensure proper footwear and conduct terrain assessments |