

Chapter 1: [General Policy and Responsibilities](#)

ESH Project Review Procedure

Product ID: [476](#) | Revision ID: 1741 | Date published: 27 May 2015 | Date effective: 27 May 2015

URL: <http://www-group.slac.stanford.edu/esh/eshmanual/references/eshProcedProjectReview.pdf>

1 Purpose

The purpose of this procedure is to ensure that the environment, safety, and health (ESH) aspects of project activities are adequately identified and mitigated before projects are authorized and released. The goals of this procedure are to

1. Establish a uniform process of project reviews
2. Establish consistent thresholds for a graded approach
3. Clarify and streamline the structure and process of reviews
4. Provide a framework that fosters timely and adequate planning and support to project sponsors

This procedure covers the three main elements of the review process:

1. Threshold and applicability determination
2. Experimental project review
3. Conventional project review

This procedure applies to line management, responsible persons, ESH coordinators, and reviewers involved in the proposal, review, and approval of project (experimental and conventional) activities at SLAC.

2 Roles and Responsibilities

2.1 Line Management

- Supports the implementation of this procedure throughout the organization
- Ensures that adequate resources are allocated to supporting projects
- Sets the tone to enable/promote self-policing of process/voluntary compliance/self-governance

2.2 Responsible Person

- Develops a comprehensive scope of work
- For construction projects, teams with ESH and Facilities Construction Management to perform a project risk analysis

- Teams with the ESH coordinator and other resources to perform an effective and accurate threshold review and applicability determination
- Develops applicable submittals to review entities, for example, the Building Inspection Office (BIO)
- Teams with engineers to ensure SLAC Conduct of Engineering Policy requirements are met
- Teams with ESH coordinator to execute experimental and conventional project review processes, as appropriate
- Ensures adequate staffing and timelines
- Fosters and ensures adequate communication to stakeholders
- Is responsible for the overall ESH performance of the project

2.3 ESH Coordinator

- Provides input to review statement of work (SOW) against the lower limit thresholds
- Identifies, solicits input from, and liaises with subject-matter experts (SME) who can assist in the threshold review
- Teams with the responsible person (the principal investigator [PI] / project manager [PM]) to
 - Perform formal review of the activity/project in the context of the broad thresholds
 - Document the rationale for designation as a work activity or a project activity, including hazard identification/analysis
 - Assist in the execution of experimental and conventional project review processes, as appropriate

2.4 Reviewer

The following responsibilities apply to everyone involved in project review:

- Provides thorough and timely review guidance to the project team
- Communicates early and often with the project team to ensure comments are addressed both in letter and intent, keeping the “One Lab” perspective in mind

2.5 Chief Safety Officer, Associate Laboratory Director, Laboratory Director

- Hears appeals for unresolved issues with experimental review. Final appeal is to the SLAC laboratory director

3 Procedures

The three elements of the process are summarized below; the steps are illustrated in the following process flow charts.

3.1 Threshold Review and Applicability Determination

The *responsible person* (for example, principal investigator, researcher, or project manager) and ESH coordinators (with input from subject matter experts as required) will determine whether a proposed activity/experiment can be categorized as a *work activity* or a *project activity* that needs to be reviewed through one/both of the experimental project review and conventional project review processes. All steps reside within the requester's line organization and include two levels of thresholds: lower limit thresholds and broad thresholds. The rationale for the eventual determination is documented via the threshold review form and retained by the responsible person. An [ESH Threshold Review Form](#) must be completed if the activity exceeds any of the lower limit thresholds.

The lower limit thresholds help determine if the proposed activity is within the "standard model" for the researcher/principal investigator and immediate team, while the broad thresholds help to determine whether all ESH aspects of the proposed activity can/will be adequately addressed within the requester's line organization.

The responsible person is responsible for safety of the work being performed in accordance with integrated safety management guiding principles.

3.2 Experimental Project Review Process

All equipment and operational aspects of proposed experimental projects are to be reviewed through this process. The key organizational stakeholders include the requester's line organization, the ESH coordinator, and safety officers/subject matter experts. There are two areas that need to be considered by the line organization:

1. Experiments that meet the lower limit thresholds and need to be discussed with the ESH coordinator
2. Experiments that involve working with various groups, for example coordinating among various laboratory groups for logistics, starting an already approved project in a new laboratory, et cetera. In such situations, line organizations need to appoint an experimental project manager who is responsible for coordination between the groups and to ensure that the project moves along smoothly.

The process includes specific provisions for the line organization to review and approve scope changes driven by reviewer comments and includes an appeal mechanism – to the SLAC chief safety officer and the SLAC laboratory director. Specific "go forward" authorization/approval is provided via an acceptance/commissioning step. The threshold review form provides summary level documentation into this process.

3.2.1 Biohazardous Materials and Animal Research

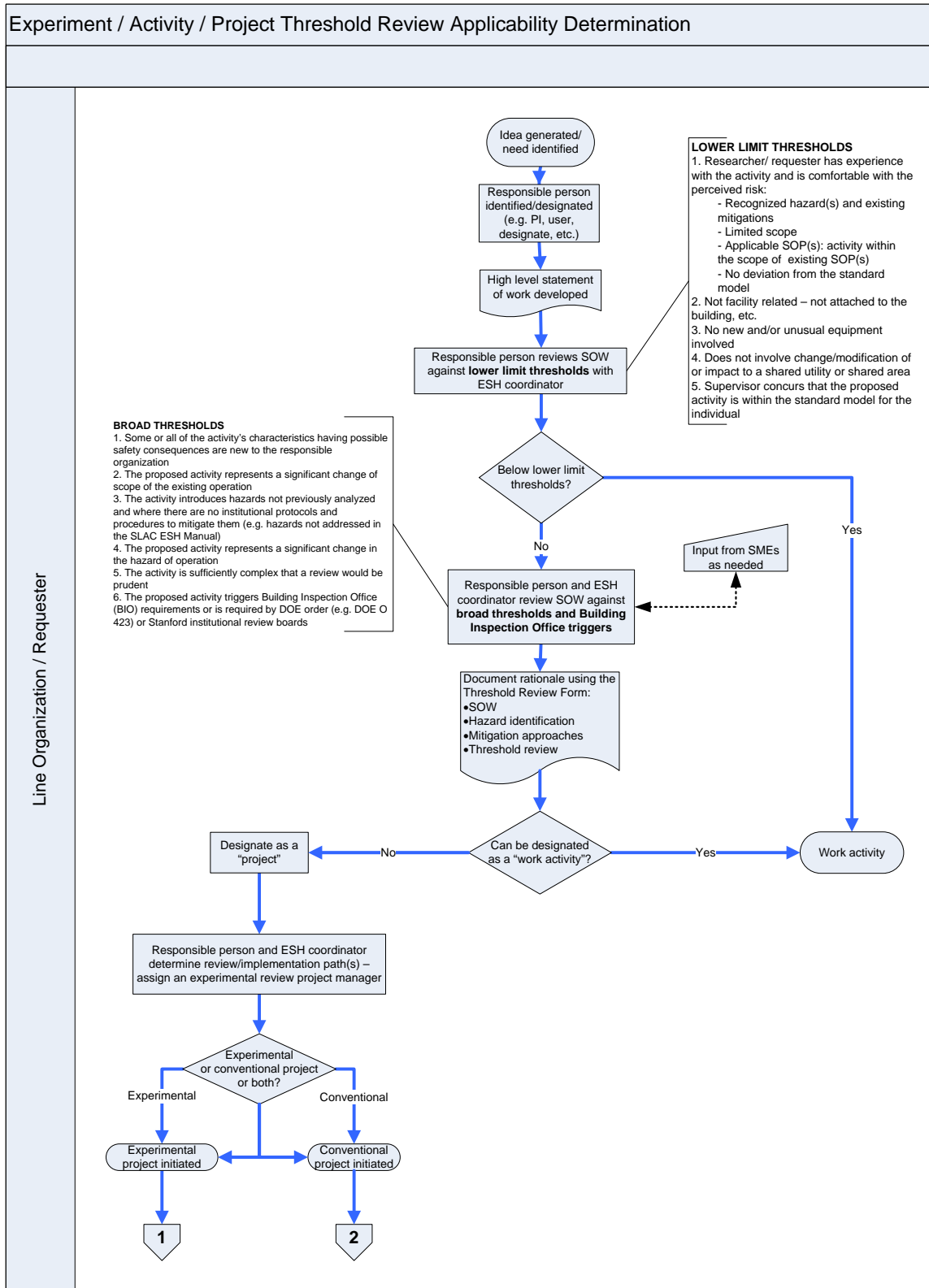
All work at SLAC involving potentially biohazardous materials or animal research must be conducted under the policies and procedures set forth by Stanford University. Work covered under the biosafety requirements must go through the university's Administrative Panel on Biosafety (APB). (See [Stanford University Biosafety Program](#).)

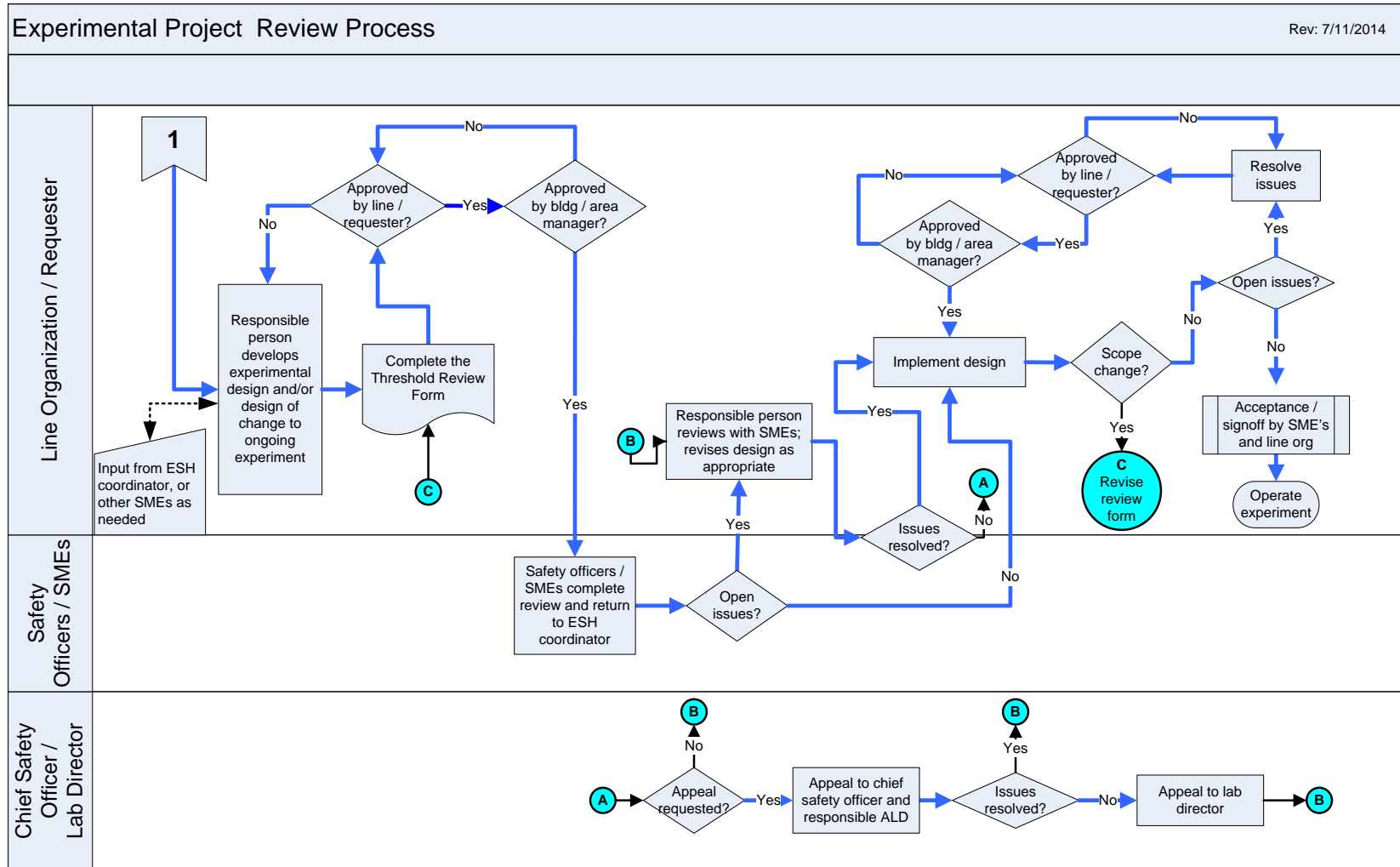
Any work involving laboratory animals must go through the university's [Administrative Panel on Laboratory Animal Care \(APLAC\)](#). Approval must also be obtained from the DOE SLAC Site Office (SSO).

Principal investigators planning on such work must first meet with their directorate ESH coordinator and the SLAC biosafety program manager to review these requirements and develop the necessary submittals for review by the appropriate university panel.

3.3 Conventional Project Review Process

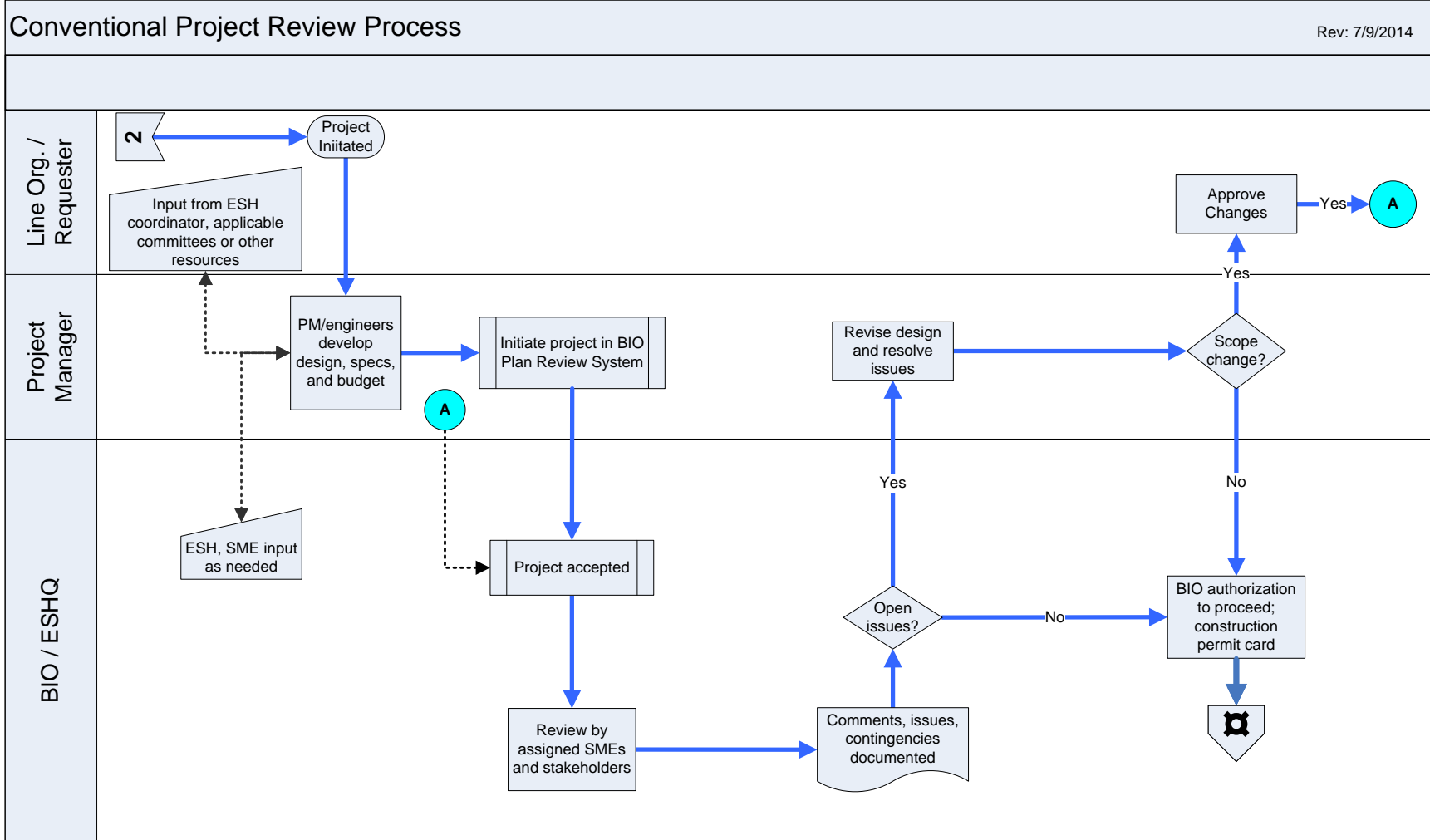
All equipment and operational aspects of proposed conventional projects that trigger external mandates (for example, Building Inspection Office requirements) and/or impact a shared area or resource are reviewed through this process. The key organizational stakeholders include the project manager, requester's line organization, Building Inspection Office (BIO), Environment, Safety, and Health (ESH), Purchasing, and Facilities/subcontractors. The [BIO Plan Review System](#) is the on-line tool used to manage this business process.

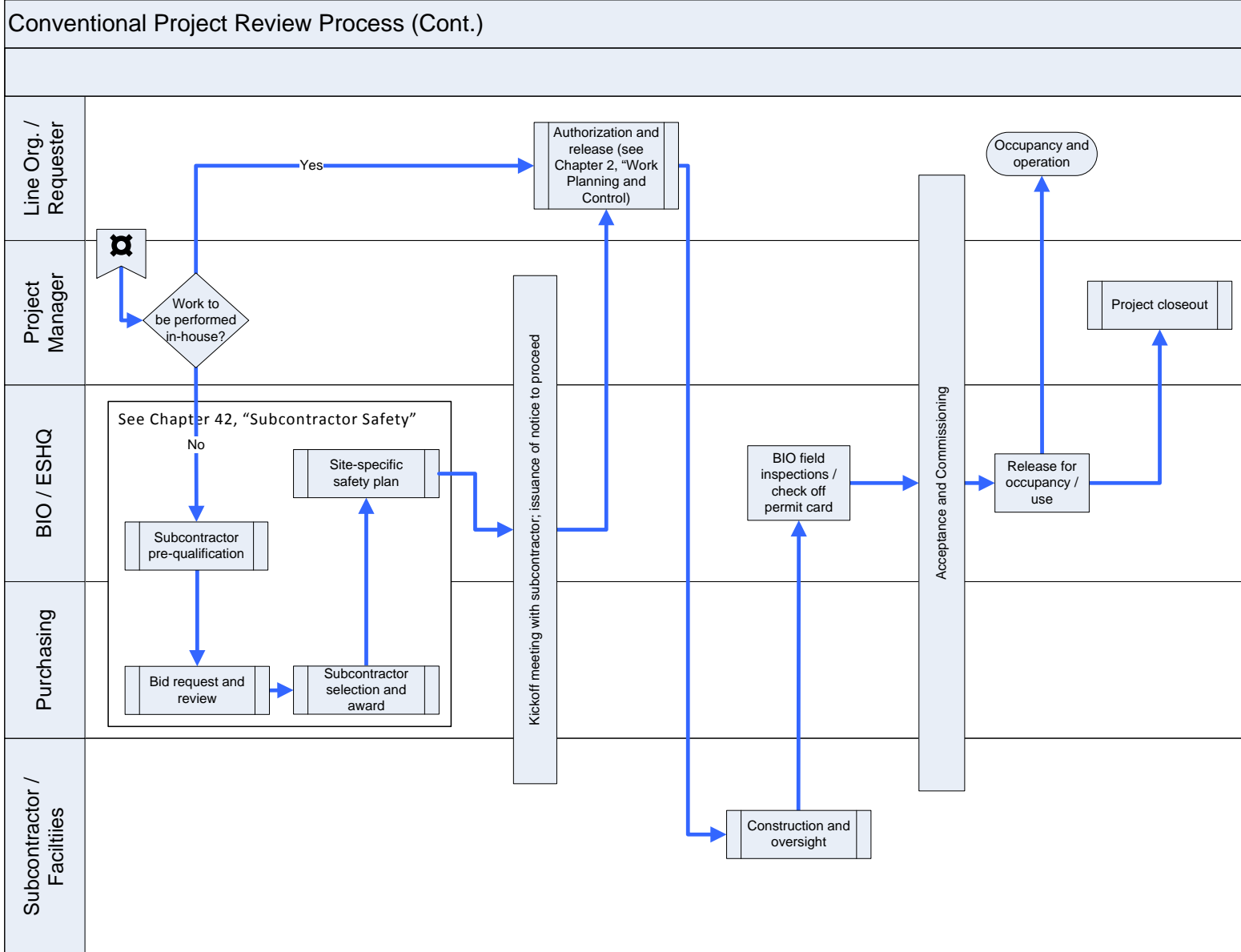




* For work activities above the lower threshold, the following project requirements must be addressed:

- Designation of a project manager by line management
- Project manager, together with directorate ESH coordinator and other SMEs as needed, to determine what project reviews are needed. The directorate ESH coordinator will make sure that the line understands all of the risks associated with the project and determine which ESH program managers need to review the project.
- Project reviews may include requirements/specification review, engineering review, and committee reviews.
- Requirements/specification must be documented. Existing SLAC documentation methods are acceptable for gathering this information.
- Project completion document. This may be satisfied by an acceptance/certification test or by an approval-to-operate form.





4 Forms

The following forms are required by this procedure:

- [General Policy and Responsibilities: ESH Threshold Review Form](#) (SLAC-I-720-0A24J-001). Form for documenting whether work exceeds lower limit thresholds and requires ESH project review
- [BIO Plan Review System](#). System for performing and documenting conventional project reviews

5 Recordkeeping

This procedure includes the following recordkeeping requirements:

- The responsible person must retain documentation and submittals.

6 References

[SLAC Environment, Safety, and Health Manual](#) (SLAC-I-720-0A29Z-001)

- [Chapter 1, “General Policy and Responsibilities”](#)

Other SLAC Documents

- [SLAC Conduct of Engineering Policy](#) (SLAC-I-701-701-001-00)
- [BIO Project Review and Authorization Manual](#) (SLAC-I-730-2A24Z-001)

Other Documents

- [Stanford University, Department of Environmental Health and Safety. Research and Laboratory Safety: Biosafety](#)
- [Stanford University, Research Compliance Office, Administrative Panel on Laboratory Animal Care \(APLAC\)](#)