



Indian Point 2

Environmental Health & Safety

2001 Business Plan

Plan Manager: Roger Keppel

Submitted: _____

[Signature]

Date: 1/4/01

Sr. Management Sponsor: Alan Blind

Approved: _____

A. Alan Blind

Date: 1/4/01

Environmental, Health and Safety (EH&S) 2001 Business Plan Summary

OVERVIEW:

The Environmental, Health and Safety (EH&S) Department is responsible for the overview and monitoring of station Environmental, Health and Safety programs. WE ensure that the Indian Point Station is in compliance with Federal, State and Local regulations and our Corporate Environmental Procedures, General Environmental Procedures and Safety Procedures. Additional functions include: overview of the asbestos abatement work, maintenance of asbestos tracking system, OSHA 200 logs, vehicle accidents, Confined Space Program including training and maintaining equipment, safety training issues, upkeep of First Aid room, safety walk downs, Administering prescription safety Eye wear program, fire brigade, fire extinguishers, contractor health and safety plans (HASP) review, chair station Safety and Environmental committees, SARA Title III, oil storage, chemical storage, SPDES program, interface with Coast Guard, resolving of Industrial Hygiene issues, and monitoring equipment for Industrial Hygiene and maintenance of Industrial Hygiene equipment.

To enhance our ability to operate, Environmental, Health and Safety will need to incorporate an EH&S Web site. This site will allow our customers to easily obtain useful information, such as a section for frequently asked questions section, an asbestos tracking system, a certificate section, and so on. This project was not approved for in 2000 business plan, but should be pursued in 2001. Phase II due diligence investigation for the proposed sale, several areas were identified as areas of concern due to elevated levels of some non-radiological contaminants. A qualified vendor, Earth Tech, estimated the cost of remediation.

To better serve our customers, the space which has been allotted to the Environmental, Health and Safety (EH&S) department in the Administration building (53') must be made more customer friendly and efficient, this will require a modification to the space allotted to the department.

ORGANIZATIONAL INTERFACES :

Environmental, Health and Safety (EH&S) interfaces with every organization at Indian Point.

The EH&S department coordinates EH&S requirements with Corporate EH&S; however, after ownership transfer in 2001, Con Edison Corporate EH&S will no longer support Indian Point.

CHALLENGES:

Environmental, Health and Safety (EH&S) are station priorities, significant station issue such as meeting required regulations, as well as commitments, that have been identified in audits and self-assessments for the past 6 years and perhaps longer. The safety culture at Indian Point needs to be brought up to the industry standards before the station can excel.

Contributing factors:

- Inadequate attention has been paid to all facets of Environmental, Health and Safety (EH&S) over the years.
- Environmental, Health and Safety (EH&S) has been chronically understaffed.
- Station management has not made it clear to Indian point station personnel that safety is responsibility of every individual in the station.

GOALS:

- ◆ A goal of the EH&S function is to reduce operating cost by reducing accidents, claims, and fines.
- ◆ Improve the Environmental, Health and Safety culture of the Indian Point Station
- ◆ Increase Industrial safety tours and visibility throughout the station.
- ◆ Continue to oversee and track all waste shipment.
- ◆ Enhance, reorganize and properly staff the Environmental, Health and Safety department, to meet the expanded functional requirements.
- ◆ Train newly acquired personnel to professionally perform and implement our Environmental, Health and Safety culture.
- ◆ Continue to implement and oversee the Waste Reduction program.
- ◆ Complete implementation of the Asbestos site survey of all IP2 operating areas.
- ◆ Conduct a Safety Culture Assessment and implement necessary safety awareness training. .
- ◆ Implement an Environmental, Health and Safety Web site.
- ◆ Implement and help centralize safety training records, ensuring that training meets and operates at a high level of efficiency and meets all Station, Federal, State and Local regulations.
- ◆ Assume Corporate functions of the Asbestos Certificate program.
- ◆ Increase Safety through a high visible station campaign
- ◆ Conduct environmental regulatory-based assessments for air, oil, water, hazardous waste and chemical programs to ensure regulatory compliance.
- ◆ Increase involvement of station personnel in the day to day activities of safety (possible on loan program from other sections).
- ◆ Update and maintain all regulatory based compliance plans (Facility Response, Contingency Plan, Spill Prevention, etc.)
- ◆ Upgrade capability of an effective station response to a large oil spill in the river
- ◆ Maintain compliance of fire safety equipment

EXPECTED RESULTS:

- ◆ Unveil and support the Environmental, Health and Safety Web site.
- ◆ Improve the Environmental, Health and Safety culture.
- ◆ Oversee and track all waste shipment
- ◆ Continue to revamp, implement and oversee the waste reduction program
- ◆ Complete all training requirements for newly acquired personnel
- ◆ Centralize safety training records
- ◆ Ensure we have Industrial Safety tours and more visibility throughout the station
- ◆ Properly staff the Environmental, Health and Safety organization to meet the expanded functional requirements
- ◆ Completion of the Asbestos site survey.

Without appropriate backing, staffing, and funding some of the goals will not be accomplished.

ENVIRONMENTAL, HEALTH & SAFETY**2001 BUDGET**

	HUMAN RESOURCES												
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Average
Management Weekly													
SUB TOTAL													
Contractors Weekly Overtime Hours													

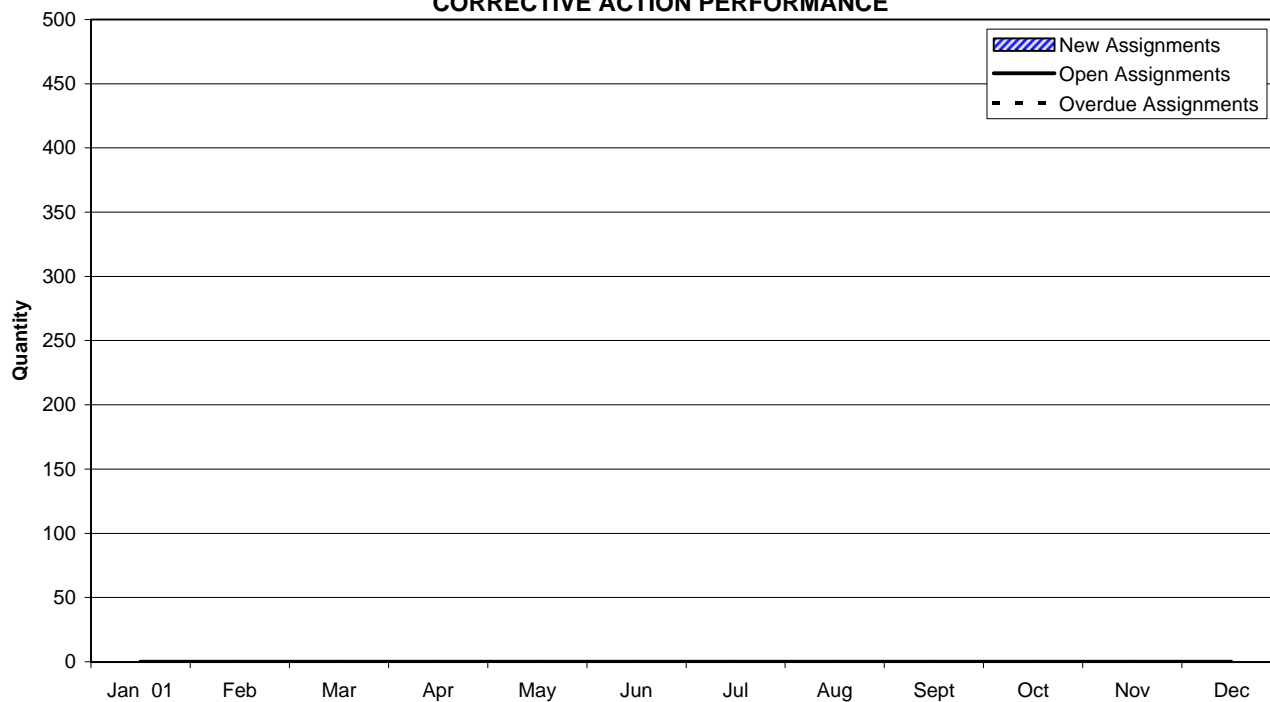
	(\$000)												
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
<u>Labor:</u>													
Management													
Comp													
SUB TOTAL MANAGEMENT													
Weekly													
TOTAL LABOR													
<u>Accounts Payable:</u>													
Site Remediation													
Safety Programs													
Fire/Safety Equipment													
EH&S Initiatives/Awards													
Environmental Programs													
All Other													
SUB TOTAL A/P													
<u>All Other:</u>													
Materials & Supplies													
P Card													
Benchmarking/Training													
Petty Cash													
All Other													
SUB TOTAL ALL OTHER													
TOTAL NON-OUTAGE													

OUTAGE		
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EH&S GOALS 2001

Strategic Goal	Owner	Implementing Action	Measure	Cost (\$000)	Due Date	Status	Completed Date
Increase Station Awareness of EH&S	EH&S	Develop and maintain a web site providing EH&S information to the Station	Increase awareness of EH&S		02/01/01 with quarterly improvements		
Increase Station Environmental Awareness and Community Outreach	EH&S/ Station	Conduct monthly meetings of the Station Environmental Excellence Committee. Encourage environmental awareness at the Station and support Community Outreach on environmental issues.	Improve site wildlife habitat and site beautification. Provide funding for site environmental initiatives by Environmental Excellence Committee.		Environmental initiatives planned and carried out during monthly meetings		
Achieve Environmental Excellence	EH&S/ Station	Perform environmental self-assessments using only regulatory citations portions of the Corporate Audit Forms (excluding requirements specified only in Con Edison procedures).	Reduce non-compliance programs to 0.		Complete 25% of subject areas each quarter		
Achieve Environmental Excellence	EH&S/ Station	Maintain expertise of Station Spill Management Team as required by US Coast Guard. Train with oil spill response contractors and upgrade spill response procedures.	Maintain 100% training compliance and improve Station oil spill response		Boom training/ Site Manual by 04/15/01 Annual table top exercise by 10/01/01		
Achieve Environmental Excellence	EH&S/ Station	Update all regulatory plans (Spill Prevention Control Countermeasures, Facility Response Plan, Spill Prevention Report, Contingency Plan) as required	Maintain 100% compliance with regulatory plan requirements		Plans updated before sale transfer		
Achieve Environmental Excellence	EH&S / Station	Create and Manage the Pollution Prevention Program (P2)	Reduction in waste costs		12/31/01 with monthly work down curves		
Achieve Environmental Excellence	EH&S/ Station	Conduct a remediation plan for the Areas of Concern identified in Divestiture Phase II Investigation.	Compliance with NY State Dept of Environmental Conservation requirements		To be determined after negotiations with NY State DEC or funding to be transferred to new owner.		
Achieve Environmental Excellence	EH&S	Monitor all Station asbestos projects and ensure EH&S personnel maintain asbestos qualifications (project monitor, inspector, etc.)	Maintain 100% compliance with asbestos regulations		Certifications due before birth dates		
Ensure a Safe Workplace	EH&S / Station	Conduct safety self-assessments using Con Edison Corporate Safety Procedures (CSP's) and OSHA guidelines	100% compliance with overall Corporate Safety programs		Complete 25% of subject areas each quarter		
Ensure a Safe Workplace	EH&S	Develop professional expertise in staff members with outside OSHA Training and benchmarking	Improvements in staff expertise/obtain certifications		Benchmarking by 03/01/01 Staff training by 06/01/01		
Ensure a Safe Workplace	EH&S / Station	Conduct a Safety Culture Assessment and train Safety Focus Teams in key operating groups. Conduct monthly meetings of the Station Safety Committee.	Reduce safety incidents/close calls		Safety culture assessment by 03/01/01 Department groups trained by 06/01/01		
Ensure a Safe Workplace	EH&S/ Station	Conduct safety recognition programs and safety awareness for employees and their families (Safety Calendars, etc.).	Number of best practices recognized / close calls reported		12/31/01 with monthly work down curves		
Ensure a Safe Workplace	EH&S/ Station	Conduct required monthly checks of all station fire extinguishers using a qualified vendor.	Maintain 100% compliance in fire extinguisher availability		Monthly vendor reports to document compliance		
Ensure a Safe Workplace	EH&S/ Station	Maintain a well trained confined space rescue team and upgrade equipment as required	Maintain 100% availability of rescue team to support operations		Replace & renew gear as needed Train an additional 10 personnel		

EH&S CORRECTIVE ACTION PERFORMANCE



Month	Jan 01	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
NEW CRs	0	0	0	0	0	0	0	0	0	0	0	0
New ICAs	0	0	0	0	0	0	0	0	0	0	0	0
New Assignments	0	0	0	0	0	0	0	0	0	0	0	0
Open Assignments	0	0	0	0	0	0	0	0	0	0	0	0
Overdue Assignments	0	0	0	0	0	0	0	0	0	0	0	0
Dept. CAP Index												

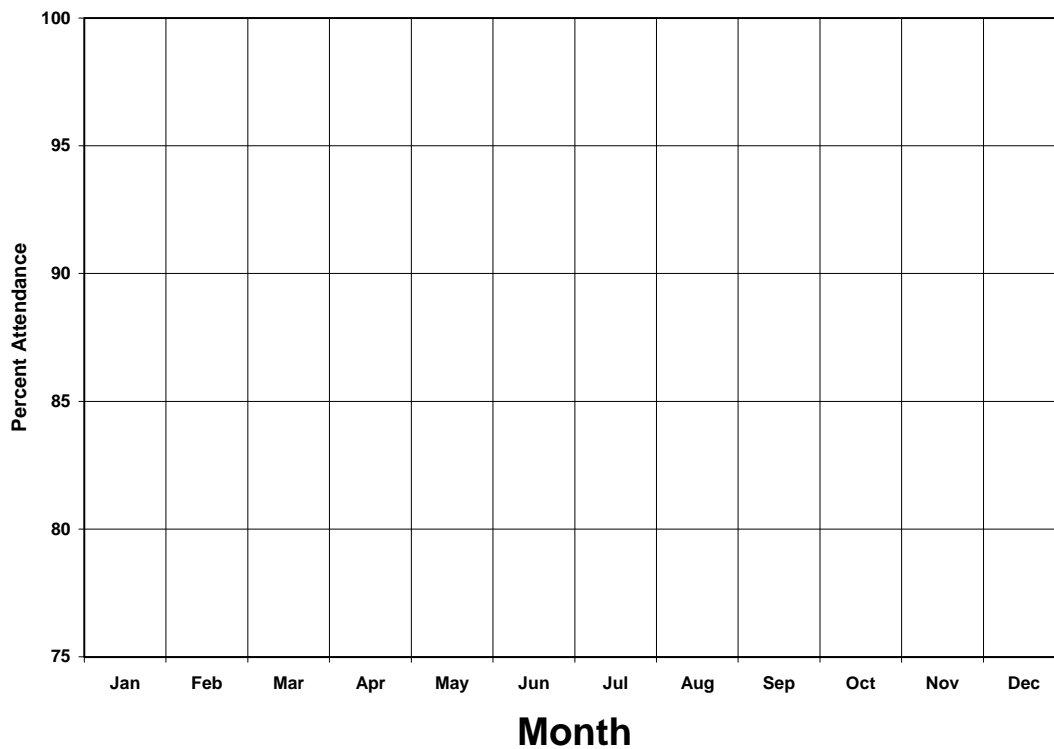
INDICATOR DESCRIPTION

This indicator presents the status of CRs and ICAs that are assigned to this department. Additional specific information can be obtained directly from the Corrective Action Group and the CRS reporting system. The total of the new CRs plus new ICAs is represented as "Total New Assignments" and the backlog of CRs and ICAs to be processed is represented as "Open Assignments". "Overdue Assignments" are those CRs and ICAs that are past due (30 days for CRs and beyond the scheduled due date for ICAs). Additionally, the overall CAP Index is presented as determined by the Corrective Action Group for this department. The CAP Index addresses department performance regarding Timeliness, Schedule Adherence and Quality of Corrective Action related activities.

ANALYSIS

Put Analysis Here

EH&S Training Attendance



Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Site Attendance	0	0	0	0	0	0	0	0	0	0	0	0
Off Site Attendance	0	0	0	0	0	0	0	0	0	0	0	0
Overall Attendance	0	0	0	0	0	0	0	0	0	0	0	0
**												

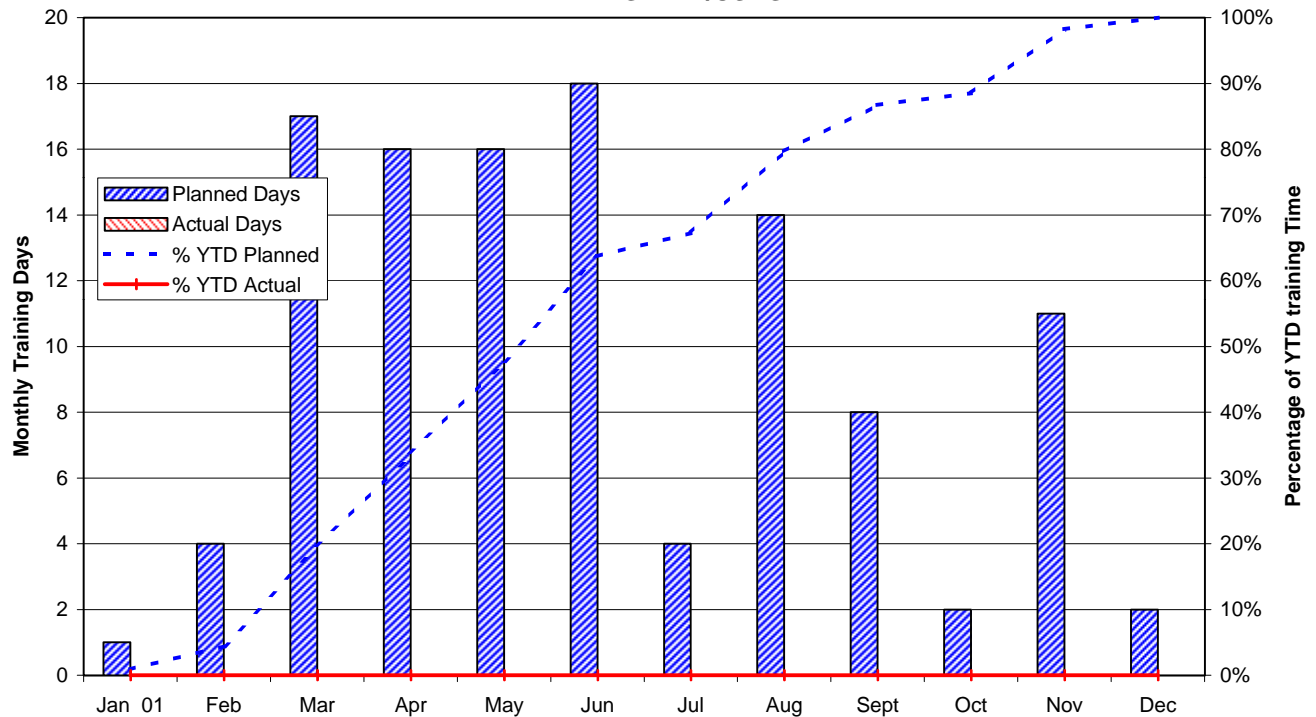
** No training this month

Indicator Description:

This performance indicator represents the percentage of trainees attending classes (classroom, lab) as scheduled. Attendance is defined as being present for the entire session without interruption. The class attendance in each program is averaged for a month and reported. the goal is 100% of attend classes as scheduled.

Analysis:

EH&S TRAINING TIME/USAGE



Month	Jan 01	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Planned Days	1	4	17	16	16	18	4	14	8	2	11	2
Actual Days	0	0	0	0	0	0	0	0	0	0	0	0
YTD Planned	1	5	22	38	54	72	76	90	98	100	111	113
YTD Actual	0	0	0	0	0	0	0	0	0	0	0	0
% YTD Planned	1%	4%	19%	34%	48%	64%	67%	80%	87%	88%	98%	100%
% YTD Actual	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Total Days

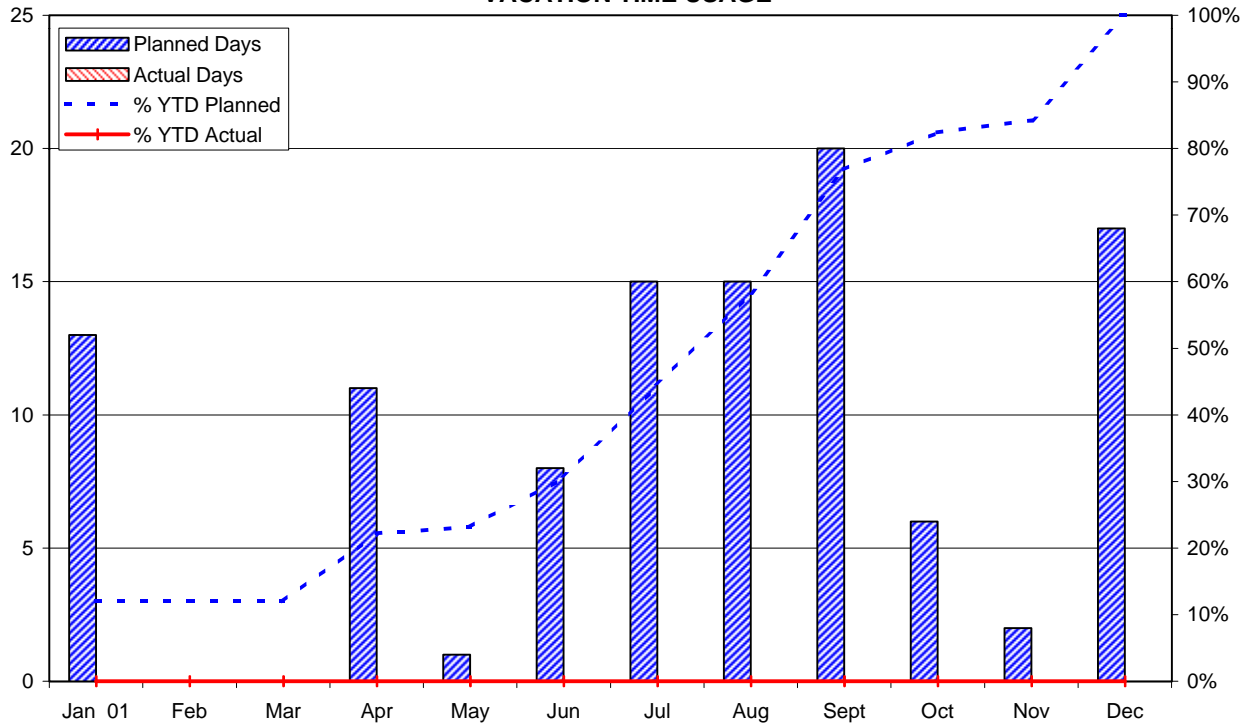
INDICATOR DESCRIPTION

This indicator represents the planned versus actual Training schedule for the department. Training is performed at the beginning of the year and used for work planning and ensuring that there is sufficient staffing even during peak vacation periods. Actual usage of Training time may vary depending upon personal circumstances.

ANALYSIS

The analysis section describes the department's performance on a monthly basis, whether or not performance is on track with the business plan and if there are any specific reasons for the performance indicated. If emerging issues are of concern or if remedial measures are being taken that could affect future performance and /or indicated trends, they can be presented in this section.

EH&S VACATION TIME USAGE



Month	Jan 01	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Planned Days	13	0	0	11	1	8	15	15	20	6	2	17
Actual Days	0	0	0	0	0	0	0	0	0	0	0	0
YTD Planned	13	13	13	24	25	33	48	63	83	89	91	108
YTD Actual	0	0	0	0	0	0	0	0	0	0	0	0
% YTD Planned	12%	12%	12%	22%	23%	31%	44%	58%	77%	82%	84%	100%
% YTD Actual	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

INDICATOR DESCRIPTION

This indicator represents the planned versus actual vacation schedule for the department. Vacation planning is performed at the beginning of the year and used for work planning and ensuring that there is sufficient staffing even during peak vacation periods. Actual usage of vacation time may vary depending upon personal circumstances.

ANALYSIS

The analysis section describes the department's performance on a monthly basis, whether or not performance is on track with the business plan and if there are any specific reasons for the performance indicated. If emerging issues are of concern or if remedial measures are being taken that could affect future performance and /or indicated trends, they can be presented in this section.