



SAFETY MANAGEMENT MANUAL

9.1 NON-CONFORMITIES

Originator:

Hank Ayers

Approved By:

Albert F. Suchy

1. Purpose

This procedure is designed to set forth the guidelines for the reporting, recording and analysis of Non-Conformities, Observations, Accidents and Hazardous Occurrences. This system meets the requirements of the International Safety Management Code and is fundamental to the continued safe and pollution free operation of the WHOI's fleet.

2. Responsibility

It is the responsibility of the Director of Ship Operations to ensure that this system is in place to handle Non-Conformities, accidents and hazardous occurrences and to provide the feedback necessary to initiate timely corrections. Within the scope of this responsibility the Director of Ship Operations has designated the Marine Engineer to monitor the overall safety system that collects this information.

Any crewmember or shore staff can report what he/she thinks to be a Non-Conformity. He/She should communicate all necessary details to the Master or Director of Ship Operations to support why he/she feels the item is a Non-Conformity. It is the responsibility of each vessel's Master or Director of Ship Operations to decide if it needs to be entered into NS5 as a formal Non-Conformity. The Master or Ship Operations Manager must ensure that this feedback system is actively used to report occurrences designed to be entered in NS5.

3. Definitions

- Observations – In general an Observation is the least significant condition that is entered into the system. An Observation is a finding or condition which if left uncorrected will likely result in a Non-Conformity.
- Non-Conformity – A finding, discovery, incident or occurrence that has come to someone's attention that impacts the safety of the vessel, its equipment, personnel or the environment. By its very definition, it is meant to be very broad and general, to include all nature of findings that impact safety on the vessel. This impact may even include system discrepancies and lack of recorded actions. The scope of a Non-Conformity is to include items that may be discovered during normal maintenance and repair as failed or on the verge of failure that were not otherwise expected.



SAFETY MANAGEMENT MANUAL

9.1 NON-CONFORMITIES

Originator:

Hank Ayers

Approved By:

Albert F. Suchy

- Reportable non-conformities include:

<ul style="list-style-type: none"> • Accidents & Oil Spills • Significant Damage 	<ul style="list-style-type: none"> • System Discrepancies • Any issues that the Master or crewmember determines may benefit from a formal review
<ul style="list-style-type: none"> • Fire • Serious Injury 	<ul style="list-style-type: none"> • Critical equipment/system failures • Use of inappropriate materials or equipment
<ul style="list-style-type: none"> • Near Misses/Hazardous Occurrences 	<ul style="list-style-type: none"> • Problems for modifications and improvements to SMS

- A Major Non-Conformity is an identifiable deviation, which poses a serious threat to personnel or ship's safety or a serious risk to the environment and requires immediate attention.
- Accident – The definition of an accident in the scope of this Safety Management System is more inclusive than that defined by the U. S. Coast Guard or UNOLS.
 - A. It includes all personnel injuries or deaths occurring on vessels operated by Woods Hole Oceanographic Institution or operations from said vessels. The threshold for reporting shall be any injury that requires more than first aid and/or results in loss time from work. It also includes all injuries that may result in a claim against Woods Hole Oceanographic Institution.
 - B. It includes significant damage to the vessel, its equipment or machinery, or scientific equipment deployed from it as a result of an occurrence or activity.
 - C. It includes any occurrence or activity that results in oil entering the water.
- Hazardous Occurrence – This is an incident that did not result in an injury or damage but certainly had the potential. These are often referred to as a “near-miss.”
- Illness – An illness is a condition of the body associated with poor health as in disease and not the result of a momentary activity such as an accident.
- Injury – A malady as a result of a sudden trauma or body movement or activities.
- Reportable Marine Casualty –The U. S. Coast Guard requires notice of a reportable marine casualty be reported, “immediately after the addressing of resultant safety



SAFETY MANAGEMENT MANUAL

9.1 NON-CONFORMITIES

Originator:

Hank Ayers

Approved By:

Albert F. Suchy

concerns” as defined in 46 CFR 4.05-1. The notice of a reportable marine casualty shall be made to the US Coast Guard Captain of the Port at which time he or she will determine if a US Coast Guard Form CG-2692 needs to be filled out. The incident shall be recorded in NS5 whether a form CG-2692 is required or not. If form CG-2692 is required, it shall be included in the NS5 report. These same criteria shall apply to all accidents and hazardous occurrences. The Port Office shall be notified with all information that is available to understand the nature and extent of the incident.

- Corrective Action – This is a plan of action with responsibility and deadlines assigned which will ameliorate the Non-Conformity or Observation.

4. General Reporting Criteria

The categories below may be the result of a formal audit or simply the result of an individual observing his or her normal responsibilities. It is important to emphasize that this process is neither to assign blame nor to avoid responsibility. The information obtained is to be the backbone of the Safety Management System and how it makes WHOI vessels safe work places in the marine environment.

The usefulness of the Non-Conformity systems is only as good as the information that is collected. It must be useful and yet not so onerous as to stifle the desire to place an incident into the system. Understandably, the more serious the incident the more information the examination into the incident must collect.

Timely investigation is imperative for the collection of accurate information. A written report following the outline below should be submitted no later than 7 days after the incident or by the next port call, whichever is sooner. It is important to recognize that with a port call, witnesses or injured individuals may be departing the vessel. There is no need to wait until all reports (from doctors or laboratories) have been received before completing the report.

- Non-Conformity
Enough information shall be collected to identify the nature of the Non-Conformity and why it is a Non-Conformity. The report of a Non-Conformity should cite the specific reference in the SMM or other authoritative document that was found in violation. Any determination as to the cause of the Non-Conformity should be included. Linkage between and among Non-Conformities should be reported. Non-Conformities should be resolved as soon as possible. The same general guidance applies to reporting Observations.



SAFETY MANAGEMENT MANUAL

9.1 NON-CONFORMITIES

Originator:

Hank Ayers

Approved By:

Albert F. Suchy

- Accidents/injuries

All accidents are subject to reporting requirements. Because the inquiry into them is usually the basis for reporting to the U. S. Coast Guard or to WHOI's insurance underwriter, the information needs to be more thoroughly provided.

In general, the following must be established through prompt interviews with the injured and/or witnesses:

- A. Name and position of the injured
- B. Identification of equipment or machinery involved
- C. Time, date and location of the event
- D. Nature of the injury, with an initial impression of its severity or description of the damage
- E. Name and position of the supervisor
- F. Names and positions of any witnesses
- G. Activity or operation taking place at the time
- H. Weather and sea state and other pertinent external parameters
- I. Photos should be taken where appropriate.
- J. Failed equipment and components should be retained
- K. Proximate cause of the accident. (This is the very last thing in the chain of events leading up to the accident.)
- L. Contributing factors. (These might be other elements in the chain of events such as assigning an untrained person to a duty or improper state of cleanliness that led to a slip.)
- M. Procedures recommended for adoption to prevent a recurrence. (This must be approached with the philosophy that all accidents are preventable. A statement that an accident was a result of bad luck or just one of the hazards of going to sea will not be accepted.)
- N. Facilities and/or hardware changes recommended to prevent a recurrence
- O. List all individuals from whom urine samples were taken for drug tests. The USCG regulations **require** drug tests for the presence of alcohol for everyone involved in a serious marine incident, as defined in 46 CFR 4.03-2.

Not all the information above is applicable in all incidents. This should not delay the capturing and reporting of the information that is immediately available.

Not all injuries are reportable to the Coast Guard. All injuries should be recorded in NS5 as an incident and in the individual's record.

- Hazardous Occurrence

The same information needs to be collected for a hazardous occurrence as for an accident. If no one has been injured some information suggested above does not apply.



SAFETY MANAGEMENT MANUAL

9.1 NON-CONFORMITIES

Originator:

Hank Ayers

Approved By:

Albert F. Suchy

- **Illness**

Illnesses are not normally reportable occurrences; however, if the illness results in the individual leaving the vessel prior to their scheduled departure, it should be recorded in the individual's record in NS5.

- **Corrective Actions**

Corrective Actions should be entered in NS5 within 30 days after it is determined that the incident is a Non-Conformity. The Corrective Action should include a closure date. If shore services are requested to research the item, they shall have 30 days to ensure corrective action is entered into NS5 including a closure date for the issue.

Any occurrences entered into NS5 as an Incident shall have a corresponding Corrective Action entered and completed at the same time. This Corrective Action shall be referenced in the CAR tab of the Incident report in NS5.

Detailed information concerning the process of initiating and tracking Corrective Actions can be found in Section 12.1 of the Safety Management Manual.