

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

ESH Project Review Procedure

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URL: <https://www-esh.slac.stanford.edu/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. Conventional project review

This procedure applies to *line management*, *responsible persons*, *ESH coordinators*, and reviewers involved in the proposal, review, and approval of project 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 Design and Construction Services 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 and to execute the conventional project review process, as appropriate
- Develops applicable submittals to review entities, for example, the Building Inspection Office (BIO)
- Teams with engineers to ensure conduct of engineering requirements are met
- 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 (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 the conventional project review process, 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 review. Final appeal is to the SLAC laboratory director

3 Procedures

The 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* (project manager) and ESH coordinators (with input from subject matter experts as required) will determine whether a proposed activity can be categorized as a *work activity* or a *project activity* that needs to be reviewed through the conventional project review process. 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 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. (See Table 1 for thresholds.)

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

Table 1 Lower Limit and Broad Thresholds

Lower limit thresholds	<ol style="list-style-type: none">1. Requester has experience with the activity and is comfortable with the perceived risk:<ul style="list-style-type: none">▪ Recognized hazard(s) and existing mitigations▪ Limited scope▪ Applicable SOP(s): activity within the scope of existing SOP(s)▪ No deviation from the standard model2. Not facility related – not attached to the building, etc.3. No new and/or unusual equipment involved4. Does not involve change/modification of or impact to a shared utility or shared area5. Supervisor concurs that the proposed activity is within the standard model for the individual
Broad thresholds	<ol style="list-style-type: none">1. Some or all of the activity’s characteristics having possible safety consequences are new to the responsible organization2. The proposed activity represents a significant change of scope of the existing operation3. The activity introduces hazards not previously analyzed and where there are no institutional protocols and procedures to mitigate them (e.g., hazards not addressed in the SLAC ESH Manual)4. The proposed activity represents a significant change in the hazard of operation5. The activity is sufficiently complex that a review would be prudent6. The proposed activity triggers Building Inspection Office (BIO) requirements or is required by DOE order (e.g., DOE O 423) or Stanford institutional review boards

3.2 Biohazardous Materials and Animal Research

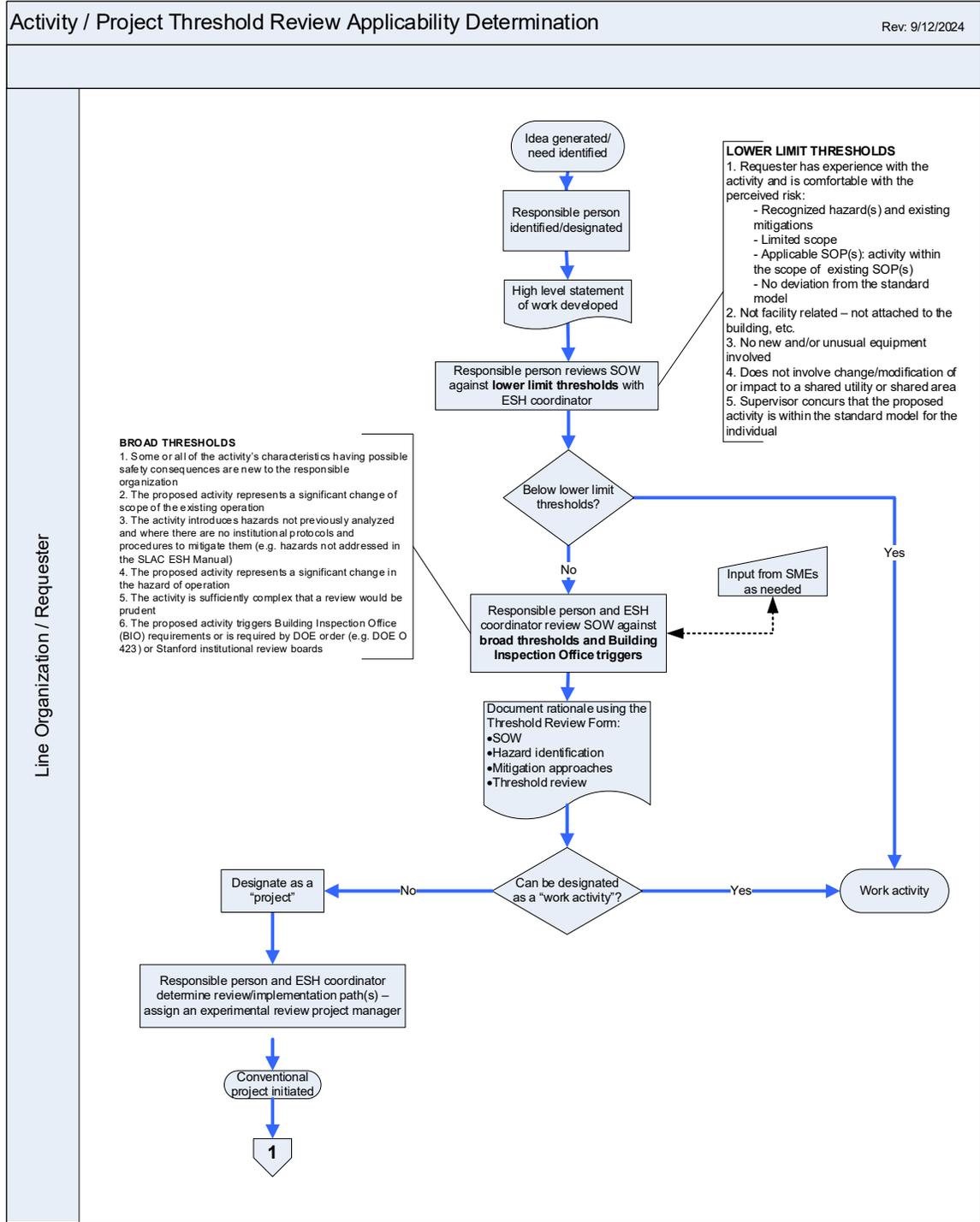
All work at SLAC involving potentially biohazardous materials or animal research must be conducted under the policies and procedures set forth by Stanford University. Work covered under the biosafety requirements must go through the university's Administrative Panel on Biosafety (APB). (See [Chapter 34, "Biosafety"](#).)

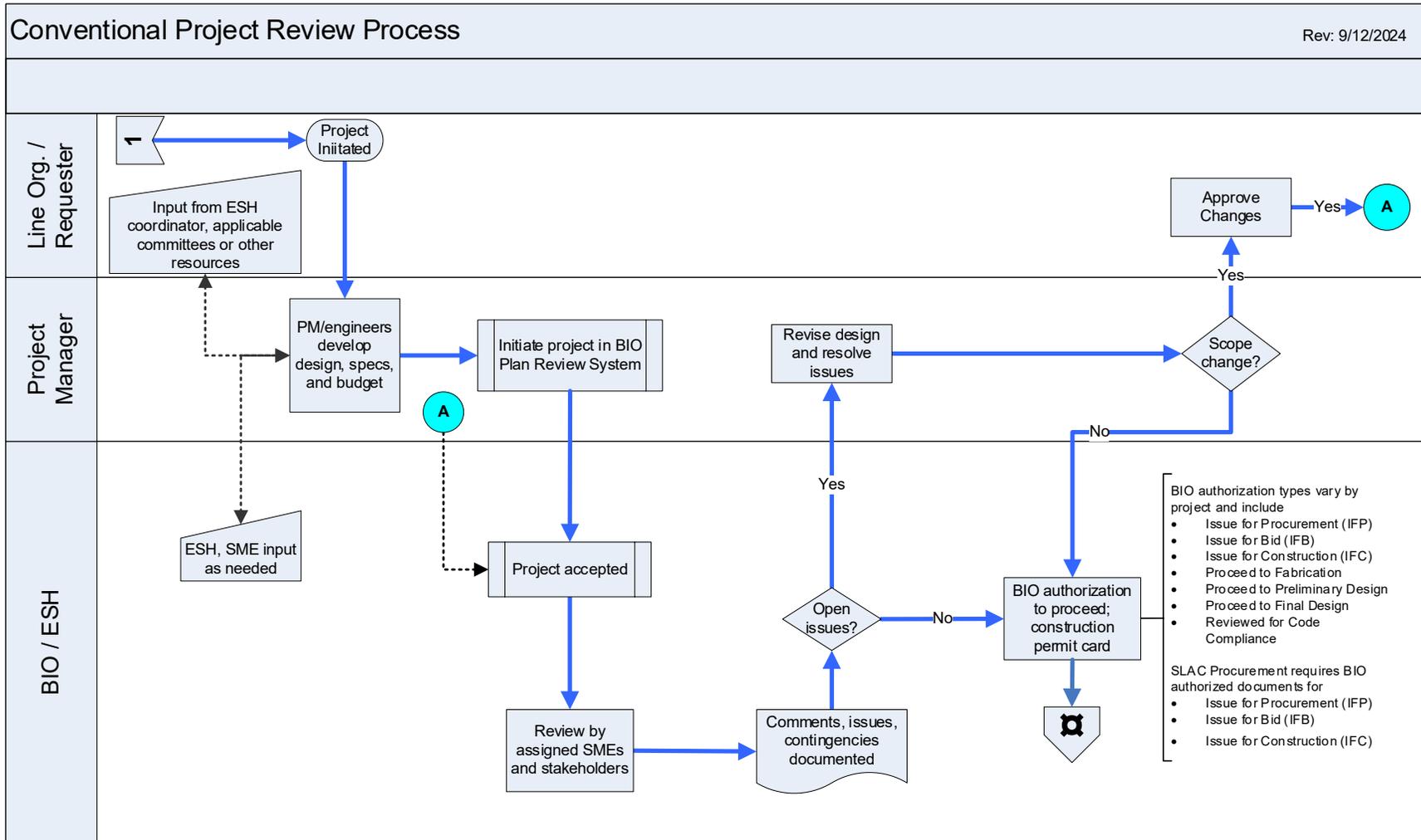
Any work involving laboratory animals must be submitted to the university's [Administrative Panel on Laboratory Animal Care \(APLAC\)](#) and comply with the university's [Research Policy Handbook \(RPH\)](#), Section 19.1, "Applicability of the Stanford University Research Policy Handbook (RPH) to SLAC National Accelerator Laboratory (SLAC)" ([RPH, Section 19.1](#)). Approval must also be obtained from the SLAC chief research officer (or equivalent position) and the DOE SLAC Site Office (SSO) (per the [DOE Animal Use Memorandum](#).)

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

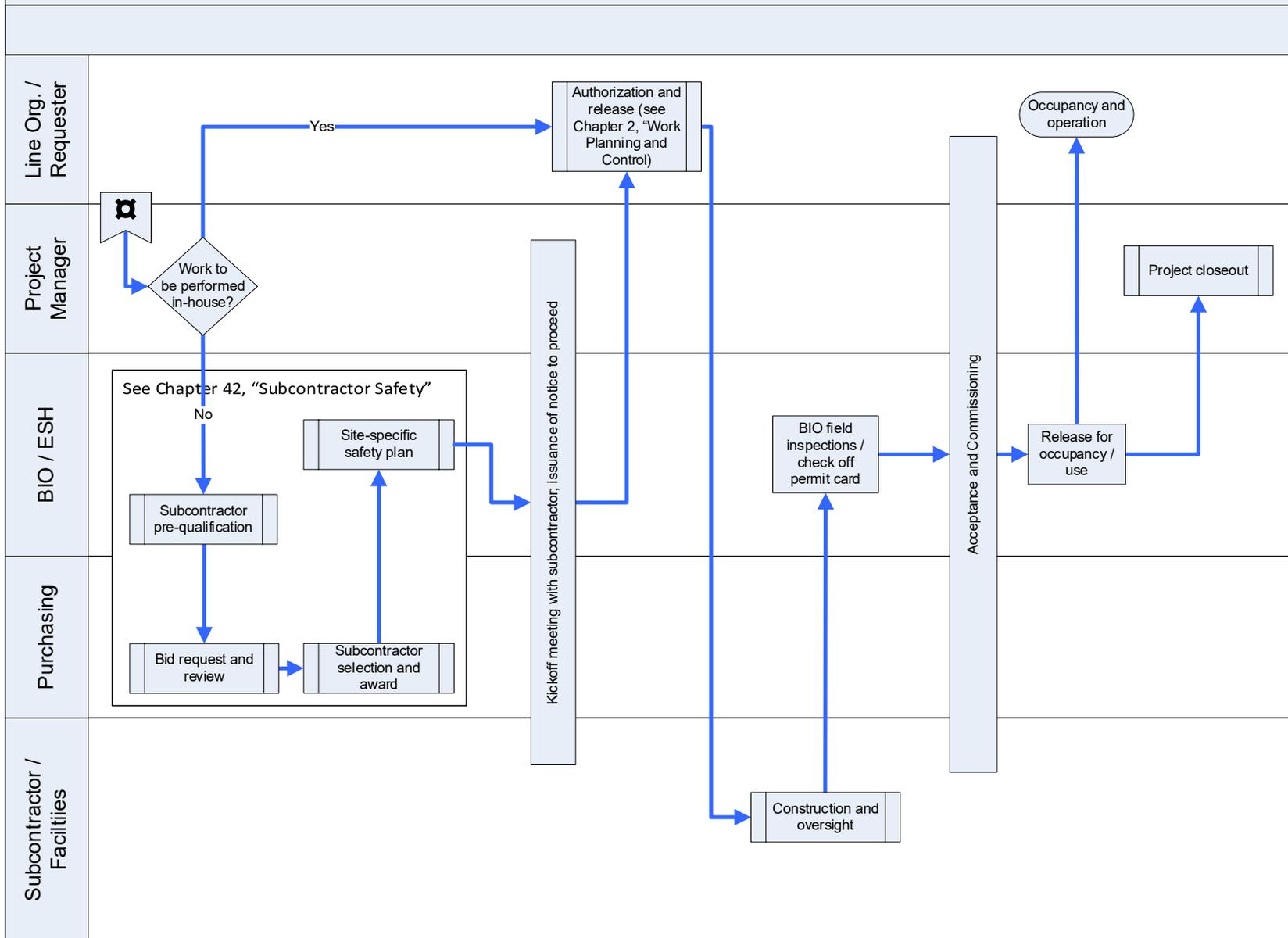
All equipment and operational aspects of proposed conventional projects that trigger external mandates (for example, Building Inspection Office requirements) and/or impact a shared area or resource are reviewed through this process. The key organizational stakeholders include the project manager, requester's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





Conventional Project Review Process (Cont.)

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4 Forms

The following forms and systems 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 and broad thresholds and requires ESH project review
- [BIO Plan Review System](#). System for performing and documenting conventional project reviews

5 Recordkeeping

The following recordkeeping requirements apply for this procedure:

- 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”](#)
 - [General Policy and Responsibilities: Hazard Control Selection and Management Requirements](#) (SLAC-I-720-0A24S-001)
- [Chapter 34, “Biosafety”](#)

Other SLAC Documents

- [SLAC Conduct of Engineering Policy](#) (ENG-2018-018)
- [BIO Project Review and Authorization Manual](#) (SLAC-I-730-2A24Z-001)

Other Documents

- Department of Energy, Office of Science. “Changes to the Office of Science/Headquarters (SC/HQ) Review and Approval Process for Non-Department of Energy Funded Work Involving Animal Use at Office of Science Laboratories” ([DOE Animal Use Memorandum](#))
- Stanford University, Office of the Vice Provost and Dean of Research. [Research Policy Handbook \(RPH\)](#), Chapter 19, “SLAC National Accelerator Laboratory–Related Research Policies”, Section 19.1, “Applicability of the Stanford University Research Policy Handbook (RPH) to SLAC National Accelerator Laboratory (SLAC)” ([RPH, Section 19.1](#))
- Stanford University, Research Compliance Office, [Administrative Panel on Laboratory Animal Care \(APLAC\)](#)