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MARINE CORPS ORDER 8020.14

From: Commandant of the Marine Corps
To: Distribution List

Subj: MARINE CORPS EXPLOSIVES SAFETY COMPLIANCE PROGRAM

Ref: (a) DoD Directive 6055.9E, "Explosives Safety Management and the DoD Explosives Safety Board," 19 August 2005
(b) SECNAVINST 5100.10J
(c) OPNAVINST 8020.14A
(d) NOSSAINST 8020.14E
(e) DoD 6055.09-M Volumes 1-8, "DoD Ammunition and Explosives Safety Standards: General Explosives Safety Information and Requirements," Change 1, March 12, 2012
(f) MCO P8020.10B
(g) NAVSEA OP 5 Vol.1
(h) CJCSI 4360.01A, "Explosives Safety and Munitions Risk Management for Joint Operations Planning, Training, and Execution," November 25, 2014
(i) MCO 5100.29B
(j) MCO 5530.14A
(k) MCO 3500.27B
(l) MIL-STD-882E, "Department of Defense Standard Practice System Safety," 11 May 2012
(m) SECNAV M-5210.1
(n) SECNAVINST 5211.5E

Encl: (1) Explosives Safety Compliance Program Guidance

1. Situation. The Explosives Safety Compliance Program provides guidance, policy development, and compliance oversight for the conduct of Marine Corps explosives safety inspections to ensure compliance with Department of Defense (DoD) and Department of the Navy explosives safety standards in accordance with references (a) through (c).

2. Cancellation. This Order cancels participation in reference (d), the DON Shore Station Explosives Safety Compliance Program.

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distribution is unlimited.

3. Mission. This Order provides policy and procedural guidance for the implementation of the Marine Corps Explosives Safety Compliance Program in support of the Marine Corps Explosives Safety Management Program (ESMP). The Program ensures explosives safety regulatory compliance in accordance with references (e) through (h) and identifies specific command responsibilities. Policy and procedural guidance is contained in enclosure (1).

4. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. The intent of this Order is to provide procedures to evaluate explosives safety compliance with the standards set forth by the DoD. Strict adherence to explosives safety standards enhances force and asset preservation by minimizing explosives mishaps that may result in death, serious injury, and the loss of materiel assets. The desired end state is to establish a formal Marine Corps Explosives Safety Compliance Program that will ensure full implementation of the Marine Corps ESMP and compliance with DoD standards.

(2) Concept of Operations. This Order pertains to the execution and management of the Marine Corps Explosives Safety Compliance Program. It addresses the responsibilities and tasks required to implement, execute, and maintain the program, as well as provide policy guidance on the following:

- (a) Marine Corps Explosives Safety Inspections
- (b) ESMP Evaluations
- (c) Explosives Safety Self-assessments
- (d) Corrective Action Plan (CAP) execution

b. Subordinate Element Mission. Commanding officers (COs) of inspected commands supporting ammunition and explosives handling or storage operations are required to implement and ensure compliance with the intent of the references and the contents of this Order.

5. Administration and Logistics. Recommendations and correspondence concerning the contents of this Order may be forwarded to the Commander, Marine Corps Systems Command

(COMMARCORSYSCOM), PM AMMO (PMM-116), Environmental and Explosives Safety Office via the appropriate chain of command.

a. Records created as a result of this Order shall be managed according to National Archives and Records Administration approved dispositions per reference (m) to ensure proper maintenance, use, accessibility and preservation, regardless of format or medium.

b. The generation, collection, or distribution of Personally Identifiable Information (PII), and management of privacy sensitive information shall be in accordance with the Privacy Act of 1974, as amended, per reference (n). Any unauthorized review, use, disclosure, or distribution is prohibited.

6. Command and Signal

a. Command. This Order is applicable to the Marine Corps Total Force.

b. Signal. This Order is effective the date signed.


J. F. SHRADER
By direction

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Chapter 1

Roles and Responsibilities

1. Background. The Marine Corps continuously trains and deploys with military munitions. The storage, handling, transportation, and employment of these items are inherently hazardous. Therefore, it is imperative that an effective ESMP designed to minimize potential hazards of ammunition and explosives be aggressively pursued at all levels. In accordance with reference (f), the Marine Corps will establish and maintain an effective process to validate explosives safety compliance per the requirements of references (e) through (g). This will include a means to inspect and assess installations, commands, and DoD contractors providing ammunition and explosives related products and services aboard Marine Corps installations.

2. Responsibilities. An effective Explosives Safety Compliance Program is dependent upon command support at all levels. The responsibilities listed outline the major aspects of the Explosives Safety Compliance Program, but may not be all inclusive.

a. Commandant of the Marine Corps Safety Division (CMC SD)

(1) Provides overall administration of the Marine Corps Safety Program.

(2) CMC (SD) has designated the COMMARCORSYSCOM responsibilities for implementation of the Marine Corps ESMP and execution of the Explosives Safety Compliance Program per reference (i).

b. Deputy Commandant, Combat Development and Integration. Serve as the Marine Corps single point of contact for range operations involving the use of Class V material as it pertains to explosives safety.

c. Deputy Commandant, Plans, Policy, and Operations (Physical Security). Serve as the Marine Corps single point of contact for the Physical Security Program and conduct physical security surveys on behalf of the installation commander per reference (j).

d. Deputy Commandant, Aviation (DC AVN) Logistics (ASL-30)

(1) Serve as the single point of contact for aviation operations explosives safety as delegated by CMC (SD) to include Class V(A) ordnance safety, and operational use of Class V(A) ordnance in aircraft operating areas.

(2) Coordinate with COMMARCORSYSCOM in assigning a Senior Military Representative (SMR) to assist in executing the Marine Corps Explosives Safety Compliance Program for Marine Corps Air Stations.

e. Commander, Marine Forces Command (COMMARFORCOM), Commander, Marine Forces Pacific (COMMARFORPAC), Commander, Marine Installations Command (COMMCICOM) and Commander, Marine Forces Reserve (COMMARFORRES)

(1) COMMARFORCOM/COMMARFORPAC. Ensure operational explosives safety criteria, Explosives Safety and Munitions Risk Management and Consequence and Risk Identification assessments within respective areas of responsibility are in compliance with explosives safety criteria per reference (h).

(2) COMMCICOM, will coordinate and facilitate the requirements detailed in this Order as they pertain to installations.

(3) COMMARFORRES. Administer the ESMP and provide Explosives Safety Compliance Program management and oversight functions for the Marine Reserve activities.

(4) COMMARFORCOM, COMMARFORPAC and COMMARFORRES will be evaluated per Chapter 2 of this Order.

f. COMMARCORSYSCOM

(1) Assess Marine Corps installations, commands, and DoD contractors providing ammunition and explosives related products and services aboard Marine Corps installations where ammunition and explosives is handled or stored to validate compliance with appropriate policy and criteria.

(2) Schedule and conduct ESI, Re-inspections of unsatisfactory activities, and close-out inspections of explosives storage facilities being transferred from DON control in accordance with Chapter 2.

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(3) Assess command compliance utilizing applicable explosives safety related references. In addition, provide the command with a documented evaluation of the effectiveness and overall posture of its ESMP per Chapter 2, Explosives Safety Inspection Rating Criteria.

(a) In accordance with reference (g) Non-Marine Corps tenants aboard Marine Corps installations will be inspected per Marine Corps criteria in consideration of formal agreements (Memorandum of Understanding, Memorandum of Agreement, and Inter-Service Support Agreement) in place. Marine Corps tenant commands aboard the property of another service or agency will be inspected per Marine Corps criteria in consideration of formal agreements in place.

(b) Inspections of Navy activities aboard Marine Corps installations will be coordinated between COMMARCORSYSCOM and Naval Ordnance Safety and Security Activity (NOSSA).

(4) Establish ESI Team membership based on:

(a) Current ESI Program requirements.

(b) The inspected command's mission and previous inspection CAPs.

(c) ESI Schedule Guide (Chapter 6).

(d) Availability of qualified personnel.

(5) Notify each Command at least 45 days prior to the inspection to confirm team membership by name, rank/grade, function, and security clearance. The following information shall be required from the activity prior to arrival:

(a) The in-brief date and time with activity CO or command representative.

(b) A copy of the command ESSA plan/instruction (provided at least 30 days prior to ESI).

(6) Provide the Marine Corps ESI Evaluation Guide for commands to refer to in establishing and maintaining effective ESMP. Maintain the guide and post changes on Environmental and Explosives Safety (EES) web portal under the "Explosives Safety Compliance" tab.

(7) Maintain a database of explosives safety compliance generated data (program trends, information on inspected commands, root cause analysis, etc.). Ensure all inspection reports, CAPs, and related inspection correspondence are incorporated into the EES Web Portal and used to facilitate objective and informed policy and compliance decisions. Provide OPNAV (N411) periodic trend analysis reports per reference (c).

(8) Issue a quarterly inspection schedule notification to the commands being inspected/re-inspected, at least 90 days prior to the beginning of the quarter.

(9) As directed by reference (f) the ESI Team shall stop all observed unsafe ammunition and explosives operations until unsafe conditions have been mitigated.

(10) Notify CMC (SD), Chief of Naval Operations (CNO) (N411), MCICOM, appropriate chain of command, and DC AVN (ASL-30) for Marine Corps Air Stations, as soon as practical if the ESI Team recommends an overall UNSATISFACTORY rating for the ESI.

(11) Issue the final inspection report to the inspected installation CO within 30 calendar days of the out-brief with copies forwarded to CMC (SD), CNO (N411), MCICOM, applicable MARFOR, NOSSA (Code N5), and applicable chain of command. Additionally, forward copies of Marine Corps Air Station inspection reports to DC AVN (ASL-30) and Naval Supply Systems Command (NAVSUP) Global Logistics Support (NAVSUP GLS).

(12) Review and ensure that CAPs are submitted per Chapter 4.

(13) Provide qualified personnel to serve as inspectors for Program 15 (Inventory Management/Inventory Accuracy) at Marine Corps activities that store Class V(W) ammunition and explosives.

(14) Liaison with NAVSUP GLS to ensure qualified personnel serve as inspectors for Program 15 (Inventory Management/Inventory Accuracy) at Marine Corps activities that store Class V(A) ammunition and explosives.

(15) Assign an SMR for Marine Corps ground activities.

g. Commanding General, MCI East/West/Pacific/National
Capital Region

(1) Administer the Regional ESMP and provide Explosives Safety Compliance Program management and oversight functions for the installations within their respective regions.

(a) Ensure all commands are in compliance with explosives safety criteria per references (e) through (g), this Order, and other appropriate directives.

(b) MCI Regional Command Explosives Safety Offices will be evaluated per Chapter 2.

(2) Participate in ESIs within their respective region per Chapter 2.

(3) The Regional Explosives Safety Officer (ESO) will review and recommend concurrence or non-concurrence with the installation CAP per Chapter 5. Ensure the CAP has accurate and acceptable root cause, root cause analysis, and corrective action, prior submission to COMMARCORSYSCOM.

h. NAVSUP GLS

(1) Provide qualified personnel to serve as inspectors for Program 15 (Inventory Management/Inventory Accuracy) at Marine Corps activities that store Class V(A) ammunition and explosives.

(2) Submit Class V(A)-pertinent proposed modifications to the Program 15 (Inventory Management) portion of the Marine Corps ESI Evaluation Guide as needed or as requested to COMMARCORSYSCOM.

i. Inspected Commands shall:

(1) Comply with the provisions of references (e) through (g), this instruction, and other appropriate directives in order to maintain and enhance the command's explosives safety posture.

(2) Maintain an active ESSA Program per Chapter 4.

(3) Submit CAPs and associated updates to COMMARCORSYSCOM via the EES web portal per Chapter 5.

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(4) Coordinate the ESI schedule, itineraries and inspection per Chapter 2 with COMMARCORSYSCOM, tenants, and chain of command as appropriate.

(5) Utilize the EES Web Portal to submit preliminary ESI documentation, post-ESI data and CAPs.

Chapter 2

Explosives Safety Inspections

1. Background. Commands and their tenant activities that handle and store ammunition and explosives shall receive a periodic ESI per this Order. This chapter provides guidance on the conduct of ESIs at Marine Corps installations and activities.

2. Program Administration. The following applies to the conduct and administration of the Marine Corps ESI Program:

a. The Marine Corps ESI Evaluation Guide is available electronically under the Explosives Safety Compliance section of the EES web portal. It provides a listing of key functional areas and selected explosives safety requirements that shall be employed by commands and ESI Teams in assessing explosives safety programs. The ESI Evaluation Guide is not all-inclusive; it does not contain a complete list of questions or references that may be part of the inspection. The guide serves as a baseline for inspectors and activities to prepare for, and conduct the ESI.

b. Evaluation guides will be updated regularly to provide current and accurate questions and associated reference citations. Evaluation guides will be revised/updated to appropriately address changes to explosives safety criteria and varying ammunition and explosives operations and scenarios.

c. The following ESI Program inspection guides reside on the EES Web Portal.

- (1) Command Administration and Management
- (2) Qualification/Certification
- (3) Standard Operating Procedures
- (4) Ammunition Storage/Magazines
- (5) Operating Buildings and Production Lines
- (6) Lightning Protection and Grounding
- (7) Environmental Compliance
- (8) Ammunition and Explosives Physical Security

- (9) Ranges/EOD
- (10) Motor Vehicle Transportation
- (11) Railroad Transportation
- (12) Piers and Wharves/Barges
- (13) Airfield Operations
- (14) Ammunition/Explosives Related Equipment
- (15) Inventory Management

d. With the exception of stricter DoD and Chairman, Joint Chiefs of Staff Instruction guidance, Marine Corps directives take precedence in the event of conflicting regulatory guidance.

e. ESI Team Membership may consist of:

(1) Lead Inspector. The designated COMMARCORSYSCOM representative responsible for the team, conduct, coordination, and execution of the inspection.

(2) Inspectors. Civilian/military specialists having explosives safety expertise (e.g., personnel from COMMARCORSYSCOM PM AMMO, NAVSUP GLS AMMO and NOSSA for Navy activities) who report to the Lead Inspector during the inspection. Selection of qualified inspectors is determined by COMMARCORSYSCOM.

(3) SMR. The SMR is responsible to COMMARCORSYSCOM, for the accurate assessment of the COMMARCORSYSCOM ESI process. SMRs are assigned by the COMMARCORSYSCOM Deputy Program Manager, Ammunition, for Marine Corps Bases or DC AVN (ASL-30) for Marine Corps Air Stations.

(4) Observers. Typically, personnel under instruction to become an SMR, Team Members, personnel from other commands or Services observing in preparation for their own ESI or from regional offices. Observers are not inspectors and shall only accompany the ESI Team for informational purposes; they do not provide input to findings or programs. COMMARCORSYSCOM must approve all observer requests prior to the inspection. The ESI Lead Inspector will determine when observers may or may not participate in meetings during the ESI.

f. The final ESI report shall provide a rating of the Command's Explosives Safety Program as either SATISFACTORY; overall SATISFACTORY with Program(s) UNSATISFACTORY; SATISFACTORY with UNSATISFACTORY Tenant; or overall UNSATISFACTORY per rating criteria in Chapter 3 of this Order.

g. Commands receiving an overall UNSATISFACTORY shall be re-inspected within 180 days of the final dated ESI report. COMMARCORSYSCOM shall make the final determination warranting re-inspection.

(1) The final re-inspection report shall indicate a rating of the Command's Explosives Safety Program as either being COMPLIANT or NON-COMPLIANT with explosives safety criteria. The re-inspection shall be conducted by evaluating findings identified in the unsatisfactory programs and elements during the initial ESI. Additional findings may be identified during the re-inspection.

(2) If available, the re-inspection team will be comprised of the original Lead Inspector and Team Member(s) necessary to evaluate corrective status of the original findings.

(3) In the event a command receives a NON-COMPLIANT rating from a re-inspection, a plan will be established in which the command will be required to submit bi-weekly progress reports to the respective MCI Regional Command Explosives Safety Office, with a copy to COMMARCORSYSCOM, until the NON-COMPLIANT rating has transitioned to COMPLIANT.

(4) Transition of NON-COMPLIANT ratings to COMPLIANT requires concurrence from both the MCI Regional Command and COMMARCORSYSCOM.

3. Inspected Command Actions

a. Submit the Command's current ESSA Plan/Instruction (do not send the Command's evaluation/findings) to the assigned COMMARCORSYSCOM Lead Inspector via the Explosives Safety Compliance tab on the EES web portal at least 30 days prior to the ESI.

b. Submit a Command Point of Contact list and other necessary documentation as required to the assigned Lead Inspector at least 30 days prior to the ESI via the EES Web Portal.

c. Schedule an in-brief and out-brief with the activity CO. The in-brief shall include a general overview of the inspected activity's organizational alignment, ammunition and explosives operational highlights, and a breakdown of host/tenant agreements.

d. Ensure the participation of the ESO, tenant command CO/Officers in Charge and ESOs, and other involved command personnel during the in-brief (e.g., environmental, security, and ammunition inventory management personnel), throughout the ESI, and as required, during the out brief.

e. Where other stakeholders from outside of the inspected activity's chain of command are to be present for the inspection, coordinate participation of representatives and notify the applicable ESI Lead Inspector prior to start of the inspection. Representatives at all levels may be present during inspection meetings as determined appropriate by the ESI Lead Inspector. Representatives may be present at all briefings external to inspection team meetings.

f. Provide the inspection team with administrative assistance, office space, transportation, security access badges, personnel protective equipment, and program representatives as necessary to conduct the ESI.

g. Provide documents identified in the command notification letter to the ESI Lead Inspector on the first day of the inspection (Electronic copies are acceptable).

4. ESMP Evaluations. COMMARCORSYSYCOM will conduct biennial ESMP evaluations of Marine Corps Operating Forces, Marine Corps Reserve Forces, and MCI Regional commands. ESMP evaluations are programmatic and objectively assess the effectiveness of the explosives safety responsibilities outlined in reference (f) and will be evaluated concurrent with the installation ESI of the same geographic location.

a. COMMARFORCOM and COMMARFORPAC will be evaluated to ensure the ESMP is integrated into operational and exercise planning and execution of operations per reference (h).

b. COMMARFORRES will be evaluated for Explosives Safety Compliance Program management and oversight functions for Marine Reserve activities. Reserve activity ESIs will be coordinated

between COMMARCORSYSCOM and COMMARFORRES via separate correspondence.

c. MCI Regional ESMP programs will be evaluated for Explosives Safety Compliance Program management and oversight functions for their respective region.

d. Official notification of ESMP evaluations will be provided via separate correspondence. Specific coordination and tasking requirements will be identified and provided as part of the official notification.

5. Explosives Site Closeout Inspections. Explosives storage facilities being transferred from DoD control must have a closeout ESI. The closeout ESI report will be included as part of the explosives safety site approval cancellation request submitted to the DoD Explosives Safety Board.

a. When Potential Explosives Sites (PESs) aboard Marine Corps installations are terminated, the Command shall notify COMMARCORSYSCOM of the need for a Closeout ESI. The Closeout ESI will evaluate the command's level of compliance with closure practices and actions covered in reference (g).

b. Closeout Inspections shall be requested by the command when all ammunition and explosives material, with the exception of limited amounts of security ammunition, have been removed from all PESs and the host command has conducted an initial inspection in accordance with reference (g).

c. At completion of the closeout inspection, COMMARCORSYSCOM shall issue a report to the inspected Command, and Naval Facilities Engineering Command (NAVFAC) indicating whether all explosives safety matters have been addressed. NAVFAC shall then continue the installation closeout process as appropriate.

Chapter 3

Explosives Safety Inspection Rating Criteria

1. Background. The COMMARCORSYSCOM ESI Team will determine the inspected command's compliance to explosives safety criteria and overall explosives safety posture using the following criteria:

- a. SATISFACTORY
- b. SATISFACTORY with UNSATISFACTORY Program
- c. SATISFACTORY with UNSATISFACTORY Tenant
- d. UNSATISFACTORY

2. SATISFACTORY Criteria. The COMMARCORSYSCOM ESI Team shall recommend an overall Explosives Safety Program rating of SATISFACTORY, provided the Command:

- a. Conducts ammunition and explosives operations in compliance with all applicable explosives safety regulations.
- b. Clearly demonstrates that it maintains an effective ESMP that enhances force and asset preservation while supporting operational requirements.

3. SATISFACTORY with UNSATISFACTORY Program/Elements Criteria

a. The ESI Team will recommend a program(s) is rated UNSATISFACTORY if, based on the overall assessment of individual findings within the program elements, it does not meet the provisions of references (e) through (g).

b. The ESI Team may recommend that, although individual programs or elements inspected do not comply with the provisions of references (e) through (g), the overall explosives safety posture of the activity is SATISFACTORY.

4. UNSATISFACTORY Criteria. The COMMARCORSYSCOM ESI Team may recommend an overall UNSATISFACTORY rating if the programs and elements inspected reveal there is evidence of a systemic breakdown in ESMP processes. Examples include, but are not limited to:

a. The Command's ESMP is not effectively protecting personnel, facilities, and the environment as identified by explosives incidents.

b. The ESO is not effectively executing the duties identified in references (f) and (g).

c. The command has not submitted, maintained, or established site approvals for activities where ammunition and explosives are handled, manufactured, or stored prior to conducting explosives operations.

d. Qualification and Certification of personnel is non-existent or ineffective.

e. Standing Operating Procedures are not in place or not utilized during explosives operations.

f. Operations are not conducted in full compliance with the requirements of Secretarial Certifications, Waivers, Exemptions, or Special Authorizations officially sanctioning deviations from established explosives safety criteria.

g. The command failed to effectively manage ammunition and explosives assets as directed by MCO 8015.3 for Class V(W) activities or OPNAVINST 8015.2C and NAVSUP P-724 Class V(A) activities.

5. Finding Analysis. Each finding will be analyzed using Operational Risk Management (ORM) concepts per reference (k) and (l). A risk assessment code (RAC), based on the potential explosives safety hazard severity and explosives mishap probability, will be assigned to each finding. The resulting RAC code will assist the ESI Team in determining the overall severity of the finding and will be considered during the rating criteria process.

Chapter 4

Explosives Safety Self-Assessment Program

1. Background. As directed by reference (c), DON commands shall conduct periodic self-assessments of their ESMPs to evaluate and ensure compliance with references (e) through (h).

2. ESSA. The ESSA is the formal program by which installations conduct on-going appraisals of ammunition and explosives operations to determine the effectiveness of their ESMP. The ESSA shall promote the highest standards of explosives safety integrity and compliance, while applying the precepts of ORM. The ESSA must be a continuous process and shall not be conducted solely in anticipation of an ESI or any such evaluation. A complete ESSA will be conducted by each installation on an annual basis.

a. The ESSA will be a formal written program. ESSA format and content are at the discretion of the ESO. However, the most current version of the COMMARCORSSYSCOM ESI evaluation guide should be adapted to meet installation specific requirements and used as a baseline guide.

b. The ESSA must be conducted on all installation commands, including tenant commands that store, handle, or transport ammunition and explosives. The ESSA program must include the following minimum elements:

(1) The installation ESO, in conjunction with unit personnel, must perform annual reviews of all elements of the munitions mission to address the functional areas, audit methodology, process quality control, and corrective actions.

(2) Establish a process to ensure inspection results are:

(a) Properly analyzed

(b) Unfavorable causes and trends are identified

(c) Findings are tracked and formally closed out when corrections have been completed.

(3) The ESO shall provide recommendations and solutions to facilitate corrective actions, ensure corrective actions are accomplished to preclude reoccurrence, and ensure a comprehensive ESMP is achieved.

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(4) Commands shall incorporate regional, local, and activity specific requirements that are not listed in the ESI Evaluation Guide in order to increase ESSA effectiveness.

(5) In cases where operational tempo, lack of available personnel, deployments, or other constraining factors preclude ESO assessments, evaluations conducted by unit Explosive Safety Representatives may be considered as part of the ESSA process to avoid duplicative inspection efforts.

(6) At the conclusion of the review, a final report of findings and recommended corrective actions will be prepared by the ESO and provided to each organization inspected and the installation commander.

c. The ESSA will be evaluated annually by the respective MCI regional explosives safety office during regional audits.

Chapter 5

Corrective Action Plan Execution

1. Background. A CAP ensures resolution, and prevention of recurrence of discrepancies observed during an ESI or ESSA by identifying the root cause and applying the appropriate corrective action for both isolated and systemic problems. When executed properly, it becomes an integral part of a Command's Explosives Safety Compliance Program and significantly increases the effectiveness of the Command's ESSA and ESI.

2. Corrective Action Plan Execution

a. To properly and effectively execute a CAP, the command must first critically examine each discrepancy to determine if it is an isolated occurrence or if there is evidence of a widespread (systemic) problem. The command must attempt to identify all root causes of the discrepancy then initiate appropriate corrective action to prevent recurrence.

b. The command shall formally review all discrepancies and root causes at least every 90 days to ensure corrective action has been completed.

(1) Logically follow previously submitted CAPs by tracking progress on all outstanding deficiencies.

(2) Actions previously listed as completed (i.e. have been physically corrected) require no further reporting.

c. The CAP must contain all required information and be formatted as defined below:

(1) Discussion: Supporting information.

(2) Root Causes: Underlying cause or circumstance causing the discrepancy. Root cause rationalization must be provided as supporting information in the Discussion section. Root causes are divided into four categories:

(a) Policy (faulty or conflicting Federal, DoD, DON, MCO or local policy or regulation)

(b) Resources (fiscal constraints, lack of human resources, etc.)

(c) Training (lack of, or insufficient training)

(d) Compliance (failure to comply, with no other valid reason, does not fall into other categories)

(3) Corrective Action: Actions, or planned actions, taken to physically correct the discrepancy and prevent recurrence.

(4) Current Status: Status of corrective action.

(a) Open

(b) Closed

3. CAP Submissions

a. CAPs shall be submitted electronically to the respective MCI Regional Command for review within 45 calendar days from the date the signed final ESI report is received.

b. CAPs will be submitted via the EES Web Portal and will include root cause, root cause analysis, and an uploaded copy of formal documentation indicating CO approval/endorsement.

c. CAPs will be coordinated and submitted by the inspected command's ESO. This coordination will require the ESO to receive actions from organizations and departments located within the command as well as all tenant activities for which they are responsible. The ESO of the activity identified as the primary addressee of the ESI report is responsible for compiling the CAP for the installation and its tenants, and posting it in the EES Web Portal.

4. CAP Review

a. CAPs will be subjected to quarterly progress reviews until all outstanding deficiencies are corrected.

b. The respective MCI Regional Command Explosives Safety Office will review all CAP submissions quarterly. The MCI review shall include the following:

(1) Critical examination of each corrective action to determine if it is an isolated occurrence or if there is evidence of a widespread (systemic) problem.

(2) The root cause of each discrepancy is properly identified.

(3) Appropriate corrective action has been initiated by the inspected command to prevent recurrence.

c. The MCI Regional Command Explosives Safety Office will determine when each corrective action is sufficiently completed. Upon this determination, the MCI Regional Command will endorse and submit the final CAP to COMMARCORSYSCOM via the EES Web Portal.

d. COMMARCORSYSCOM will review the final CAP submission to determine if all corrective actions are adequately corrected in compliance with established directives. Dependent on review, COMMARCORSYSCOM will concur or non-concur with the CAP.

(1) CAPs receiving non-concurrence will be returned to the evaluated command via the MCI Regional Command for further action.

(2) Compliant CAPs will be closed out and archived in the EES Web Portal.

e. COMMARCORSYSCOM will maintain and evaluate data collected during ESIs. Explosives Safety Compliance Program data will be continually evaluated to validate the implementation and effectiveness of the Marine Corps ESMP.

Chapter 6

Explosives Safety Inspection Schedule

1. Background. COMMARCORSYSCOM will schedule Marine Corps ESIs on a biennial basis. This 24-month cycle may be extended or compressed when determined appropriate by COMMARCORSYSCOM.

2. ESI Schedule. Table 6-1 identifies commands to be inspected. Schedules are depicted by Fiscal Year (odd/even) and quarter. Additional ammunition and explosives activities, not identified in Table 6-1, may be scheduled for an ESI as they are identified. Scheduling conflicts will be coordinated with the MCI Regional Command Explosives Safety Office for resolution with COMMARCORSYSCOM.

ESI Schedule	
EVEN FY	ODD FY
1st QTR	
MCAS Yuma	MCAS Beaufort
MCAGCC 29 Palms	MCRD Parris Island
2nd QTR	
MCB Camp Pendleton	MCLB Albany
MCAS Camp Pendleton	Blount Island Command
MCB/MCAF Quantico	MCB Hawaii
	MCAS Cherry Point
3rd QTR	
MCB Camp Butler MCAS Futenma	MCAS Iwakuni
MARFOR Korea	CATC Camp Fuji
MCB Camp Lejeune	
MCAS New River	
4th QTR	
MCMWTC Bridgeport	MCAS Miramar
MCLB Barstow	MCRD San Diego

Table 6-1.--ESI Schedule

3. Inspection Rescheduling. Rescheduling an ESI is highly discouraged. If a command finds it necessary to reschedule their ESI from one quarter to the next, it shall do so at the earliest opportunity available. Activity COs must submit a formal letter to COMMARCORSYSCOM, justifying the request for the ESI delay.

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COMMARCORSYSCOM will approve or deny the request. The next ESI for an activity receiving a delay will take place during the regularly scheduled quarter; not 24 months from the assigned delay date.