
CORRECTIVE ACTION PLANS

HARMONY EVANDER KINROSS GOLD PLANT

Introduction

One of the components of the auditing of the ICMI Cyanide Code is the development of a set of Corrective Action Plan for those parts of the audit findings that have been found to be in substantial compliance and require focussed responses to take the site to full compliance.

ICMI requirements indicate that Corrective Action Plans and notification thereof must be completed within 12 months of posting of the Plan on the ICMI website.

The section below details the corrective actions, agreed by the Harmony Evander Kinross Gold Plant and the Lead Auditor, necessary to bring the Harmony Evander Kinross Gold Plant in full compliance, as indicated in the Detailed Audit Report.

Corrective Action Plan - 1

Principle 3 – Handling & Storage: Protect workers and the environment during cyanide handling and storage

Handling & Storage Practice 3.1 Design and construct unloading, storage and mixing facilities consistent with sound and accepted engineering practice and employing quality control/quality assurance procedures and spill prevention and containment measures.

Deficiencies

- The current cyanide unloading and storage facilities include a liquid sodium cyanide tank and two redundant, flake cyanide tanks. These facilities are 40 years old and are not fully Code compliant. Compliance weaknesses include secondary containment, end of life issues and outdated design.

Corrective Actions

- Capital approval has been gained and detailed plans drawn up, to establish new, Code compliant cyanide offloading and storage facilities which will include the decommissioning and removal of all old storage and offloading facilities, including flake cyanide.
- Additional interim actions to manage the cyanide risk include additional tank and facility inspections which includes thickness tests and frequent sealing of the bund area

Evidence for Auditors

Evidence required by auditors to confirm the corrective actions have been implemented effectively:-

- Photographic and/or documentary evidence of completion and commissioning of the new cyanide storage and off-loading facilities.
- Photographic and/or documentary evidence of the decommissioning of the old cyanide storage and off-loading facilities, including the flake cyanide facilities.

Completion Date: - 31st January 2011

Corrective Action Plan - 2

Principle 4 – Operations: manage cyanide process solutions and waste streams to protect human health and the environment

Operations Practice 4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures

Deficiencies

- The plant is in the process of implementing a Computerised DMS 2000, Planned Maintenance System (PMS). Although the cyanide plant maintenance and inspection schedule covering critical cyanide equipment was sighted, there were insufficient records to evaluate the effective implementation and sustainability of the PMS.

Corrective Actions

- Six months of PMS records and associated documentation to illustrate the sustainability and operational implementation of the PMS.

Evidence for Auditors

Evidence required by auditors to confirm the corrective actions have been implemented effectively:-

- An additional six months of records which include scheduled maintenance inspections, equipment histories, linked job card records, inspection schedules, inspection frequency evaluation documentation and any other documentation which demonstrates the operational and continuity status of the PMS.

Completion Date: - 30th November 2010

Corrective Action Plan - 3

Principle 8 – Training: Train workers and emergency response personnel to manage cyanide in a safe and environmental protective manner.

Operations Practice 8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

Deficiencies

- The whole Harmony Group training system was changed from a historically less formal training structure to a formal structured and well planned system, referencing national unit standards relating to metallurgy. Although the old system ensured competency, the process of training the staff in the revised standards and procedures which are Cyanide Code compliant, is in its early stages of retraining. There are currently insufficient records and follow up observations to demonstrate the competency of the staff in the new systems and procedures.

Corrective Actions

- The Harmony Group Training structures, along with the various plant trainers, have planned to complete the training and the appropriate planned task observations within the next eight months.

Evidence for Auditors

Evidence required by auditors to confirm the corrective actions have been implemented effectively:-

- Proof of training of all appropriate staff on the new procedures and evidence of associated planned task observations and assessments to illustrate that the training has been effective and is sustainable.

Completion Date: - 30th November 2010

Consolidated Completion Date: - 28th February 2011



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