



One Team. One Culture.

Administrative Procedure

PRC-PRO-SH-52755

Employee Job Task Analysis

Revision 1, Change 0

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Program: Occupational Safety and Industrial Hygiene

Topic: Occupational Safety and Industrial Health

Technical Authority: Brasker, Cheryle

Functional Manager: Roueche, Kimberly

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JHA: Administrative**Periodic Review Due Date: 08/06/2019**

Rev. 1, Chg. 0

USQ Screen Number:

- 100 K Facility : **Screening Determination Performed:**
0085-2014
Screener: Williams, James
- Canister Storage Building/Interim Storage Area : **Screening Determination Performed:**
CSB-14-075
Screener: Covey, Lori
- Central Plateau Surveillance and Maintenance : **Categorical Exclusion:** GCX-7 (Minor Change)
Screener: Buck, Francis
- Less Than HazCat 3 : Excluded from USQ
Exclusion Reason:
Exempt from USQ Process per PRC-PRO-NS-062, SCOPE
- Plutonium Finishing Plant : **Categorical Exclusion:** GCX-7 (Minor Change)
Screener: Higuera, Maurice
- Solid Waste Operations Complex : **Categorical Exclusion:** GCX-7 (Minor Change)
Screener: Buck, Francis
- Transportation : Excluded from USQ
Exclusion Reason:
"N/A per Section 1.3 - < 1 A
- Waste Encapsulation Storage Facility : **Screening Determination Performed:**
WESF-14-107
Screener: Covey, Lori

CHANGE SUMMARY**Description of Change**

Completely revised to provide additional direction as provided by DOE.

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1.0 INTRODUCTION

1.1 Purpose

This procedure defines the requirements for utilizing the automated employee job task analysis (EJTA) to establish necessary employee medical qualifications and monitoring based on the job requirements, hazards, exposures, and overall risk associated with their assigned work scope.

The EJTA also:

- Satisfies specific Americans With Disabilities Act Amendment Act (ADAAA) and Fitness For Duty data needs
- Helps identify the need for additional employee exposure assessment and monitoring data
- Aids in determining the necessary health and safety training

Use of the EJTA facilitates compliance with U.S. Department of Energy (DOE) 10 CFR 851, *Worker Safety and Health Program*, which requires employee job task and hazard analysis information be provided to the Occupational Medical Service Provider (OMSP).

1.2 Scope

The requirements in this procedure are applicable to CH2M HILL Plateau Remediation Company (CHPRC) employees and subcontractor work activities performed under the CHPRC scope of work.

The requirements do not apply to Vendors. Vendors are defined as contractors that provide only “commercial items” as defined under the Federal Acquisition Regulations (FAR) and are not exposed to hazards on the Hanford Site (e.g. radiological, beryllium, hazardous waste) while providing their service.

This procedure does not apply to the OMSP (per contract with DOE) which is responsible for scheduling employees for medical qualification examinations and monitoring, for removing employees from medical program placement, for reporting results of medical examinations and monitoring, and for maintaining medical records.

The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical or physical exposures that may have been encountered. Workers may document past exposures on the [DOE Historic Health Exposure Questionnaire](#) and submit the form to the OMSP.

1.3 Applicability

This procedure is applicable to CHPRC employees and subcontractors who perform work on site. An employee shall not be exposed to work-related hazards/exposures without a current signed EJTA. The process for completion of subcontractor EJTA's is contained in Appendix A.

1.4 Implementation

This procedure is effective upon publication.

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2.0 RESPONSIBILITIES

All responsibilities associated with this procedure are identified in the process steps.

3.0 PROCESS

3.1 Development and Revision of EJTA

Actionee	Step	Action
NOTE:	<ul style="list-style-type: none"> • Access to the automated EJTA can be obtained by contacting the CHPRC Occupational Safety and Industrial Hygiene Technical Authority. • Process for Contractor EJTAs is in Appendix A. 	
Managers or delegate	<ol style="list-style-type: none"> 1. COMPLETE an initial EJTA upon hire for each employee in accordance with the EJTA instructions which are part of the automated system or can be accessed at HPMC EJTA help. Every effort will be made to complete the EJTA as soon as the necessary information is available. 2. REVISE the EJTA when employees' essential job functions, physical job requirements or the needed medical qualifications are altered as a result of job transfer or fundamental change in job requirements or hazards encountered. 3. UPDATE the employees' EJTAs annually. It is imperative that EJTAs are maintained current in order for the occupational surveillance examinations to be scheduled/performed and Medical clearances do not expire. EJTAs expire 365 days from the date last sent to Medical. When EJTAs are updated, the annual period will reset to the last date sent to Medical. 4. ENSURE the following statement is/has been added to the front page of the EJTA in the comment section during completion of the initial EJTA or when revising/updating the EJTA : "The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical of physical exposures that may have been encountered." 5. ENSURE a Safety and Health (S&H) professional has reviewed and has concurred with the preparation of the EJTA. 	

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<i>Actionee</i>	<i>Step</i>	<i>Action</i>
Safety & Health Professional	6.	<p>REVIEW/COMPLETE the potential exposure hazards (PEH) section of the EJTA.</p> <ul style="list-style-type: none"> • During this review, applicable exposure information will be consulted to evaluate exposure levels using a graded approach. • Information to be considered includes previous EJTAs, baseline hazard assessments, previous monitoring data and representative monitoring data. • If sufficient data exist to accurately assess exposures, the quantitative data (Qd) box should be checked for the agent. • A person can be administratively enrolled in a program if Qd data box is not checked and the hazard ranking is 2 or 3.
Manager	7.	INVOLVE employees in the EJTA process.
	8.	PROVIDE employees the opportunity to discuss the EJTA with the Safety and Health Professional when requested.
Employee	9.	REVIEW EJTA <u>AND</u> DISCUSS any concerns with Manager and/or Safety and Health Professional.
Manager	10.	INCORPORATE appropriate employee and Safety and Health Professional input into the EJTA.
	11.	INVALIDATE the EJTA if employee disagrees with the EJTA content <u>AND</u> SELECT the "Employee refused to sign" box on the EJTA.
	12.	FACILITATE a resolution meeting with the employee and Safety and Health Professional when employee disagrees with the EJTA content and refuses to sign. Every employee on the Hanford Site has the right to participate in the dispute resolution process without fear of retaliation, reprisal, or penalty.
	13.	NOTIFY and INCLUDE the HAMTC Health Advocate and the HAMTC Safety Representative (or equivalent union representative) in the resolution meeting for bargaining unit/building trade employees.
	14.	DO NOT SUBMIT EJTA to Medical until the employee, the Manager, and the Safety and Health Professional are all in agreement.

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<i>Actionee</i>	<i>Step</i>	<i>Action</i>
Manager, Employee, Safety and Health Professional	15.	SIGN a hard copy of the EJTA when the employee agrees with the EJTA content and the Safety & Health Professional has concurred with the preparation of the EJTA
Manager	16.	MAINTAIN the signed EJTA in the identified IDMS EJTA folder by sending the signed EJTA and correspondence electronically to ^PRC Records or hard copies to CHPRC Records at Mailstop T1-41.
	17.	PROVIDE a copy of the EJTA to the employee when requested.
Safety and Health Professional	18.	SUBMIT EJTA to OMSP.
Manager	19.	TERMINATE the EJTA when employee separates from the company or is on disability.

3.2 After-Completion of EJTA

<i>Actionee</i>	<i>Step</i>	<i>Action</i>
Managers	1.	ENSURE that employees report for medical qualification and monitoring examinations as scheduled by the OMSP.
	2.	COMPLETE employee training matrix based on the Occupational Safety and Health Administration (OSHA) training requirements and the results of the EJTA.
	3.	VERIFY medical qualifications and training before authorizing the employee to work in tasks that would present such exposures.
	4.	ENSURE that the EJTA is revised so that the baseline audiogram is obtained prior to the employee's first exposure to noise at or above the allowable exposure of 85 dBA TWA. Employees whose work will change to expose them to 85 dBA TWA or higher must be sent to the OMSP to get a baseline audiogram before they are exposed to noise over 85 dBA TWA.
Safety and Health Professional	5.	ASSIST managers <u>AND</u> INTERFACE with the OMSP in interpreting EJTA information to determine employee placement in medical qualification examinations and medical monitoring programs, and the need for additional workplace hazard controls.
	6.	DEVELOP a monitoring plan for any agents marked with a "2" or "3" on the PEH section of the EJTA that do not have the Qd box checked, <u>AND</u> UPDATE the EJTA once the monitoring has been completed.

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<i>Actionee</i>	<i>Step</i>	<i>Action</i>
	7.	ASSIST, as requested, line management in completing the employee training matrix based on the OSHA training requirements and the results of the EJTA.
Managers	8.	ENSURE that employees receive the appropriate health and safety training as indicated by evaluation of the employee profile.
	9.	ENSURE the historical exposure information statement from step 3.1.4 above has been added to the hardcopy of the signed EJTA before providing the EJTA to employees, third party administrators, or other authorized parties. <ul style="list-style-type: none"> EJTAs completed prior to the effective date of this procedure may need to have the statement added via typed statement on the form, computer form addition, stamp, or other permanent means.
Human Resources Department POC	10.	DETERMINE the necessary accommodations or actions if the OMSP determines an employee is not capable of performing the specified essential job functions and physical job requirements.
	11.	USE the EJTA as a resource for conducting ADAAA accommodation and Fitness for Duty reviews.

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4.0 FORMS

[DOE Historic Health Exposure Questionnaire](#)

Site OMSP's New Hire Scheduling Form

5.0 RECORD IDENTIFICATION

All records are required to be managed in accordance with PRC-PRO-IRM-10588, *Records Management Processes*. OCRWM records are also managed in accordance with PRC-PRO-QA-19579, *OCRWM Records Management*.

Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility	OCRWM Retention Schedule (If OCRWM Related)
Signed EJTA	Responsible Manager	Responsible Manager per PRC-PRO-IRM-10588	N/A

6.0 SOURCES

6.1 Requirements

10 CFR 851, *Worker Safety and Health Program*

6.2 References

PRC-PRO-IRM-10588, *Records Management Processes*

PRC-PRO-QA-19579, *OCRWM Records Management*

7.0 APPENDIXES

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Appendix A - Employee Job Task Analysis for Contractors

Subcontractors who do not have access to the EJTA automated system will initiate the EJTA manually as described in this appendix.

Request the Contractor company complete the Site OMSP's New Hire Scheduling Form and submit to OMSP for each worker the contractor proposes to work on site and who has not previously supported CHPRC. The OMSP forms are available through the CHPRC Safety Reference Documents external webpage at the following link:

<http://chprc.hanford.gov/page.cfm/CHPRCSafetyReferenceDocuments>

The subcontractor will work with the BTR or EJTA coordinator and the responsible project safety and health professional to perform a preliminary hazards assessment to identify anticipated chemical/physical hazardous exposure(s) likely to be encountered during performance of the subcontracted work. This assessment will be documented on a CHPRC draft EJTA, also available through the CHPRC Safety Reference Documents external webpage.

The safety and health professional will prepare an initial EJTA in the automated system and submit the completed EJTA to the Site OMSP.

The Site OMSP Scheduler processes the EJTA, schedules the exam and contacts the subcontractor with the medical surveillance appointment date and time. The subcontractor ensures that workers report for medical qualification and monitoring examinations as scheduled by the OMSP.

The remaining expectations of the EJTA process in this procedure will be completed with the BTR or an assigned manager fulfilling the role of the EJTA manager. These expectations include:

- Revise the EJTA when employee functions or medical surveillance requirements change.
- Review/Update the EJTA annually.
- Ensure the following statement has been added to the EJTA: "The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical or physical exposures that may have been encountered."
- Involve and gain agreement from the employee and the responsible safety and health professional. Utilize the resolution process if there is disagreement.
- Hardcopy signatures and EJTA record retention.
- Verify the EJTA, medical qualifications and necessary training are complete before the employee is exposed to hazards.
- Implement a monitoring plan as identified on the EJTA

Terminate the EJTA when the subcontractor finishes work and leaves the site.