Administrative Procedure

PRC-PRO-SH-40499

Safety and Health Inspections

Revision 1, Change 0

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Effective: 01/29/2015

Program: Occupational Safety and Industrial Hygiene
Topic: Occupational Safety and Industrial Health

Technical Authority: Robinson, Kristine
Functional Manager: Roueche, Kimberly

Use Type: Administrative
JHA: Administrative

Periodic Review Due Date: 01/29/2017

Rev. 1, Chg. 0

USQ Screen Number:

- Solid Waste Operations Complex: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** Olsen, Ashley
- Canister Storage Building/Interim Storage Area: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** Covey, Lori
- Central Plateau Surveillance and Maintenance: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** Olsen, Ashley
- Waste Encapsulation Storage Facility: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** Covey, Lori
- 100 K Facility: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** Williams, James
- Plutonium Finishing Plant: **Categorical Exclusion:** GCX-8 (Not in Safety Basis Compliance Matrices)
  **Screener:** King, Jeffry
- Transportation: Excluded from USQ

Exclusion Reason:
N/A per Section 1.3 - < 1 A2

**CHANGE SUMMARY**

**Description of Change**

Incorporate verbiage in PRC-PRC-SH-40499, Safety and Health Inspections and clarify the requirement for the completion of a Condition Report for issues that may require evaluation, trending, cause, determination or identification and tracking of actions.
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1.0 INTRODUCTION

PRC-PRO-SH-40499, Safety and Health Inspections, safeguards and monitors the programmatic requirements for ensuring compliance to Title 10, Energy, Code of Federal Regulations (CFR) Part 851, Worker Safety and Health Program to identify industrial and occupational safety hazards applicable to the CH2M HILL Plateau Remediation Company (CHPRC) work scope and are included in PRC-MP-SH-32219, 10 CFR 851 CHPRC Worker Safety and Health Program Description.

PRC-PRO-SH-40499, Safety and Health Inspections implements the CHPRC, Integrated Safety Management System (ISMS) & Environmental Management System (EMS) Description (ISMSD) as detailed in PRC-MP-MS-003, Integrated Safety Management System/Environmental Management System Description (ISMSD), including ISMS/EMS Core Functions to Identify and Analyze Hazards (CF-2) and Provide Feedback and Continuous Improvement (CF-5).

Projects/Organizations participating in the Department of Energy (DOE), DOE-Voluntary Protection Program (DOE-VPP) should consult DOE/EH-0433, Department of Energy Voluntary Protection Program, Part I: Program Elements which establishes criteria for worksite analysis including conducting routine, general hazard assessments that follow written procedures or guidance and result in written reports of findings and tracking of hazard correction.

1.1 Purpose

This Level 1 procedure establishes minimum requirements for conducting and documenting safety and health inspections.

1.2 Scope

This procedure integrates requirements for worksite safety and health inspections that occur on a scheduled basis into one overall inspection process. The scope of this procedure includes:

- Conducting and documenting workplace safety and health inspections to identify existing and potential safety and health hazards and non-compliances with DOE prescribed, worker safety and health requirements; and,
- Conducting and documenting general observations of unsafe acts or behaviors in the workplace, providing on-the-spot coaching when an unsafe act or behavior is identified.
NOTE: • A safety and health inspection is intended to be adjunct, and not a substitution for the performance of associated programmatic inspections or assessments including, but not limited to the following:

− Readiness Reviews used for preparation of startup or restart of Facilities (Refer to PRC-PRO-OP-055, Startup Readiness);

− Management Assessments (Refer to PRC-PRO-QA-246, Management Assessment);

− Fire Protection Assessments (Refer to PRC-PRO-FP-40420, Fire Protection Analyses and PRC-STD-FP-40404, Fire Protection Program);

− Property Management Inspections (Refer to PRC-PRO-PMT-52772, Property Management); and,

− Industrial Hygiene Exposure Assessments (Refer to PRC-PRO-SH-17916, Industrial Hygiene Exposure Assessments).

1.3 Applicability

This procedure is applicable to CHPRC Team employees and subcontractors performing work in support of CHPRC.

1.4 Implementation

This procedure is effective upon publication.

2.0 RESPONSIBILITIES

Responsibilities associated with this procedure are identified in the process steps.
3.0 PROCESS

<table>
<thead>
<tr>
<th>Actionee</th>
<th>Step</th>
<th>Action</th>
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</thead>
<tbody>
<tr>
<td>Facility/ Project Manager</td>
<td>1.</td>
<td>SCHEDULE safety and health inspections for work areas and activities under assigned area of responsibly.</td>
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<td></td>
<td>2.</td>
<td>ENSURE safety and health inspections are performed as follows:</td>
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<td></td>
<td></td>
<td>- All Office Areas-QUARTERLY</td>
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<tr>
<td></td>
<td></td>
<td>- Shops &amp; Storage Areas-MONTHLY</td>
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<td></td>
<td></td>
<td>- All Field Operations, Maintenance-WEEKLY</td>
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<tr>
<td></td>
<td></td>
<td>- All Demolition and Deconstruction (D&amp;D)-WEEKLY</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- All Construction (during periods of active construction)-DAILY</td>
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</tbody>
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**NOTE:**
- *The Project/Organization in consultation with the Project Occupational Safety and Industrial Hygiene (OS&IH) Professional may increase the frequency of safety and health inspections based upon levels of risk and complexity of work scope and conditions, or decrease the frequency during periods of initial mobilization, inactivity or site shutdown. A safety and health inspection plan with justification to decrease the frequency of inspections shall be documented and approved by the Facility/Project Manager and Project OS&IH Manager.*
- *Project specific procedures for conducting and documenting safety and health inspections may be utilized when such procedures implement, without contradiction, all requirements of this Level 1 procedure. For example, PRC-PRO-CN-40344, Construction Safety and Health Inspections implements the minimum requirements for the completion of safety and health inspections associated with active construction projects as prescribed within PRC-PRO-SH-40499.*

3. ENSURE the Project OS&IH Professional is scheduled to lead the safety and health inspection.

4. ENSURE additional resources are scheduled to participate in the safety and health inspection.
NOTE:

- The Project OS&IH Professional is expected to lead the safety and health inspection. The Project OS&IH Professional has the requisite knowledge to lead or conduct the safety and health inspection with an understanding of the safety and health regulatory requirements and the knowledge to recognize the workplace hazards related to the scope of the inspection.

- A Line Management representative, with the authorization to provide direction to have hazards immediately corrected and provide on-the-spot coaching when an unsafe act or behavior is identified, is expected to participate in the safety and health inspection.

- General Employee participation in the safety and health inspection is encouraged, and should be solicited.

- Employees functioning in specialized positions, e.g., Environmental Compliance Officer (ECO) or Facility Chemical Custodian (FCC), and who have distinct knowledge or areas of expertise, are encouraged, and may participate in the safety and health inspection.

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<tr>
<th>Actionee</th>
<th>Step</th>
<th>Action</th>
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<tbody>
<tr>
<td></td>
<td>5.</td>
<td>ENSURE that construction contractors have designated representatives who are knowledgeable of the hazards associated with the project and who have full authority to act on behalf of the construction contractors and who have the ability to make frequent and regular inspections of the worksite.</td>
</tr>
<tr>
<td>Project OS&amp;IH</td>
<td>6.</td>
<td>LEAD the safety and health inspection.</td>
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<td></td>
<td>7.</td>
<td>COMMUNICATE results of the safety and health inspection performance to Project Management.</td>
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<td></td>
<td>8.</td>
<td>DOCUMENT safety and health inspection results, including results that identify existing and potential safety and health hazards and non-compliances as well as general observations of unsafe acts or behaviors.</td>
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<td></td>
<td>9.</td>
<td>INITIATE a Condition Report to ensure safety and health inspection results are evaluated and resolved when issues and non-compliances are identified.</td>
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<td>10.</td>
<td>SUBMIT a copy of completed safety and health inspection results, including a copy of the associated Condition Report to Facility/Project Manager.</td>
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</table>
NOTE:

- PRC-PRO-QA-052, Issues Management establishes the requirements and responsibilities for the identification, evaluation and resolution of events, conditions, or opportunities for improvement and the process to document preventive and remedial (collectively, corrective) actions, as well as actions to address improvement opportunities.

- CHPRC has established specific management performance goals including the submittal of a Condition Report within five working days of issue identification.

11. PROVIDE recommendations to the Facility/Project Manager to resolve adverse safety and health conditions or deficiencies.

12. REVIEW results of safety and health inspections with the Facility/Project Manager and Project OS&IH Manager for the purpose of tracking and trending issues.

13. SUBMIT a copy of completed safety and health inspection results, including a copy of the associated Condition Report to the Project OS&IH Manager for review.

4.0 FORMS

The OS&IH web site provides checklists and forms that can be used to document inspections. [http://prc.rl.gov/rapidweb/OSIH/index.cfm?PageNum=27](http://prc.rl.gov/rapidweb/OSIH/index.cfm?PageNum=27).

5.0 RECORD IDENTIFICATION

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

Records created during the performance of OCRWM activities shall be managed and additionally submitted to the OCRWM Records Coordinator, in accordance with PRC-PRO-QA-19579, OCRWM Records Management.

Records Capture Table

<table>
<thead>
<tr>
<th>Name of Record</th>
<th>Submittal Responsibility</th>
<th>Retention Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety &amp; Health Inspections</td>
<td>Project Management</td>
<td>Project OS&amp;IH</td>
</tr>
</tbody>
</table>
6.0 SOURCES

6.1 Requirements

10 CFR 851, U.S. Department of Energy, Worker Safety and Health Program
29 CFR 1910, U.S. Department of Labor, Occupational Safety and Health

6.2 References

PRC-MP-MS-003, Integrated Environment, Safety, and Health Management System Description
PRC-MP-SH-32219, 10 CFR 851 CHPRC Worker Safety and Health Program Description
PRC-PRO-FP-40420, Fire Protection Analyses
PRC-PRO-IRM-10588, Records Management Processes
PRC-PRO-OP-055, Startup Readiness
PRC-PRO-PMT-52772, Real Property Asset Management
PRC-PRO-QA-052, Issues Management
PRC-PRO-QA-246, Management Assessment
PRC-PRO-17916, Industrial Hygiene Exposure Assessments
PRC-PRO-QA-19579, OCRWM Records Management
PRC-STD-FP-40404, Fire Protection Program
PRC-PRO-CN-40344, Construction Safety and Health Inspections