



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

04-ESQ-088

Mr. E. S. Aromi, President
and General Manager
CH2M HILL Hanford Group, Inc.
Richland, Washington 99352

Dear Mr. Aromi:

CONTRACT NO. DE-AC27-99RL14047 – REPORT A-04-ESQ-TANKFARM-013 – REVIEW OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) INJURY/ILLNESS RECORDKEEPING, SEPTEMBER 23 – 29, 2004

This letter forwards the results of the U.S. Department of Energy, Office of River Protection assessment of the CH2M HILL Hanford Group, Inc. (CH2M HILL), OSHA Injury/Illness Recordkeeping, conducted from September 23 through 29, 2004. The reviewer identified one Observation. Details of the review are documented in the attached report.

The reviewer concluded the CH2M HILL OSHA Injury/Illness Recordkeeping programs were adequate and in conformance with established requirements as identified in 29 CFR Part 1904, "Recording and Reporting Occupational Injuries and Illnesses," and DOE M 231.1-1A, "Environmental, Safety and Health Reporting Manual." The reviewer also concluded program elements implementation was effective in establishing a clear process for reporting injuries and illnesses.

The reviewer identified one Observation, as follows:

- CH2M HILL had not reviewed subcontractor procedures to ensure subcontractor procedures complied with current OSHA requirements, as evidenced by the Washington Group International procedure No. 8.0, Revision 2., "Records and Reports," being outdated and referring to OSHA 29 CFR 1904 requirements superseded in January 2002.

CH2M HILL should verify that all of its subcontractor's procedures implement the most current OSHA accident and incident reporting requirements.

The reviewer also found:

- AdvanceMed Medical staff have revised Record of Visit forms to minimize misunderstandings regarding employee work restrictions;
- CH2M HILL has reviewed injury and illness data and corrected discrepancies back to the year 2002; and

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- Training was provided to CH2M HILL staff responsible for injury/illness recordkeeping by ORP in July, 2004.

The attached Assessment Report A-04-ESQ-TANKFARM-013 documents the details of the assessment.

If you have any questions, please contact me, or your staff may call Robert C. Barr, Director, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

ESQ:PRH

Roy J. Schepens
Manager

Attachment

cc w/attach:

T. E. Krietz, EM-3

D. N. Price, CH2M HILL

**OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING REVIEW CH2M HILL
HANFORD GROUP, INC. (CH2M HILL) SEPTEMBER 23 – 29, 2004**

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an OSHA injury/illness recordkeeping review during the period of September 23 – 29, 2004. The review team consisted of a DOE employee from the ORP Office of Environmental Safety and Quality. The review included all injuries occurring at the tank farms contractor's projects and facilities between January 1 – September 22, 2004. Approximately 44 records were included in the review (first aid and OSHA recordables). The reviewer selected cases for analysis from CH2M HILL's First Aid Log containing 245 incidents for the 2004 calendar year to date. Selections from the Log concentrated on first aid cases which would typically result in medical service beyond first aid and/or restricted or lost work days. Examples include strains, contusions, pain, sprains, exposures, and heat stress. The reviewer conducted discussions with the CH2M HILL safety staff and AdvanceMed Hanford medical providers during the review. Also, the reviewer compared the OSHA 300 Log and the information submitted into the DOE Computerized Accident/Incident Reporting System (CAIRS). CH2M HILL subcontractor employee records were included in the review.

Review of Procedures

CH2M HILL provided pertinent recordkeeping procedures for review prior to the review at the request of the review team. The ORP reviewer evaluated two procedures which had been revised since the last DOE recordkeeping review in March 2004. The first procedure, TFC-ESHQ-S_CMLI-C-02, Revision A-4, "Responding and Reporting Injuries, Illnesses, And Accidents," provided direction for reporting, investigating and managing injuries, illnesses, or accidents to CH2M HILL employees and subcontractors. The procedure included the requirements for reporting, investigating and managing the following:

- Occupational and non-occupational injuries and illnesses;
- Chemical exposures;
- Government motor vehicle accidents and incidents; and
- Government property damage incidents.

The second procedure, TFC-ESHQ-S_CMLI-C-01, Revision B, "Injury, Illness, Vehicle, And Property Loss Record Management," provided direction for the reporting and recordkeeping of occupational injury/illness, work related fatalities, vehicle and property

events for CH2M HILL and their subcontractors. The procedure included the requirements for managing the following:

- Maintaining injury/illness case files;
- Performing case classifications in accordance with DOE and OSHA guidelines;
- Reporting recordable injuries and illnesses into the DOE CAIRS database;
- Documenting injuries/illnesses on the OSHA 300 Log, and posting summary; and
- Distributing injury/illness information and trends.

DOE's review of the contractor's procedures for the OSHA Recordkeeping Program determined there was a clear delineation of responsibilities between the employees, supervisors, safety group, project medical staff, and the Case Management Coordinator. There was a clear process described for reporting injuries for CAIRS and OSHA recordkeeping purposes. There were requirements for periodic (annually) assessment of injury/illness case management files through contractor internal and external assessments. CH2M HILL had completed updating the procedures to incorporate September 2004 revisions to the DOE Environment, Safety and Health Reporting Manual, DOE M 231.1-1A. The procedures included the requirement for electronic submittal of injury/illness data to the CAIRS database. The DOE reviewer found the procedures adequate.

Review of Medical Files

The CH2M HILL safety organization had comprehensive case management files documenting analysis of each case for OSHA recordability. ORP reviewed case files maintained in the contractor's safety organization as well as medical files at the first aid clinic, managed by AdvanceMed. DOE's review of these files for the January – September 2004 time period found that if formal restrictions were imposed there was a "Record of Visit" (ROV) form in the files. The ROVs contained sections listing formal restrictions, date of restriction, duration, and end date. Employees have been instructed that unless the ROV specifies restricted work activity, there was no work restriction. Clarification of formal work restrictions to employees, managers and case management staff has been effective in eliminating uncertainties in recording injuries and illnesses.

Comparison of OSHA Log and CAIRS Data

The CH2M HILL safety staff had access to the CAIRS production database. The information from January – September 2004 was printed out and compared to the CH2M HILL OSHA 300 Log for Calendar Year (CY) 2004. The ORP reviewer analyzed 21 cases posted on the OSHA Log indicating restricted or lost work days. Using the

assigned case numbers from the Log, the reviewer accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Reports," for each case. The contents of the 5484.3 forms were then compared to the information in the CH2M HILL Case Management Coordinator file and the patient's AdvanceMed medical file.

The DOE reviewer selected two separate CH2M HILL cases for employee interviews. The two cases were reported on the OSHA 300 Log and CAIRS database as having the longest periods of restricted work days. Both employees had injuries involving back strain. The reviewer used questions furnished by DOE Headquarters during the interviews. The employees described the incidents and the nature of medical treatment administered. They both acknowledged the imposition of formal work restrictions such as limits set for lifting, carrying, pushing, and pulling weight greater than 20 pounds. Their restrictions were later revised to add no use of self-contained breathing apparatus when these heavy pieces of personal protective gear were required for tank farm operators, due to vapor issues. Both employees stated that they were never pressured to return to work early or perform any activities that their medical provider had restricted. Neither employee was transferred to another job as a result of their injuries. They were both complimentary of the medical services they received and of the support they received from their employer.

The reviewer found all cases on the OSHA 300 log were properly listed in CAIRS as restricted work days or days away from work, with the correct day count.

Review of Subcontractor OSHA Recordkeeping

All subcontractor employees working on CH2M HILL projects report their injuries and illnesses through the CH2M HILL Case Management Coordinator. The DOE reviewer selected one subcontractor, Washington Group International (WGI), for review. WGI had no recordable injuries in CY 2004. They employ 25 to 35 workers on CH2M HILL projects. The review team reviewed a WGI procedure, No. 8.0, "Records and Reports," and found the subcontractor was required to log and report all injuries and illnesses in accordance with OSHA requirements as prescribed in the "Record keeping Guidelines for Occupational Injuries and Illnesses."

Observation

- CH2M HILL had not reviewed subcontractor procedures to ensure subcontractor procedures complied with current OSHA requirements, as evidenced by the Washington Group International procedure No. 8.0, Revision 2., "Records and Reports," being outdated and referring to OSHA 29 CFR 1904 requirements superseded in January 2002.

CH2M HILL should verify that all of its subcontractor's procedures implement the most current OSHA accident and incident reporting requirements.

Discussion of CH2M HILL Subcontractor Procedure

The reviewer considered CH2M HILL subcontractor procedures, then selected WGI procedure No. 8.0, Revision 2, “Records and Reports” for evaluation. The procedure was not dated. The reviewer found several outdated requirements within the procedure including the following:

- Section 8.6, C. 4: Required all OSHA recordable injuries and illnesses be recorded on the OSHA 200 Log. The OSHA 200 Log had been superseded by the OSHA 300 Log in January 2001. [29 CFR 1904.32(b)(6)]
- Section A-3, e., “Non-Recordable – First Aid Treatment” and Appendix B, Example 2: The OSHA standard was changed in 2001 to require the administration of a single prescription medication be recorded as medical treatment beyond first aid. [29 CFR 1904.5(i)(B)]

Review Summary

In the six months since DOE’s March 2004 recordkeeping review, CH2M HILL has made significant improvements in the area of injury/illness recordkeeping. Examples include improving and updating medical ROV forms, adding staff to the case management function, performing a historical records review, revising the injury/illness reporting procedure, conducting in-house training for safety staff, attending DOE’s recordkeeping training, and improving accuracy in reporting injury and illness records.

One area requiring action was identified. While CH2M HILL had performed oversight of its subcontractors relative to the reporting and recording of injuries and illnesses, there was no evidence CH2M HILL had performed assessments of subcontractor procedures to ensure the subcontractors are following procedures which complied with updated OSHA requirements.