



U.S. Department of Energy
~~OFFICE OF RIVER PROTECTION~~
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

05-ESQ-089

JAN 04 2006

Dr. Jou G. Hwang, Ph. D.
Project Manager
Advanced Technologies
and Laboratories International, Inc.
1845 Terminal Drive, Suite 203
Richland, Washington 99352

Dear Dr. Hwang:

CONTRACT NO. DE-AC27-05RV14548 – ASSESSMENT REPORT A-05-ESQ-ATL-001 –
ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING, DECEMBER 5 THROUGH
DECEMBER 12, 2005

This letter forwards the results of the U.S. Department of Energy (DOE), Office of River
Protection assessment of the Advanced Technologies and Laboratories International, Inc. (ATL)
OSHA Injury/Illness Recordkeeping Program conducted from December 5 through
December 12, 2005 (attached).

The assessor concluded that the actual reporting of work-related injuries into Computerized
Accident/Incident Reporting System by ATL complies with DOE and OSHA requirements. One
Finding (A-05-ESQ-ATL-001-F01) described that ATL has not developed and implemented
effective procedures and processes for Injury/Illness Recordkeeping as required by the DOE
Environmental, Safety, and Health Reporting Manual, DOE M 231.1A. ATL is requested to
provide specific actions that will be taken to ensure Injury/Illness Recordkeeping is performed in
accordance with contract and OSHA requirements.

Please provide the response to the Finding and the ATL corrective actions within 30 days of
receipt of this letter.

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,

Roy J. Schepens, Manager
Office of River Protection

ESQ:PRH

Attachment

cc w/attach:
ATL Correspondence Control

Attachment
05-ESQ-089
A-05-ESQ-ATL-001

U.S. DEPARTMENT OF ENERGY
Office of River Protection
Environmental, Safety and Quality

ASSESSMENT: Occupational Safety and Health Administration Injury/Illness
Recordkeeping Review Advanced Technologies and Laboratories
International, Inc.

REPORT: A-05-ESQ-ATL-001

FACILITY: ATL 222-S Analytical Services Production Contractor

LOCATION: Hanford Site

DATES: December 5 through December 12, 2005

ASSESSORS: Paul R. Hernandez, Lead Assessor

APPROVED BY: Patrick P. Carier, Team Lead
Verification and Confirmation Team

Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of Advanced Technologies and Laboratories International, Inc.'s (ATL) Occupational Safety and Health Administration (OSHA) Injury/Illness Recordkeeping Program. The assessor evaluated the procedural requirements, interviewed employees who had been injured on the job, and examined records pertaining to the assessment subject. The purpose of the assessment was to evaluate the effectiveness of the Contractor's implementation of procedures and practices which satisfy the requirements of OSHA 29 Code of Federal Regulations 1904, "Recording and Reporting Occupational Injuries and Illnesses." Assessment efforts focused on determining the effectiveness of the processes associated with identifying, evaluating, and recording injuries and illnesses on OSHA forms and in the DOE Computerized Accident/Incident Reporting System (CAIRS) database. ORP is required to perform quality checks of the information reported through the CAIRS by its contractors every six months. This was the first assessment of ATL since the award of their contract in May 2005.

The assessor concluded that the actual reporting of work-related injuries into CAIRS by ATL complies with DOE and OSHA requirements. One Finding (A-05-ESQ-ATL-001-F01) was issued because ATL has not developed and implemented effective procedures and processes for Injury/Illness Recordkeeping as required by DOE M 231.1A.

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List of Acronyms

AMH	AdvanceMed Hanford
ATL	Advanced Technologies and Laboratories International, Inc.
CAIRS	Computerized Accident/Incident Reporting System
CH2M HILL	CH2M HILL Hanford Group, Inc.
DOE	U.S. Department of Energy
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
QA	Quality Assurance
ROV	Record of Visit

Occupational Safety and Health Association (OSHA) Injury/Illness Recordkeeping Review Technologies and Laboratories International, Inc. (ATL)

Scope

From December 5 through December 12, 2005, the U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of ATL's OSHA Injury/Illness Recordkeeping Program.

Details

The assessor examined relevant documentation including safety records, a Quality Assurance (QA) surveillance, and corrective action plans. The assessor also evaluated employee medical records, and Computerized Accident/Incident Reporting System (CAIRS) database entries. The assessor interviewed ATL's Safety Specialist, a QA Specialist, and an AdvanceMed Hanford (AMH) Medical Provider. The assessor interviewed six ATL employees who sustained injuries between May and December 2005, and had sought medical services from AMH.

Review of Procedures

DOE's review of the contractor's procedure for the OSHA Recordkeeping Program determined ATL has not developed and implemented effective procedures for Injury/Illness Recordkeeping. Written procedures that describe a clear process for reporting injuries for CAIRS and OSHA recordkeeping purposes are required for a DOE contractor to meet the minimum requirements in the DOE Environmental, Safety, and Health Reporting Manual, DOE M 231.1-1A. Contrary to requirements, ATL did not have a procedure in effect at the time of this assessment.

Comparison of CAIRS Data to Medical Files

The ORP assessor reviewed the CAIRS production database for ATL. The data evaluated included ATL entries from May through December 2005. ORP analyzed the one case posted in CAIRS that indicated an OSHA recordable injury. Using the assigned case number from the log, the assessor accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Reports," for the case. The content of the 5484.3 form was then compared to the information in the patient's medical file. The result was that ATL reported accurately into the CAIRS database.

ORP reviewed seven medical files maintained in the Richland first aid clinic, managed by AMH. A review of these files verified that a Record of Visit (ROV) form was included in the patient's file. The forms contained sections listing formal restrictions, date of restriction, duration, and end date. The forms were provided to the employee, their supervisor, and the safety representative. Employees have been instructed that unless the

restriction assessment is completed there were no work restrictions. If a restriction was imposed by an employee's personal care provider, the information was transposed to the AMH ROV form.

There were no issues found in the area of medical files.

Conclusions

The ORP assessor concluded that ATL had not developed and implemented procedures adequate for Injury/Illness Recordkeeping as required by OSHA 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses. This issue was self-identified by the contractor in Surveillance SR-ES-05-01, "Occupational Safety and Health Act (OSHA)." Corrective actions have been implemented through ATL's Issue Identification process. CAIRS database entries were accurate. Medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. No evidence of underreporting in terms of OSHA recordability requirements was found during this assessment.

Items Opened

Finding A-05-ESQ-ATL-001-F01: ATL failed to develop and implement effective procedures and processes for Injury/Illness Recordkeeping; as required by DOE M 231.1A, the DOE Environmental, Safety, and Health Reporting Manual. DOE's Manual ensures complex-wide compliance with OSHA 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses.

The Manual states that DOE contractors must develop facility-wide procedures, protocols, or other methods to meet the Injury/Illness Reporting requirements. ATL had elected to adopt the use of certain procedures from other Hanford contractors in order to maintain continuity of operations. The use of other's procedures was outlined in and authorized by ATL's Management Plan, ATL-MP-1001, Revision 4, "Procedures Acceptable for Use by the ATL 222-S Analytical Services Production Contractor," dated November 11, 2005. The assessor was informed that ATL did not have a procedure for the OSHA Recordkeeping Program.

Signatures

Paul Hernandez 12/21/05

Paul R. Hernandez
Assessment Team Leader

Patrick P. Carier 12/29/05

Patrick P. Carier, Team Leader
Verification and Confirmation Team

Task# ORP-ESQ-2005-0093

E-STARS™ Report
 Task Detail Report
 01/04/2006 1137

TASK INFORMATION			
Task#	ORP-ESQ-2005-0093		
Subject	CONCUR:05-ESQ-089; ASSESSMENT REPORT A-05-ESQ-ATL-001 -- ASSESSMENT OF OSHA INJURY/ILLNESS RECORDKEEPING, DECEMBER 5 - 12, 2005		
Parent Task#		Status	CLOSED
Reference	05-ESQ-089	Due	
Originator	Gano, Becky	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	12/13/2005 1244	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	None	View Permissions	Normal
Instructions	Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list. BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE R.C.BARR, ESQ P.P.CARRIER, ESQ P.R.HERNANDEZ, ESQ C.B.REID, OPA RECORD NOTE:		
ROUTING LISTS			
1	Route List	Inactive	
	<ul style="list-style-type: none"> ● Hernandez, Paul R - Review - Concur - 12/13/2005 1523 <i>Instructions:</i> ● Carier, Patrick P - Review - Concur - 01/04/2006 1104 <i>Instructions:</i> ● Barr, Robert C - Review - Concur - 01/03/2006 0755 <i>Instructions:</i> ● Reid, Clo B - Review - Concur - 01/03/2006 1439 <i>Instructions:</i> ● Schepens, Roy J - Approve - Cancelled - 01/04/2006 1105 <i>Instructions:</i> 		
ATTACHMENTS			
Attachments	<ol style="list-style-type: none"> 1. 05-ESQ-089 ATL LTR Assessment Report A-05-ESQ-ATL-001.doc 2. 05-ESQ-089 att Assessment Report A-05-ESQ-ATL-001.doc 3. 05-ESQ-089 Inspection Notes-ATL.doc 		<div style="font-size: 24pt; font-weight: bold; margin-bottom: 10px;">RECEIVED</div> <div style="font-size: 18pt; margin-bottom: 10px;">JAN 04 2006</div> <div style="font-size: 18pt; font-weight: bold;">DOE-ORP/ORPCC</div>
COLLABORATION			

Task# ORP-ESQ-2005-0093

E-STARS™ Report
 Task Detail Report
 12/13/2005 0212

TASK INFORMATION			
Task#	ORP-ESQ-2005-0093		
Subject	CONCUR:05-ESQ-089; ASSESSMENT REPORT A-05-ESQ-ATL-001 -- ASSESSMENT OF OSHA INJURY/ILLNESS RECORDKEEPING, DECEMBER 5 - 12, 2005		
Parent Task#		Status	Open
Reference	05-ESQ-089	Due	
Originator	Gano, Becky	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	12/13/2005 1244	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	None	View Permissions	Normal
Instructions	<p>Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list.</p> <p>BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE R.C.BARR, ESQ P.P.CARIER, ESQ P.R.HERNANDEZ, ESQ C.B.REID, OPA</p> <p>RECORD NOTE:</p>		
ROUTING LISTS			
1	Route List		Active
	<ul style="list-style-type: none"> ● Hernandez, Paul R - Review - Awaiting Response <i>Instructions:</i> PRH 12/21/05 ● Carier, Patrick P - Review - Awaiting Response <i>Instructions:</i> PPC 12/29/05 ● Barr, Robert C - Review - Awaiting Response <i>Instructions:</i> REB 12/29/05 ● Reid, Clo B - Review - Awaiting Response <i>Instructions:</i> CR 11/3/06 ● Schepens, Roy J - Approve - Awaiting Response <i>Instructions:</i> RS 		
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Attachments	<ol style="list-style-type: none"> 1. 05-ESQ-089 ATL LTR Assessment Report A-05-ESQ-ATL-001.doc 2. 05-ESQ-089 att Assessment Report A-05-ESQ-ATL-001.doc 3. 05-ESQ-089 Inspection Notes-ATL.doc 		
COLLABORATION			

BACKGROUND

(PLEASE SCAN)

LETTER # 05-ESQ-089

ASSESSMENT NOTES**Inspection Note Number:** A-05-ESQ-ATL-001**Inspectors Names(s):** Paul R. Hernandez**Dates of Inspection:** December 5 through 9, 2005**Area/Item(s) Inspected: Occupational Safety and Health Act (OSHA)
Injury/Illness Recordkeeping**

The U.S. Department of Energy (DOE) Field Offices will ensure that DOE contractors report work-related fatalities, injuries, and illnesses occurring among DOE contractor/subcontractor employees and arising out of work primarily performed at facilities under their direction. Periodic, at least annual, quality checks will be performed to verify that the information recorded and reported regarding work related injuries and illnesses to DOE contractor employees is thorough and accurate. Reports of work-related fatalities, injuries, and illnesses to DOE employees will comply with the record keeping and reporting requirements contained in the current version of Title 29, Code of Federal Regulations (CFR), Part 1904.

29 CFR 1904 states, "The purpose of this rule is to require employers to record and report work-related fatalities, injuries and illnesses." The assessor reviewed the Injury/Illness recordkeeping requirements and the program and processes implemented by Advanced Technologies and Laboratories International, Inc (ATL). Employers must consider an injury or illness to meet the general recording criteria, and therefore to be recordable, if it results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness. ATL must also consider a case to meet the general recording criteria if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional.

Observations and Assessments:

The assessor reviewed the following documents related to the ATL Injury/Illness recordkeeping program:

- OSHA 29 CFR Part 1904 "Recording and Reporting Occupational Injuries and Illnesses;"
- OSHA 29 CFR Part 1910 "Occupational Safety and Health Standards for General Industry;"
- DOE O 440.1 "Worker Protection Management For DOE Federal And Contractor Employees;"

- DOE M 231.1-1A, "Environment, Safety And Health Reporting Manual," Revised September 9, 2004;
- ATL Management Plan, ATL-MP-1001, Revision 4, "Procedures Acceptable for Use by the ATL 222-S Analytical Services Production Contractor," dated November 11, 2005.
- ATL (CH2M HILL) procedure TFC-ESHQ-S-CMLI-CD-03, Revision A-2, "Workers' Compensation," dated June 9, 2005;
- ATL (CH2M HILL) procedure TFC-ESHQ-S-CMLI-C-02, Revision A-8, "Responding and Reporting Injuries, Illnesses, and Accidents," dated July 12, 2005;
- DOE F 5483.3 Form for case 2005001, incident dated September 28, 2005;
- Surveillance SR-ES-05-01, "Occupational Safety and Health Act (OSHA)," dated November 30, 2005;
- Surveillance Checklist for Surveillance SR-ES-05-01, "Occupational Safety and Health Act (OSHA)," undated;
- ATL Issue Identification Form ATL-2005-064, "During a surveillance of OSHA Injury/Illness recordkeeping, it was found that there is no implementing procedure to define the recordkeeping activity as required by DOE M 231.1A," dated November 30, 2005;
- ATL Issue Identification Form ATL-2005-063, "The safety specialist has not fully completed the QUAL cards that apply to his job," dated November 30, 2005; and
- ATL Task Tracking Form LABACT-2005-064.1, "OSHA audit reveals no implementing procedure to define the recordkeeping activity as defined by DOE M 231.1A," dated January 5, 2005.

Discussion:

The assessor examined relevant documentation including CH2M HILL Hanford Group, Inc. (CH2M HILL) procedures for implementation of ATL's OSHA Recordkeeping Program. The assessor performed evaluations of employee medical records, contractor documentation, and Computerized Accident/Incident Reporting System (CAIRS) database entries. The assessor interviewed ATL's Safety Specialist, six employees, a Quality Assurance Specialist, and an AdvanceMed Hanford (AMH) Medical Provider.

Review of Procedures

ATL is required to comply with DOE's Environmental, Safety, and Health Reporting Manual, DOE M 231.1-1A. The Manual states that DOE contractors must develop facility-wide procedures, protocols, or other methods to meet the injury/illness reporting requirements. ATL had elected to adopt the use of certain procedures from other Hanford contractors in order to maintain continuity of operations. The use of other's procedures was outlined in and authorized by ATL's Management Plan, ATL-MP-1001, Revision 4, "Procedures Acceptable for Use by the ATL 222-S Analytical Services Production Contractor," dated November 11, 2005. The assessor was informed that ATL did not have a procedure for the OSHA Recordkeeping Program.

ATL was considering the incorporation of CH2M HILL procedures TFC-ESHQ-S-CMLI-C-02, "Responding and Reporting Injuries, Illnesses, and Accidents," dated July 12, 2005, and TFC-ESHQ-S-CMLI-C-02, "Injury, Illness, Vehicle, and Property Loss Record Management," dated June 23, 2005, into their list of acceptable procedures in the Management Plan. DOE Office of River Protection (ORP) had previously determined that the CH2M HILL procedures were in accordance with September 2004 revisions to the DOE Environmental, Safety, and Health Reporting Manual, DOE M 231.1-1A. In order to use the CH2M HILL procedures, ATL would need to revise them to reflect the ATL organization and associated areas of responsibility.

There are benefits of adapting the Tank Farm contractor procedures into ATL's operations. For over one year CH2M HILL has included Case Management Report forms in Safety Case Management files. This form is used to describe injury/illness events and provide justification for cases where CH2M HILL has determined an event is either recordable or not, for OSHA recordkeeping purposes. The information supplements the AMH medical files and provides adequate information to give the reviewer an understanding of why a case would or would not be classified as first aid, recordable, restricted, or non-occupational. The documentation verifies that the CH2M HILL safety organization had performed analysis of the cases to determine OSHA recordability. This good practice resulted in favorable results in an October 2005 ORP Injury/Illness Recordkeeping assessment of CH2M HILL's program.

Review of Medical Files

DOE ORP reviewed case files maintained in the Richland first aid clinic, managed by AMH. A review of these files for the May through December 2005 time period verified that if formal restrictions were imposed a Record of Visit form was included in the patient's file. The forms contained sections listing formal restrictions, date of restriction, duration, and end date. The forms were provided to the employee, their supervisor, and the safety representative. Employees have been instructed that unless the restriction assessment is completed there were no work restrictions. ATL had seven first aid cases since May 2005. The ORP assessor reviewed all of the medical files and found them to be complete and accurate. No issues were identified in the area of medical records.

Comparison of OSHA Log and CAIRS Data

The ORP assessor had access to the CAIRS production database for ATL. The information from May to December 2005 was accessed and analyzed. There was only one case resulting in medical treatment beyond first aid and with restricted work days. In this case the employee was issued the restriction limiting use of the right arm above shoulder level. The restriction was imposed from September 29 through October 20, 2005, for a total of 20 days. This matched the entry in the CAIRS database. The ORP assessor accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Report," for the case. The contents of Form 5484.3 was compared to the information in the patient's medical file. The entry in the CAIRS database agreed with information in the employee medical files. No issues were found with ATL's CAIRS data.

Review of Subcontractor OSHA Recordkeeping

ATL does not have subcontractor with more than ten employees so this section does not apply.

ATL Self Assessment of OSHA Recordkeeping

ATL Quality Assurance performed a surveillance of the Safety and Industrial Hygiene Organization a week before the ORP OSHA Injury/Illness Recordkeeping assessment. The results were documented as Surveillance SR-ES-05-01, "Occupational Safety and Health Act (OSHA)," dated November 30, 2005.

The surveillance was performed in accordance with the following checklist, based on DOE M 231.1-1A, "Environment, Safety and Health Reporting Manual," Contractor Requirements document (CRD).

CRD Item	Requirement	Sat Y or N	Observation/Comment
Intro	The contractor must develop sitewide and facility-wide procedures, protocols, or other methods to meet the reporting requirements of this CRD	N	No implementing procedure in place. Safety Specialist follows the directives in the requirements documents. Issue ID form ATL-2005-064.
3.	Ensure that environmental, safety and health reports are complete and readily available for authorized dissemination outside the cleared community.	Y	Electronic records were reviewed.
3.a	...the contractor must ensure that records are kept as directed in Title 29 CFR 1904.4 through 1904.11,	Y	See entries below.

	1904.29-1904.32, 1904.44, and 1904.46		
	<p>29 CFR 1904.4 Recording criteria (DNA 1904.5-1904.11 as these parts further define 1904.4)</p> <p>Each employer required by this Part to keep records of fatalities, injuries, and illnesses must record each fatality, injury and illness that,</p> <ol style="list-style-type: none"> 1. is work-related 2. is a new case; and 3. meets one or more of the general recording criteria of 1904.7, which identifies recordable injuries as any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness, significant injury diagnosed by a physician or other licensed health care professional, even if it does not result in any of the above. 	Y	Injuries and illnesses were recorded as specified.
3.b	<p>29 CFR 1904.29 Forms</p> <p>You must use OSHA 300, 300-A, and 301 forms or equivalent forms for recordable injuries and illnesses. OSHA 300, Log of Work Related Injuries and Illnesses OSHA 300-A, Summary Of Work-Related Injuries and Illnesses, OSHA 301, Injury and Illness Incident Report (DNA 1904.30)</p>	Y	Electronic records were reviewed.
	<p>1904.32 Annual summary</p> <p>At the end of each calendar year, you must</p> <ol style="list-style-type: none"> 1. review the OSHA 300 Log to verify that entries are complete and accurate, and correct any deficiencies identified 2. create an annual summary of injuries and illnesses recorded on the OSHA 300 Log 3. certify the summary 	NA	Contractor has not been in operation for a full year.

	4. post the annual summary (DNA 1904.44 and 1904.46)		
3.b	(2) Record and report all recordable work-related contractor employee fatalities, injuries and illnesses on form DOE F 5484.3, Individual accident/incident Report. Reports must be submitted to the Computerized Accident/Incident Reporting system (CAIRS) (3) Report employees' total hours worked on DEO F 5484.4, Tabulation of Work Hours (4) conduct periodic, at least quarterly, quality checks of the record keeping and reporting program to verify that the information recorded and reported is thorough, accurate, and consistent with information contained in local records.	Y NA	There has been one recordable injury which occurred on September 20, 2005. The safety specialist was not granted access to CAIRS until October 3, 2005, and entered the recordable on October 3, 2005, as soon as he gained access. The recordable occurred within the current quarter.
3.c	The contractor must ensure that reports for select subcontractors, (more than 10 employees on the DOE work being performed), are recorded in accordance with the above requirements.	NA	No subcontractor employees more than 10 employees on work performed for ATL.
3.d	Ensure the new reports (DOE F 5484.3 are submitted at least twice per month for receipt on or before the 15 th of the month and the last working day of the month.	Y	Submitted electronically as reports are completed
3.e	Ensure the quarterly work-hours are submitted by the 10 th of the month following the end of the quarter.	Y	
3.f	Ensure the OSHA 300A form is completed, certified, and posted in the workplace annually.	NA	Will be posted in February.
3.g	(1) A contractor newly assuming occupational safety and health responsibilities for DOE work being performed must accept and maintain already existing records of a prior contractor.	Y	Records for one employee with continuing work restriction are being maintained.
	(2) records must be available for inspection and copying.	Y	Some hard copy records lacked a case number.

			Safety Specialist is correcting the record.
	(3) ensure that OSHA form No. 300 is updated. Each quarter for at least one year from the date of the injury/illness, ensure that each DOE F 5484.3 that includes lost work time is updated to indicate changes in lost work time or changes in the description or outcome of the case	NA	There have been no updates needed to date.
	(4) ensure that individuals tasked with occupational injury and illness recoding and reporting responsibilities are appropriately trained to accomplish the recording and reporting requirements of the CRD and are informed to contact the Office of Corporate Performance Assessment for additional information and assistance in interpretation requirements	See comment	The safety specialist has been trained in the CAIRS reporting system. He has been working on completing the QUAL cards for Safety Specialist and Industrial Hygiene Specialist but has not completed them as yet. Issue Id Form ATL-2005-063.

The surveillant noted the following areas where improvements were needed:

ATL does not have an implementing procedure (required by DOE M 231.1-A) that defines roles, responsibilities, and methods for completing OSHA and DOE forms. ATL employs one safety specialist who has this responsibility and the safety specialist follows the directives listed above.

Issue Identification Form No. ATL-2005-064 was issued to document the lack of a procedure.

The safety specialist has documentation that he is trained on the CAIRS reporting system. However, the Qualification Card for Safety Specialist and Industrial Hygiene Specialist has not been totally completed as yet. A specified time for completing the QUAL card has not been required.

Issue Identification Form No. ATL-2005-063 was issued to document the need to complete the QUAL cards

Conclusions:

The assessor concluded that ATL had not developed and implemented procedures adequate for injury/illness recordkeeping as required by OSHA 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses. This issue was self-

identified by the contractor in Surveillance SR-ES-05-01, "Occupational Safety and Health Act (OSHA)." Corrective actions have been implemented through ATL's Issue Identification process. CAIRS database entries were accurate. Medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. No evidence of underreporting in terms of OSHA recordability requirements was found during this assessment.

Due to the importance of accurate injury/illness recordkeeping DOE ORP will assess contractor implementation of OSHA 29 CFR 1904 on a semi-annual basis.

Submitted by: Paul Hernandez Approved by: _____
Date: 12/13/05 Date: _____