



U.S. Department of Energy
Office of River Protection

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

05-ESQ-024

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-05-ESQ-TANKFARM-003 – REVIEW
OF OCCUPATIONAL SAFETY AND HEALTH (OSHA) INJURY/ILLNESS
RECORDKEEPING FOR APRIL 11 THROUGH 15, 2005**

This letter forwards the results of the U.S. Department of Energy (DOE), Office of River Protection (ORP) review of the CH2M HILL Hanford Group, Inc. (CH2M HILL), OSHA Injury/Illness Recordkeeping for the Tank Farm Project during the period April 11 through 15, 2005. The reviewer identified one Observation. Details of the review are documented in the attached report.

ORP acknowledges continued success in CH2M HILL injury/illness safety records, procedures, and categorization of injury/illness events. A minor weakness in the area of meeting the requirements of DOE M 231.1-1A, "Environment, Safety and Health Reporting Manual," and OSHA 29 CFR Part 1904, "Recording and Reporting Occupational Injuries and Illnesses," was identified. Contrary to requirements, the CH2M HILL safety organization was not effective in ensuring its construction subcontractor, Washington Group International, updated an internal procedure governing OSHA injury/illness recordkeeping. This is a repeat of the same deficiency identified in the October 2004 ORP assessment. This issue has been documented as Observation A-05-ESQ-TANKFARM-003-O01.

Due to the repeat nature of this procedural deficiency, CH2M HILL should respond to the Observation documented in this assessment within 30 days of receipt of this letter. The response should include the corrective actions that will be taken by CH2M HILL to ensure this deficiency is corrected.

The attached Assessment Report A-05-ESQ-TANKFARM-003 documents the details of the assessment.

Mr. E. S. Aromi
05-ESQ-024

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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:

M. W. Elkins, CH2M HILL
E. E. Kennedy, CH2M HILL
D. Price, CH2M HILL

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

ASSESSMENT: Occupational Safety and Health Administration Injury/Illness
Recordkeeping Review CH2M HILL Hanford, Inc.

REPORT: A-05-ESQ-TANKFARM-003

FACILITY: CH2M HILL Hanford, Inc. Tank Farm Project

LOCATION: Hanford Site

DATES: April 11 through 15, 2005

ASSESSORS: Paul Hernandez, Lead Assessor

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

Executive Summary

Introduction

From April 11 through 15, 2005, the U.S. Department of Energy (DOE), Office of River Protection conducted an assessment of CH2M HILL Hanford, Inc.'s (CH2M HILL) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program. The assessors evaluated the procedural requirements, interviewed those charged with managing and implementing the processes, and examined records pertaining to the assessment subject.

Assessment activities focused on verifying the effectiveness of the Contractor's implementation of procedures which satisfy the requirements of OSHA 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses." Assessment efforts focused heavily on assessing 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.

Significant Conclusions and Issues

The ~~assessment team~~ ~~assessor~~ found the Contractor had electronic access to the CAIRS database. The ~~assessment team~~ also found the Contractor had procedures in place to ~~sufficiently~~ implement ~~the~~ DOE M 231.1-1A requirements ~~associated with the DOE O-231.1-A~~. These procedures prescribed processes which, if implemented properly, would produce effective results. ~~The assessment team identified one problem with procedure content.~~ The ~~assessment team~~ identified one observation which provided the basis for the ~~assessment team~~ to conclude the Contractor's safety organization was not effective in ensuring their construction subcontractor updated ~~its~~ ~~the~~ internal procedure governing OSHA injury/illness recordkeeping. The observation is listed below:

- A-05-ESQ-TANKFARM-003-O01. The CH2M HILL safety organization was not effective in ensuring its construction subcontractor, could not produce documented evidence that they had performed oversight on subcontractor Washington Group International (WGI), updated an internal procedure governing OSHA injury/illness recordkeeping. ~~—~~The reviewer found several outdated requirements which referred to the OSHA 200 Log within the ~~in the~~ WGI procedure, "Record ~~k~~Keeping Guidelines for Occupational Injuries and Illnesses."

The improper reference to the OSHA 200 Log instead of the OSHA 300 Log did not result in any under reporting of injuries or illnesses.

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List of Acronyms

CH2M HILL	CH2M HILL Hanford, Inc.
CAIRS	Computerized Accident and Incident Reporting System
AMH	AdvanceMed Hanford
DOE	U.S. Department of Energy
ORP	Office of River Protection
ORPS	Occurrence Reporting and Processing System
OSHA	Occupational Health and Safety Administration
PER	Problem Evaluation Request
WGI	Washington Group International

**OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING REVIEW
CH2M HILL HANFORD, INC. (CH2M HILL) April 11 THROUGH 15, 2005**

~~The purpose of his assessment verified that injuries and illnesses were reported accurately. OSHA 29 CFR 1904 is to require employers to record and report work-related fatalities, injuries, and illnesses.~~ The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an OSHA injury/illness recordkeeping review during the period of April 11 through 15, 2005. OSHA 29 CFR 1904 requires employers to record and report work-related fatalities, injuries, and illnesses. 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 Farm project between September 2004 and April 2005. The reviewer selected cases for analysis from CH2M HILL's First Aid Log concentrating on first aid cases which would typically result in medical service beyond first aid and/or restricted or lost work days. Examples included strains, contusions, pulled muscles, back pain, objects in the eye, fractures, and respiratory problems associated with exposure to vapors. ~~The reviewer conducted discussions with the CH2M HILL safety staff and medical providers during the review.~~ The reviewer evaluated OSHA 300 Logs and Calendar Year (CY) 2004 OSHA Form 300As for CH2M HILL and CH2M HILL subcontractors. The reviewer accessed the DOE Computerized Accident/Incident Reporting System (CAIRS) to compare data entries with hardcopy records.

Review of Procedures

ORP's review of the CH2M HILL 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 Safety Case Management Coordinator (CMC). There was a clear process described for reporting injuries for CAIRS and OSHA recordkeeping ~~purposes~~. CH2M HILL procedures TFC-ESHQ-S_CMLI-C-01, "Responding and Reporting Injuries, Illnesses, and Accidents," dated February 16, 2005, and TFC-ESHQ-S_CMLI-C-02, "Injury, Illness, Vehicle, and Property Loss Record Management," dated August 6, 2004, were ~~determined to be in in~~ accordance with September 2004 revisions to the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A.

The assessor found that CH2M HILL had implemented the following since Safety Case Management Coordinator stated that as a result of DOE's 2004 assessment recordkeeping reviews several program improvements had been implemented. ~~These included:~~

- 1) ~~C~~reation of a new permanent clerical support position. This staff member assists in the safety data input and trending graphics activities ~~thereby allowing the CMC to focus on his other responsibilities;~~
- 2) ~~I~~mproved AdvanceMed Hanford (AMH) Occupational Care Services Record of Visit (ROV) descriptions. ROVs are now more descriptive, eliminating vague restricted-

duty language such as “Limit movement as ~~patient’s pain-tolerated,~~” which allowed employees to impose restrictions on themselves. Restrictions are now s-Specific with respect to allowable lifting weight limits, definition of restricted activities (such as no stair-climbing), and work durations (i.e., rest break every hour); are now used instead; and

- 3) ~~The use of Case Management Report forms in the Safety Case Management files.~~
The form is used to describe injury/illness events chronologically 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 medical files and provides 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 narratives demonstrated the CH2M HILL safety organization had performed analysis of the cases to determine OSHA recordability.

The above improvements were considered ~~These are all~~ good practices.

Review of Medical Files

ORP reviewed patient medical files maintained in the Richland first aid clinic, managed by AMH. Review of these files for the October 2004 through April 2005 time period, found that if formal restrictions were imposed there was a ROV form in the file. The forms contained sections for listing formal restrictions, date of restriction, duration, and end date. The forms were provided to the employee, their supervisor, and the safety representative. Clarification of formal work restrictions to employees, managers, and case management staff has been effective in eliminating uncertainties in recording injuries and illnesses. There were no issues found in the area of medical files.

Comparison of OSHA Log and CAIRS Data

The ORP assessor ~~had~~ accessed to the CAIRS production database for CH2M HILL and subcontractors. The information from September through December 2004 was accessed and compared to the CH2M HILL OSHA 300 Log for CY 2004. The ORP reviewer analyzed all cases posted on the OSHA log that indicated 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 patient’s medical file and Safety Case Management files. No problems with 2004 OSHA 300 Logs were identified.

The assessor reviewed CAIRS data entries between January 2005 and April 2005. Using the assigned case numbers from the 2005 log, the reviewer accessed the applicable DOE Form 5484.3, “Individual Accident/Incident Reports,” and resulting Problem Evaluation Request for each case for comparison to the information in the patient’s medical file and Safety Case Management files. One minor error was found by the assessor. In one case (# 2005017) the CAIRS Accident Log coded the illness as a “skin disorder” when in actuality the employee’s sensitivity to chemicals was an upper respiratory condition. Upon notification of the discrepancy, CH2M HILL immediately corrected the CAIRS

database entry. All other CAIRS database entries ~~reviewed by the assessor~~ were ~~found to be~~ correct and accurate.

Review of Subcontractor OSHA Recordkeeping

CY 2004 OSHA Form 300 logs and Form 300A Summary forms for CH2M HILL and major subcontractors were evaluated, and found ~~to be~~ acceptable.

The ~~assessor review team~~ reviewed a Washington Group International (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.” The reviewer found several ~~instances in the WGI procedure where the OSHA 200 form was called out instead of the OSHA 300 form. outdated requirements within the procedure.~~ (This issue has been documented as Observation A-05-ESQ-TANKFARM-003-O01.)

Items Opened, Closed and Discussed

Opened Observation

A-05-ESQ-TANKFARM-003-O01 - CH2M HILL did not perform adequate oversight on subcontractor WGI. The reviewer found several outdated requirements within the WGI procedure, “Record keeping Guidelines for Occupational Injuries and Illnesses.”

Requirements:

DOE M 231.1-1A, “Environment, Safety And Health Reporting Manual,” Attachment II, 3.c. stated, “The contractor must ensure that reports for select subcontractors, those who employ more than 10 employees on the DOE work being performed, are recorded in accordance with 29 CFR 1904.4 through 1904.11, 1904.30, 1904.31, and 1904.46.”

Discussion:

The assessor reviewed 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 29 CFR 1904 requirements as prescribed in the “Record keeping Guidelines for Occupational Injuries and Illnesses.” The reviewer found ~~the following several~~ outdated requirements, including use of the old OSHA 200 form, within the procedure ~~as follows:~~

- 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)]; and
- 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)].

This is a repeat of the same deficiency identified in the October 2004 ORP assessment. This issue has been documented as Observation A-05-ESQ-TANKFARM-003-O01.

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Closed Findings

All findings from the previous DOE injury/illness recordkeeping reviews were satisfactorily closed prior to assessment ~~A-05-ESQ-TANKFARM-003-001~~.

Conclusions

The assessor concluded that CH2M HILL and ~~its, with one exception,~~ subcontractors have developed and implemented procedures adequate for injury/illness recordkeeping as required by OSHA 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses. Medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. OSHA records including 300 Logs and 300A Summary forms were completed, signed, and displayed ~~as required~~. No ~~evidence of~~ underreporting in terms of OSHA recordability requirements was ~~found identified during this assessment~~. However, CH2M HILL continues to exhibit weakness in the area of subcontractor oversight for OSHA recordkeeping. CH2M HILL was not effective in directing ~~its~~ ~~their~~ subcontractor, WGI to update an outdated procedure. This issue has been documented as Observation A-05-ESQ-TANKFARM-003-001.

~~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.~~

Signatures

Paul R. Hernandez

Assessment Team Leader

Patrick P. Carier, Team Leader
| Verification and Confirmation Team