



JUL 1 4 2006

06-ESQ-088

Dr. J. G. Hwang, President Advanced Technologies and Laboratories International, Inc. P.O. Box 250 Richland, Washington 99352

Dear Dr. Hwang:

CONTRACT NO. DE-AC27-05RV14548 – ASSESSMENT REPORT A-06-ESQ-ATL-004 – ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) INJURY/ILLNESS RECORDKEEPING, JUNE 19 THROUGH 23, 2006

This letter forwards the results of the U.S. Department of Energy (DOE), Office of River Protection (ORP) assessment of the Advanced Technologies and Laboratories International, Inc. (ATL) OSHA Injury/Illness Recordkeeping Program conducted from June 19 through 23, 2006 (attached).

The assessor identified no Findings or Observations. ATL had implemented processes that satisfied OSHA 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses," and the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A, both required by the contract. ORP acknowledges continued accurate and timely reporting of injury/illness events.

The attached Assessment Report, A-06-ESQ-ATL-004, 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,

Office of River Protection

ESQ:PRH

cc: C. R. Ungerecht, PAC G. M. Wemhoff, PAC ATL Correspondence

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-06-ESQ-ATL-004

FACILITY:

ATL 222-S Analytical Services Production Contractor

LOCATION:

Hanford Site

DATES:

June 19 through June 23, 2006

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) assessed the Advanced Technologies and Laboratories International, Inc.'s (ATL) Occupational Safety and Health Administration (OSHA) Injury/Illness Recordkeeping Program. ORP staff evaluated the effectiveness of the Contractor's implementation of procedures and practices which satisfy the requirements of OSHA 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses." The staff reviewed procedural requirements, interviewed employees who had been injured on the job, and examined records pertaining to the assessment subject. 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 performs quality checks of the information reported through the CAIRS by its contractors every six months. The last ORP assessment of ATL occurred in December 2005.

The assessor concluded injury/illness recordkeeping by ATL complies with DOE and OSHA requirements. No Findings or Observations were identified.

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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

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

Scope

From June 19 through 23, 2006, the U.S. Department of Energy (DOE), Office of River Protection (ORP) evaluated 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 responsible for implementing the recordkeeping program, and QA Specialist responsible for evaluating the program. The assessor interviewed five ATL employees who sustained injuries and had sought medical services from AdvanceMed Hanford (AMH) between December 2005 and June 2006.

Review of Procedures

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 requirement in the DOE Environmental, Safety, and Health Reporting Manual, DOE M 231.1-1A. DOE's review of the contractor's procedure for the OSHA Recordkeeping Program determined ATL developed and implemented effective procedures for Injury/Illness Recordkeeping, as a result of an ORP Finding from the December 2005 assessment. ATL did not have its own procedures in effect at the time of that assessment, but rather followed guidance contained in CH2M HILL Hanford Group, Inc. (CH2M HILL) procedures as interim measures. As corrective actions to ORP's Finding, ATL developed two procedures:

- ATL procedure ATL-312, Section 10.02, Revision 1, "Responding and Reporting Injuries, Illnesses, and Accidents," dated March 31, 2006; and
- ATL procedure ATL-312, Section 10.01, Revision 0, "Accident/Incident Event Record Keeping (CAIRS/OSHA 300)," dated February 7, 2006.

ATL based its procedures on CH2M HILL procedures which contain all the elements essential for successful implementation of OSHA recordkeeping processes.

Comparison of CAIRS Data to Case Files

The ORP assessor reviewed the CAIRS production database for ATL. The assessor found no ATL entries from December 2005 through June 2006, because there were no recordable injuries or illnesses during the period. ORP analyzed all first aid cases for the December to June period. The assessor reviewed the ATL case files for five employees who required first aid in the last six months. A review of these files verified that an AMH Record of Visit form was included in the patient's case file if the employee sought first aid services. Through employee interviews ORP verified that the injuries sustained were not OSHA recordable. There were no issues found in the area of case files.

Conclusions

The ORP assessor concluded that ATL had developed and implemented procedures adequate for Injury/Illness Recordkeeping as required by OSHA 29 CFR 1904, Recording and Reporting Occupational Injuries and Illnesses. CAIRS database entries were accurate. Case files containing injury and illness records were completed and well-maintained. No evidence of underreporting in terms of OSHA recordability requirements was found during this assessment.

Items Opened

None

Items Closed

<u>Finding A-05-ESQ-ATL-001-F01:</u> 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. As of December 2005 ATL did not have a procedure for the OSHA Recordkeeping Program. As corrective actions to ORP's Finding, ATL developed two procedures:

- ATL procedure ATL-312, Section 10.02, Revision 1, "Responding and Reporting Injuries, Illnesses, and Accidents," dated March 31, 2006; and
- ATL procedure ATL-312, Section 10.01, Revision 0, "Accident/Incident Event Record Keeping (CAIRS/OSHA 300)," dated February 7, 2006.

ORP determined the corrective actions were acceptable. The Finding is considered closed.