



U.S. Department of Energy
Office of River Protection

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

MAY 15 2006

06-ESQ-043

Mr. W. S. Elkins, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Elkins:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-06-ESQ-RPPWTP-005
– ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING, APRIL 10 THROUGH 14, 2006

This letter forwards the results of the U.S. Department of Energy, Office of River Protection (ORP) assessment of the Bechtel National, Inc. (BNI) OSHA injury/illness recordkeeping program, which was conducted the week of April 10, 2006 (attachment).

The ORP assessor found BNI reporting of work-related injuries had improved for the period of October 2005 through April 2006, noting BNI had reported all cases in accordance with OSHA requirements and had effectively implemented corrective actions to two ORP Findings from the September 2005 assessment.

In this report, ORP is issuing Finding A-06-ESQ-RPPWTP-005-F01 that describes BNI data entry errors in the Computerized Accident/Incident Reporting System (CAIRS) database. ORP assessor found 6 out of 16 "Accident Dates" in CAIRS between October 2005 and April 2006 were incorrect. BNI has corrected the CAIRS entries but should revise its process to require checks to ensure accurate data entry.

BNI is requested to provide a response to the above Finding within 30 days from receipt of this letter. The response should include the following:

- The reason for the Finding, if admitted, and if denied, the reason why;
- The corrective steps that have been taken and the results achieved; and
- The corrective steps that will be taken to avoid further errors in the injury/illness reporting process.

MAY 15 2006

Mr. W. S. Elkins
06-ESQ-043

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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,



John R. Eschenberg, Project Manager
Waste Treatment and Immobilization Plant

ESQ:PRH

Attachment

cc w/attach:

C. M. Davis, BNI

D. E. Gergely, BNI

J. P. Henschel, BNI

D. E. Kammenzind, BNI

P. Schuetz, BNI

G. Shell, BNI

Administrative Record

BNI Correspondence

Attachment
06-ESQ-043
A-06-ESQ-RPPWTP-005

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

ASSESSMENT: (OSHA) Injury/Illness Recordkeeping Review
Bechtel National, Inc.

REPORT: A-06-ESQ-RPPWTP-005

FACILITY: Bechtel National, Inc. Waste Treatment and Immobilization Plant

LOCATION: Hanford Site

DATES: April 10 through 14, 2006

ASSESSORS: Paul Hernandez, Lead Assessor

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

Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of Bechtel National, Inc.'s (BNI) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program. The assessor evaluated the procedural requirements, interviewed employees who had direct involvement with analyzing or reporting injuries, and examined records pertaining to the assessment subject. This assessment evaluated 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." The assessment 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. The assessor paid particular attention to injuries which were compensable by the State of Washington Department of Labor and Industries, but were not reported as OSHA recordable. ORP is required to perform quality checks of the information reported through the CAIRS by its contractors every six months. The last assessment of BNI was performed in October 2005.

The assessor concluded reporting of work-related injuries by BNI had improved over the last six month period. For the October 2005 through April 2006 period ORP found all cases reported in accordance with OSHA requirements. Corrective actions from the September 2005 ORP assessment findings were effectively implemented. ORP verified that five injuries that had been previously underreported had been properly entered into the CAIRS database as recordable. BNI's CAIRS database was found to be inaccurate, containing several incorrect "Accident Date" entries. As a result the assessor identified the following Finding:

A-06-ESQ-RPPWTP-005-F01 - "Accident Dates" between October 2005 and April 2006 entered into CAIRS were found to be inaccurate.

During medical records review ORP found that the dates of injury listed in CAIRS were different from the dates of services performed by the Occupational Medical Provider, WorkCare. It was determined that six out of 16 CAIRS dates were incorrect.

A response to the finding is required.

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List of Acronyms

BNI	Bechtel National, Inc
CAIRS	Computerized Accident/Incident Reporting System
DOE	U.S. Department of Energy
L&I	Labor and Industries
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
WTP	Waste Treatment and Immobilization Plant

Occupational Safety and Health Association (OSHA) Injury/Illness Recordkeeping Review Bechtel National, Inc. (BNI)

Scope

From April 10 through 14, 2006, the U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of BNI's OSHA injury/illness recordkeeping program.

Details

The assessor examined relevant documentation including the revised BNI procedure for implementation of the OSHA Recordkeeping Program. The assessor performed evaluations of employee medical records, Computerized Accident/Incident Reporting System (CAIRS) database entries, and "Safety Data System (SDS) First Aid Log" data. The assessor interviewed BNI's Workers Compensation Administrator and reviewed current Labor and Industries (L&I) records for employees who had filed claims.

Review of Procedures

DOE's review of the contractor's procedure for the OSHA Recordkeeping Program determined there was a clear process described for reporting injuries for CAIRS and OSHA recordkeeping purposes. BNI procedure 24590-WTP-GPP-SIND-023, Revision 4, Injury/Illness Notification, Investigation, and Reporting," dated September 7, 2005, met the minimum requirements in the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A.

The assessor also reviewed procedure 24590-WTP-GPP-SIND-022, Assessment and Issue of Noncompliance for Construction Subcontractor's Safety and Health Compliance. This procedure was developed as part of a corrective action from a previous ORP Injury/Illness Recordkeeping assessment. The assessor determined that BNI was effectively implementing the procedure. The assessor reviewed two quarters of BNI oversight assessments performed to ensure subcontractors are recording injuries and illnesses accurately. The assessor concluded BNI procedures were adequate in the area of injury/illness recordkeeping. There were no issues in the area of procedures.

Comparison of CAIRS Data to Medical Files

The ORP assessor had access to the CAIRS production database for BNI and subcontractors. The data evaluated ranged from October 2005 through April 2006. The ORP reviewer analyzed all cases posted in CAIRS that indicated an OSHA recordable injury including 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.

ORP reviewed case files maintained in the Waste Treatment and Immobilization Plant (WTP) onsite first aid clinic, managed by WorkCare. The ORP assessor found some discrepancies between CAIRS data entries and patient medical records. BNI’s CAIRS database was found to be inaccurate, containing several incorrect “Accident Date” entries. As a result the assessor identified the following Finding:

A-06-ESQ-RPPWTP-005-F01 - 37 % of the “Accident Dates” in CAIRS between October 2005 and April 2006 were found to be inaccurate.

During medical records review ORP found that the dates of injury listed in CAIRS were different from the dates of services performed by the Occupational Medical Provider, WorkCare. It was determined that six out of 16 CAIRS dates were incorrect. BNI promptly acknowledged the errors and corrected the inaccurate CAIRS database entries. BNI is requested to provide a response to the above finding describing the quality control processes that will be applied to ensure accurate injury/illness reporting.

Comparison of L&I Data to CAIRS Data

The ORP assessor initiated this review using L&I data from BNI’s Worker’s Compensation Administrator. ORP focused on cases compensated by L&I and were not reported as OSHA recordable by the contractor. In theory, all L&I cases are not necessarily OSHA recordable and conversely all OSHA recordable cases are not necessarily compensable. However, OSHA often reviews L&I records because there may be an overlap. Many cases in which the state is compensating individuals for injuries would be work related, and would likely involve medical treatment beyond first aid.

The ORP reviewer analyzed all cases in the L&I records for the period from October 2005 through April 2006 and compared it to the information in the patient’s medical file. The assessor found no underreporting of injuries or illnesses in any of the Worker’s Compensation cases filed over the past six month period.

Review of Subcontractor OSHA Recordkeeping

During the March 2005 ORP assessment of OSHA recordkeeping, the assessor found weaknesses in BNI’s oversight of major subcontractors. There was a lack of documented evidence that BNI had performed oversight on WTP subcontractors. BNI failed to demonstrate they had performed comparison of OSHA 300 and first aid logs to injuries reported by their subcontractors.

BNI’s actions in response to this Finding included the performance of several surveillances in accordance with procedure GPP-SIND-022, “Assessment and Issue of Noncompliance for Construction Subcontractor’s Safety and Health Compliance,”

effective August 22, 2005. The procedure contains a Subcontractor Environmental, Safety, and Health Evaluation Checklist for documenting quarterly assessments of BNI subcontractor injury/illness recordkeeping by BNI safety representatives. The ORP assessor reviewed five recent subcontractor assessment reports and interviewed the BNI safety representative who performed the assessments. ORP verified the effective implementation of BNI's oversight of major subcontractors in the area of injury/illness reporting. The assessor concluded BNI provided effective oversight of subcontractor injury/illness recordkeeping.

Items Opened

Finding A-06-ESQ-RPPWTP-005-F01: 37 % of the "Accident Dates" in CAIRS between October 2005 and April 2006 were found to be inaccurate.

During medical records review ORP found that the dates of injury listed in CAIRS were different from the dates of services performed by the Occupational Medical Provider, WorkCare. It was determined that six out of 16 CAIRS dates were incorrect.

BNI immediately recognized their data input errors and corrected the entries.

Items Closed

Finding A-05-ESQ-RPPWTP-007-F01: Between March and September 2005 five injuries were not reported in accordance with OSHA requirements.

ORP verified CAIRS database corrections were completed by BNI.

Finding A-05-ESQ-RPPWTP-007-F02: BNI Subcontractor Oversight issue was not corrected.

ORP determined BNI's last two quarters assessment of subcontractor Injury/Illness records were acceptable.

ORP determined the corrective actions by BNI were effective. As a result both Findings are considered closed.

Items Reviewed

None