

**U.S. Department of Energy**

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

06-ESQ-062

JUN 01 2006

Mr. M. S. Spears, President
and Chief Executive Officer
CH2M HILL Hanford Group, Inc.
Richland, Washington 99352

Dear Mr. Spears:

CONTRACT NO. DE-AC27-99RL14047 – REPORT A-06-ESQ-TANKFARM-004 REVIEW
OF OCCUPATIONAL SAFETY AND HEALTH ACT (OSHA) INJURY/ILLNESS
RECORDKEEPING FOR MAY 15 THROUGH 18, 2006

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 May 15 through 18, 2006.

The assessor identified no Findings or Observations. CH2M HILL has implemented processes that satisfy 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. Since the last assessment six months ago, ORP acknowledges continued accurate and timely reporting of injury/illness events.

The attached Assessment Report, A-06-ESQ-TANKFARM-004, documents the details of the assessment.

The direction herein is considered to be within the limitations of the Technical Direction (TD) clause in the Contract and does not meet any of the conditions described in Paragraph (b) (1) through (4) of the TD clause. If, in the opinion of the Contractor, any instruction or direction by the Contracting Officer's Representative in this letter falls within one of the categories defined in TD Clause (b)(1) through (b)(4), the Contractor shall not proceed but shall notify the Contracting Officer immediately orally, and in writing within five working days, after receipt of any such instruction or direction and shall request the Contracting Officer to modify the contract accordingly. The Contracting Officer will respond as required by the TD clause.

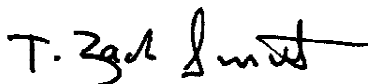
Mr. M. S. Spears
06-ESQ-062

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JUN 01 2008

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,



T. Zack Smith
Contracting Officer's Representative

ESQ:PRH

Attachment

cc w/attach:
T. E. Krietz, EM-3
F. M. Ito, CH2M HILL
M. J. Sorrells, CH2M HILL
CH2M Correspondence

Attachment
06-ESQ-062
A-06-ESQ-TANKFARM-004

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-06-ESQ-TANKFARM-004

FACILITY: CH2M HILL Hanford, Inc. Tank Farm Project

LOCATION: Hanford Site

DATES: May 15 through 18, 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 CH2M HILL Hanford, Inc.'s (CH2M HILL) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program from May 15 through 18, 2006. ORP performs quality checks of the information reported through the Computerized Accident/Incident Reporting System (CAIRS) by its contractors every six months. ORP performed the last assessment of this activity in October 2005.

This assessment evaluated the effectiveness of CH2M HILL's implementation of procedures which satisfy the requirements of 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. The assessor focused on determining the effectiveness of the processes associated with identifying, evaluating, and recording injuries and illnesses on OSHA forms and in the DOE CAIRS database. The assessor evaluated the procedural requirements, interviewed those charged with managing and implementing the processes, and examined records pertaining to the assessment subject. The assessor paid particular attention to injuries which were compensable by the State of Washington Department of Labor and Industries, to see if they were properly classified as OSHA recordable.

The assessors concluded that CH2M HILL had implemented the requirements of OSHA 29 CFR 1904 and DOE M 231.1-1A. The reviewer identified no Findings or Observations. ORP acknowledges continued success in CH2M HILL injury/illness safety records, procedures, and categorization of injury/illness events.

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List of Acronyms

AMH	AdvanceMed Hanford
CAIRS	Computerized Accident/Incident Reporting System
CH2M HILL	CH2M HILL Hanford Group, Inc.
CMC	Case Management Coordinator
DOE	U.S. Department of Energy
L&I	Labor and Industry
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
ROV	Record of Visit

**OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING REVIEW
CH2M HILL HANFORD, INC. (CH2M HILL) MAY 15 THROUGH 18, 2006**

Details

OSHA 29 CFR 1904 requires employers to record and report work-related fatalities, injuries, and illnesses. The U.S. Department of Energy (DOE), Office of River Protection (ORP) is required to perform quality checks of the information reported through the Computerized Accident/Incident Reporting System (CAIRS) by its contractors every six months. 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 October 2005 and May 2006. The assessor 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 evaluated the OSHA 300 Log for CH2M HILL, Worker's Compensation records, and the DOE CAIRS to compare data entries with hardcopy records.

Review of Procedures

The assessor determined the contractor's procedures for the OSHA Recordkeeping Program clearly delineated responsibilities between the employees, supervisors, safety group, AdvanceMed Hanford (AMH) medical staff, and the Safety Case Management Coordinator (CMC). There was an effective process of reporting injuries for CAIRS and OSHA recordkeeping purposes. CH2M HILL procedures TFC-ESHQ-S-CMLI-C-02, "Responding and Reporting Injuries, Illnesses, and Accidents," dated January 26, 2006, and TFC-ESHQ-S-CMLI-C-021 "Injury and Illness Record Management," dated January 25, 2006, were determined to be in accordance with September 2004 revisions to the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A. There were no issues identified in the area of procedures.

Review of Medical Files

The assessor reviewed 14 medical files maintained in the Richland first aid clinic, managed by AMH. A review of these files verified that if formal restrictions were imposed 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. 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 assessor accessed the CAIRS production database for CH2M HILL. The information was compared to the CH2M HILL OSHA 300 Log for Calendar Year 2005. The assessor analyzed all cases resulting in medical treatment beyond first aid and cases with restricted or lost work days. For each case the assessor accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Reports." The content of the 5484.3 forms was compared to the information in the patient's medical file. All entries in the CAIRS database agreed with entries on the OSHA 300 Log and with the information in the employee medical files. CAIRS database entries were correct and accurate. There were no issues found in the area of log keeping.

Review of Worker's Compensation Files

The assessor used Worker's Compensation (Labor and Industry [L&I]) data created by CH2M HILL's Worker's Compensation Administrator. ORP focused on cases compensated which the contractor had not reported as OSHA recordable. In theory, all L&I cases are not OSHA recordable, and all OSHA recordable cases are not compensable. However, OSHA will often review L&I records because there is overlap.

The assessor compared the CAIRS production database for CH2M HILL to the L&I records for the same period. ORP reviewed 11 worker compensation case files maintained by the CH2M HILL safety organization. There were several L&I cases where a work-related injury resulting in medical treatment beyond first aid was not reported as OSHA recordable. One such incident occurred on March 23, 2006. A Nuclear Operator was picking up tumbleweeds and felt his low back tighten and begin to hurt. He was treated at AMH, administered over-the-counter medications and returned to work without restrictions. The next day the employee elected to stay home due to back stiffness. The employee returned to AMH for an evaluation on the next Monday, March 27, and received work restrictions. The new restrictions directed the employee not to use Self Contained Breathing Apparatus, and did not impact the employee's routine work assignment. The employee returned to AMH a week later and was issued another restriction directing him to avoid lifting in excess of 25 pounds. Once again, the limitations did not impact his routine work assignments. On April 7, 2005, the employee sought treatment from his personal Physician, who administered prescription medications and referred the employee to Physical Therapy. Through the worker's compensation program the employee initiated further medical treatment in the form of physical therapy. The administration of prescription medication and continuing medical services in the form of Physical Therapy changed the case from a non-recordable to OSHA recordable. Upon receipt of the updated treatment plan CH2M HILL reclassified the case in CAIRS to reflect medical treatment beyond first aid. This is an example of the effective case management on the part of the CH2M HILL Safety CMC, who also performs the duties of Worker's Compensation Administrator.

Items Opened, Closed and Discussed

Opened Finding or Observation

None

Items Closed

None

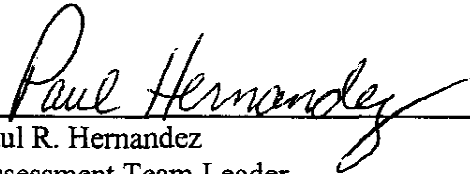
Items Discussed

None


Conclusions

The assessor concluded that CH2M HILL developed and implemented procedures adequate for injury/illness recordkeeping as required by OSHA 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses, and by the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A. CAIRS database entries were accurate and updated on a regular basis. Medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. OSHA 300 Logs were kept up-to-date and accurate. No evidence of underreporting in terms of OSHA recordability requirements was found during this assessment.

Signatures



Paul R. Hernandez
Assessment Team Leader



Patrick P. Carrier, Team Leader
Verification and Confirmation Team