



U.S. Department of Energy
~~OFFICE OF RIVER PROTECTION~~

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Richland, Washington 99352

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06-ESQ-147

Mr. M. S. Spears, President
and Chief Manager
CH2M HILL Hanford Group, Inc.
2440 Stevens Center Place
Richland, Washington 99354

Dear Mr. Spears:

CONTRACT NO. DE-AC27-99RL14047 – ASSESSMENT REPORT A-06-ESQ-TANKFARM-010 REVIEW OF OCCUPATIONAL SAFETY AND HEALTH ACT (OSHA) INJURY/ILLNESS RECORDKEEPING FOR OCTOBER 10 THROUGH 13, 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 October 10 through 13, 2006.

The assessor identified no Findings and one Observation. The Observation dealt with one case underreported and one case overreported into the Computerized Accident/Incident Reporting System database. 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.

The attached Assessment Report, A-06-ESQ-TANKFARM-010, documents the details of the assessment. No response to the Observation is required.

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, Assistant Manager
for Tank Farms Project

ESQ:PRH

Attachment

cc: See page 2

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 Group, Inc.

REPORT: A-06-ESQ-TANKFARM-010

FACILITY: CH2M HILL Hanford Group, Inc. Tank Farm Project

LOCATION: Hanford Site

DATES: October 10 through 13, 2006

ASSESSORS: Paul R. 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) evaluated the CH2M HILL Hanford, Inc.'s (CH2M HILL) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program from October 10 through 13, 2006. 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. ORP performs quality checks of the information reported through the Computerized Accident/Incident Reporting System (CAIRS) by its contractors every six months.

The assessor concluded that CH2M HILL had implemented the requirements of OSHA 29 CFR 1904 and DOE M 231.1-1A. The reviewer identified no Findings and one Observation. ORP found that CH2M HILL reporting into CAIRS was accurate; with the exception of a single case inadvertently miss-recorded. The contractor immediately corrected the data entry error. 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
HQ	Headquarters
L&I	Labor and Industry
NCO	Nuclear Chemical Operator
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 GROUP, INC. (CH2M HILL)
OCTOBER 10 THROUGH 13, 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 examined all injuries occurring at the Tank Farm project between May and October 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 CH2M HILL employee medical records, Worker's Compensation records, and the DOE CAIRS database 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) 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, "Injury and Illness Events," dated July 31, 2006, and TFC-ESHQ-S-CMLI-C-021, "Injury and Illness Record Management," dated July 26, 2006, were determined compliant 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 15 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, the employee's supervisor, and the safety representative. Employees had been instructed that unless the restriction assessment was 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 had 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 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 information in the employee medical files. CAIRS database entries were correct and accurate, with the exception of a single case inadvertently miss-recorded. (This issue is identified as assessment Observation A-06-ESQ-RPPWTP-010-001.)

Observation A-06-ESQ-TANKFARM-010-001: Between May and October 2006 one recordable injury had not been reported into the CAIRS database in accordance with OSHA requirements.

Based on OSHA requirements one case had been underreported and one case was over reported:

- One case (2006009) CH2M HILL reported as non recordable (first aid) should have been reported as OSHA recordable; and
- One case (2006007) CH2M HILL reported as OSHA recordable should have been reported as first aid only.

The two cases were transposed. Both cases involved employees bitten by insects, a bee (2006007) and a spider (2006009). The initial May 10, 2006, ROV from AMH for the bee sting case stated prescription medication had been administered. This was an error that AMH corrected, providing CH2M HILL with an addendum to the ROV dated June 15, 2006. The revised ROV stated over-the-counter non-prescription medication was administered. CH2M HILL attempted to delete the recordable entry from the CAIRS database, unaware this could only be accomplished by DOE Headquarters (HQ). The bee sting Case Number 2006007 was then "reused" to record the spider bite case into the CAIRS database. Since the original case was never actually deleted, the second case was not entered in its place. During a quality check CH2M HILL saw the recordable case listed as an insect bite injury, and assumed the entry was correct. The screen used for the quality check did not display the employee names.

ORP sorted cases on a different screen that displayed employee names, and used this output to review and analyze medical case files at AdvanceMed. The error was discovered by comparing the two patient's medical files.

CH2M HILL immediately corrected the problem, first entering Case Number 2006009 into the CAIRS database, then contacting DOE HQ to move Case Number 2006007 into the first aid only category. All corrections had been completed prior to the assessment exit briefing.

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 due to overlap.

The assessor compared the CAIRS production database for CH2M HILL to the L&I records for the same period. ORP reviewed seven worker compensation case files maintained by the CH2M HILL safety organization. There were several L&I cases where an injury resulting in medical treatment beyond first aid was not reported as OSHA recordable. One such incident occurred on May 31, 2006. A Nuclear Chemical Operator (NCO) was playing basketball during the noon lunch break when he broke his ankle. The employee was treated at Kadlac Medical Center where he initiated payment for his medical bills through the worker's compensation program. His claim was processed and approved for payment. However, CH2M HILL did not report the injury as OSHA recordable, citing the OSHA regulations to justify their decision.

10 CFR 1904.5 (b) states, "You must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception in § 1904.5(b)(2) specifically applies." Exemption (iii) closely aligns with the injury sustained by the NCO. "The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball."

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

Observation A-06-ESQ-TANKFARM-010-001: Between May and October 2006 one recordable injury was not reported into the CAIRS database in accordance with OSHA requirements. Based on OSHA requirements one case was underreported and one case was over reported.

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. With the exception of a single case inadvertently miss-recorded 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