



U.S. Department of Energy

~~Office of River Protection~~

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

JUN 25 2007

07-ESQ-101

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-07-ESQ-ATL-001 –
ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING, MAY 29 THROUGH 31, 2007

This letter forwards the results of the U.S. Department of Energy, Office of River Protection (ORP) assessment of the Advanced Technologies and Laboratories International, Inc. OSHA Injury/Illness Recordkeeping Program conducted from May 29 through 31, 2007.

The assessor identified no Findings or Observations during this assessment. ORP acknowledges continued accurate and timely reporting of injury/illness events.

The attached Assessment Report, A-07-ESQ-ATL-001, documents the details of the assessment. No response is necessary.

If you have any questions, please contact me, or your staff may call William J. Taylor, Assistant Manager, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

Shirley J. Olinger, Acting Manager
Office of River Protection

ESQ:PRH

Attachment

cc w/attach:
S. W. Sanders, PAC
C. R. Ungerecht, 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-07-ESQ-ATL-001

FACILITY: ATL 222-S Analytical Services Production Contractor

LOCATION: Hanford Site

DATES: May 29 through May 31, 2007

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) staff evaluated the Advanced Technologies and Laboratories International, Inc.'s (ATL) Occupational Safety and Health Administration (OSHA) Injury/Illness Recordkeeping Program. ORP staff reviewed the effectiveness of the Contractor's implementation of procedures and practices that satisfy the requirements of OSHA 29 Code of Federal Regulations (CFR) 1904, "Recording and Reporting Occupational Injuries and Illnesses." In conducting this assessment, ORP staff reviewed procedural requirements, interviewed the ATL Safety Representative, and examined records pertaining to the assessment subject.

The assessor concluded that ATL had effectively 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 ATL injury/illness safety records, procedures, and categorization of injury/illness events.

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List of Acronyms

AMH	AdvanceMed Hanford
ATL	Advanced Technologies and Laboratories International, Inc.
CAIRS	Computerized Accident/Incident Reporting System
CFR	Code of Federal Regulations
Chem-Tech	Chemical-Technician
DOE	U.S. Department of Energy
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
Rad/Chem	Radiological/Chemical
ROV	Record of Visit

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

Scope

From May 29 through 31, 2007, 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 in the form of event reports, employee medical records, and Computerized Accident/Incident Reporting System (CAIRS) database entries. The assessor interviewed ATL's Safety Specialist responsible for implementing the OSHA recordkeeping program.

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. ATL implemented the following OSHA Recordkeeping Program procedures:

- ATL procedure ATL-312, Section 10.02, Revision 1, "Responding and Reporting Injuries, Illnesses, and Accidents," dated April 23, 2007.
- ATL procedure ATL-312, Section 10.01, Revision 0, "Accident/Incident Event Record Keeping (CAIRS/OSHA 300)," dated April 19, 2007.

The assessor concluded the above procedures included the elements essential for successful implementation of OSHA recordkeeping processes. The procedures had been recently updated to include provisions to comply with the regulatory criteria contained in 10 Code of Federal Regulations (CFR) 851, "Worker Safety and Health Program."

Comparison of CAIRS Data to Case and Medical Files

The ORP assessor reviewed the CAIRS production database for ATL. The assessor found no entries from December 2006 through May 2007 because there were no recordable injuries during the period. ORP analyzed all first aid cases for the December through May period. The assessor reviewed the ATL case files for two employees who required three first aid visits to AdvanceMed Hanford (AMH) during those six months. A review of these files verified that an AMH Record of Visit (ROV) form was included in the patient's case file each time the employee sought first aid services. One of the ROVs included the administration of over-the-counter non-prescription strength medicine

to treat a skin rash. This case was correctly classified as first aid only. A second ROV included lab work to test for mercury exposure. The results were negative. This case was correctly classified as first aid only. The third ROV included an exam only as a result of an employee falling in the parking lot. No medical treatment beyond first aid was required. This case was correctly classified as first aid only. Employees requiring medical attention were promptly provided services at AMH. None of the injuries were OSHA recordable for the six month period.

Conclusions

The ORP assessor concluded that ATL revised procedures adequate for Injury/Illness Recordkeeping as required by OSHA 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses." The procedures had been recently updated to include provisions to comply with the regulatory criteria contained in 10 CFR 851, "Worker Safety and Health Program."

Injury and illness records were completed and maintained. ATL had effectively implemented the requirements of OSHA 29 CFR 1904 and DOE M 231.1-1A. The reviewer identified no Findings or Observations.

Items Opened

None.

Items Closed

Finding A-06-ESQ-ATL-005-F01: One case reported as first aid only should be OSHA recordable with restricted workdays.

On August 29, 2006, a Chemical-Technician (Chem-Tech) was walking in the 2704S office building when she tripped and fell onto the carpet, resulting in a burn and abrasion to the elbow. Employee was taken to AMH and administered a tetanus shot and antibiotic ointment, and the wound was covered with a non-zone dressing. On August 31, 2006, the employee returned to AMH for a follow-up examination. As a result of the follow-up examination AMH initiated the following work restriction, "No work where Radiological/Chemical (Rad/Chem) contamination likely to occur to right elbow. CIZ (covered in zone) dressing non applicable."

The restriction specified the employee was not to wear a waterproof bandage acceptable in a Rad/Chem zone. The Chem-Tech was assigned to perform data uploads for the duration of the AMH work restrictions. She would have typically entered the Rad/Chem zone during the normal course of work in a given week, but performing data uploads is part of the Chem-Tech workscope as well. The restrictions were lifted following a follow up examination on September 15, 2006.

ATL considered this a first aid only case. They did not report the injury as OSHA recordable or report the restricted workdays. ORP verified the CAIRS database was corrected. Finding is considered closed.

Observation A-06-ESQ-ATL-005-O01: One case reported as OSHA recordable should be first aid only.

On October 26, 2006, an employee smelled an odor in Room 1K of the 222-S Laboratory and was taken to AMH for evaluation. The employee experienced an asthma reaction while at AMH. The asthma was a pre-existing condition that the employee controls with an Albuterol inhaler. The employee did not have access to her own Albuterol because it was left at the worksite in her purse. AMH provided another Albuterol inhaler, which the employee self-administered.

ORP concluded this case is not OSHA recordable because the employee has a preexisting asthma condition and would have self-treated with her own inhaler had she not been away from the worksite. This ORP case should have been reported as first aid only.

ORP verified the CAIRS database was corrected. No closure of Observation required.