



U.S. Department of Energy

~~Office of River Protection~~
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

JUL 27 2007

07-ESQ-105

Mr. John Fulton, President
and Chief Executive Officer
CH2M HILL Hanford Group, Inc.
2440 Stevens Center Place
Richland, Washington 99354

Dear Mr. Fulton:

CONTRACT NO. DE-AC27-99RL14047 – ASSESSMENT REPORT A-07-ESQ-TANKFARM-003 REVIEW OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) INJURY/ILLNESS RECORDKEEPING FOR JUNE 4 THROUGH 8, 2007

This letter forwards the results of the U.S. Department of Energy, 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 June 4 through 8, 2007.

The assessor identified one Finding, one Observation, and one Assessment Follow-up Item (AFI). The Finding resulted from inaccuracies in reporting one case as OSHA recordable. The Observation resulted from delays in uploading recordable cases from the Hanford Occupational Injury and Illness database into the Computerized Accident/Incident Reporting System database. The AFI dealt with the need for modified job descriptions and work restrictions for employees with pre-existing limitations or non work-related injuries.

The attached Assessment Report, A-07-ESQ-TANKFARM-003, documents the details of the assessment. Within 30 days of receipt of this letter CH2M HILL should respond to the assessment Finding. The AFI will remain open until the next ORP OSHA Injury/Illness Recordkeeping assessment is scheduled in six months. No response to the Observation or AFI is required.

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

Sincerely,

WJ Taylor
for Shirley J. Olinger, Acting Manager
Office of River Protection

ESQ:PRH

Attachment

cc: See page 2

Mr. John Fulton
07-ESQ-105

-2-

JUL 27 2007

cc w/attach:

T. E. Krietz, EM-3

F. M. Ito, CH2M HILL

M. J. Sorrells, CH2M HILL

S. W. Sanders, PAC

C. R. Ungerecht, PAC

CH2M HILL Correspondence

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-07-ESQ-TANKFARM-003

FACILITY: CH2M HILL Hanford, Inc. Tank Farm Project

LOCATION: Hanford Site

DATES: June 4 through 8, 2007

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) conducted an assessment of CH2M HILL Hanford Group, Inc.'s (CH2M HILL) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program from June 4 through 8, 2007. 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 2006.

This assessment evaluated the effectiveness of CH2M HILL's implementation of procedures which satisfy the requirements of OSHA 29 Code of Federal Regulations (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 Washington State Department of Labor and Industries, to see if they were properly classified as OSHA recordable.

The assessor concluded that CH2M HILL had implemented the requirements of OSHA 29 CFR 1904 and DOE M 231.1-1A, with a few exceptions. The reviewer identified one Finding, one Observation, and one Assessment Follow-up Item (AFI). The Finding resulted when ORP found inaccuracies in CH2M HILL's reporting of one OSHA recordable case into CAIRS. ORP made an Observation that the Hanford Occupational Injury and Illness database failed to upload some recordable cases into the CAIRS database. The AFI dealt with the need for modified job descriptions and work restrictions for employees with pre-existing medical conditions or limitations from non work-related injuries.

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List of Acronyms

AMH	AdvanceMed Hanford
AFI	Assessment Follow-up Item
CAIRS	Computerized Accident/Incident Reporting System
CFR	Code of Federal Regulations
CH2M HILL	CH2M HILL Hanford Group, Inc.
DOE	U.S. Department of Energy
EJTA	Employee Job Task Analysis
HPT	Health Physics Technician
L&I	Labor and Industry
OII	Occupational Injury/Illness
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
OTC	Over-the-Counter
ROV	Record of Visit
SCBA	Self-Contained Breathing Apparatus

**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 Code of Federal Regulations (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 2006 and May 2007. 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, and back pain. 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. 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 December 18, 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 seven 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.

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 or 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 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, with restricted workdays.

Case # 2007001: One such incident occurred on February 15, 2007, where an employee developed lower back pain after driving steel electrodes into the ground with a hammer. In this case AMH provided an exam only, with no medical treatment beyond first aid. AMH imposed the following medical restrictions, "No lifting, pushing, pulling, more than 15 pounds. Limited bending, stooping, or twisting." The restrictions were initially imposed from February 16 through 22, 2007, but modified during a follow-up visit on February 21, 2007. The modified restriction added, "Limited standing, sitting, or walking." The restriction was extended through March 15, 2007. On March 8, 2007, the employee was released for full duty as a result of a follow-up exam at Workcare at Kadlec.

ORP found case # 2007001 involved restricted work days, not recorded in CAIRS. ORP reviewed the employee's job duties with the employee's supervisor. In this case, AMH imposed restrictions which ORP assumed prevented the employee from performing routine duties typically performed at least once per week. ORP determined case # 2007001 was OSHA recordable with 20 restricted workdays. CH2M HILL disputed the ORP determination of restricted workdays. During the factual accuracy review CH2M HILL provided a list with examples of tasks that an employee could perform within the broad range of their duties. ORP allowed the case to be classified as OSHA recordable without restricted workdays.

Case # 2006016: In this second incident an employee felt back pain after he picked up Self-Contained Breathing Apparatus (SCBA) cases on December 22, 2006. The employee reported to AMH for medical treatment, which included administration of a cold pack and receipt of Over the Counter (OTC) ibuprofen at prescription strength. AMH imposed the following medical restrictions, "No lifting, pushing, pulling, more than 15 pounds. Limited bending, stooping, or twisting." The restrictions were imposed

from December 22 through December 27, 2006. ORP interviewed the employee and reviewed the employee's job duties. In this case, AMH imposed restrictions which prevented the employee from performing routine duties typically performed at least once per week. ORP determined case was OSHA recordable with five restricted workdays.

CH2M HILL considered this case non-work related, and proposed removing it from the CAIRS database. CH2M HILL provided email documentation regarding the employee's pre-existing condition. The AMH email stated that in April of 1999 the employee had chronic back pain. The ORP assessor reviewed the employee medical file and acknowledged his on-going back problems. Lacking any compelling evidence to the contrary, ORP determined that the back injury was a "significant aggravation of a pre-existing condition." ORP evaluated this case against the OSHA regulations:

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."

ORP considered the movement of SCBA suitcases, which took place in the workplace, as an "event." As a result of the event, the employee sought medical attention, was administered prescription strength medications, and received medical restrictions. Based on the regulation, ORP disagreed with CH2M HILL's decision to reclassify this case. ORP considered case # 2006016 to be OSHA recordable with five restricted workdays.

CH2M HILL disputed the ORP determination of restricted workdays. During the factual accuracy review CH2M HILL provided a list with examples of tasks that an employee could perform within the broad range of their duties. ORP allowed the case to be classified as OSHA recordable without restricted workdays.

ORP found inaccuracies in CH2M HILL's reporting of an OSHA recordable case into CAIRS. Case # 2006016 was to remain in CAIRS as an OSHA recordable case. (This issue is identified as assessment Finding A-07-ESQ-TANKFARM-003-F01)

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. ORP found discrepancies in the CAIRS database entries. On the first day of this assessment a printout of the 2006 and 2007 CAIRS logs indicated several cases were inadvertently omitted. CH2M HILL used the

Occupational Injury/Illness (OII) Database to record and track occupational injury/illness cases.

CH2M HILL provided ORP an explanation for the discrepancies. The cases were not inadvertently omitted. The database was updated as a part of the normal month-end processes. The audit started on June 5, 2007, and due to June 1, 2007, being a Friday off, June 5, 2007, was the second working day of the month. As a result, the month end closing and normal database updates were on-going during the audit. CH2M HILL immediately corrected the problem, ensuring the OSHA recordable cases were uploaded from the OII database into CAIRS. All corrections were completed prior to the assessment exit briefing.

ORP concluded that the Hanford OII database failed to upload some recordable cases into the CAIRS database. (This issue is identified as assessment Observation A-07-ESQ-RPPWTP-003-O01.)

Items Opened, Closed, and Discussed

Opened Finding or Observation

Finding A-07-ESQ-TANKFARM-003-F01: CH2M HILL had inaccuracies in determining OSHA recordability, as required by 10 CFR 1904.5(b).

Observation A-07-ESQ-TANKFARM-003-O01:

The Hanford OII database failed to upload some recordable cases into the CAIRS database.

Assessment Follow-up Item (AFI) A-07-ESQ-TANKFARM-003-AFI01:

There is a need for modified job descriptions and work restrictions for employees with pre-existing limitations or non work-related injuries.

During the course of this assessment ORP reviewed a variety of documents associated with injured employees who had been given medical restrictions from licensed medical providers. One of the documents reviewed was the Employee Job Task Analysis (EJTA). An EJTA reflects hazards the employee either is, or is likely to be, exposed to during routine work activities. In addition, the EJTA identifies essential job functions, and specific qualification programs required by the employee's position. It is completed by an employee's supervisor with the assistance of a safety and health specialist and reviewed with the employee. Each supervisor should meet with their employees to ensure the hazards of the job are understood.

ORP noticed EJTA's described lifting 25 to 50 pounds up to 1/3 of the time; and lifting between 10 and 25 pounds "frequently," defined as more than 1/3 of the time for Health

Physics Technicians (HPT). Some employees may have pre-existing conditions that preclude them from lifting over 15 or 20 pounds. However, their "generic" EJTA indicates routine lifting in excess of 20 pounds. Employees with pre-existing limitations need some type of documentation stating that. This documentation would not be formal medical restrictions resulting from an occupational injury. OSHA recognizes modified job descriptions from employees' physicians as a means to restrict employee activities to prevent on-the-job injuries. The restrictions do not count against the employer's OSHA recordable rates, since the nature of the illness or injuries is considered non work-related. ORP reviewed the EJTA for the employee who was injured in case # 2007002. The employee's EJTA specifies frequent (more than 1/3 of the time) lifting, between 10 and 25 pounds.

Case # 2007002: In this incident an employee felt back pain after she moved laundry bags on February 27, 2007. The employee reported to AMH for medical treatment, which included administration of a cold pack and receipt of OTC medication at non-prescription strength. AMH imposed the following medical restrictions, "No lifting, pushing, pulling, more than 20 pounds." The restrictions were imposed from February 27, 2007, through March 6, 2007, and later extended through June 14, 2007. ORP interviewed the employee's supervisor and reviewed the employee's job duties. In this case, AMH imposed restrictions which prevented the employee from performing routine duties typically performed by an HPT as described in the EJTA. The assessor was told that the employee had been coached by management not to lift anything that would result in an injury. In other words, the employee had been advised to "take it easy" due to their susceptibility for injury. From an OSHA point of view, the employee was not working under medical restrictions (imposed by a licensed health care provider) at the time of the February 27, 2007, injury. ORP considered the movement of laundry bags, which took place in the workplace, as an "event." As a result of the event, the employee sought medical attention, was administered non-prescription strength medications, and received medical restrictions. ORP determined case # 2007002 was OSHA recordable with an estimated 106 restricted workdays. CH2M HILL disagreed with ORP's determination. ORP's determination was based on the lack of signed documentation relevant to the employee limitations allegedly imposed by the supervisor.

CH2M HILL committed to work with their Human Resources staff and the site medical provider to develop a process that accurately captures, describes, and documents worker limitations.

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 OII, and by the DOE Environmental Safety and Health Reporting Manual, DOE M 231.1-1A. CAIRS database entries were accurate, with the exception of those that were not uploaded from the OII database at the end of May 2007. Medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. With the exception of the one case described in the Finding, and the one case described in the AFI, no evidence of underreporting in terms of OSHA recordability requirements was found during this assessment.

Signatures



Paul R. Hernandez
Assessment Team Leader



Patrick P. Carter, Team Leader
Verification and Confirmation Team

Task# ORP-ESQ-2007-0110

E-STARS[®] Report
Task Detail Report
07/30/2007 0742

TASK INFORMATION			
Task#	ORP-ESQ-2007-0110		
Subject	CONCUR:07-ESQ-105; ASSESSMENT REPORT A-07-ESQ-TANKFARM-003 REVIEW OF OSHA INJURY/ILLNESS RECORDKEEPING FOR JUNE 4 THROUGH 8, 2007		
Parent Task#		Status	CLOSED 07/30/2007
Reference	07-ESQ-105	Due	
Originator	Gano, Becky (Gano, Becky)	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	06/25/2007 1312	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	Long Term	View Permissions	Normal
Instructions	<p>Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list.</p> <p>BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE C.B.REID, AMD P.P.CARRIER, ESQ J.L.POLEHN, ESQ W.J.TAYLOR, ESQ D.L.NOYES, TF</p> <p>RECORD NOTE:</p>		
ROUTING LISTS			
1	Route List		Inactive
	<ul style="list-style-type: none"> ● Hernandez, Paul R - Review - Concur - 07/30/2007 0741 <i>Instructions:</i> ● Carier, Patrick P - Review - Concur with comments - 07/19/2007 1457 <i>Instructions:</i> ● Taylor, William - Review - Concur - 07/18/2007 0940 <i>Instructions:</i> ● Noyes, Delmar L - Review - Cancelled - 07/30/2007 0742 <i>Instructions:</i> ● Olinger, Shirley J - Approve - Cancelled - 07/30/2007 0742 <i>Instructions:</i> 		
ATTACHMENTS			
Attachments	<ol style="list-style-type: none"> 1. 07-ESQ-105 att Assessment Report A-07-ESQ-TANKFARM-003.doc 2. 07-ESQ-105 CH2M LTR Assessment Report A-07-ESQ-TANKFARM-003 Review of OSHA Injury Illness Recordkeeping for 6 4-8 2007.doc 		
COLLABORATION			

RECEIVED

JUL 30 2007

DOE-ORP/ORPCC

Task# ORP-ESQ-2007-0110	
COMMENTS	
Poster	Carier, Patrick P (Gano, Becky) - 07/19/2007 0207
	Concur
	Bill Taylor concurred for Pat Carier on 7/19/07.
Poster	Gano, Becky (Gano, Becky) - 07/30/2007 0707
	CLOSED
	Ben Harp concurred for Delmar Noyes on 7/19/07; Bill Taylor signed for Shirley Olinger, as Acting MGR, on 7/27/07.
TASK DUE DATE HISTORY	
<i>No Due Date History</i>	
SUB TASK HISTORY	
<i>No Subtasks</i>	

-- end of report --

Task# ORP-ESQ-2007-0110

E-STARS[®] Report
 Task Detail Report
 06/25/2007 0121

TASK INFORMATION			
Task#	ORP-ESQ-2007-0110		
Subject	CONCUR:07-ESQ-105; ASSESSMENT REPORT A-07-ESQ-TANKFARM-003 REVIEW OF OSHA INJURY/ILLNESS RECORDKEEPING FOR JUNE 4 THROUGH 8, 2007		
Parent Task#		Status	Open
Reference	07-ESQ-105	Due	
Originator	Gano, Becky (Gano, Becky)	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	06/25/2007 1312	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	Long Term	View Permissions	Normal
Instructions	Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list. BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE C.B.REID, AMD P.P.CARRIER, ESQ J.L.POLEHN, ESQ W.J.TAYLOR, ESQ D.L.NOYES, TF RECORD NOTE:		
ROUTING LISTS			
1	Route List		Active
	<ul style="list-style-type: none"> Hernandez, Paul R - Review - Awaiting Response - Due Date <i>Instructions:</i> <i>Paul Hernandez 7/11/07</i> 		
	<ul style="list-style-type: none"> Carrier, Patrick P - Review - Awaiting Response - Due Date <i>Instructions:</i> <i>WJT 7/19/07</i> 		
	<ul style="list-style-type: none"> Taylor, William - Review - Awaiting Response - Due Date <i>Instructions:</i> <i>WJT 7/19/07</i> 		
	<ul style="list-style-type: none"> Noyes, Delmar L - Review - Awaiting Response - Due Date <i>Instructions:</i> <i>DLN 7/19/07</i> 		
<i>B</i>	<ul style="list-style-type: none"> Olinger, Shirley J - Approve - Awaiting Response - Due Date <i>Instructions:</i> <i>WJT 7/27/07</i> 		
ATTACHMENTS			
Attachments	1. 07-ESQ-105 att Assessment Report A-07-ESQ-TANKFARM-003.doc 2. 07-ESQ-105 CH2M LTR Assessment Report A-07-ESQ-TANKFARM-003 Review of OSHA Injury Illness Recordkeeping for 6 4-8 2007.doc		
COLLABORATION			