



U.S. Department of Energy
Office of River Protection

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

08-ESQ-086

Mr. John C. 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-08-ESQ-TANKFARM-005 REVIEW OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) INJURY/ILLNESS RECORDKEEPING FOR APRIL 14 THROUGH 17, 2008

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 April 14 through 17, 2008. The Team had no findings.

In the area of injury/illness recordkeeping the Team concluded that reporting of work-related injuries by CH2M HILL has been accurate in the last six month period. For the October 2007 through April 2008 period, ORP found all cases reported in accordance with OSHA requirements.

If you have any questions, please contact me, or your staff may contact Paul R. Hernandez, Office of Environmental Safety and Quality, (509) 376-2209.

Sincerely,

William J. Taylor, Assistant Manager
Office of Environmental Safety and Quality

ESQ:PRH

Attachment

cc w/attach:
T. E. Krietz, EM-3
K. W. Daniels, CH2M HILL
M. J. Sorrells, CH2M HILL
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 Group, Inc.

REPORT: A-08-ESQ-TANKFARM-005

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

LOCATION: Hanford Site

DATES: April 14 through 17, 2008

ASSESSORS: Paul R. Hernandez, Lead Assessor

APPROVED BY: Kenneth A. Hoar, Division Director
Verification and Confirmation Division

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 April 14 through 17, 2008. 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 2007.

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. No issues were identified as a result of this assessment.

Table of Contents

| | |
|--|------------|
| Executive Summary | ii |
| Table of Contents | iii |
| List of Acronyms | iv |
| Details..... | 1 |
| Items Opened, Closed, and Discussed | 3 |
| Signatures | 3 |

List of Acronyms

| | |
|-----------|---|
| AMH | AdvanceMed Hanford |
| CAIRS | Computerized Accident/Incident Reporting System |
| CFR | Code of Federal Regulations |
| CH2M HILL | CH2M HILL Hanford Group, Inc. |
| DOE | U.S. Department of Energy |
| L&I | Labor and Industry |
| ORP | Office of River Protection |
| OSHA | Occupational Safety and Health Administration |
| PA | Physician's Assistant |
| ROV | Record of Visit |

**OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)
INJURY/ILLNESS RECORDKEEPING REVIEW OF CH2M HILL HANFORD
GROUP, INC. (CH2M HILL) APRIL 14 THROUGH 17, 2008**

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 2007 and April 2008. 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, lacerations, 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 March 24, 2008, and TFC-ESHQ-S-CMLI-C-021, "Injury and Illness Record Management," dated March 20, 2008, were determined to be in accordance with 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 spreadsheets and case files maintained by the CH2M HILL safety organization. ORP questioned one December 2007 Worker's Compensation case where an individual filed a claim for lower back pain resulting from lifting a sprayer in the AP Tank Farm. CH2M HILL did not report this case in the CAIRS database as OSHA recordable, even though the following restrictions were issued, "No lifting greater than 15 pounds; No bending at waist, recommend desk work." CH2M HILL supported their decision by providing ORP with the following case management information:

- "Reasonable Accommodation to Work Restrictions Evaluation" form signed by both the employee and their supervisor. The employee acknowledged they can perform all of their regularly assigned duties with the restrictions in place.
- Information supporting the consideration that this case was non-occupational, based upon serious prior back injuries sustained by the employee in 2004, outside of work.

ORP discussed the case with the AMH Physician's Assistant (PA) who treated the employee in December 2007. The PA showed ORP progress notes in the medical file that supported the decision to consider this case to be non-occupational. ORP acknowledged the professional opinion of the AMH PA that this case was not work-related, and therefore not OSHA recordable. There were no issues found in the area of Worker's Compensation case management.

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 no discrepancies in the CAIRS database entries. ORP concluded that CH2M HILL accurately reported into the CAIRS database in accordance with the requirements of DOE M 231.1-1A.

Items Opened, Closed, and Discussed

Items Opened

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, and by the DOE Environmental Safety and Health Reporting Manual, DOE M 231.1-1A. CAIRS database entries were accurate, medical files located at the AMH first aid clinic containing injury and illness records were complete and well-maintained. There was no evidence of underreporting in terms of OSHA recordability requirements found during this assessment.

Signatures

Paul R. Hernandez
Assessment Team Leader

Kenneth A. Hoar, Director
Verification and Confirmation Division