

Program Policy

1.0 Purpose

This procedure provides requirements for identifying key aspects of contractor safety that provide all employees a safe and healthful workplace while also protecting the environment in compliance with Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA) standards. The provisions of this procedure apply to work activities associated with tasks performed by Battelle- Pacific Northwest Division (PNWD) contractors and subcontractors.

2.0 Definitions

The following list identifies terms selected and defined for this procedure. The complete definitions can be found in Appendix A, "Glossary."

- Competent Person
- personal protection equipment

3.0 Requirements

The provisions for program policy at project locations will include:

- Responsibility
- Contractor/Subcontractor Responsibilities
- General Requirements
- Safety Requirements
- Safety Rights
- Safety Responsibilities
- Safety Bulletin Boards
- Adverse Weather Conditions.

3.1 Responsibility

The contractor is overall accountable for the safety of their project. The contractor allocates the proper resources necessary to execute all safety-related tasks. The contractor is responsible for implementing all required safety-related codes and contract/subcontract requirements.

The contractor will be fully accountable for safety and health related activities within their purview, including the following activities:

- implementing this procedure (or contractor's own procedure when found acceptable)
- pre-planning work effectively to identify potential hazards and take appropriate steps to control/mitigate/eliminate these hazards
- orienting employees to the plan and Battelle-applicable requirements

- training employees in safe-work practices
- documenting all training on a Training Attendance Record
- providing each employee a place of employment which is as free as possible from recognized hazards that are likely to cause harm
- providing required personal protection equipment (PPE), making sure employees know how to use the equipment and enforcing its use in the field
- monitoring the workplace for unsafe conditions and taking steps to eliminate them
- taking immediate action to correct unsafe conditions, acts, and other deficiencies identified during inspections
- providing a Competent Person to oversee all activities.

All employees shall be responsible for carrying out their assigned work in a safe manner to protect themselves and others from undue hazards and to prevent damage to property and the environment. All employees shall be responsible for the following:

- actively complying with applicable safety standards and reporting promptly to their supervisors any condition which may lead to a violation of these standards or any other unsafe condition
- correcting unsafe conditions (within their ability and authority)
- reporting emergencies and responding to warning signals which may be activated
- reporting all occupational injuries and illnesses immediately to their immediate supervisor.

3.2 Contractor/Subcontractor Responsibilities

The following summarizes the responsibilities of the prime contractor and any subcontractors hired by the contractor in the course of this project.

Contractor Responsibilities:

- Immediately rectify any and all conditions that are found to be unsafe and/or unsanitary.
- Report any unsafe conditions to project personnel according to the Battelle contract.
- A follow-up report shall be issued detailing the action taken to rectify any and all inadequacies.
- Coordination of activities with subcontractors shall take place so work will proceed in accordance with applicable safety requirements.
- Project personnel and contractors shall be notified of any recognized hazards, potential problem areas, and safety requirements.
- Coordination of all pertinent certifications, training, and recordkeeping shall take place and their accessibility for review made available.

Subcontractor Responsibilities:

- Subcontractors shall retain full responsibility for the safety of his/her personnel.
- Review possible safety hazards, construction activities, etc., with his/her personnel.

- Make regular inspections of hand tools and equipment used in all phases of the contractor work activity.
- Immediately correct any safety deficiencies when identified and/or notified.
- Immediately inform the contractor safety representative of any and all unsafe conditions or activities.

Note: There must be an open and continuous line of communication between the contractor and subcontractor to discuss any unsafe acts or conditions that may arise during the project.

3.3 General Requirements

The contractor shall take all reasonable precautions in the performance of work to protect the health and safety of employees, members of the public, environment, and Battelle-owned or operated facilities.

The contractor shall perform the following:

- allocate sufficient resources to implement this safety program and specific contract requirements
- develop, implement, and/or adhere to job safety analyses (JSA's) or other pre-job planning documents
- establish safety flow-down requirements in all subcontracts
- coordinate and plan pre-job planning with subcontractors, field supervisors, and others as required
- conduct a daily walk-around safety inspection and document this inspection
- instruct all employees, initially and periodically, on matters pertaining to employee safety and health rights, protections, obligations, and responsibilities
- designate (in writing) a "Competent Person" in the following areas (as necessary per the contract scope of work):

Ladders	Lead
Excavation/Trenching	Asbestos
Scaffolds	Demolition
Fall Protection	Fire Protection
Safety Monitor	Aerial Lift Trainer
Forklift Trainer/Evaluator	Rigging Evaluator

Safety Requirements

Contractors working at PNNL are expected to take actions that foster a safe working environment.

Each worker has the right, without fear of retaliation, to raise concerns about work-related issues. PNNL will not tolerate retaliation against workers for raising concerns in good faith.

Supervisors must protect staff from harassment, retaliation, or disciplinary action that is based on staff having exercised their safety rights.

The workers are informed of their rights and responsibilities by appropriate means, including access to an appropriate DOE Occupational Safety and Health Protection poster in their workplace (see Section 6.0 below).

Safety Rights

Workers have these rights:

- To obtain their personal records on injury, illness, exposure, and medical documentation.
- To review their company's summary information on injury and illness. This information is available through their supervisor and the OSHA Form 300 summary, which is posted in each building during the month of February.
- To obtain and review their radiological exposure information. This information is available through PNNL Dosimetry Services, Field.
- To be represented during regulatory workplace safety inspections (i.e., inspections by DOE or Washington State Department of Labor and Industries, Division of Occupational Safety and Health). Staff members may contact their managers if they wish to request the name of their staff representative or participate in the workplace inspection as a staff representative.
- To have access to DOE worker protection publications, DOE-prescribed standards, PNNL's own protection standards, and their company's procedures applicable to the workplace. Staff members may contact their supervisor for more information.
- To observe monitoring or measuring of hazardous agents to which the staff member is exposed and have access to the results of their exposure monitoring. Staff members may contact their supervisor for more information.
- To be notified when monitoring results indicate they were overexposed to hazardous materials. Staff members may contact their supervisor for more information.
- To request and receive results of inspections and accident investigations. Staff members may contact their supervisor for more information.
- To stop work immediately, without fear of reprisal, when convinced a situation exists that places themselves, their coworkers, or the environment in danger.
- To address unsafe working conditions by preventing, avoiding, and reporting them.

Safety Responsibilities

Workers have these responsibilities:

- To conduct only those activities that the manager has approved; to use Battelle facilities, equipment, and tools only for the purposes for which they were designed.
- To stop work immediately without fear of retaliation and to notify your manager when you are convinced a situation exists which places you, your coworkers, or the environment in danger.
- To follow technical work documents and consult material safety data sheets associated with the work being done.
- To observe requirements, procedures, instructions, signs, postings, and warning signals.
- To know emergency plans and procedures for your work area.
- To become familiar with potential hazards associated with your work and work area and the measures taken to control the hazards.
- To use the required and appropriate personal protective clothing and equipment.
- To report near-accidents or incidents to your manager before proceeding with the work.
- To report emergencies or work-related accidents, injuries, or illness promptly to your manager.
- To report unsafe conditions and hazards to your manager.
- To be aware of your current exposure status and the applicable control levels and limits. Staff members may contact their supervisor for more information.
- To warn fellow staff members about hazards in your work area and point out the controls that are in place.
- To report noncompliance with ES&H requirements to your supervisor.
- To participate in required medical and biological monitoring programs. Workers may contact their supervisor for more information.

3.4 Safety Bulletin Boards

The contractor is responsible for installing and maintaining a safety bulletin board (when eight or more persons are working at a jobsite) at the location where the majority of employees report to work.

Mobile crews shall be advised of the location of the nearest bulletin board.

Employees shall be responsible for reviewing the bulletin board to keep informed of safety-related information.

Safety bulletin boards shall be sufficient size to display and post safety bulletins, newsletters, posters, accident statistics, and other safety educational material.

At a minimum, the safety bulletin board shall post the following:

- DOE Occupational Safety and Health Poster DOE-F 5480.2
- DOE Occupational Safety and Health Complaint Form 5480.4
- Citations and notices as appropriate
- OSHA 300 form during February 1 to March 1
- Battelle-furnished safety bulletins and publications
- *Your Rights as a Worker* (poster)
- Washington State Industrial Notice for Employee's Form II P242-191-000.

Suggested Items to be posted include the following:

- Safety & Health posters
- minutes of safety meetings
- information on accidents
- hazard communication information
- Lessons Learned.

3.5 Adverse Weather Conditions

To keep workers safe, work or portions of work may be temporarily and incrementally shut down due to high winds, lightning, extreme heat, or other inclement weather as determined by PNNL. The contractor issues the following warnings via radio system, public address announcement, or in person. The contractor shall make sure that subcontractor personnel are apprised of the warnings and take the required actions as stated below.

- Sustained winds greater than 15 mph – crane operation shall be closely evaluated for necessity.
- Sustained winds greater than 25 mph and/or gusts greater than 40 mph – all crane operations must cease and be secured. All loose outdoor materials shall be secured. Work on roofs and elevated surfaces (roof, scaffolds, aerial lift, etc) shall be scrutinized before continuing.
- Sustained winds greater than 50 mph – outdoor activities shall be curtailed and limited to those approved by PNWD and contractor supervision.

Safety guidance for lightning/thunderstorm activity within 30 miles of the Hanford Site: The Hanford Weather Station (373-2716) or the National Weather Service Office (NWSO) located in Pendleton, Oregon (541 276-7832) can be used to detect and locate hazardous weather patterns. Contractor personnel shall not work on roofs or elevated surfaces during these threats. Personnel shall stay away from construction equipment such as drill rigs, cranes, boom trucks, or aerial lifts. Employ the “30-30 Rule” to know when to seek a safer location. The “30-30 Rule” states that when you see lightning, count the time until you hear thunder. If this time is 30 seconds or less, go immediately to a safe location. These protective actions shall remain in place until PNWD or the contractor cancels the warning. Again, the Hanford Weather Station or the NWSO should be used to verify the storm has dissipated or moved on past 30 miles.

4.0 References

29 CFR 1910, Occupational Safety and Health Standards

29 CFR 1926, Safety and Health Regulations for Construction

WAC 296-155, Safety Standards for Construction Work

5.0 Records

Training Attendance Record

Competent Person Designation

6.0 Exhibits

[Job Safety and Health Protection](#) poster (pdf)

[Right to a Safe and Healthful Workplace](#) poster (pdf)

[Worker Protection for DOE Contractor Employees](#) poster (pdf)

7.0 Forms

[Competent Person Designation](#) (Word)

[Training Attendance Record](#) (Word)