



## OSHA: Most Frequently Cited Standards

Each fall, OSHA publishes its list of the top 10 most frequently cited violations of the fiscal year.

The OSHA top ten list reflects federal numbers only. Have you ever wondered how SNL Facilities construction non-compliant observations compare to OSHA's most frequently cited standards?

We pulled the numbers and discovered there are few similarities, although fall protection is in the top five in both cases.

The first table below lists the FY07 top 10 OSHA citations. The second table lists the top 6 Sandia Facilities non-compliant observations for FY07.

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See page 2 for important tips on the upcoming HS-64 audit...



Rank	Top 10 Most Frequently Cited OSHA Standards
1	Scaffolding (29 CFR 1926.451)
2	Fall Protection (29 CFR 1926.501)
3	Hazard Communication (29 CFR 1910.1200)
4	Control of hazardous energy (lockout/tagout), general industry (29 CFR 1910.147)
5	Respiratory protection, general industry (29 CFR 1910.134)
6	Powered industrial trucks, general industry (29 CFR 1910.178)
7	Electrical, wiring methods, components and equipment, general industry (29 CFR 1910.305)
8	Ladders, construction (29 CFR 1926.1053)
9	Machines, general requirements, general industry (29 CFR 1910.212)
10	Electrical systems design, general requirements, general industry (29 CFR 1910.303)

Rank	Top 6 Sandia Facilities Construction Non-Compliant Observations
1	Personal Protective Equipment (29 CFR 1926 Subpart E)
2	Electrical (29 CFR 1926 Subpart A)
3	Tools - Hand and Power (29 CFR 1926 Subpart G)
4	<ul style="list-style-type: none"> <li>General Safety and Health (29 CFR 1926 Subpart C)</li> <li>Signs, Signals and Barricades (29 CFR 1926 Subpart G)</li> </ul>
5	<ul style="list-style-type: none"> <li>Fall Protection (29 CFR 1926 Subpart M)</li> <li>Cranes Derricks, Hoists, Elevators and Conveyors (29 CFR 1926 Subpart N)</li> <li>Stairways and Ladders (29 CFR 1926 Subpart X)</li> </ul>
6	<ul style="list-style-type: none"> <li>Fire Protection and Prevention (29 CFR 1926 Subpart F)</li> <li>Underground Construction, Caissons, Cofferdams and Compressed Air (29 CFR 1926 Subpart S)</li> <li>Demolition (29 CFR 1926 Subpart T)</li> </ul>

### HEAVENLY AUDIT

A construction worker dies in a fishing accident on his 40th birthday and finds himself greeted at the Pearly Gates by a brass band. Saint Peter runs over, shakes his hand and says "Congratulations!"

"Congratulations for what?" asks the construction worker.

"Congratulations for what?" says Saint Peter. "We are celebrating the fact that you lived to be 160 years old."

"But that's not true," says the construction worker. "I only lived to be forty."

"That's impossible," says Saint Peter, "we added up your time sheets."



## Surviving the Audit: HS-64 Inspection Process Tips

The HS-64 audit is fast approaching. Between January 28 and February 8, 2008, Department of Energy Office of Environmental, Safety and Health Evaluations Inspectors (HS-Inspectors) will evaluate Sandia's Construction Program and Activities for Integration of ES&H into work planning and execution, primarily through observing work activities.

### The HS-Inspectors

Who are these HS-Inspectors and what will they be looking for? The inspection team will be made up of qualified technical ES&H subject matter experts who have inspected Construction Activities at DOE sites around the country. Some of the HS-Inspectors may have participated in previous inspections at Sandia.

The HS-Inspectors will observe and evaluate work at Sandia, identifying strengths and weaknesses. As they observe, they will be looking for answers to the following questions:

- Are requirements in the Sandia contract with DOE being flowed down to all of the construction contracts and subcontracts?
- Is there evidence that flowed requirements are being followed in the field consistently?
- Is the work performed in an organized manner?
- Does the observed process meet the intent of requirements?
- Are work areas safe?
- Are workers trained and qualified to do their work?
- Have PPE requirements been properly identified for individual tasks and is the correct PPE being used?

Contrary to popular belief, the HS-Inspectors are not out to get you. They do not want to find things wrong or make you look bad. Their goal is to help improve Sandia's systems and processes so that any

work done at Sandia will be accomplished safely and successfully. They are not enforcers; they are contributors to Sandia's continuous improvement, deserving of the same respect from you that you expect from them.

### Be Prepared!

The best way to be prepared for the audit is to take a good hard look at the work you do at Sandia and ask yourself the following question:

Are we meeting all of the requirements in our contract, Company ES&H programs, processes and Safety Plan? If yes, how do you know the answer is yes?

Some more specific things to look at:

- Are all documents required to be on site actually on site?
- Is training current and are records in order?
- Are your workspaces clean and orderly?
- Is all PPE and equipment in good order?
- Are superintendent observations in order?
- Are Material Safety Data Sheets on site?
- Are all product containers labeled?
- Do all workers know what to do in an emergency?

### What to Expect

An SNL counterpart will accompany an HS-Inspector on an inspection. It's a good idea to have a manager or ES&H representative present for support and assistance and appropriate workers/supervisors present to answer questions. Examples of questions you may be asked, along with appropriate responses, are as follows:

Q. Who authorizes your work?

A. The person who authorizes your work is your immediate supervisor or manager.

Q. Is there a technical work document that identifies hazards?

A. There are several documents that identify hazards, including JSHEs, permits, your daily pre-task planning meetings, etc. **If asked for a document, allow the HS-inspector to review anything they wish to examine on site, but do not release anything to the HS-Inspector directly, Sandia will transmit any documents requested by the HS-Inspectors formally. Ask the Sandia Counterpart or your Inspector for help.**

Once you are face to face with an HS-Inspector:

- Be relaxed and candid
- Be specific and factual
- Answer only the questions asked, with no unnecessary elaboration
- Ask for clarification if a question is unclear; if you don't know the answer, tell the HS-Inspector you will get back to him/her with the requested information
- Be aware of your body language and facial expressions
- Don't argue
- Don't appear arrogant or indifferent
- Cooperate with the HS-Inspectors to the best of your ability

Remember, the HS-Inspectors are here to help, so cooperate as much as possible, but it is your worksite and safety comes first! The HS-Inspectors expect you to enforce your normal visitor requirements such as sign in, hard hat, safety shoes, etc. Although it is not meant to be, the inspection process can be intimidating. If you believe that the inspection process is impacting safe operations, you have the authority and obligation to stop work.

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