

*U.S. NUCLEAR REGULATORY COMMISSION*

***DIRECTIVE TRANSMITTAL***

TN: DT-02-02

**To:** NRC Management Directives Custodians

**Subject:** Transmittal of Directive 10,130, "Safety and Health Program Under the Occupational Safety and Health Act"

**Purpose:** Directive and Handbook 10.130 have been revised to add the hazardous waste disposal program and hazard communication program, and make necessary changes to the respiratory protection program to ensure compliance with the Occupational Safety and Health Act.

**Office and Division of Origin:** Office of Human Resources

**Contact:** Randall Brown, 415-7111

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**Volume:** 10 Personnel Management

**Part:** 5 Benefits, Health Services, and Employee Safety

**Directive:** 10.130 Safety and Health Program Under the Occupational Safety and Health Act

**Availability:** Rules and Directives Branch  
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***Safety and Health Program  
Under the Occupational  
Safety and Health Act***

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***Directive  
10.130***

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# U. S. Nuclear Regulatory Commission

Volume: 10 Personnel Management

Part: 5 Benefits, Health Services, and Employee  
Safety

HR

## Safety and Health Program Under the Occupational Safety and Health Act Directive 10.130

### Policy

(10.130-01)

- It is the policy of the U.S. Nuclear Regulatory Commission to establish and manage an occupational safety, health, and environmental program as required by Section 19 of the Occupational Safety and Health Act of 1970 (29 U.S.C. 668 et seq.); Executive Order 12196, "Occupational Safety and Health Programs for Federal Employees"; Title 29 of the *Code of Federal Regulations*, Part 1960 (29 CFR 1960), "Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters"; and the environmental hazardous waste disposal program in accordance with the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6922 and 6924; 40 CFR, "Protection of Environment," Parts 260-266, 268, 270-271, and 273; and Code of Maryland Regulations (COMAR) 26.13.03.05E and 26.13.02.05. It is also NRC policy to establish and maintain occupant emergency plans, hereafter referred to as the emergency protection plan (EPP), as required by the "Federal Property Management Regulations" (FPMR) of 41 CFR 101-20.103-4. (011)
- The NRC policies in this directive and handbook are limited to nonradiological hazards. Requirements to protect NRC employees from radiological hazards are included in Management Directive (MD) 10.131, "Protection of NRC Employees Against Ionizing Radiation." (012)

### Objectives

(10.130-02)

- To provide work places and conditions of employment for NRC employees that are free from recognized hazards that are likely to cause injuries or illnesses. (021)

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## **Objectives**

(10.130–02) (continued)

- To ensure compliance with standards issued under Section 6 of the Occupational Safety and Health Act of 1970 (29 U.S.C. 655). (022)
- To ensure prompt abatement of unsafe or unhealthful working conditions or development of abatement plans that include a timetable for abatement and interim protective measures for employees affected. (023)
- To ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition. (024)

## **Organizational Responsibilities and Delegations of Authority**

(10.130–03)

### **Executive Director for Operations (EDO)**

(031)

Provides oversight of NRC's occupational safety and health program.

### **Deputy Executive Director for Management Services (DEDM)**

(032)

Provides general direction on issues involving NRC's occupational safety and health program.

### **Chief Information Officer (CIO)**

(033)

Establishes a written hazard communication program for the Publishing Services Branch, Office of the CIO, which must comply with the policies of this directive, and submits a copy of the program to the Agency Safety and Health Program Manager, HR. (For the content of a minimally acceptable program, see Section 10.130-06 of this directive.)

### **Director, Office of Human Resources (HR)**

(034)

- Serves as NRC's Designated Agency Safety and Health Official. (a)

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**Director, Office of Human Resources (HR)**  
(034) (continued)

- Implements the provisions of the Occupational Safety and Health Act, Executive Order 12196, and 29 CFR Part 1960. (b)
- Reports serious accidents to the area office of the Occupational Safety and Health Administration nearest to the site of the accident, as required by 29 CFR 1960.70. (c)
- Adopts standards consistent with those promulgated by the Secretary of Labor; establishes procedures for the adoption of any NRC occupational safety and health standard, including different and/or supplementary NRC standards and emergency standards. (d)
- Establishes NRC occupational safety and health policies. (e)
- Provides guidance and oversight on hazardous waste disposal in accordance with the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. 6922 and 6924; 40 CFR 260-266, 268, 270-271, and 273; and Code of Maryland Regulations (COMAR) 26.13.03.05E and 26.13.02.05. (f)
- Informs employees of the NRC safety and health programs and of protection afforded employees under the programs. (g)
- Appoints the Agency Safety and Health Program Manager. The Agency Safety and Health Program Manager ensures that a collateral duty officer is designated for the Technical Training Center. (h)

**Director, Office of Administration (ADM)**  
(035)

- Develops and implements the EPP, as required by the FPMR (41 CFR 101-20.103-4 and 103-5, "Occupant Emergency Program"), including training to perform the functions of the plan. Provides assistance to regional offices in the development of their EPP. (a)
- Establishes written Hazardous Waste Disposal procedures for headquarters' buildings. (b)
- Appoints, in writing, a designated official for each building at NRC headquarters responsible for all Federal employees in that building. (c)

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**Director, Office of Administration (ADM)**  
(035) (continued)

- Acts as the liaison between the designated officials and the local fire marshall's office in the preparation and approval of the EPP. (d)
- Notifies the Agency Safety and Health Program Manager and maintains documentation on all fire-related incidents. (e)
- Coordinates scheduling and execution of fire drills for headquarters' buildings. (f)
- Establishes a written hazard communication program for headquarters' buildings and the NRC warehouse, which must comply with the policies of this directive, and submits a copy of the program to the Agency Safety and Health Program Manager. (For the content of a minimally acceptable program, see Section 10.130-06 of this directive.) (g)

**Regional Administrators**  
(036)

- Establish, in cooperation with the Agency Safety and Health Program Manager, occupational safety and health programs that are consistent with the NRC occupational safety and health program guidelines, insofar as the mission, size, and organization of each region permits. (a)
- Establish written Hazardous Waste Disposal procedures for regional buildings. (b)
- Designate a collateral duty safety and health officer to be responsible for the management of each region's program and to ensure compliance with the provisions of this directive and handbook. (Dissemination of this designation shall be in compliance with 29 CFR 1960.12.) (c)
- Appoint, in writing, a designated official for the region, if necessary. (d)
- Establish a hazard communication program, a respiratory protection program (or a written policy that prohibits inspectors from entering areas that require respiratory protection for nonradiological hazards), and a laboratory safety program to comply with the policies of this directive and submit a copy of each of these programs to the Agency Safety and Health Program

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**Regional Administrators**  
(036) (continued)

Manager. (For the content of a minimally acceptable program for each, see Section 10.130-06 of this directive.) (e)

- Provide information regarding the proper use of safety equipment. (f)
- Establish an occupational safety and health committee within each region in compliance with 29 CFR Part 1960, Subpart F, "Occupational Safety and Health Committees." (g)
- Develop and implement the EPP in each region, as required in the FPMR, including training to perform the functions of the plan. (h)

**Office Directors and Supervisors at All Levels**  
(037)

- To the extent of their authority, provide employees a workplace that is free from recognized hazards that could cause death or serious physical harm. (a)
- Ensure the safety of employees under their supervision by identifying hazardous conditions, informing employees of them, and correcting the conditions as promptly as possible. (b)
- Ensure that hazardous waste is disposed of according to established procedures. (c)
- Inform employees of the NRC occupational safety and health program and of protection afforded employees under the program. (d)
- Provide active and aggressive leadership for overall safety of operations. (e)
- Give prompt attention to employee reports of alleged unsafe or unhealthful working conditions and request assistance from the Agency Safety and Health Program Manager and the collateral duty safety and health officers, when necessary. (f)
- Investigate promptly all accidents occurring in workplaces under their jurisdiction, and submit accurate and timely accident reports. (g)
- Provide special protective clothing and/or equipment and require their use, when necessary, to protect employees from identified hazards that cannot be eliminated. (h)



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**Office Directors and Supervisors at All Levels  
(037) (continued)**

- Ensure employee compliance with the occupational safety and health standards applicable to the activity being performed and with all rules, regulations, and orders issued with respect to the NRC occupational safety and health program. (i)
- Ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition. (j)
- Post notices of hazards in the immediate work area (see Handbook 10.130, Part III(B)(2)). (k)
- Cooperate fully with the appointed designated official in developing, maintaining, and implementing the occupant emergency plan, including staffing and making employees available for training. (l)
- Office directors who have site inspectors shall establish a written respiratory protection program (or a written policy that prohibits inspectors from entering areas that require respiratory protection for nonradiological hazards) that must comply with the policies of this directive. Submit a copy of this program to the Agency Safety and Health Program Manager. (For the content of a minimally acceptable program, see Section 10.130-06 of this directive.) (m)

**Applicability  
(10.130-04)**

The policy and guidance in this directive and handbook apply to all NRC employees.

- Bargaining unit employees also are governed by the collective bargaining agreement. Where provisions of the collective bargaining agreement are in conflict with this directive, the provisions of the agreement apply. (041)
- NRC employees who work in establishments of private employers are covered by the NRC occupational safety and health program. Although the NRC may not have the authority to require abatement of hazardous conditions in a private-sector workplace, safe and healthful working conditions for the NRC employee must be ensured. This task will be accomplished by administrative controls, personal protective equipment, or withdrawal of the NRC

## **Applicability**

(10.130–04) (continued)

employees from the private-sector facility to the extent necessary to protect them. (042)

- While Section 19 of the Occupational Safety and Health Act of 1970 provides for safe and healthful working conditions for Federal employees, it does not cover employees of private contractors. They are covered under other provisions of the act. (043)

## **Handbook**

(10.130–05)

Handbook 10.130 contains procedures and guidelines for personnel who administer and are affected by the NRC occupational safety and health program.

## **Specific Program Content**

(10.130–06)

**A written hazard communication program.** A minimally acceptable program consists of—(061)

- A list of all hazardous materials used in the workplace (a)
- Procedures to collect and maintain material safety data sheets (b)
- Procedures to ensure that all containers are properly labeled according to content and that methods are in place for training and informing employees of hazardous material information (c)
- Procedures for safely conducting nonstandard work practices (d)
- Procedures to ensure that contractors and other persons not employed by NRC are informed of the hazardous materials in the workplace (e)

**A written respiratory protection program.** A minimally acceptable program consists of standard operating procedures governing the selection, use, and maintenance of respirators. [Note: This requirement is not applicable when NRC uses licensee respiratory protection programs in lieu of a formal written NRC program; however, the provision still applies to any nonradiological tasks requiring the use of a respirator.] (062)

## **Specific Program Content**

(10.130–06) (continued)

**A written laboratory safety program.** A minimally acceptable program consists of written standard operating procedures governing the storage, handling, and use of all hazardous materials, equipment, and instruments that are used in NRC laboratories. (063)

## **Reporting**

(10.130–07)

Employees have the right to report unsafe and unhealthful working conditions to their supervisor, their appropriate director, administrator, the Agency Safety and Health Program Manager, the collateral duty safety and health officer, the Designated Agency Safety and Health Official, or a union representative, without fear of restraint, interference, coercion, discrimination, or reprisal. Reporting requirements are contained in Handbook 10.130, Part III(C).

## **References**

(10.130–08)

Americans With Disabilities Act of 1990 (42 U.S.C. 12101 et seq.).

Architectural Barriers Act of 1968 (42 U.S.C. 4151 et seq.).

Federal Employees Compensation Act (FECA) (5 U.S.C. 8101 et seq.).

Occupational Safety and Health Act of 1970 (29 U.S.C. 651 et seq.).

Protective Clothing and Equipment (5 U.S.C. 7903).

Rehabilitation Act of 1973, Section 504 (29 U.S.C. 794).

Resource Conservation and Recovery Act (42 U.S.C. 6922 and 6924).

Safety Programs (5 U.S.C. 7902).

*Code of Federal Regulations*, “Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters,” 29 CFR Part 1960.

## References

(10.130–08) (continued)

—, “Federal Employees Compensation Act,” 20 CFR Subchapter B.

—, “Federal Property Management Regulations (FPMR),”  
41 CFR 101-19.6, Appendix A (Uniform Federal Accessibility  
Standards).

—, FPMR, 41 CFR 101-20.103-4 and 103-5.

—, 40 CFR, “Protection of Environment,” Parts 260-266, 268, 270-271,  
and 273.

Code of Maryland Regulations (COMAR), 26.13.03.05E and  
26.13.02.05.

Executive Order 12196, “Occupational Safety and Health Programs for  
Federal Employees,” February 26, 1980 (45 FR 12769).

— 12566, “Safety Belt Use Requirements for Federal Employees,”  
September 26, 1986 (51 FR 34575).

NRC Emergency Protection Plan, October 1999, or current document.

NRC Management Directives—

7.1, “Tort Claims Against the United States.”

10.101, “Employee Grievances.”

10.131, “Protection of NRC Employees Against Ionizing  
Radiation.”

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***Handbook  
10.130***

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**Exhibit**

OSHA Form 200, U.S. Department of Labor, “Log and Summary  
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## Part I Standards

### General (A)

Section 19 of the Occupational Safety and Health Act of 1970 contains provisions to ensure safe and healthful working conditions for Federal employees. Each Federal agency is responsible for establishing and maintaining an effective and comprehensive occupational safety and health program consistent with the standards promulgated under Section 6 of the act. The Secretary of Labor issued 29 CFR Part 1960, “Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters,” to provide the basic guidance for these programs. (1)

Although agencies are required to establish and maintain a program in accordance with 29 CFR Part 1960, there are provisions that permit agencies the flexibility needed to implement their programs in a manner consistent with their respective missions, sizes, and organizational structure. Moreover, an agency may request the Secretary of Labor to consider approval of alternate program elements. Therefore, standards are considered consistent if they provide protection to employees that is at least as effective as the protection provided by the Occupational Safety and Health Administration (OSHA) standards. (2)

### NRC Occupational Safety and Health Standards (B)

The following standards, codes, and criteria documents have been adopted for the protection of NRC employees:

- American Conference of Governmental Industrial Hygienists (ACGIH), Threshold Limit Values and Biological Exposure Indices (latest edition).

## **NRC Occupational Safety and Health Standards (B) (continued)**

- American National Standard Institute (ANSI) Standard for Personal Protection-Protective Footwear Protection, ANSI Z41-1991.
- American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE) Handbook of Fundamentals (latest edition), New York.
- Americans With Disabilities Act (ADA) (42 U.S.C. 12101 et seq.).
- ANSI Standard Practice for Occupational and Educational Eye and Face Protection, ANSI Z87.1-1989.
- ANSI/ASME Safety Code for Elevators and Escalators, A17.1.
- Architectural Barriers Act of 1968 (42 U.S.C. 4151 et seq.).
- Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters; Final Rule, 29 CFR Part 1960.
- BOCA National Building Code, Building Officials and Code Administrators (BOCA) International, Inc. (latest edition).
- Code of Maryland Regulations (COMAR) 26.13.03.05E and 26.13.02.05.
- Fire Protection Engineering Manual, U.S. General Services Administration (GSA) PBS-P-3430.1A.
- General Industry Codes (applicable portions), 29 CFR Part 1910.
- GSA Occupational Safety and Health Program, ADM-P-5940.1.
- Illuminating Engineering Society of North America, IES Lighting Handbook (latest edition), New York.
- National Fire Protection Association (NFPA) Codes and Standards.
- Protection of Environment, 40 CFR Parts 260-266, 268, 270, 271, 273.
- Protective Headwear for Industrial Workers Requirements, ANSI Z89.1-1986.

## **NRC Occupational Safety and Health Standards (B) (continued)**

- Rehabilitation Act of 1973 (29 U.S.C. 791 et seq.).
- Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6922 and 6924.
- Safety and Health Regulations for Construction, 29 CFR Part 1926.
- Standard Building Code, Southern Building Code International, Inc. (SBCCI) (latest edition).
- Uniform Building Code, International Conference of Building Officials (latest edition).
- Uniform Federal Accessibility Standards.
- U.S. Army Corps of Engineers Safety and Health Requirements Manual, EM385-1-1.

## **Adoption of Alternate and/or Supplementary Standards (C)**

The NRC may adopt such alternate or supplemental standards as have been determined necessary and appropriate for specialized application to particular working conditions and other related needs of the agency. The drafts of standards that are in the developmental process, as well as existing standards that are being considered for adoption, shall be sent to NRC office directors for comment and concurrence. Additionally, the drafts shall be sent to the safety and health committees at all NRC operating locations for comments. (1)

### **Alternate Standards (a)**

A request for an alternate standard shall be communicated in writing to the NRC Designated Agency Safety and Health Official (DASHO). The request shall include the standard to be replaced, the standard proposed, and the particular working conditions or other related needs to be covered. (i)

The alternate standard shall be consistent with the equivalent OSHA standard in accordance with the provisions of 29 CFR Part 1960. The DASHO shall notify the Secretary of Labor and request approval of the alternate standard. (ii)

## **Adoption of Alternate and/or Supplementary Standards (C) (continued)**

### **Supplementary Standards (b)**

The NRC may adopt a supplementary standard, as necessary and appropriate, for application to working conditions of NRC employees for which there exists no appropriate OSHA standard. A request for a supplementary standard shall be communicated in writing to the NRC DASHO. The request shall include a complete description of the particular condition not covered by an OSHA standard and the standard proposed for adoption. (i)

The NRC DASHO, or his or her representative, shall consult with employees and the occupational safety and health committees and the Secretary of Labor before adoption of the standard. (ii)

Revisions, modifications, or revocations of NRC standards by the NRC DASHO, or his or her representative, will be coordinated following the procedures in Section (C)(1) above. (2)

## **Conflicting Standards (D)**

When NRC employees engage in joint operations with other agencies, and/or primarily report to work or carry out operations in the same establishment with other agencies, the NRC DASHO, or his or her representative, shall arrange consultation between the agencies involved, and with the Secretary of Labor, to resolve any conflict between the occupational safety and health standards of the involved agencies. (1)

When the NRC occupational safety and health standards may conflict with another Federal authority's occupational safety and health standards, the NRC DASHO, or his or her representative, shall inform the head of the other Federal authority and the Secretary of Labor of such conflict so that joint efforts to resolve the conflict may be undertaken. However, until such conflicts are resolved, employees will be protected by whichever standard gives the most protection. (2)

## **Emergency Standards (E)**

In the event the Secretary of Labor promulgates an emergency temporary occupational safety and health standard to protect employees from serious hazards, the NRC DASHO, or his or her representative, may adopt the standard without change if it is applicable. The NRC official should immediately make sure that agency employees exposed to the unsafe or unhealthful working condition receive the protection provided for in the standard. The standard should remain effective as an NRC standard until such time as the Secretary of Labor promulgates a permanent standard and the NRC completes the process to adopt a permanent standard. (1)

The NRC DASHO, or his or her representative, also may adopt emergency temporary occupational safety and health standards when he or she deems such action necessary for the protection of NRC employees from serious danger. The NRC official shall immediately inform the Secretary of Labor of such action. (2)

## **Reference Copies (F)**

Copies of standards that have been adopted for protection of employees can be found in the NRC library or the regional offices.

## **Part II**

# **The Program**

### **Purpose (A)**

The NRC occupational safety and health program implements the provisions of the Occupational Safety and Health Act, Executive Order 12196, and 29 CFR Part 1960. The program is designed to—

- Investigate reports of unsafe or unhealthful working conditions (1)
- Meet recordkeeping and reporting requirements of the Occupational Safety and Health Administration (OSHA) (2)
- Coordinate and evaluate safety and health activities (3)
- Meet education, training, and promotion requirements of OSHA and the NRC occupational safety and health program under the Occupational Safety and Health Act (4)

### **The Agency Safety and Health Program Manager (B)**

The Agency Safety and Health Program Manager, as the representative of the Designated Agency Safety and Health Official (DASHO), manages and administers the NRC occupational safety and health program under the Occupational Safety and Health Act, including the evaluation of the regional safety and health programs as required by 29 CFR 1960.8(c). The program manager also—

- Provides necessary direction and support to collateral duty safety and health officers located in the regional offices and the Technical Training Center (TTC), as well as in the headquarters' buildings (1)
- Establishes a management information system to carry out the recordkeeping and reporting duties of the program (2)

## **The Agency Safety and Health Program Manager (B) (continued)**

- Arranges for periodic announced or unannounced inspections of headquarters, the TTC, and regional offices workplaces, including evaluation of the state of readiness of the employee protection plan and organization for each building, and recommends corrective action, when necessary (3)
- Assesses NRC occupational safety and health training needs, develops training requirements, and coordinates course development through the Office of Human Resources Organizational Development and Training component (4)
- Develops and submits reports to the Office of Federal Agency Programs, except for reports of serious accidents (those resulting in the death or hospitalization of the employee), which are developed and submitted by the Chairman of the Nuclear Regulatory Commission, or designee, pursuant to 29 CFR 1960.70 (5)
- Implements program requirements published by the Secretary of Labor in accordance with the mission, size, and organization of NRC (6)
- Provides liaison with the Department of Labor, the Occupational Safety and Health Administration, the Federal Advisory Council on Occupational Safety and Health, the Federal Safety and Health Council, and private and public safety and health organizations, as required by the program (7)
- Establishes a headquarters occupational safety and health committee (8)
- Evaluates the performance of the employee protection plan teams during scheduled fire drills (9)
- Sponsors an annual counterparts meeting for all NRC collateral duty safety and health officers to discuss safety and health matters, resolve problems, and provide to the DASHO minutes reflecting results of the meeting (10)
- Oversees NRC's hazardous materials disposal program (11)

## **The Collateral Duty Safety and Health Officers (C)**

In cooperation with the Agency Safety and Health Program Manager, each region and the TTC has a collateral duty safety and health officer who manages and administers the NRC occupational safety and health program within each region. The collateral duty officer for each region—

- Acts on reports of hazards or alleged hazards, maintaining confidentiality when requested and correcting hazardous conditions when discovered (1)
- Establishes and maintains a management information system to provide the necessary reports to the Agency Safety and Health Program Manager (2)
- Arranges for periodic unannounced inspections of workplaces in his or her respective region, including evaluation of the employee protection plan and organization, and recommends corrective action, when necessary (3)
- Coordinates safety and health training for employees in his or her respective region (4)
- Acts as liaison with Field Federal Safety and Health Councils (5)

## **Joint Labor-Management Occupational Safety and Health Committees (D)**

Joint Labor-Management Occupational Safety and Health Committees, composed of equal numbers of management and nonmanagement (i.e., bargaining unit members) NRC employees, shall be established in each region, the TTC, and at NRC headquarters to (a) monitor and assist the NRC safety and health program, (b) assist NRC to maintain an open channel of communication between employees and management concerning safety and health matters in NRC workplaces, and (c) provide a method by which employees can utilize their knowledge of workplace operations to assist NRC



## **Joint Labor-Management Occupational Safety and Health Committees (D) (continued)**

management to improve policies, conditions, and practices. [Note: Management and labor also may (in lieu of a committee) operate in a less formal manner to carry out the goals and objectives of the safety and health program. However, if the parties choose to have a formal committee, it shall function as stated.]

Regional committees shall—(1)

- Monitor and assist the safety and health program at establishments under their jurisdiction and make recommendations on the operation of the program to the official in charge (a)
- Monitor findings and reports of workplace inspection to confirm that appropriate corrective measures are implemented (b)
- When requested, or when the committee deems it necessary, participate in inspections of the establishment (c)
- Review internal and external evaluation reports and make recommendations concerning the establishment's safety and health program (d)
- Review and recommend changes, as appropriate, to procedures for handling safety and health suggestions and recommendations from employees (e)
- When requested, or when the committee deems it necessary, comment on proposed standards (f)
- Monitor and recommend changes, as required, in the level of resources allocated and spent on the regional safety and health program (g)
- Review NRC responses to reports of hazardous conditions, safety and health program deficiencies, and allegations of reprisal (h)
- Report their dissatisfaction to the Secretary of Labor if half the members of record determine that management has failed to correct safety and health program deficiencies in a timely or effective manner or if management has failed to investigate and resolve reports of reprisal (i)

## **Joint Labor-Management Occupational Safety and Health Committees (D) (continued)**

- Request the Secretary of Labor to conduct an evaluation or inspection if half the members of record are not satisfied with the NRC response to a report of hazardous working conditions (j)

The headquarters committee, in addition to those duties previously listed, as they relate to headquarters, shall—(2)

- Monitor performance of the NRC safety and health program and make policy recommendations on the operation of the program to the NRC DASHO (a)
- Monitor and assist in the development and operation of the NRC regional committees (b)
- Monitor and review—(c)
  - Reports of inspections (i)
  - Internal and external evaluation reports (ii)
  - NRC safety and health training programs (iii)
  - Proposed agency standards (iv)
  - NRC plans for abating hazards (v)
  - NRC responses to reports of hazardous conditions (vi)
  - NRC safety and health program deficiencies (vii)
  - Allegations of reprisal (viii)
- Monitor and recommend changes in the resources allocated to the entire agency safety and health program (d)
- Report their dissatisfaction to the Secretary of Labor if half the members of record determine that management has failed to correct safety and health program deficiencies in a timely or effective manner or if management has failed to investigate and resolve reports of reprisal (e)
- Request the Secretary of Labor to conduct an evaluation or inspection if half the members of record are not satisfied with an NRC response to a report of hazardous working conditions (f)

## **Employees (E)**

NRC employees shall—

- Comply with the standards, rules, regulations, procedures, and orders issued by the NRC that are applicable to their own actions and conduct (1)
- Use safety and personal protective equipment and other devices provided and/or directed by NRC that are necessary for protection (2)
- Use correct, safe procedures in all official activities (3)
- Report observed hazards to either a supervisor, a union representative, or a safety official (4)
- Promptly carry out any assigned emergency responsibilities when an emergency is declared (5)
- In the absence of assigned emergency responsibilities, evacuate the building expeditiously when the fire alarm system is activated (6)

## **Part III**

# **Safety and Health Inspections, Abatement, and Hazard Reporting**

### **Inspections (A)**

The primary purpose of the safety and health inspection program is to ensure safe working conditions and practices for NRC employees at headquarters and all regional locations through the early detection and abatement of unsafe practices and/or working conditions. This requirement excludes private establishments. (1)

The responsible collateral duty safety and health officer, or designee, and/or, if appropriate, the Agency Safety and Health Program Manager will conduct unannounced inspections of all workplaces under their jurisdiction at least once annually. Workplaces where there is an increased risk of accidents, injury, or illness will be inspected more frequently. (2)

Inspections shall be performed at reasonable times, during normal business hours, and shall not disrupt normal operations. No advance notice will be given to the person in charge of the area or establishment to be inspected. (3)

Safety and health officers, serving in their capacity as inspectors, shall—(4)

- Examine accident, injury, and illness reports to assist in identifying potentially unsafe and unhealthful workplaces (a)
- Ensure that environmental samples and photographs are taken, if necessary (b)
- Question employees at the workplace, if appropriate (c)

## **Inspections (A) (continued)**

- Comply with all safety and health regulations at the workplace being inspected (d)
- Report items not in compliance with standards to the supervisor responsible for the work area (e)
- Make recommendations on corrective measures to be taken by the supervisor of the particular work area (f)
- Ensure that the responsible director provides to the NRC Designated Agency Safety and Health Official's (DASHO's) representative, or his or her representative, a plan for abatement of any unsafe or unhealthful condition within 15 workdays of receipt of the findings of the inspection (g)
- Conduct unannounced followup inspection(s) to ensure that abatement of hazardous conditions has been accomplished (h)

The supervisor in charge of the work area being inspected and an employee representative may accompany the inspector and bring to his or her attention possible unsafe or unhealthful conditions. (5)

## **Hazard Abatement (B)**

The functional manager in charge of an operation is responsible for initiating the action required to correct unsafe or unhealthful working conditions brought to his or her attention. He or she shall also ensure that employees are not exposed to undue risk of injury or illness during the period required to abate the hazard. Abatement must be accomplished through normal administrative channels when practicable. (1)

The responsible supervisor will post a notice of hazards in the immediate work area. Extracts of inspection surveys and hazard reports may be posted on NRC Form 219, "Notice of Unsafe or Unhealthful Working Conditions" (access this form through the WordPerfect [WP] Informs icon). Notices shall not be removed for 3 workdays or until the hazard has been abated, whichever is later. (2)

If a situation exists that could reasonably be expected to cause death or serious physical injury, the immediate supervisor must take appropriate action to protect all affected employees. If immediate

## **Hazard Abatement (B) (continued)**

abatement of the hazard is not possible, contact the NRC DASHO or the appropriate regional administrator for assistance. (3)

## **Hazard Reporting (C)**

Many safety and health problems can be eliminated as soon as they are identified and brought to the attention of the supervisor. However, an employee does not have to await the outcome of an oral report before filing a written report. The oral or written reports are not intended to interfere in any way with the prior, simultaneous, or subsequent use by any employee of any established grievance procedures or collective bargaining agreements as means of requesting corrections of alleged unsafe or unhealthful working conditions. (1)

An employee may orally identify any hazard to his or her supervisor, who will immediately examine the condition and initiate corrective action. (2)

Any employee or employee representative (i.e., National Treasury Employees Union steward, a supervisor, or another coworker) may request an inspection of the workplace if he or she believes that an unsafe or unhealthful working condition exists. The report should—(3)

- Be in writing on NRC Form 14, “Report of Safety or Health Hazard” (access this form through the WP Informs icon) (a)
- Give particular grounds for the report (b)
- Be signed by the person making the report (c)
- Be addressed to the NRC DASHO, or his or her representative, or to the appropriate regional administrator. A copy of the report should be sent to the appropriate safety and health committee. (d)

An inspection will be conducted within 24 hours for conditions of imminent danger, within 3 working days for potentially serious conditions, and within 20 working days for other than serious safety and health conditions. (4)

## **Hazard Reporting (C) (continued)**

When anonymity is requested, the name of the person making the report or the names of individual employees referred to in the request will not be disclosed to anyone other than authorized representatives of the Secretary of Labor, or to the inspector, if he or she cannot locate the alleged condition without assistance from the person making the report. (5)

Any employee who filed a report of an unsafe or unhealthful condition and is not satisfied with the NRC's final disposition may contact the Office of Federal Agency Safety Programs, U.S. Department of Labor. The contact must—(6)

- Be in writing (a)
- Describe in detail the entire processing of the report of the unsafe or unhealthful condition (b)
- Set forth the objections thereto (c)
- Include a copy of the letter for the NRC DASHO or regional administrator, as appropriate (d)

## **Part IV**

### **Allegations of Reprisal**

The NRC has established procedures to ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition, or other participation in the NRC occupational safety and health program activities, or because of the exercise by such employee on behalf of himself or herself or others of any right afforded by Section 19 of the Occupational Safety and Health Act, Executive Order 12196, or 29 CFR Part 1960. (A)

These rights include, among others, the right of an employee to decline to perform his or her assigned task because of a reasonable belief that under the circumstances the task poses an imminent risk of death or serious bodily harm, coupled with a reasonable belief that there is insufficient time to seek effective redress through normal hazard reporting and abatement procedures established in accordance with 29 CFR Part 1960. (B)

The NRC Designated Agency Safety and Health Official, or his or her representative, shall keep the appropriate occupational safety and health committee advised of agency activity regarding allegations of reprisal and any agency determinations thereof. Copies of reprisal investigation findings shall be provided to the Secretary of Labor and to the appropriate safety and health committee. (C)

Grievance procedures for those employees who believe they have been subjected to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition are contained in Management Directive 10.101, "Employee Grievances," and in the Collective Bargaining Agreement, as appropriate. (D)



## Part V

# Education and Training

### Objectives (A)

An aggressive, formal safety and health education and training program is the process for communicating knowledge and skills in safe practices. This process includes on-the-job training as well as other types of more formal instruction, as appropriate, and presents both facts and underlying principles. The two primary objectives follow.

#### **Informing Employees About Workplace Hazards and Individual Responsibilities (1)**

The first objective is to provide information through education and training that is tailored for the level of responsibility addressed. When a new standard is issued that affects NRC employees, directors and key staff members need to be informed of its principal contents, the reasons for its issuance, ways in which the agency will be affected, and who is going to take action on it. In turn, intermediate management, supervisors, and employees need to know exactly what is required of them. Specifically, the Occupational Safety and Health Act requires that training information must be provided periodically for the following categories of personnel:

- Office directors, regional administrators, and above (a)
- Managers and supervisors (b)
- Safety and health specialists (c)
- Safety and health inspectors (d)
- Collateral duty safety and health personnel and committee members (e)
- Employees and employee representatives (f)

## **Objectives (A) (continued)**

### **Keeping the Agency Safety and Health Program Manager and Collateral Duty Safety Officers Current (2)**

The second objective of the education and training program is to make available to the occupational safety and health personnel the means of keeping abreast of developments in their specialties and increasing their professional competence. Short courses such as those sponsored by the National Institute for Occupational Safety and Health, the Occupational Safety and Health Administration, and educational institutions also are recommended. Refresher or advanced training courses should be provided in accordance with a plan of professional development to be coordinated with the staff members and the immediate professional supervisor.

## **Methods (B)**

The education and training program shall consist of an awareness of this directive and handbook and the following elements, as a minimum:

### **Regional Administrators, Office Directors, and Above (1)**

Upper management shall be provided with appropriate orientation and learning experiences to enable them to provide knowledgeable support to the NRC Occupational Safety and Health Program. Such orientation must include—

- Section 19 of the Occupational Safety and Health Act (a)
- Executive Order 12196 (b)
- Requirements of 29 CFR Part 1960, Subpart H, “Training” (c)

### **Managers and Supervisors (2)**

All supervisors must be provided with occupational safety and health training material that includes—

- An explanation of supervisory responsibility for providing and maintaining a safe workplace (a)
- Section 19 of the Occupational Safety and Health Act (b)

## **Methods (B) (continued)**

### **Managers and Supervisors (2) (continued)**

- Executive Order 12196 (c)
- Requirements of 29 CFR Part 1960, Subpart H, “Training” (d)
- Generally applicable occupational safety and health standards (e)
- Other appropriate rules and regulations (f)
  - Introductory and specialized courses and materials in hazard recognition, evaluation, and abatement (i)
  - Development of skills to manage the agency’s occupational safety and health work unit, including the training and motivation of subordinates toward ensuring safe and healthful work practices (ii)

### **Agency Safety and Health Manager, Collateral Duty Safety Officers, or Contracted Safety and Health Inspectors (3)**

Occupational safety and health inspectors, who may include the Agency Safety and Health Manager, collateral duty safety officers, or contracted safety and health inspectors, shall have training that includes—

- Familiarity with applicable standards (a)
- Use of appropriate equipment and testing procedures necessary to identify and evaluate hazards and suggest abatement procedures (b)
- Preparation of reports and other documentation to support inspection findings (c)
- Certification of contracted safety and health inspectors as safety professionals (d)

### **Collateral Duty Safety and Health Personnel and Committee Members (4)**

On appointment of employees to collateral duty positions or committees, the NRC shall provide training commensurate with the scope of their assigned responsibilities. The training shall include—

**Methods (B) (continued)**

**Collateral Duty Safety and Health Personnel and Committee  
Members (4) (continued)**

- Section 19 of the Occupational Safety and Health Act (a)
- Executive Order 12196 (b)
- 29 CFR Part 1960, Subpart H, “Training” (c)
- Recognition of hazardous conditions and environments (d)
- Identification and use of occupational safety and health standards (e)
- Other appropriate rules and regulations (f)

**Employees (5)**

Agency employees shall be provided with specialized occupational safety and health training appropriate to the work performed if the work is considered hazardous.

## Part VI

# Recordkeeping and Reporting

### Forms and Reports (A)

NRC has six reporting units: headquarters and four regions, and one Technical Training Center. The Agency Safety and Health Program Manager maintains the required log and records for headquarters. The collateral duty safety and health officer for each region and the TTC maintains the log and records for that region. To establish uniform requirements for the collection and compilation of occupational safety and health data for proper evaluation and necessary corrective action, the various types of reporting are described below. The information collected shall be used to identify unsafe and unhealthful working conditions and to establish program priorities.

#### Occupational Safety and Health Administration (OSHA) Form 200, "Log and Summary of Occupational Injuries and Illnesses" (1)

A log of recordable occupational injuries and illnesses will be maintained at each NRC reporting unit. Within 6 working days after receiving information on a recordable occupational injury or illness, appropriate information concerning such injury or illness shall be entered on the record or log. For this purpose, OSHA Form 200 shall be used and shall be completed in the detail required by that form and the instructions contained therein (see the exhibit to this handbook). As a minimum, any occupational injury or illness reported by an employee on a Form CA-1 or CA-2 (except first aid cases) to the Office of Workers' Compensation Programs (OWCP), Department of Labor, shall be considered recordable on the log.

## **Forms and Reports (A) (continued)**

### **NRC Form 436, “Supervisor’s Supplementary Report of Federal Occupational Injuries and Illnesses” (2)**

Each reporting unit shall maintain a supplementary record of each recordable occupational injury or illness for each entry on OSHA Form 200. The supplementary record shall be completed on NRC Form 436 within 6 working days after the receipt of information that a recordable occupational injury or illness occurred (access this form through the WordPerfect [WP] Informs icon). The supplementary record shall be retained in the reporting unit for 5 years in accordance with General Records Schedule 1-34, “Occupational Injury and Illness Files.”

### **Annual Summaries of Federal Occupational Injuries and Illnesses (3)**

Each reporting unit, on a fiscal year basis, shall forward an annual summary, using the last page of the OSHA Form 200, to the Agency Safety and Health Program Manager within 25 days of the close of the fiscal year. Regional reports are forwarded to the Agency Safety and Health Program Manager, who combines all reports for a single submission of the NRC consolidated annual summary to the Department of Labor. (a)

The Secretary of Labor, as provided for under Section 19 of the Occupational Safety and Health Act, provides the President with a summary or digest of reports concerning the occupational safety and health programs of the Federal agencies. These reports are derived from the statistics provided by each Federal agency to the Occupational Safety and Health Administration. The President then transmits annually, to the Senate and the House of Representatives a report of the activities of Federal agencies under Section 19 of the act. (b)

Each reporting unit shall post a copy of the annual summary of Federal occupational injuries and illnesses no later than 45 calendar days after the close of the fiscal year. Copies shall be posted for a minimum of 30 consecutive days on official NRC bulletin boards. (c)

### **Reporting of Serious Accidents (4)**

Within 8 hours after the occurrence of an employment accident, the Executive Director for Operations, or his designee, shall report by telephone or fax to the Office of Federal Agency Programs: (a)

## Forms and Reports (A) (continued)

### Reporting of Serious Accidents (4) (continued)

- Any occupational accident that is fatal to one or more employees (i)
- Any occupational accident that results in the hospitalization of three or more employees (ii)
- Any occupational illness that results in death (iii)
- Any occupational accident involving both Federal and non-Federal employees that results in a fatality or the hospitalization of three or more such employees (iv)

Accidents not immediately reportable but that result in death within 6 months of the date of the accident shall be reported within 8 hours of the time the employer becomes aware of the death. (b)

All known details must be immediately reported by telephone to the Director of the Office of Human Resources, who then arranges for the reporting of the incident to the Office of Federal Agency Programs. The report shall relate— (c)

- The circumstances of the accident (i)
- Name(s) of individual(s) involved (ii)
- The number of fatalities and/or injuries and illnesses (iii)
- The extent of any injuries (iv)
- Any additional information the Secretary of Labor may require (v)

### Retention of Records (5)

The records and reports required under this program shall be retained for 5 years following the end of the fiscal year to which they relate in accordance with General Records Schedule 1-34.

## Reports of Occupational Disease, Injury, or Accident (B)

Any employee experiencing occupational disease, injury, or accident shall give immediate notice of the disease or injury to his or her official supervisor. The supervisor will provide the forms required. (1)

## **Reports of Occupational Disease, Injury, or Accident (B) (continued)**

Reports of occupational injuries and illnesses are required by two separate acts: The Federal Employees Compensation Act and the Occupational Safety and Health Act. (2)

The Federal Employees Compensation Act, administered by the Department of Labor, Office of Worker's Compensation Programs, provides monetary compensation, medical care and assistance, vocational rehabilitation, and reemployment rights to Federal employees who sustain disabling injuries as a result of employment with the Federal Government. The procedures that shall be followed by employees who suffer a disease, an injury, or an accident and by official supervisors of those employees are found in 20 CFR Subchapter B, Part 10, "Federal Employees Compensation Act." (3)

The Occupational Safety and Health Act requires a supplementary report of each recordable occupational injury or illness. NRC Form 436 is used by the supervisor to document the accident investigation. For reporting purposes, the office to which the employee is assigned is responsible for completing and submitting the report. (4)

- Provide as much supplementary information as possible. Use attachments to the report to provide further information, photographs, measurements, and so forth. It is important that the supervisors determine the causes of the accidents, as they are instrumental in determining ways to prevent a similar accident from occurring. If the supervisor is not sure about certain aspects of the investigation, he or she should contact one of the safety and health designees for assistance. (a)
- The completed NRC Form 436 is forwarded within 6 working days after the occurrence to either the Agency Safety and Health Program Manager for NRC headquarters employees, or to the collateral duty safety and health officer for NRC regional employees. (b)

Procedures and responsibilities for reporting automobile accidents are found in Management Directive 7.1, "Tort Claims Against the United States." (5)



## Part VII

# Emergency Protection Plan (EPP)

### General (A)

Federal Property Management Regulations (FPMR), 41 CFR 101-20.103-4, require that every Federal facility, owned or leased, have an occupant emergency plan (NRC's EPP) developed by the designated official, as defined in 41 CFR 101.20.003(g). (1)

The EPP is a method devised to use during emergency situations to protect life and property in a specific federally occupied space. The following definitions are specific to this plan: (2)

- **Designated official.** The highest ranking official of the primary occupant agency or the alternate highest ranking official or designee selected by mutual agreement by other occupant agency officials. (a)
- **Emergency.** A situation that involves a bombing or bomb threats, civil disturbance, fire, explosion, evacuation, flood, electrical power failure, medical emergency, hurricane, tornado, earthquake, or other natural disaster, or accidental human-caused disaster. The term does not include emergency preparedness as it applies to civil defense matters, such as potential or actual enemy attack. (b)
- **Emergency protection plan organization.** The emergency response organization composed of tenant employees of the Federal agency(ies) in a building designated to perform the requirements established by the occupant emergency plan. (c)
- **Occupant agency.** The resident Federal agency(ies) assigned to a building or facility. (d)

## **General (A) (continued)**

- **Occupants.** Both visitors and resident Federal employees working in a building or facility. (e)
- **Primary occupant agency.** The Federal agency having the largest number of employees working in a building or facility. This determination is usually based on each agency's space requirements. (f)

## **Appointing the Designated Official (B)**

At NRC headquarters, the Director of the Office of Administration (ADM) names, in writing and by title, the designated official in each building exclusively occupied by NRC, or in buildings in which the NRC has been selected by mutual agreement with other occupant agency officials to be the lead agency and assume the responsibility for all Federal employees in the building. Similarly, each regional administrator designates in writing by position a designated official, if one is required.

## **Preparation of the Plan (C)**

The Director of ADM develops, implements, and maintains a current plan for headquarters' buildings. Each regional administrator develops, implements, and maintains a current plan for the regional office. (1)

NRC managers and supervisors in the building shall cooperate fully with the designated official in staffing the organization and making employees available for required EPP training. (2)

## **Evaluation of the Plan (D)**

The Agency Safety and Health Program Manager reviews the occupant emergency plan at the time of the annual inspection of workplaces. The Program Manager at headquarters also observes the operation of the plan and the organization during fire drills and reports the results to the Designated Agency Safety and Health Official. (1)

The collateral duty safety and health officer in each region performs these functions and makes his or her report to the appropriate regional administrator. (2)

## Glossary

**Establishment.** A single physical location where business is conducted or where services or operations are performed. Where distinctly separate activities are performed at a single physical location, each activity shall be treated as a separate establishment. Typically, an “establishment” as used in this handbook refers to a field activity, a regional office, or an area office, installation, or facility.

**Imminent danger.** Any conditions or practices in any workplace that could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through normal procedures.

**Inspection.** A comprehensive survey of all or part of a workplace in order to detect safety and health hazards. Inspections are normally performed during the regular work hours of the agency, except as special circumstances may require. Inspections do not include routine, day-to-day visits by agency occupational safety and health personnel or routine workplace surveillance of occupational health conditions.

**Lost workdays.** Injuries and illnesses that involve days away from work and/or days of restricted work activity.

**Lost workdays – away from work.** The number of workdays (consecutive or not) during which the employee would have worked but could not because of an occupational injury or illness. Fractional lost workdays are not considered lost time.

**Lost workdays – restricted work activity.** The number of workdays (consecutive or not) during which, because of injury or illness, the employee (1) was assigned to another job on a temporary basis; (2) worked at a permanent job less than full time; or (3) worked at a permanently assigned job but could not perform all duties normally connected with the job.

## Glossary (continued)

- Medical treatment.** Treatment (other than first aid) administered by a physician or by registered professional personnel under the standing orders of a physician.
- Recordable occupational injuries or illnesses.** Information about every occupational death; every nonfatal occupational illness; and those nonfatal occupational injuries that involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment (other than first aid).
- Reporting unit.** An establishment, except as otherwise agreed on between the agency and the Office of Federal Agency Programs, U.S. Department of Labor, as provided in 29 CFR 1960.74.
- Representative of management.** A supervisor or management official as defined in the applicable labor-management relations program covering the affected employees.
- Reprisal.** Any act of restraint, interference, coercion, or discrimination against an employee for exercising his or her rights for participating in the agency's occupational safety and health program, under Executive Order 12196 and 29 CFR Part 1960.
- Safety and health inspector.** A safety and/or occupational health specialist or other person authorized (pursuant to Executive Order 12196, Section 1-201 (g)) to carry out inspections for the purpose of Subpart D of 29 CFR Part 1960, or a person having equipment and competence to recognize safety and/or health hazards in the workplace.
- Serious.** As in "serious hazard," "serious violation," or "serious condition," means hazard, violation, or condition for which there is a substantial probability that death or severe physical harm could result.
- Workplace.** A physical location where the agency's work or operations are performed.
- Willful violation.** A willful violation occurs when NRC employees intentionally and knowingly interfere with, ignore, disregard, delay, and/or fail to fully implement an occupational safety and health program, procedure, and/or requirement promulgated by this directive and handbook.

Volume 10, Part 5 – Benefits, Health Services, and Employee Safety  
 Safety and Health Program Under the Occupational  
 Safety and Health Act  
 Handbook 10.130 Exhibits

### Exhibit

## OSHA Form 200, U.S. Department of Labor

# “Log and Summary of Occupational Injuries and Illnesses”

U.S. Department of Labor																			
Log and Summary of Occupational Injuries and Illnesses										For Calendar Year 19____			Page _____ of _____						
<p><small>NOTE: This form is required by Public Law 94-498 and must be kept in the establishment for 3 years. Failure to maintain and post may result in the issuance of citations and assessment of penalties. (See penalty requirements on the other side of form.)</small></p> <p><small>RESPONSIBLE CAREER: You are required to record information about every nonfatal death; every specified occupational illness; and every recorded nonfatal injury which results in one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment (other than first aid, first aid/first treatment as defined in 29 CFR 1916.107).</small></p>										Company Name Establishment Name Establishment Address			Form Approved						
OSHA No. 200	Date of Injury or Onset of Illness	Employer's Name	Occupation	Department	Description of Injury or Illness  <small>Typical words for OSH returns might be: Amputation of the joint right hand/wrist; Strain of lower back; Contact Dermatitis on both hands; 2 Irritant Contact Dermatitis.</small>	Extent and Dates of IL/INJ						Type, Dates of, and Outcome of ILL/INJ							
						Facility	Employee's Position	Injury Type	Agencies With Lost Workdays	Illness Without Lost Workdays	Days Lost	Days Off Work	Medical Treatment	Illness Without Lost Workdays	Days Lost	Days Off Work	Medical Treatment		
<small>Enter a three-digit number with the last three digits of the establishment's zip code.</small>	<small>Enter M, A, M, J, J, O, N, D.</small>	<small>Enter five-digit or ZIP code, include letters, but none.</small>	<small>Enter regular job title; use secondary occupations only when performing unusual job duties or in event of illness. In the absence of a board title, enter a brief description of the employer's duties.</small>	<small>Enter department to which the employee is regularly assigned or a description of several occupations to which employee is assigned, even though temporarily working in another department at the time of injury or illness.</small>	<small>Enter a brief description of the injury or illness and indicate the part or parts of body affected.</small>	<small>Enter DATE of death.</small>	<small>Enter a CHECK if injury occurred on the day of death or part of the day.</small>	<small>Enter a CHECK if injury occurred during hours of work.</small>	<small>Enter number of DAYS away from work.</small>	<small>Enter number of DAYS of occupational and nondesired work.</small>	<small>Enter a CHECK if an injury was made to appendix F or H but the injury is not reportable to OSHA.</small>	<small>CHECK Only One Column for Each Illness After either side of check for Amputation or permanent handicap.</small>	<small>Always Indicate</small>	<small>Enter DATE of death.</small>	<small>Enter a CHECK if illness occurred on the day of death or part of the day.</small>	<small>Enter a CHECK if illness occurred during hours of work.</small>	<small>Enter number of DAYS away from work.</small>	<small>Enter number of DAYS of occupational and nondesired work.</small>	<small>Enter a CHECK if an illness was made to appendix F or G.</small>
											(A) (B) (C) (D) (E) (F) (G) (H) (I) (J)	(K) (L) (M) (N) (O) (P)	(Q) (R) (S) (T) (U) (V) (W) (X) (Y) (Z)						

**INJURIES**

**ILLNESSES**

Certification of Annual Summary Form By \_\_\_\_\_ Title \_\_\_\_\_  
 OSHA No. 200 POST ONLY THIS PORTION OF THE LAST PAGE NO LATER THAN FEBRUARY 1.

Exhibit (continued)

Public reporting burden for this collection of information is estimated to average 4 to 30 hours per response with an average of 10 (give in minutes) per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. You must not send any information regarding this collection of information except as required by the instructions. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, please send them to the OSHA, Office of Statistics under the Department of Labor, Office of PMA Policy, Room H-1201, 300 Constitution Avenue, N.W., Washington, D.C. 20201

Instructions for OSHA No. 200

<p><b>I. Log and Summary of Occupational Injuries and Illnesses</b></p>	<p><b>Column 9 - DATE OF INJURY OR ONSET OF ILLNESS.</b></p>	<p><b>Columns 6 and 12 - INJURIES OR ILLNESSES WITHOUT LOST WORKDAYS.</b> Self-explanatory.</p>	<p><b>26. Poisoning (Excludes Effect of Toxic Materials)</b>                  Examples: Poisoning by lead, mercury, cadmium, bromine, or other metals; poisoning by carbon monoxide, hydrogen sulfide, or other gases; poisoning by arsenic, carbon tetrachloride, or other organic solvents; poisoning by insecticide sprays such as parathion, lead arsenate; poisoning by other chemicals such as formaldehyde, plastics, and nitric acid.</p>
<p>Each employer who is subject to the recordkeeping requirements of the Occupational Safety and Health Act of 1970 must maintain for each establishment a log of all recordable occupational injuries and illnesses. This form (OSHA No. 200) may be used for that purpose. A substitute for the OSHA No. 200 is acceptable if it is as detailed, easily readable, and understandable as the OSHA No. 200.</p>	<p>For occupational injuries, enter the date of the work accident which resulted in injury. For occupational illnesses, enter the date of initial diagnosis of illness, or, if illness first was noticed before diagnosis, enter the first day of the disease attributable to the illness which was first diagnosed or recognized.</p>	<p><b>Column 7a - TYPE OF ILLNESS.</b>                  Enter a check in only one column for each illness.</p>	<p><b>27. Disorders Due to Physical Agents (Other than Toxic Materials)</b>                  Examples: Heatstroke, sunstroke, heat exhaustion, and other effects of environmental heat; freezing, frostbite, and effects of exposure to low temperatures; carbon dioxide; effects of ionizing radiation (X-rays, radium); effects of nonionizing radiation (ultraviolet light, of radiant heat, or ultrasonic, microwave, etc.</p>
<p>Enter each recordable case on the log within 30 (30) workdays after learning of its occurrence. Although other records must be maintained at the establishment to which they refer, it is possible to prepare and maintain the log at another location, using dual processing equipment if desired. If the log is prepared elsewhere, a copy retained within 45 calendar days must be present at all times in the establishment.</p>	<p><b>Column 6 through 7 - Self-explanatory.</b></p> <p><b>Column 1 and 8 - INJURY OR ILLNESS RELATED DEATHS.</b> Self-explanatory.</p>	<p><b>TERMINATION OR PERMANENT TRANSFER</b>—Place an asterisk to the right of the entry in columns 7a through 7c if type of event which warranted a termination of employment or permanent transfer.</p>	<p><b>28. Disorders Associated With Repetitive Trauma</b>                  Examples: Nerve-induced hearing loss; sprains; tenosynovitis, and bursitis; Raynaud's phenomenon; and other conditions due to repeated motion, vibration, or pressure.</p>
<p>Logs must be maintained and retained for the 30 years following the end of the calendar year to which they refer. Logs must be available throughout at the establishment for inspection and copying by representatives of the Department of Labor, or the Department of Health and Human Services, or State approved jurisdiction under the Act. Access to the log is also provided to employees, former employees and their representatives.</p>	<p><b>Column 2 and 9 - INJURIES OR ILLNESSES WITH LOST WORKDAYS.</b> Self-explanatory.</p> <p>Any injury which involves days away from work, or days of restricted work activity, or both must be recorded even if it always involves one or more of the criteria for recordability.</p>	<p><b>V. Tests</b>                  Add number of tests in columns 1 and 8.                  Add number of checks in columns 2, 5, 6, 7, 8, 10, 11, and 12.                  Yearly tests for each column (1-12) are required for posting. Reading or tape tests may be generated at the discretion of the employer.</p>	<p><b>29. All Other Occupational Illnesses</b>                  Examples: Arthritis, bronchitis, infectious hepatitis, malignancy and benign tumors, food poisoning, Hemorrhoids, osteoarthritis, etc.</p>
<p><b>II. Changes in Extent or Character of Injury or Illness</b>                  If, during the 3-year period the log must be retained, there is a change in the extent and nature of an injury or illness which affects entries in columns 1, 2, 6, 8, 9, or 12, the first entry should be lined out and a new entry made. For example, if an injured employee at first required only medical treatment but later lost workdays away from work, the check in column 6 should be lined out, and checks entered in columns 2 and 3 and the number of lost workdays entered in column 4.</p>	<p><b>Column 3 and 10 - INJURIES OR ILLNESSES INVOLVING DAYS AWAY FROM WORK.</b> Self-explanatory.</p> <p><b>Column 4 and 11 - LOST WORKDAYS—DAYS AWAY FROM WORK.</b>                  Enter the number of workdays (inclusive or not) on which the employee would have worked but could not do so as a result of occupational injury or illness. The number of lost workdays should not include the day of injury or onset of illness or any days on which the employee would not have worked even though able to work.</p>	<p>If an employer's loss of workdays is continuing at the time the tests are administered, estimate the number of future workdays the employee will lose and add that estimate to the workdays already lost and include this figure in the annual total. No further entries are to be made with respect to such cases in the next year's log.</p>	<p><b>VI. Descriptions</b>                  OCCUPATIONAL INJURY is any injury such as a cut, fracture, sprain, amputation, etc., which results from a work accident or from an exposure involving a single incident in the work environment.                  NOTE: Conditions resulting from animal bites, such as insect or snake bites or from one-time exposure to chemicals, are considered to be injuries.</p>
<p>In another example, if an employee with an occupational illness lost workdays, returned to work, and then died of the illness, any entries in columns 6 through 12 should be lined out and the date of death entered in column 8.</p>	<p><b>NOTE:</b> For employees not having a regularly scheduled shift, such as certain truck drivers, construction workers, farm labor, seasonal labor, part-time employees, etc., it may be necessary to estimate the number of lost workdays. Estimates of lost workdays shall be based on prior work history of the employee AND days worked by employees, not ill or injured, working in the department under occupation of the ill or injured employee.</p>	<p>OCCUPATIONAL ILLNESS of an employee is any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with employment. It includes acute and chronic illnesses or diseases which may be caused by inhalation, absorption, ingestion, or direct contact.</p>	<p><b>MEDICAL TREATMENT</b> includes treatment (other than first aid administered by a physician or by registered professional personnel under the standing orders of a physician, medical treatment does NOT include first aid treatment, first-aid treatment and subsequent observation of minor scratches, cuts, burns, abrasions, and so forth, which do not ordinarily require medical care) even though provided by a physician or registered professional personnel.</p>
<p>The entire entry for an injury or illness should be lined out if later found to be nonrecordable. For example, an injury which is later determined not to be work related, or which was initially thought to involve medical treatment but later was determined to have involved only first aid.</p>	<p><b>Column 8 and 12 - LOST WORKDAYS—DAYS OF RESTRICTED WORK ACTIVITY.</b>                  Enter the number of workdays (inclusive or not) on which because of injury or illness:                  (1) the employee was assigned to another job or a temporary task, or                  (2) the employee worked at a permanent job but less full time, or                  (3) the employee worked at a permanently assigned job but did not perform all duties normally connected with it.</p>	<p>The following factors give the occupancies of occupational illness and disorders that will be utilized for the purpose of identifying recordable illnesses. For purposes of interpretation, examples of each category are given. These are typical examples, however, and are not to be considered the complete listing of the types of illnesses and disorders that are to be counted under each category.</p>	<p><b>ESTABLISHMENT:</b> A single physical location where business is conducted or where services or industry operations are performed (for example a factory, mill, store, hotel, restaurant, cruise liner, store, ranch, hotel, office, workshop, or federal administration office). Where distinctly separate activities are performed at a single physical location, such as construction activities operated from the same physical location in a number of years, such activity shall be treated as a separate establishment.</p>
<p><b>III. Posting Requirements</b>                  A copy of the log and information following the bold face of the last page for the year must be posted at each establishment in the place or places where notices to employees are customarily posted. This copy must be posted no later than February 1 and must remain in place until March 1.</p>	<p>The number of lost workdays should not include the day of injury or onset of illness or any days on which the employee would not have worked even though able to work.</p>	<p>2a. Occupational Skin Diseases or Disorders                  Examples: Contact dermatitis, eczema, or rash caused by primary irritants and sensitizers or poisonous chemicals; oil acne; dryness (skin); chemical burns or irritations, etc.</p>	<p>For firms engaged in activities which may be physically demanding such as significant construction, transportation, communications, and electric, gas, and utility services, records may be maintained at a place to which employees report each day.</p>
<p><b>IV. Instructions for Completing Log and Summary of Occupational Injuries and Illnesses</b></p>	<p>Column A - CARE OR FILE NUMBER. Self-explanatory.</p>	<p>2b. Dust Diseases of the Lungs (Pneumoconiosis)                  Examples: Silicosis, asbestosis and other asbestos-related diseases, coal worker's pneumoconiosis, byssinosis, sarcoid, and other pneumoconiosis.</p>	<p>Records for personnel who do not primarily report to work at a single establishment, such as traveling salesmen, workmen, engineers, etc., shall be maintained at the location from which they are paid or the base from which personnel operate to carry out their activities.</p>

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