



Requirements Document

PRC-RD-SH-11058

Occupational Medical Qualification and Monitoring

Revision 0, Change 2

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**Project: CH2M HILL Plateau Remediation Company
Topic: Occupational Safety & Industrial Hygiene**

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Administrative Use

Occupational Medical Qualification and Monitoring

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CHANGE SUMMARY

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100K/D&D Exempt per Table B2

BOS GCX-7

CSB/ISA GCX-7

PFP PFP-068-2011

SWOC GCX-2

T&P Exempt per Table B2 & HNF-17235

WESF GCX-7

Description of Change

Rev 0-2 (02/22/11):

Add reference to section 1.0 for completing subcontractor EJTA per App F of PRC-PRO-SH-40078. Added PRC-PRO-SH-40078 to section 3.2, References.

Updated listed Requirement From: CRD O 5480.20A, Chg 1, *Personnel Selection, Qualification and Training Requirements of DOE Nuclear Facilities* To: CRD O 426.2, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*

Rev 0-1 (5/17/09): Editorial changes to align with current CHPRC procedures format, and reference and form numbers and titles.

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1.0 PURPOSE AND SCOPE

This Level 1 Requirements Document defines the requirements for utilizing the automated employee job task analysis (EJTA) and obtaining necessary employee medical qualifications and monitoring based on the job requirements, hazards, exposures, and overall risk associated with their assigned workscope. Use of the EJTA will allow the collection of the data necessary for a risk-based approach to medical qualification and monitoring.

The EJTA also:

- Satisfies specific Americans With Disabilities Act (ADA) and Fitness For Duty data needs,
- Identifies the need for additional employee exposure assessment and monitoring data,
- Aids in determining the necessary health and safety training.

Use of the EJTA facilitates compliance with U.S. Department of Energy (DOE) Worker Safety and Health Program (10 CFR 851) which requires employee job task and hazard analysis information be provided to the medical contractor. These requirements are applicable to CH2M HILL Plateau Remediation Company (CHPRC) Team employees' work activities performed under the CHPRC scope of work including preselected subcontractors. It is applicable to CHPRC Team employees who perform work on site for 30 or more days per year, or who have a potential for exposure to hazardous chemical or physical agents. These requirements are also applicable to subcontractors performing CHPRC scope of work, when specified in approved Statements of Work. The process for completion of subcontractor EJTAs is contained in Appendix F of PRC-PRO-SH-40078.

The EJTA estimated exposure frequency (e.g., less than or greater than 30 days per year) and exposure level (e.g., above or below an identified exposure criterion) is based on a combination of qualitative judgment and quantitative exposure data. This data is not expected to be an exhaustive or exacting list of every possible exposure and hazard regardless of its significance; nor is it an exact measure of the frequency of exposure. Rather, it is intended to be an estimate based on informed professional and supervisory judgment that provides information on hazards and significant exposures.

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2.0 REQUIREMENTS

2.1 Development and Revision of EJTA

NOTE: For the tables in this section under the requirement "type" column, "V" means verbatim and "I" means interpreted.

#	REQUIREMENT	TYPE V or I	SOURCE
1.	Line management shall ensure that an initial EJTA is completed during the hiring process for each employee in accordance with the EJTA instructions which are part of the automated system.	I	10 CFR 851, Appendix A, Item 8.
	<p>NOTE 1: As used in this document, line management refers to the employee's immediate manager, or one which provides direct supervision, whether the employee is a line or functional group employee.</p> <p>NOTE 2: Access to the automated EJTA can be obtained by contacting the CHPRC Occupational Safety and Industrial Hygiene organization.</p>		
2.	Line management shall ensure that the initial EJTA is revised when employees' essential job functions, physical job requirements or the needed medical qualifications are altered as a result of job transfer or fundamental change in job requirements or hazards encountered.	I	10 CFR 851, Appendix A, Item 8.
3.	Line management shall ensure that the employees' EJTA's are updated periodically (i.e., at least every year for employees who are enrolled in one or more medical surveillance programs, and at least every three years for employees not enrolled in any medical surveillance programs).	I	10 CFR 851, Appendix A, Item 8.
	<p>NOTE: The EJTA system will identify any EJTA that is over 1 year old as "aging". This is intended as a reminder and not an indication that an update is required, as it does not consider whether the employee is enrolled in medical surveillance programs.</p>		
4.	A safety and health professional will review/complete the potential exposure hazards (PEH) section of the EJTA. During this review, applicable exposure information will be consulted to evaluate exposure levels using a graded approach. Information to be considered includes previous EJTA's, baseline hazard assessments, previous monitoring data and representative monitoring data. If sufficient data exist to accurately assess exposures, the Qd (quantitative data) box should be checked for the agent.	I	10 CFR 851, Appendix A, Item 8.
	<p>NOTE 1: As used in this document, safety and health professional refers to the facility/project/functional group safety and health professional who is familiar with employee exposures.</p> <p>NOTE 2: Exposures for <u>nonroutine</u> tasks which were not predictable and were therefore not captured in the Potential Exposure Hazard portion of the EJTA are addressed via the job hazard/safety analysis (See PRC-PRO-WKM-079, Job Hazard Analysis), when employee exposures are greater than the established exposure criteria.</p>		

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5.	The employee shall review the EJTA and appropriate employee input will be incorporated into the EJTA.	I	10 CFR 851, Appendix A, Item 8.
6.	The Occupational Medical Service Provider (OMSP) shall be notified of an employee separation by terminating the current EJTA for the employee. This includes both disability separations and terminations.	I	10 CFR 851, Appendix A, Item 8.
NOTE: <i>The OMSP will schedule any required medical closeout examination.</i>			

2.2 After Completion of EJTA

#	Requirement	Type V or I	Source
1.	Line management shall ensure that employees report for medical qualification and monitoring examinations as scheduled by the <i>OMSP</i> .	I	10 CFR 851, Appendix A, Item 8.
2.	Line management shall ensure that employees receive the appropriate health and safety training as indicated by evaluation of the employee profile.	I	10 CFR 851.25.
3.	The Human Resources Department shall be consulted to determine the necessary accommodations or actions if the <i>OMSP</i> determines an employee is not capable of performing the specified essential job functions and physical job requirements.	I	ADA, Public Law 101-336, Section 102.a.
4.	A safety and health professional will assist line management and interface with the <i>OMSP</i> in interpreting EJTA information to determine employee placement in medical qualification examinations and medical monitoring programs, and the need for additional workplace hazard controls.	I	10 CFR 851.22.
5.	A safety and health professional will develop a monitoring plan for any agents marked with a "2" or "3" on the PEH section of the EJTA that do not have the Qd box checked, and update the EJTA once the monitoring has been completed.	I	10 CFR 851, Appendix A, Item 6.
6.	A safety and health professional will assist line management in interpreting the medical monitoring results provided by the <i>OMSP</i> and in determining the need for additional workplace hazard controls.	I	10 CFR 851, Appendix A, Item 8.
7.	A safety and health professional will, as requested, assist line management in completing the employee training matrix based on the OSHA training requirements and the results of the EJTA.	I	10 CFR 851.25.
8.	Human Resources will use the EJTA as a resource for conducting ADA accommodation and Fitness For Duty reviews.	I	ADA, Public Law 101-336, Section 102.a.
9.	The <i>OMSP</i> (per contract with DOE) is responsible for scheduling employees for medical qualification examinations and medical monitoring based on the data provided through the EJTA.	I	10 CFR 851, Appendix A, Item 8

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#	Requirement	Type V or I	Source
10	The OMSP is responsible for removing employees from medical program placement when warranted based on EJTA information and other relevant medical information.	I	10 CFR 851, Appendix A, Item 8.
11	The OMSP is responsible for reporting results of medical examinations and monitoring to employees and line management including the following: <ul style="list-style-type: none"> Occupationally related information such as medical qualification and monitoring results, medical opinions, and other information regarding medical conditions that would place the employee's health at risk from working in the occupational environment. Determinations regarding the employee's physical and mental health and their ability to safely and reliably perform the assigned job tasks and physical job requirements in accordance with the ADA of 1990 and Fitness for Duty. The adequacy of hazard control measures based on individual employee health data and population based health data. 	I	10 CFR 851, Appendix A, Item 8.
12	The OMSP is responsible for maintaining medical records in accordance with the applicable OSHA and DOE requirements.	I	10 CFR 851, Appendix A, Item 8.

3.0 SOURCES

3.1 Requirements

Americans with Disabilities Act, *Public Law 336 of the 101st Congress* (P.L. 101-336), enacted July 26, 1990

10 CFR 851, *Worker Safety and Health Program*

29 CFR 1910, *Occupational Safety and Health Standards*

CRD O 426.2, *Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities*

3.2 References

29 CFR 1910, *OSHA Standards for General Industry*

29 CFR 1926, *Safety and Health Regulations for Construction*

PRC-PRO-WKM-079, *Job Hazard Analysis*

PRC-PRO-SH-40078, *Contractor Safety Processes*