

**Savannah River Site (SRS) Service and Construction Subcontract
Worker Protection Plan (WPP) Evaluation Checklist**

**Primary Checklist
Overview and Instructions
For Onsite Manual Work**

OVERVIEW

To perform service or construction subcontract work at SRS, a Worker Protection Plan (WPP) is required. A WPP specifies how a company will implement, maintain, and manage subcontract/regulatory compliance while conducting business under subcontract at SRS.

Regulatory agencies stipulate minimum occupational safety and health compliance requirements. The WPP must mandate an environment that is free from recognized hazards and require participation by all levels of management and employees in the prevention and recognition of unsafe acts and conditions. WSRC subcontracts require companies to identify tasks hazards, safeguards & controls associated with subcontract scope.

SUBCONTRACTOR INSTRUCTIONS

The successful subcontractor, while reviewing their corporate WPP, must complete the following checklist, recording sections/page numbers that correspond to requirements applicable to the subcontract scope. Prior to submittal to WSRC all “No” responses on the checklist shall be addressed via a revision or addendum to the WPP.

In addition, successful subcontractors are required to identify and submit applicable Focused Observation Checklist(s) located on the SRS Internet Homepage (www.srs.gov/general/busiops/PMMD/prod1.htm) as attachments to their WPP. These checklist are currently titled “Safety Checklist”.

This document identifies the minimum safety and health program elements that WSRC expects subcontractors to address in the WPP. It is not intended to be all inclusive and should be used as guidance only for WPP(s) or service maintenance manual package submittals.

For some scopes, a service maintenance manual may be submitted as part of the WPP if associated hazards, safeguards and controls are identified within the manual. In addition to the manual, the subcontractor must address the minimum applicable program elements from the checklist in section III on a company letterhead.

If applicable program elements are not addressed, WSRC’s review of the WPP will result in possible delay of work and a request for an addendum from the subcontractor to address missing program elements.

REFERENCES:

- WSRC General Provisions
- DOE 10 CFR 851- Worker Safety and Health Program
- Occupational Safety and Health Standards (OSHA) 29 CFR 1910 General Industry
- OSHA Homepage (Small Business) Safety Program Guidance
- National Fire Protection Association (NFPA)
- American National Standards Institute (ANSI)

Section I:

Used by WSRC and Subcontractor for safety submittal documentation.

Section II:

How a company complies with applicable site directives and policies.

Section III:

Used by WSRC and Subcontractor(s) to evaluate WPP submittals for adequacy and acceptance.

Primary Checklist
For Onsite Manual Work

For assistance or questions, contact Subcontract Safety Support Personnel - Butch Jones at 803-952-9919, Mike Sutton at 803-952-9092, or Jerry Furse at 803-952-6825.

SECTION I:

WSRC and Subcontractor must complete the following for safety submittal documentation review.

Subcontractor Name:	
Subcontract PO#:	
Buyer:	
STR:	
Area Safety Engineer:	
Industrial Hygiene:	
Reviewed By:	
Date Reviewed:	

The following confirms the assigned category and that the submitted package contains acceptable documents. Acceptance of the WPP will be based on how well it addresses program elements applicable to the scope. For some scopes, the reviewer may choose to inform the subcontractor via the buyer that non-crucial elements are missing from the WPP, but compliance is expected. (Such elements must be included in the reviewer's response to Procurement with special emphasis on compliance expectation.)

Category B

- High, or Medium Hazard Work – WPP, TSP and Focused Observation Checklists
- Low Hazard Work – WPP and Focused Observation Checklists

Category C

- High, Medium or Low Hazard Work – WPP and Focused Observation Checklists

SECTION II – Site Directives/Policies *WSRC/BSRI and subcontractor use***WPP provides requirements related to:****Location: page/section**

Fitness for Duty - an individual's ability to perform the assigned job free from impairments, i.e. substance abuse, emotional distress, personal health problems

Yes No N/A Location _____

Inclusion & completion of applicable Focused Observation Checklists from SRS Internet Homepage

Yes No N/A Location _____

A minimum of two barrier controls established for vehicles/equipment that has the potential to come in contact with overhead power lines. Example: Trained spotter and documented standoff distance.

Yes No N/A Location _____

Drilling and Penetration work which includes SRS training and specific requirements. (Re: SOW & Clauses)

Yes No N/A Location _____

A statement of commitment by employer to use safe electrical work practices and to follow NFPA 70, 2005 version and 70E, 2004 version and either 29CFR 1910 or 29CFR 1926, as applicable.

Yes No N/A Location _____

A statement of commitment by the employer for employees to do electrical work, whenever possible, in a de-energized state (Lockout/Tagout).

Yes No N/A Location _____

An energized electrical work procedure that documents safe work practices and precautions.

Yes No N/A Location _____

A description of justification/approval process for energized electrical work that must be done while energized.

Yes No N/A Location _____

SECTION III – 10 CFR 851 *WSRC/BSRI and subcontractor use***Subpart B –Program Requirements**

10 CFR 851 rule requires contractors to provide a place of employment that is free from recognized hazards that are causing or have the potential to cause death or serious physical harm to workers. This provision of the rule was carried over from DOE Order 440.1A and closely parallels the OSHA general duty clause established in Section 5(a) (1) of the OSHA Act of 1970. The rule, titled Worker Safety and Health Program require all subcontractors prepare and maintain a worker safety and health program. DOE-SR & WSRC have determined that subcontractors must prepare a worker protection plan (WPP) to satisfy the 851 requirement for establishing a worker safety and health program here at Savannah River Site. Subcontractors must maintain their WPP in a manner that reflects program elements applicable to their statement of work and resubmit it to WSRC when changes are made. At a minimum, the WPP must be submitted annually and/or an acknowledgement to WSRC indicating the WPP remains current and no changes have been made.

WPP provides requirements related to:

Location: page/section

Subpart C – Specific Requirements

Safety policy for workplace practices and conditions

Yes No N/A Location _____

Clear goal for the subcontractor’s safety and health policy

Yes No N/A Location _____

Personnel responsibilities, authority, and accountability

Yes No N/A Location _____

Providing employees a copy of the company’s accepted WPP, when requested

Yes No N/A Location _____

A statement of commitment by the subcontractor that all employees have the right to call a time out from work if they are unsure or have questions about the assigned task.

Yes No N/A Location _____

Employees having the right to observe monitoring or measuring of exposure to hazardous agents and obtain results, when requested

Yes No N/A Location _____

Employees having the right to request and receive results of inspections and accident investigations, when requested

Yes No N/A Location _____

Employees not concealing nor destroying any information concerning non-compliance or potential noncompliance with 10 CFR 851

Yes No N/A Location _____

Considering hazards and employee exposure when selecting or purchasing equipment, products, and services

Yes No N/A Location _____

EMPLOYEE COMMUNICATIONS 10 CFR 851.20 .21 (7) (8), 25. (a)(b)(1)(2)(3)(c), .26(5)

Conducting new hire employee safety orientation

Yes No N/A Location _____

Conducting specific job hazard reviews with new hires and current employees at time of task assignment to include periodic and additional training for new or increased hazards

Yes No N/A Location _____

Conducting regular safety meetings with all employees

Yes No N/A Location _____

Analyze accident related data, trends, lessons learned, and review with employees

Yes No N/A Location _____

WPP provides requirements related to:

Location: page/section

COMPANY TRAINING PROGRAM 10 CFR 851.25

Employee training/briefings on tasks hazards prior to assignment

Yes No N/A Location _____

Employee training/briefings for specialized jobs

Yes No N/A Location _____

Employee training /briefing on hazard controls

Yes No N/A Location _____

Equipment operations i.e. Manufacturer Instructions

Yes No N/A Location _____

OCCUPATIONAL MEDICINE AND FIRST AID 1910.151 Subpart K and 1926 Subpart C, 10CFR 851
*Exception to the Occupational Medicine rule: Subcontractors who are on a DOE site for less than 30 days in a 12 month period, or subcontract personnel who are NOT in a medical or exposure monitoring program required by Federal, State, or local regulation which includes 10 CFR 851. Compliance is expected for 1910.151 subpart K, and 1926 subpart C which is identified with an asterisk **

Obtaining an off-site licensed medical physician, occupational nurse, physician assistant, nurse practitioners

Yes No N/A Location _____

Company's return to work policy including communication with medical provider following an injury or illness

Yes No N/A Location _____

* Reporting, Accidents/ Incidents, Investigating and Completing Injury/Illness form 5484.3 "Individual accident/incident report"

Yes No N/A Location _____

An established medical surveillance program for affected employees

Yes No N/A Location _____

Maintenance and employee access to medical records

Yes No N/A Location _____

* Employee(s) trained in first aid application

Yes No N/A Location _____

* First Aid Supplies

Yes No N/A Location _____

Reporting and Investigating Accidents/Incidents

Yes No N/A Location _____

* Blood-borne Pathogen Awareness Training

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

EXPOSURE ASSESSMENT PROGRAM FOR CHEMICAL, PHYSICAL AND BIOLOGICAL HAZARDS 10 CFR 851.21&.26(a)

WPP provides requirements related to:

Note: Identification of hazards for the following: chemical, physical or biological agents when applicable to the scope of work.

Chemical hazards – Reference OSHA CFR 1910 and 1926 Subpart Z tables for list of toxic and hazardous substances (Example: asbestos, lead, silica, paints, etc.) **Note: Please see Z tables to determine if this section is applicable and reference MSDS sheet for exposure information. For additional information on addressing these elements in your WPP, please see WPP Exposure Assessment Program Guidelines attached to this checklist.**

Yes No N/A Location _____

Physical Hazards – Refers to noise, thermal stresses (heat and cold), vibrations, Non-Ionizing radiation, lasers, etc.

Yes No N/A Location _____

Biological Hazards – Refers to sewage waste, legion Ella (cooling towers operation), animal waste (animal control), blood borne pathogens, etc.

Yes No N/A Location _____

Performing a hazard risk assessment

Yes No N/A Location _____

Prioritizing hazards in order of severity i.e. high, medium, low

Yes No N/A Location _____

Methods for controlling workplace hazards i.e. elimination, substitution, engineering and/or administrative controls and as a last resort PPE

Yes No N/A Location _____

Exposure assessment recordkeeping:

Yes No N/A Location _____

TOXIC AND HAZARDOUS SUBSTANCES 1910 Subpart Z, 1926 Subpart Z, 10 CFR 851 and ACGIH

NOTE: All exposure limits must be based on ACGIH Threshold Limit Values (TLVs) and/or OSHA Permissible Exposure Limits (PELs), whichever is the most restrictive.

Scope of work includes working with asbestos, benzene, lead, styrene, other _____.

Threshold Limit Values (TLV): Including a statement that confirms your company will comply with ACGIH exposure limits for toxic and hazardous substances when the ACGIH Threshold Limit Values (TLVs) are more restrictive than the OSHA's Permissible Exposure Limits (PELs)

Yes No N/A Location _____

Exposure Monitoring

Yes No N/A Location _____

Medical Surveillance

Yes No N/A Location _____

Engineering Controls

Yes No N/A Location _____

Work Practices

Yes No N/A Location _____

Respiratory Protection

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Protective Equipment

Yes No N/A Location _____

HEARING CONSERVATION PROGRAM 1910.95, 1926.52, 10 CFR 851 and ACGIH

A statement confirming compliance with America Conference of Governmental Industrial Hygienists (ACGIH) noise exposure limits. The ACGIH Threshold Limit Values (TLVs) for noise exposure are more restrictive than the OSHA's Permissible Exposure Limits (PELs)

Yes No N/A Location _____

Employee Training - effects of noise on hearing, purpose of hearing protectors, purpose of audiometric testing, and requirements associated of ACGIH.

Yes No N/A Location _____

Exposure Monitoring – baseline survey of noise producing equipment

Yes No N/A Location _____

Use of ACGIH exposure limit of 85 dBA (TLV) verse OSHA exposure limit of 90 dBA (PEL) as the limit that triggers the requirement for use of hearing protection by affected employees.

Yes No N/A Location _____

Use of ACGIH table for TLVs for noise exposure

Yes No N/A Location _____

Audiometric Testing Program - baseline audiogram, annual audiogram, evaluation of audiogram, etc.

Yes No N/A Location _____

Hearing Protectors - Providing a selection of hearing protectors, training on use and care of protectors, proper fitting, etc.

Yes No N/A Location _____

Recordkeeping – noise exposure measurement, audiometric testing, employee access to records, and record retention

Yes No N/A Location _____

WALKING – WORKING SURFACES 1910 Subpart D and 1926 Subpart X

Housekeeping – Expectation and practices

Yes No N/A Location _____

Ladders – Inspection, care and proper use

Yes No N/A Location _____

Open-sided floors/platforms/runways – standard railing and toe-board

Yes No N/A Location _____

SCAFFOLDING 1910 Subpart D and 1926 subpart L

Training

Yes No N/A Location _____

Competent and Qualified Person Responsibilities

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Fall Protection During Erection and Dismantling

Yes No N/A Location _____

Use and Inspection of Incomplete Scaffolding

Yes No N/A Location _____

Use, Inspection, and Care of Fall Protection Equipment

Yes No N/A Location _____

POWERED PLATFORMS, MANLIFTS AND VEHICLE-MOUNTED WORK PLATFORMS 1910 Subpart F

Operator Trained

Yes No N/A Location _____

Use of Personal Fall Arrest – body harness, lanyard, lifeline, inspection criteria

Yes No N/A Location _____

Man-lift – maintenance, inspection, and operation

Yes No N/A Location _____

Availability of Operator’s Manual

Yes No N/A Location _____

FALL PROTECTION-1926 Subpart M

Documentation of Employee Training

Yes No N/A Location _____

Use of Guardrail System – height of railings, load rating

Yes No N/A Location _____

Use of Safety Net System – installation, inspection, testing

Yes No N/A Location _____

Use of Personal Fall Arrest System – harness, lanyard, anchorage, inspections

Yes No N/A Location _____

Use of Positioning Device System – anchorage, components, inspections

Yes No N/A Location _____

Use of Fall Protection Plan – prepared by qualified person

Yes No N/A Location _____

CRANES, DERRICKS, HOISTS, ELEVATORS, AND CONVEYORS 1926 Subpart N

Operator Training/Qualification

Yes No N/A Location _____

Safe Operations

Yes No N/A Location _____

Load Capacities

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Hand Signals

Yes No N/A Location _____

Inspections/Maintenance/Service

Yes No N/A Location _____

Industrial Lift Trucks - 1910.178/1926.602/10 CFR 851 appendix 9

Lift truck operator training & qualifications

Yes No N/A Location _____

Lift truck operation & use

Yes No N/A Location _____

Traveling Operation, including traffic & pedestrian control

Yes No N/A Location _____

Loading & Unloading

Yes No N/A Location _____

Maintenance & inspection of lift truck

Yes No N/A Location _____

FLAMMABLE AND COMBUSTIBLE LIQUIDS 1910.106 and 1926.152

Compressed Gases – handling, storage, use, and PPE

Yes No N/A Location _____

Portable Fire Extinguisher – training, proper type, inspection, and location

Yes No N/A Location _____

Refueling Gasoline Engines – Shutdown and cool down requirements before refueling

Yes No N/A Location _____

Fuel Container – Proper type, storage, and ventilation requirements.

Yes No N/A Location _____

Control of Ignition Sources – smoking requirements, postings, and spark control

Yes No N/A Location _____

HAZARDOUS WASTE OPERATIONS 1910.120

Written Safety and Health Plan

Yes No N/A Location _____

Training/Refresher Training

Yes No N/A Location _____

Emergency Response Plan

Yes No N/A Location _____

Personal Protective Equipment

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

PERSONAL PROTECTIVE EQUIPMENT 1910 Subpart I and 1926 Subpart E

Eye and face protection

Yes No N/A Location _____

Head protection

Yes No N/A Location _____

Foot Protection

Yes No N/A Location _____

Hand protection

Yes No N/A Location _____

RESPIRATORY PROTECTION PROGRAM ELEMENTS 1910.134

Training

Yes No N/A Location _____

Medical Evaluation

Yes No N/A Location _____

Fit Tests

Yes No N/A Location _____

Selection of Respiratory Equipment

Yes No N/A Location _____

Storage of Respiratory Equipment

Yes No N/A Location _____

Pre-use Checks

Yes No N/A Location _____

CONFINED SPACE PROGRAM ELEMENTS 1910.146 and 1926.21

Training

Yes No N/A Location _____

Hazard Evaluation

Yes No N/A Location _____

Permit and Non-permit Confined Spaces

Yes No N/A Location _____

Responsibilities of Entry Supervisor, Authorized Entrant, and Authorized Attendants

Yes No N/A Location _____

Permits and Approval

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Testing and Monitoring

Yes No N/A Location _____

Emergency Rescue and Retrieval

Yes No N/A Location _____

HAZARDOUS ENERGY CONTROL PROGRAM ELEMENTS 1910 Subpart S and 1926 Subpart K

Note: In addition to your program requirements, your subcontract may require site training and compliance with site procedure 8Q, Procedure 32.

Purpose of Hazardous Energy Control Program

Yes No N/A Location _____

Employee training

Yes No N/A Location _____

Responsibilities

Yes No N/A Location _____

Installation of LOTO

Yes No N/A Location _____

Verification of De-energized Equipment

Yes No N/A Location _____

Restoring Equipment to Normal Operations

Yes No N/A Location _____

Removal of Locks and Tags

Yes No N/A Location _____

ELECTRICAL 1910 Subpart S, 1926 Subpart K, NFPA 70 & 70E

Qualified/non-qualified personnel working on or near electrical conductors

Yes No N/A Location _____

Workers having basic electrical safety training

Yes No N/A Location _____

Equipment for General Use - GFCI, flexible cords and cables, enclosures for damp or wet locations

Yes No N/A Location _____

Use of Electrical PPE, Insulate Tools, and Test Equipment

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Equipment Use - hand trucks, dollies, carts

Yes No N/A

Location _____

Personal Lifting Techniques

Yes No N/A

Location _____

**HAND AND PORTABLE POWERED TOOLS AND OTHER
HAND-HELD EQUIPMENT** 1910 Subpart P and 1926 Subpart I

Inspection

Yes No N/A

Location _____

Proper Care and Use

Yes No N/A

Location _____

Guarding

Yes No N/A

Location _____

HOT WORK- GRINDING, WELDING, CUTTING AND BRAZING 1910-Q and 1926-J

Training & Qualification

Yes No N/A

Location _____

Use of Hot Work Permit

Yes No N/A

Location _____

Equipment Inspections

Yes No N/A

Location _____

Fire Protection and Prevention

Yes No N/A

Location _____

Use of welding or Flash Screen

Yes No N/A

Location _____

Cautions for Work on Galvanized or Coated Material i.e., Respiratory Protection

Yes No N/A

Location _____

Monitoring, Purging, or ventilation of confine space, vessels, or small tanks

Yes No N/A

Location _____

HEAT STRESS

Pre-hydration

Yes No N/A

Location _____

Acclimatization

Yes No N/A

Location _____

Signs and symptoms

Yes No N/A

Location _____

WPP provides documentation related to:

Location: page/section

HAZARDOUS COMMUNICATIONS 1910.1200

Written Program - list of hazardous chemicals, methods used to inform employees of the hazards, precautionary measures

Yes No N/A Location _____

Employee Information and Training

Yes No N/A Location _____

Identity of The Hazardous Chemical(s) - labeling system

Yes No N/A Location _____

Material Safety Data Sheets – location

Yes No N/A Location _____

LASER USE AND SAFETY 10CFR 851.23, ANSI Z136.1-2000

Employee Training

Yes No N/A Location _____

Use/Service/Storage of Class 3b and 4 Lasers

Yes No N/A Location _____

An identified Laser Safety Officer

Yes No N/A Location _____

Engineering, Administrative and Procedural Controls

Yes No N/A Location _____

Personnel protective equipment

Yes No N/A Location _____

Protective Barriers/Warnings, Signs, Labels.

Yes No N/A Location _____

MOTOR VEHICLE SAFETY 1926.600 – 1926.606 Subpart O, 10 CFR 851, appendix A

Note: Tractors, platform lifts and other similar specialized equipment powered by electric motor or internal combustion engine.

Operator training/qualifications

Yes No N/A Location _____

Vehicle maintenance/ before use inspection, and safe operation program

Yes No N/A Location _____

The availability of manufacturer's operator manual

Yes No N/A Location _____

Use of safety devices i. e. seat belts, mirrors, flagman, signals

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

DEMOLITION - 1926 Subpart T

Preparatory Operations – engineering survey by a competent person and service lines shut off

Yes No N/A Location _____

Removal of Materials – walls, floors, and steel construction

Yes No N/A Location _____

Mechanical Demolition

Yes No N/A Location _____

Appendix A – Worker Safety and Health Functional Areas

The following 10 CFR 851 & OSHA Subparts apply to unique and/or special services seldom subcontracted at SRS. Therefore, specific elements from a number of subparts/851 are not identified. When such services are deemed applicable to subcontract scopes, the subcontractor must refer to the specific OSHA subparts/851 and address the appropriate elements in their WPP prior to submitting for review and acceptance.

Firearm Safety 10 CFR 851 Appendix A, section 5

A written program addressing inspection, safe use, storage, handling, cleaning, inventory, transporting, and maintenance of firearms and associated ammunition.

Yes No N/A Location _____

Notification and approval process prior to use of firearms on site.

Yes No N/A Location _____

Semi-annually/annually (as required by the NRA or equivalent training agency) provide documented proof that “shooter” has demonstrated proficiency in the use of firearms.

Yes No N/A Location _____

Describe method of pickup and disposal of misfires and/or spent shells.

Yes No N/A Location _____

Explosives and Blasting Agents – 10 CFR 851 Appendix A, section 3.

“Explosives Safety” (Re: DOE Manual M 440.1-1A DOE Explosives Safety Manual Attachment 2

General safety requirements, inspections, and signals

Yes No N/A Location _____

Competent Person role and responsibilities

Yes No N/A Location _____

Blaster qualifications

Yes No N/A Location _____

Transportation, and handling of explosives

Yes No N/A Location _____

Storage of explosives and blasting agents

Yes No N/A Location _____

Blasting procedure/plan

Yes No N/A Location _____

Misfires

Yes No N/A Location _____

WPP provides documentation related to:

Location: page/section

Construction Safety 10 CFR 851, appendix A, list of project activities that need a hazard analyses performed

Yes No N/A Location _____

Construction safety, 10 CFR 851, appendix A, identify Competent Person role and responsibilities.

Yes No N/A Location _____

Construction Safety, 10 CFR 851, Appendix A, when performing work identify on site representative with full authority to act on behalf of contractor.

Yes No N/A Location _____

Industrial Hygiene Program – 10 CFR 851, Appendix A, section 6 employee exposure and monitoring.

Yes No N/A Location _____

Motor Vehicle Safety – 10 CFR 851, Appendix A, section 9 (use GOVs and powered industrial equipment).

Yes No N/A Location _____

Pressure Safety – 10 CFR 851, Appendix A, section 4 (References ASME codes for pressure vessels, boilers, air receivers, vacuum systems, and supporting piping systems).

Yes No N/A Location _____

Biological Safety – 10 CFR 851, Appendix A, section 7 (Safe handling, transfer, and receipt of biological etiologic agents at DOE facilities).

Yes No N/A Location _____

Means of Egress – 1910 Subpart E, & NFPA 101

Yes No N/A Location _____

Dipping and Coating Operations – 1910.123

Yes No N/A Location _____

Excavations – 1926 Subpart P

Yes No N/A Location _____

Concrete and Masonry Construction – 1926 Subpart Q

Yes No N/A Location _____

Steel Erection – 1926 Subpart R

Yes No N/A Location _____

Commercial Diving Operations – 1910 Subpart T and 1926 Subpart Y

Yes No N/A Location _____

Machinery and Machine Guarding – 1910 Subpart O

Yes No N/A Location _____