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Subcontractors	Program Requirements Document	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 01/16/17
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Manual: Subcontractor Requirements

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\*The current revision can be verified on EDMS.

## 1. PURPOSE

This document provides requirements for coordinating work and controlling the hazards associated with work performed by subcontractor personnel. It requires subcontractor line management to safely control subcontract work activities by identifying and documenting existing and predictable hazards, and by informing workers about these hazards and their mitigation. Any applicable regulatory or Idaho Cleanup Project (ICP) Contractor requirements must be followed, with the most stringent requirements being met.

## 2. APPLICABILITY

This document applies to all subcontractors who perform work at the ICP when the Subcontractor Requirements Manual (SRM) is specified in their subcontract. It provides requirements that support subcontracted projects at the INL and in-town facilities managed by the ICP Contractor.

## 3. REQUIREMENTS

### 3.1 General Requirements

- 3.1.1 Compliance with Company-wide Procedure MCP-101, *ICP Integrated Work Control Process*, assists in satisfying the requirements of this document.
- 3.1.2 The requirements of this document shall be implemented using a graded approach in which the depth and rigor of reviews are commensurate with the level of risk associated with the work being reviewed.

### 3.2 Safety Reviews

- 3.2.1 Every work activity or phase of a project shall be reviewed before starting the work activities to ensure that they can be done safely. Contact the ICP Contractor's point-of-contact to obtain any Contractor's forms.

**NOTE:** *Pre-work planning meetings (see Subcontract General Provisions) shall also serve in evaluating project and task hazards.*

- 3.2.2 The subcontractor shall ensure that no employee shall work alone, unless hazards have been evaluated and adequate protective measures are documented on work control documents.

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- 3.2.3 The hazards, and their mitigations, associated with the work shall be documented in an Activity Hazard Analysis [e.g. Job Safety Analysis (JSA), Job Hazard Analysis (JHA), Health and Safety Plan (HASP), Confined Space Permits, Work Orders (WO), Fall Hazard Prevention Analysis, and Radiological Work Permit (RWP)]. Hazard evaluations shall address the following elements:
- A. Applicable activities to be performed
  - B. Involved or affected personnel, by name or job function
  - C. Potential and credible hazards
  - D. Magnitude/significance of identified risks
  - E. Required training
  - F. Mitigating actions to be used to protect workers, facilities and the environment when the hazard cannot be eliminated, such as:
    - Engineered controls (barriers)
    - Administrative controls
    - Required personnel protective equipment.
  - G. When supplementary work control documents are required
  - H. The period of effectiveness for the hazard evaluation and when the hazard evaluation (i.e., JSA) shall be re-evaluated.
- 3.2.3.1 Every subcontractor shall have at least one approved Activity Hazard Analysis that is available to workers at the job site, which addresses the hazards of the work site.
- 3.2.4 For construction activities, the subcontractor shall identify hazardous activities that require “competent person” evaluations as defined in 29 CFR 1926. Names of the subcontractor’s authorized competent person and the regulation for which they are declared a competent person shall be submitted on form 432.A31 “Competent Person Roster” to the ICP Contractor’s point-of-contact for entry into TRAIN.
- 3.2.5 Identify other work in adjacent areas that may impact or be impacted by the planned work. Utilize an Activity Hazard Analysis to address this aspect of potential hazards as well as those associated with the facility and/or operations.

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- 3.2.6 Workers who will perform at the work site should participate as members of the team, which assembles the Activity Hazard Analysis, specifically in verifying the sequence of the basic job steps. The team should walk down the work site(s), where possible. If work site(s) are not accessible other means such as video, pictures, and drawings should be utilized. This walkdown, which can satisfy the *Workability Review* (see def.) requirement if the Job Supervisor and workers have participated.
- 3.2.7 The completed Activity Hazard Analysis (including the subcontractor's review and approval signatures) shall be submitted to the ICP Contractor's point-of-contact for the Contractor's review/acceptance and to ensure that the Activity Hazard Analysis has been developed for the applicable hazards prior to start of work.
- 3.2.8 Commensurate with the risks involved in the work a *safety review* (see def.) will be performed jointly by the ICP Contractor and the subcontractor and will meet the following criteria:
- A. Performed by appropriate ICP Contractor and subcontractor (to include lower tier subcontractors) personnel, based on the types of hazards and level of risks involved.
  - B. Performed with persons knowledgeable of the facilities and processes and work associated with the activity.
  - C. Include affected personnel in the review before start of the work, to foster employee involvement.
  - D. Where practicable, reviewers conduct a walkdown of the area for the work they are reviewing or use equivalent methods (as noted in 3.2.6 above) when it is not prudent to conduct a walkdown.
  - E. Personnel are given adequate time to conduct safety reviews.
  - F. Regulatory codes and industrial standards followed as appropriate.
  - G. All non-routine matters discussed among reviewers, work performers, and document authors and owners.
  - H. All significant review comments that the hazards evaluation author does not resolve to the reviewer's satisfaction are then resolved between corresponding supervisors and/or managers.

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- I. The safety review shall be documented and maintained in the ICP Contractor Project File and by the subcontractor in his document control system.
- J. Document revisions containing significant changes should be reviewed when possible by the same or commensurate reviewer that provided the original review.
- 3.2.9 If there are contradictions between work control documents for a single task, the work shall not be initiated or continued until the contradictions have been reviewed and resolved, and the resolution has been properly documented.
- 3.2.10 If the scope of work changes or if additional hazards are identified, the affected work shall cease. Then, **EITHER**:
- Revise the existing Activity Hazard Analysis/affected work control document to identify the changed conditions **OR**
  - Develop a new work control document to address the changed conditions or controls.
- In both cases, communicate changes to affected personnel prior to resuming work.
- 3.2.11 Any change in a work control document or Activity Hazard Analysis shall be re-submitted to the ICP Contractor's point-of-contact for Contractor's review and acceptance.
- 3.2.12 All work control documents (including items such as work instructions, JSAs, work orders, permits, and similar documents) shall be kept at the work site. All employees shall sign a roster indicating that they understand and will comply with the provisions of their work assignment and the requirements of the work control document.
- 3.2.12.1 Before starting work, supervisors/representative shall conduct and document on Form 434.14 (current revision) (and continued on Form 434.15 if additional signature space is needed) a pre-job briefing meeting with all employees to review the recognized hazards and mitigation methods for the work tasks to be performed.
- 3.2.12.2 Incorporate Human Performance criteria into step 10 and 12 of the pre-job briefing (Form 434.14).

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### 3.3 Hazard Orientation

- 3.3.1 Subcontractors shall conduct a safety orientation covering the subcontractor's ES&H program before employees start work on a job.
- 3.3.2 Supervisors shall review work control documents with all employees assigned to the work task before their involvement in the work activity to communicate the actual and potential hazards and the implementation of mitigating actions identified during the hazard evaluation.
- 3.3.3 When any of the following conditions exist, perform an additional pre-job briefing for the same job, addressing only those items or activities affected:
  - A. During the work activities, area/facility conditions have changed, which may affect the safety of employees, public, or the environment.
  - B. Work scope has changed from the original briefing.

**NOTE:** *A significant work scope change may require that new documentation be prepared and re-approval received.*
  - C. Hazards or risks have changed or additional information has become available that clarifies previously indeterminate or different assumptions.
  - D. Personnel assignments have changed or new personnel are added.
  - E. Work has stopped long enough to create confusion when work resumed.
  - F. Activity has stopped or has been shutdown for a period of greater than seven consecutive days.
  - G. Employee or management requests another pre-job briefing.
- 3.3.4 Employees are responsible for understanding the work activity before commencing work, to include:
  - A. Requesting a pre-job briefing to clarify task scope, personal or public safety, environmental compliance.
  - B. Actively participating in the pre-job briefing to assure all participants understand the scope of work, hazards, mitigations, and responsibilities.

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- 3.3.5 Post-job reviews will be conducted to provide feed back and improvement.
- 3.3.6 Supervisors shall ensure task-specific training has been conducted before assigning any employee a task.

**NOTE:** *Task-specific training may be conducted during the pre-job briefing.*

- 3.3.7 Subcontractors shall ensure that visitors to a work area are oriented regarding the hazards of the work site.
- 3.3.7.1 Visitors shall be briefed on the Activity Hazard Analysis for the work site, and shall sign that they have been made aware of those hazards (see requirement 3.2.3).
- 3.3.7.2 Visitors shall be continuously escorted by an authorized person who is aware of the work activities, associated hazards, and applicable emergency or evacuation procedures.
- 3.3.8 All hazards training, including safety orientation, shall be documented in accordance with PRD-5001, "Training and Indoctrination," and submitted to the ICP Contractor's point-of-contact.

#### 4. DEFINITIONS

*Competent Person.* A person identified by the subcontractor who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

*Hazard evaluation.* A worksite analysis that assesses all the known potential dangers and unhealthy exposures associated with each activity and the means that will eliminate, mitigate, or administratively control such hazards.

*Interactive Briefing.* Briefing leader engages the attendees through questions and responses to ensure personnel understand the work scope, the hazards and the mitigation.

*Safety review.* A deliberate and critical review of a hazard evaluation or a document that will support a hazard evaluation for applicability, adequacy, and management acceptance/approval of applicable ES&H requirements for a proposed activity to ensure employee and public health and safety, facility safety, and environmental protection.

*Workability review.* A review of the work and any supporting documentation to ensure that required hazard evaluations and safety reviews are complete, are applicable to the scope of work, and satisfy the criteria given in this procedure. This review also ensures

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that the work can be completed safely and efficiently according to the work instructions, procedures, drawings, and vendor manuals identified, referenced, or included in the work order. The workability review can be a separate activity or performed at a meeting such as a scheduling meeting. This includes a job site walkdown.

*Work order.* A task-authorizing document that is uniquely numbered which contains a description for work to be performed. A work order MAY include associated drawings, procedures, schedules, permits, and other written documentation necessary to perform activities.

**5. REFERENCES**

## 5.1 Source Documents

10 CFR 851, Worker Safety and Health

29 CFR 1910 Occupational safety and Health Standards (invoked by 10 CFR 851)

29 CFR 1926 Occupational Safety and Health Standards (invoked by 10 CFR 851)

## 5.2 Related Requirements

The following documents may also contain requirements that apply to this activity:

MCP-101, ICP Integrated Work Control Process

PRD-5001, Training and Indoctrination

**6. APPENDICES**

None