

**Idaho National Laboratory**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	Page: 1 of 11
	Revision: 5	
	Effective Date: 12/20/2012	
Subcontractors	Program Description Document	eCR Number: 608850

Manual: INL Subcontractor Requirements

**1. PURPOSE**

The Subcontractor Requirements Program was established to ensure a consistent and controlled method of providing requirements for subcontractors as they perform work at Idaho National Laboratory (INL) facilities.

**2. APPLICABILITY**

This program applies to individual Contractor suppliers or subcontractors that provide services in accordance with — and as specified by — Contractor subcontract, purchase order, or other Procurement documents.

**3. PROGRAM OVERVIEW**

The Subcontractor Requirements Program has been developed — based upon a specific policy, value, and set of goals — to prevent workplace injuries and to ensure consistent and high quality products and services produced.

This program provides a consistent approach to ensuring that all work is consistently accomplished in accordance with the Contractor applicable and stated requirements. When identified in the subcontract documents, this program eliminates the requirement for independent and unique programs that would otherwise be required for individual projects.

The Subcontractor Requirements Program consolidates Contractor requirements and expectations from various programs and disciplines to support the overall goal of the safe and efficient performance of subcontracted work. This program focuses primarily on the areas of environmental assurance (ES&S), safety and health (S&H), radiological control (RADCON), and quality assurance and oversight (QA&O). This program provides a mechanism for disseminating these elements — as they apply to work activity expectations — to subcontractors through the use of consistent methods and formats. The program specifies these work requirements through program requirement documents (RDs) that provide subcontractors with Contractor requirements and references to applicable external regulations with which subcontractors are expected to comply when performing work for Contractor.

**4. PROGRAM ADMINISTRATION AND INTERFACES****4.1 Program Administration**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier:	PDD-1001	
	Revision:	5	
	Effective Date:	12/20/2012	Page: 2 of 11

The Service Subcontractor Requirements Program is a Contractor companywide program. The Subcontracted Work Office (SWO) Manager has overall management responsibility for the Subcontractor Requirements Manual (SRM). As such, the SWO manager is responsible for determining what subjects shall be represented in the manual.

A Subcontractor Requirements Steering Committee has been established to oversee the Subcontractor Requirements Program. This committee consists of at least one representative from each of the applicable functional areas, including:

- Safety and Health
- Environmental Affairs
- Environmental Support and Services
- Radiological Control
- Quality Assurance & Oversight
- INL Institute
- Facilities/Utilities/Maintenance
- Construction Management
- Project Management
- Procurement
- the subcontracting community.

The Subcontractor Requirements Steering Committee coordinates the development of the SRM in order to ensure consistency in approach and language. This includes retaining control of all subcontractor RD revisions, format changes, and additions or deletions. To ensure that revised contractual or regulatory requirements are incorporated into subcontractor RDs, the committee also functions as the primary interface with Contractor personnel (see subsection 4.2).

Subcommittees are also established, as needed, to address issues specific to the ES&S, S&H, RADCON, and QA&O program elements. These subcommittees function in much the same manner as the Subcontractor Requirements Steering Committee.

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier:	PDD-1001	
	Revision:	5	
	Effective Date:	12/20/2012	Page: 3 of 11

The SWO Manager has the responsibility to coordinate the proposed changes to the SRM, as requested by the Subcontracts Requirements Steering Committee.

The SWO Manager has the responsibility to incorporate revisions to the SRM into active service subcontracts under his/her purview, as appropriate. Other managers shall have the responsibility to evaluate active subcontracts under their purview to determine the appropriate action relative to incorporating SRM revisions or not.

## **4.2 Program Interfaces**

Effective implementation of the Subcontractor Requirements Program requires extensive interfacing between the involved subcontractors and Contractor organizations.

The Subcontractor Requirements Steering Committee acts to ensure effective interface between the Contractor organizations and disciplines. The committee coordinates the implementation of subcontractor requirements and shares information concerning the development of, and changes to, requirements as they apply to subcontractor activities.

The individual disciplines and organizations also form committees as needed to analyze requirements and requirement changes associated with their respective disciplines, and to determine applicability to subcontractor work activities.

## **5. PROGRAM DESCRIPTION**

### **5.1 Service Subcontractor RDs**

The service subcontractor RDs provide a consistent approach to ensuring that applicable requirements are passed down to a highly variable and transitional subcontractor work force. These RDs — when identified in the subcontract documents — eliminate the requirement for independent and unique subcontractor expectation documents, which would otherwise be required for individual subcontractors.

This program and associated service subcontractor RDs have been developed to provide individual organizations with the necessary requirements for interfacing with Contractor organizations and meeting Contractor expectations. The service subcontractor RDs provide the necessary requirements to adequately interface with the approved Contractor procedures, or to establish a comparable management system that meets the objectives of the Contractor.

### **5.2 Primary Program Elements**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	
	Revision: 5	
	Effective Date: 12/20/2012	Page: 4 of 11

The primary elements of the Service Subcontractor Requirements Program address S&H, ES&S, RADCON, and QA&O requirements as they apply to subcontractor activities at the INL.

Proper implementation of these program elements is essential to ensuring a safe workplace where employees produce high quality products and services. The management and employees of subcontractors working at the INL must have a “ZERO Injury” commitment. This commitment also applies to having zero:

- accidents involving property
- accidents causing chemical spills or releases to the environment
- unprotected exposures to hazardous materials above the ALARA or other permissible exposure limits
- work quality deficiencies, particularly regarding quality-affecting activities.

### **5.3 Hazard Prevention and Control**

Effective hazard prevention and control requires a demonstrated commitment from a partnership of subcontractor and Contractor employees and management to proactively recognize and minimize hazards; ultimately creating a workplace free of injuries and illnesses. The safety and health process and the “Safety and Health Value” must be integrated into all aspects of INL work activities. Employees who embrace the “Safety and Health Value” actively care for both their own safety and for the safety of others.

The hierarchy that has been established for mitigating hazards is (1) engineering controls, (2) administrative controls, and (3) the use of Personal Protective Equipment (PPE). Hazard prevention and control is addressed through both preventative and corrective measures; the first being worksite analysis, the second being accident and incident investigations.

Worksite analysis (work hazard evaluation) provides a mechanism for identifying and mitigating worksite hazards. The requirements for worksite analysis are addressed in RD-2000, Work Coordination and Hazard Control.

Accident and incident investigations are conducted to determine and correct root causes. Subcontractor supervision is required to investigate any accidents, incidents, or near misses that may occur within their area(s) of responsibility. In addition, subcontractor personnel are required to assist any associated Contractor or DOE investigation. The subcontractor must provide immediate notification to the Contractor Point of Contact (POC) (or within one hour of the incident) and must complete form 5484.3, Individual Accident/Incident Report, within 24 hours of the accident or incident.

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	
	Revision: 5	
	Effective Date: 12/20/2012	Page: 5 of 11

As an additional corrective action, subcontractors are required to develop a disciplinary action plan for violators of ES&S, S&H, RADCON, and QA&O requirements.

#### **5.4 Reporting and Resolving Safety Concerns**

Subcontractor employees not only have the right, but also have the responsibility, to respond to unsafe conditions, unsafe behaviors, and near misses. When an imminent danger situation exists, the employee must immediately stop the work and perform necessary follow-up actions. When a situation does not warrant stopping work, the employee should try to correct the situation on the spot, using immediate resources.

When reporting a situation, the employee should seek resolution (via person-to-person communication, telephone message, or the area employee input form) in the following sequence:

- immediate manager or supervisor
- safety representative
- subcontractor upper management
- safety team member
- Contractor POC or safety representative
- Contractor Employee Concerns Program (526-0333)
- DOE Employee Concerns Program (526-7200).

The individual receiving a safety concern of imminent danger is required to enter the report into the Issues Communication and Resolution Environment (ICARE) so that the concern is tracked to resolution. When the employee reporting the concern provides their identification, resolution is shared with that employee. When identification is not provided, the resolution is posted in the affected area.

#### **5.5 SRM Notices as follows:**

The SRM Notices will provide useful information in the areas of ES&S, S&H, RADCON, and QA&O and will be posted on the Subcontractor Work Office or Construction Management Homepage. The notices are a method of providing timely feedback to the subcontractors at the INL

**Idaho National Laboratory**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	
	Revision: 5	
	Effective Date: 12/20/2012	Page: 6 of 11

**6. SUBCONTRACTOR RESPONSIBILITIES****6.1 Service Subcontractor Senior Management Responsibilities**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	
	Revision: 5	
	Effective Date: 12/20/2012	Page: 7 of 11

Subcontractor senior management has the ultimate responsibility for implementing the elements of the Subcontractor Requirements Program by:

- promoting the values and goals as stated in the contents of this program
- establishing and implementing risk assessments to preserve employee health and well-being against occupational hazards
- establishing and maintaining a motivational climate that encourages employees to fulfill their responsibilities and to fully participate in employee involvement activities
- establishing and maintaining a program that recognizes employees who follow safe and healthful work practices and perform high quality work
- ensuring that the contents of the DOE VPP and Contractor Quality Assurance Program Description (QAPD) are implemented and maintained
- providing and maintaining necessary funding and equipment for effective ES&S, S&H, RADCON, and QA&O programs
- ensuring the proper posting of worker protection and employee rights and responsibilities documentation
- establishing a system that allows employees to report ES&S, S&H, RADCON, and QA&O concerns and ensures timely assessment and resolution
- promoting; supporting; participating with; and actively addressing recommendations of ES&S, S&H, RADCON, and QA&O committees
- establishing and enforcing a disciplinary action policy for employees who willfully or negligently violate program procedures, activities, or standards
- ensuring that employees are not subject to discrimination or reprisal for executing good faith activities or assigned functions
- ensuring that program requirements are passed down to subtier contractors
- ensuring that equipment, processes, and services meet Contractor requirements.

## **6.2 Service Subcontractor Field Supervision Responsibilities**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier:	PDD-1001	
	Revision:	5	
	Effective Date:	12/20/2012	Page: 8 of 11

Subcontractor field supervision is expected to support senior management in implementing the ES&S, S&H, RADCON, and QA&O programs, with supervisors having the first line of responsibility. Field supervision will implement the programs by:

- supporting the INL subcontractor drug-free workplace policy
- identifying hazards associated with activities and controlling or eliminating those hazards when planning and executing work
- identifying and evaluating potential hazards and potential process or program deficiencies associated with each aspect of a project
- assigning and communicating safety roles, responsibilities, and accountabilities to employees
- ensuring that employees are cognizant of hazards in their workplaces and adjacent areas, and that they understand their assigned duties
- notifying the Contractor point-of-contact (POC) of any stop work action
- ensuring that the conditions of a work stoppage are appropriately investigated and documented
- conducting surveillance of work environments
- investigating and tracking incidents, nears misses, and errors; determining causes; taking corrective actions to prevent recurrence; and performing trend analyses
- ensuring that identified deficiencies are tracked to closure
- following administrative procedures to enforce disciplinary action when program requirements or instructions are violated
- notifying employees of any pertinent health exposure information
- ensuring employees are enrolled in applicable medical surveillance activities
- ensuring that a high standard of housekeeping is maintained
- providing employees with appropriate and adequate instruction in:
  - stop work authority
  - employee rights and responsibilities

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier:	PDD-1001	
	Revision:	5	
	Effective Date:	12/20/2012	Page: 9 of 11

- job duties and hazards
- safety notification process
- accident prevention aspects of each job
- use, issue, storage, and disposal of PPE
- use of materials, tools, and equipment
- alarm initiation and response
- emergency reporting
- evacuations
- fire extinguisher use
- disciplinary action plan
- conducting pre-job briefings and plan-of-the-day (POD) meetings
- participating in quarterly subcontractor safety meetings
- ensuring that work is conducted in accordance with work directions in a safe and healthful manner
- addressing safety hazards and work quality deficiencies that are identified by employees and responding in a timely manner
- making appropriate notifications to the Contractor POC for occupational injury, illness, near miss, unplanned exposure, or work quality deficiency
- ensuring that personnel can perform their work tasks safely and effectively within the confines of any temporary or permanent work restrictions
- verifying that employee training is appropriate and current for the work activities to be performed.

### **6.3 Service Subcontractor Employee Responsibilities**

Subcontractor employees are expected to take responsibility for their own health and safety, for the safety of fellow employees, and for the quality of the products and services they produce by:

- recognizing and reporting hazards and work quality deficiencies
- using and maintaining tools, equipment, and PPE in the prescribed manner
- stopping work in situations of clear and present danger and reporting the situations to supervision

**Idaho National Laboratory**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001	
	Revision: 5	
	Effective Date: 12/20/2012	Page: 10 of 11

- practicing good housekeeping in assigned work areas
- working within the constraints of Service Subcontractor Requirements Program requirements, hazard evaluations, and approved work control documents
- participating as required in medical surveillance programs
- immediately reporting to direct management any occupational injuries, illnesses, near misses, potential exposures to hazardous agents, or work quality deficiencies
- immediately reporting to direct management any non-occupational injury, illness, or condition that might affect or limit employee capability to safely perform assigned job duties
- participating in:
  - safety committees
  - safety meetings
  - worksite inspections and hazard evaluations
  - POD meetings
  - weekly tool box safety meetings
- requesting any needed information about hazards in the workplace
- conforming to the requirements of a drug free workplace.

## 7. **SERVICE SUBCONTRACTOR TRAINING REQUIREMENTS**

Subcontractors must provide training to their personnel to ensure that they are aware of:

- the hazards in the subcontractor-controlled workplace
- how workplace hazards are controlled
- worker responsibilities associated with the products and services they provide.

Training may be general, site-specific, or task-specific, depending on the level of awareness and competency required.

Subcontractor management and supervision must receive documented training to enhance their roles in implementing the Subcontractor Requirements Program.

**Idaho National Laboratory**

<b>SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION</b>	Identifier: PDD-1001
	Revision: 5
	Effective Date: 12/20/2012 Page: 11 of 11

All hazards training, including safety orientation, shall be documented in accordance with RD-1008, Training and Indoctrination, and submitted to the Contractor POC.