

**Idaho National Laboratory**

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Subcontractors	Program Requirements Document	eCR Number: 631235
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Manual: INL Subcontractor Requirements

**1. PURPOSE**

This RD provides general safety and security information/requirements pertaining to Subcontractors performing work at the INL that is not otherwise stated in subject specific RD's.

All applicable requirements shall be flowed down to all lower-tier subcontractors performing work at the INL.

**2. GENERAL INFORMATION**

The Contractor maintains and operates the clinic/dispensaries, the ambulance, and the professional fire fighting services at the INL. Without guaranteeing the adequacy thereof, or assuming any liability whatsoever in connection therewith, Contractor will permit subcontractors to use such services as may be available in emergency cases without charge. The Contractor clinic/dispensaries are available for emergency medical treatment. Any additional use of the Contractor clinic/dispensaries is identified in RD-1001, *10 CFR 851 Occupational Medicine Requirements*.

In an emergency, security, fire, or medical services may be contacted twenty-four hours per day by dialing 777 from any INL telephone on the INL site (by mobile phones, 526-1515). Fire or medical services may be contacted by dialing 9-911 from any INL telephone in Idaho Falls. Security may be contacted by calling 6-0712 from any INL telephone.

**3. SUBCONTRACTOR PERSONNEL RESPONSIBILITIES****3.1 Subcontractor management is responsible for ensuring that:**

- A. Line management is responsible for the protection of employees, the public, and the environment.
- B. Clear, unambiguous lines of authority and responsibility for ensuring compliance regarding Environmental Safety & Health (ES&H) guidelines at all organizational levels..
- C. Personnel possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.
- D. Resources are effectively allocated to address ES&H, programmatic, and operational considerations. Protecting employees, the public, and the environment is a priority whenever activities are planned and performed.

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- E. Before work is performed, the associated hazards are evaluated and documented and an agreed-upon set of ES&H standards and requirements are established which, if properly implemented, provide adequate assurance that employees, the public, and the environment are protected from adverse consequences.
- F. Administrative and engineering controls to prevent and mitigate hazards are tailored to the work being performed and associated hazards. Emphasis should be on designing the work and/or controls to reduce or eliminate the hazards and to prevent accidents and unplanned releases and exposures.
- G. Establishing and enforcing a disciplinary action policy for employees who willfully or negligently violate program procedures, activities, or standards.
- H. Ensuring that employees are not subject to discrimination or reprisal for executing good faith activities or assigned functions.
- I. Ensuring the subcontractor maintains current revisions of both CFR 1910 and CFR 1926 at each job-site to assist in the understanding of the Subcontractors Requirements Documents (SRM).

### **3.2 Subcontractor Field Supervision is responsible for:**

- A. Supporting the INL drug-free workplace policy.
- B. Identifying hazards associated with activities and controlling or eliminating those hazards when planning and executing work.
- C. Preparation of a Job Safety Analysis that accurately identifies the work scope, hazards and mitigation of associated hazards. Responsible for having the JSA reviewed by the appropriate INL subcontractor oversight prior to start of the work effort. Maintaining JSA currency. Ensuring all employees, subtiers and others who enter the project area review the JSA, understand the hazards and mitigations and sign the roster indicating they understand the hazards and will adhere to the JSA requirements. Make corrections, modifications, or additions to the JSA as may be required and ensure all who originally signed the JSA review the changes and acknowledge by initialing and dating the JSA.
- D. Identifying and evaluating potential hazards and potential process or program deficiencies associated with each aspect of a project.
- E. Assigning and communicating safety roles, responsibilities, and accountabilities to employees.

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- F. Ensuring that employees are cognizant of hazards in their workplaces and adjacent areas, and that they understand their assigned duties.
- G. Notifying the Technical Point of Contact, Subcontractor Field Rep/Construction Field Rep (TPOC,SFR/CFR) of any stop work action.
- H. Ensuring that the conditions of a work stoppage are appropriately investigated and documented.
- I. Conducting weekly surveillances of work environments, including lower-tiers and preparing and implementing written corrective action plans.
- J. Ensuring that daily and weekly surveillance findings are reviewed once a month to verify that non-compliances have been corrected or mitigated and to identify any recurring non-compliances.
- K. Investigating and tracking incidents, nears misses, and errors; determining causes; taking corrective actions to prevent recurrence; and performing trend analyses.
- L. Ensuring that identified deficiencies are tracked to closure.
- M. Following administrative procedures to enforce disciplinary action when program requirements or instructions are violated.
- N. Notifying employees of any pertinent health exposure information.
- O. Ensuring employees are enrolled and maintained current in applicable medical surveillance and certification activities.
- P. Ensuring that a high standard of housekeeping is maintained.
- Q. Providing employees with appropriate and adequate instruction in:
- stop work authority
  - employee rights and responsibilities
  - job duties and hazards
  - safety notification process
  - accident prevention aspects of each job
  - use, issue, storage, and disposal of Personal Protection Equipment (PPE)

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- 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 monthly subcontractor safety meetings.
- R. Ensuring that work is conducted in accordance with work directions in a safe and healthful manner
- S. Making appropriate notifications to the TPOC, SFR/CFR for occupational injury, illness, near miss, unplanned exposure, or work quality deficiency.
- T. Ensuring that personnel can perform their work tasks safely and effectively within the confines of any temporary or permanent work restrictions.
- U. Verify that employee training is appropriate and current for the work activities to be performed.
- V. Conducting daily site inspections to ensure adequate protective measures are in place, and all recognized hazards are identified and processes are in place to ensure a safe and compliant workplace.
- W. Address safety hazards and work quality deficiencies that are identified by employees and respond in a timely manner.
- X. Instruct workers to report hazards not previously identified or evaluated.
- Y. If immediately corrective actions is not possible or the hazard falls outside of the project scope:
- immediately notify the affected workers,
  - post appropriate warning signs,

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- implement needed interim measures, and
- notify the SFR/CFR of actions taken.

Z. Having successfully completed the National safety Council's "Supervisors Development Program" or the OSHA "30-hour Construction Outreach" course. In addition to one of these classes a five year resume is also required to be evaluated by the Construction Manager and CM ES&H.

Supervisor's Development Program and OSHA 30 Construction Outreach must be current within 5 years of awarded project.

**NOTE:** *The requirements of paragraph Z will not apply to Service Subcontracts unless the service subcontract is transferred to Construction Management using form 436.04 "Project Transfer From Subcontracted Work Office to Construction Management".*

### **3.3 Subcontractor employees are responsible for:**

- A. Recognizing and reporting hazards and work quality deficiencies.
- B. Using and maintaining tools, equipment, and PPE in the prescribed manner.
- C. Stopping work in situations of clear and present danger and reporting the situations to supervision.
- D. Practicing good housekeeping in assigned work areas.
- E. Working within the constraints of Subcontractor Requirements Program requirements, hazard evaluations, and approved work control documents.
- F. Participating as required in medical surveillance and certification programs.
- G. Immediately reporting to direct management any occupational injuries, illnesses, near misses, potential exposures to hazardous agents, or work quality deficiencies.
- H. 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.

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- I. Participating in:
- Safety committees
  - Safety meetings
  - Worksite inspections and hazard evaluations
  - POD meetings
  - Weekly tool box safety meetings
- J. Requesting any needed information about hazards in the workplace.
- K. Responding appropriately to all emergency signals, whether drills or actual emergencies.
- L. Conforming to the requirements of a drug free workplace.

**3.4 Subcontractor Safety Professional is responsible for:**

- A. Having successfully completed the National Safety Council “Supervisors Development Program” or having successfully completed the OSHA “30-hour Construction Outreach” course. In addition to one of these classes a five year resume is also required to be evaluated by the Construction Manager and CM ES&H.

Supervisor’s Development Program and OSHA 30 Construction Outreach must be current within 5 years of awarded project.

**NOTE:** *The requirements of 3.4 A will not apply to Service Subcontracts unless the service subcontract is transferred to Construction Management using form 436.04 “Project Transfer From Subcontracted Work Office to Construction Management”.*

- B. Having direct access to Subcontractor management with full authority to make safety-related changes and resolve safety issues.
- C. Being at the jobsite during all work activities or appointing an alternate to perform this function.
- D. Conducting and documenting daily surveillances of the workplace to identify and correct hazards and noncompliance.

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- E. Maintaining a copy of all surveillance activities.
- F. Responding to Contractor safety surveillance findings by providing a written corrective action plan within one working day of notification.

**3.4 The Contractor reserves the right to have removed from the site and deny re-entry to any Subcontractor employee ( including supervision and management):**

- A. Found to be in a situation of imminent danger to life and health created by violating procedures covering; fall protection, confined space entry and work, lock/tag requirements, respirator protection, hoisting and rigging activities and excavations, or other tasks where injury could occur;
- B. Advising an employee to work in an unsafe condition/position; or
- C. Willfully violating any ES&H policy, procedure, rule or regulation.

**NOTE:** *If the Subcontractor's superintendent/management knowingly places an employee (including himself) in an imminent danger situation, this subcontract may be terminated for default.*

**4. REPORTING AND RECORDKEEPING**

- 4.1 The subcontractor shall verbally notify the Contractor Point of Contact (POC) of an incident (accident, injury, near miss, etc.) as soon as possible, but no later than one hour from its occurrence.
- 4.2 The subcontractor/subtier shall perform an accident investigation appropriate to the type of accident/incident/near miss that occurred or shall assist in any investigation performed by the Contractor and/or DOE.
- 4.3 Subcontractor employees shall assist in any investigation as appropriate.
  - 4.3.1 A completed DOE form 5484.3 "Individual Accident/Incident Report" (hardcopy) and/or INL Form 231.01 "Individual Accident Incident Report" (electronic) shall be submitted to the Contractor POC within 24 hours of any injury or illness, including first aid cases.
  - 4.3.2 If all information cannot be completed, an addendum may be provided at a later date.
  - 4.3.3 Special attention shall be given to DOE form 5484.3, section 38 "Accident Causes" to ensure that "Root Cause," "Direct Cause," and "Contributing Causes" have been identified.

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- 4.4 The subcontractor/subtiers shall participate in any fact-finding meeting.
- 4.4.1 A fact-finding meeting will be conducted, as a minimum, for every recordable, lost-time or significant accident/incident.
- 4.4.2 If an employee from a particular craft is involved in an incident/accident, another representative of that craft will be required to participate in the accident investigation or fact finding.
- 4.5 A copy of the records of any personnel exposure to concentrations of toxic chemicals or other materials shall be retained and submitted to the POC. This includes the following:
- A. Correspondence prepared in the normal course of business concerning or documenting exposure
  - B. standards, operating guides, and procedures (including revisions and background records)
  - C. operating plans concerning the above
  - D. records and investigations establishing the extent of employee exposure to toxic chemicals and materials
  - E. industrial hygiene log sheets recording surveys for industrial hazards.
- 4.6 The subcontractor shall ensure the recording and reporting of occupational injuries for each subcontract.
- 4.6.1 Monthly Safety Reports**
- A. Safety Meeting Reports shall be maintained at subcontractor's job site for review.
  - B. A report on project safety statistics shall be provided to the Contractor on a financial month basis. The report shall tabulate the safety statistics for subcontractor and all lower-tier subcontractors. The report shall be submitted via Form 432.A42, INL Supplier Monthly Manpower and Accident Status Report submitted within 4 business days following the end of each accounting month to subsafety@inl.gov.

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## 5. SUBCONTRACTOR MEDICAL/EXPOSURE MONITORING, INJURY/ILLNESS MANAGEMENT AND DRUG FREE WORKPLACE

- 5.1 Unless other wise specified in RD-1001 10 CFR 851 *Occupational Medicine Requirements*, the subcontractor shall provide for a mechanism to ensure that:
- A. medical or exposure monitoring (including baseline, periodic and termination of employment) and drug testing as required by applicable federal, state, or local regulations are in place. Upon request the subcontractor shall provide evidence of this monitoring.
  - B. diagnostic examinations may be needed to evaluate employee's injuries and illnesses to determine work-relatedness and the applicability of medical restrictions
  - C. after a work-related injury or illness or an absence due to any injury or illness lasting 40 or more work hours, a return to work evaluation may be needed to determine the worker's physical and psychological capacity to perform work and return to duty
  - D. any "ability to work" restrictions, both permanent and temporary, are complied with
  - E. occupationally ill and injured workers are properly managed to facilitate their rehabilitation and safe return to work and to minimize lost time and its associated costs
  - F. medical restrictions are invoked when health evaluations indicate that the worker should not perform certain job tasks. Notification shall be made to the worker and management when work restrictions are imposed or removed
- 5.2 As applicable, subcontractors shall comply with the requirements of 10 CFR 707 Workplace Substance Abuse Programs at DOE Sites:
- A. Subcontractors have the option of utilizing BEA's Workplace Substance Abuse Program or they may submit their own program for approval. If the subcontractor determines to use their program, they must submit their program to the Subcontract Administrator.

## 6. FIELDWORK

- 6.1 All persons performing field work (see def.) shall complete Unexploded Ordnance Recognition Training before working in the field.

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6.2 Personnel performing field work shall carry at least the following equipment:

- A. INL pager
- B. two-way communications (mobile phone or INL radio)
- C. fire extinguisher and shovel
- D. first aid supplies

**NOTE:** *A single set of the equipment listed above will be sufficient for a team that will be working in close proximity to each other at all times.*

6.3 Before workers begin working in the field, one of the following methods of notification must be made:

- A. EITHER Form 150.04, INL Fieldwork Visitation Record, shall be completed and submitted to the CFA alarm dispatcher (526-2212), OR
- B. an exemption from the requirement to complete Form 150.04 shall be requested from and approved by the CFA Emergency Planner (526-2226).

**NOTE:** *The criteria for approving an exemption from the requirement to complete form 150.04 include all of the following: (1) work is routinely or repeatedly performed, (2) workers are dispatched from an INL dispatch location, (3) a field work point of contact is available and able to communicate with field workers at all times while workers are in the field, and (4) the point of contact has a pager and two-way communication as described in 6.2, above.*

6.4 A field work point of contact shall be appointed who can communicate with the fieldworkers at all times while workers are in the field.

**NOTE:** *The field work point of contact for communication purposes is not necessarily, and usually will not be, the INL POC designated for the subcontract.*

6.5 The CFA emergency planner (526-2226) shall be informed of current points of contact and the means of communication with fieldworkers.

6.6 Communications capability shall be maintained between field workers and points of contact at all times while workers are in the field.

6.7 Workers in the field shall report any unusual or emergency conditions to the Warning Communication Center and the assigned point of contact.

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6.8 Workers in the field shall follow emergency directions from authorized emergency personnel (such as the field work point of contact, CFA Alarm Dispatch, the INL Emergency Response Organization, or the Warning Communication Center).

6.8.1 A current file of fieldwork points of contact and requests for exemptions shall be maintained.

## **7. MAJOR EQUIPMENT ACCESS AND INSPECTION REQUIREMENTS**

7.1 Subcontractors bringing major equipment to the INL shall notify the SFR/CFR of the time and location of equipment arrival at the jobsite for INL inspection and issue of "Subcontractor Equipment ACCEPTABLE FOR USE Tag" (form 432.A40) for each piece of equipment coming onsite.

## **8. INL SITE EQUIPMENT USE REQUIREMENTS**

All equipment, (vehicles, machinery and/or hand tools) used by the Subcontractor to perform work at the INL must be in good working condition for the purpose intended and meet all applicable codes and standards. Such equipment must be used and maintained only as intended by the manufacturer and in accordance with the manufacturer's instructions and limitations. The equipment must be free of defects and suitable for safe performance of the work. Contractor reserves the right, in its sole discretion, to conduct cursory inspections of subcontractor equipment prior to use. Equipment found to be unsatisfactory by the Contractor shall be promptly repaired or removed from the premises and replaced with satisfactory items at no cost to the Contractor. Contractor inspections, whether or not any equipment is found to be unsatisfactory or whether or not any defects are found by such inspections, do not relieve the Subcontractor of any responsibility or liability for performing the work in a safe manner.

## **9. DEFINITIONS**

For definitions of terms used throughout the INL Subcontractor Requirements Manual, refer to LST-27.