

**Idaho National Laboratory**

<b>WORK COORDINATION AND HAZARD CONTROL</b>	Identifier:	RD-2000	
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Subcontractors	Program Requirements Document		eCR Number: 635969

**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 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 INL, as specified in their contract with the Contractor. It provides requirements that support all subcontracted projects at the INL site and in-town facilities managed by Contractor. All 2000 series incorporated as applicable to the scope of work.

**3. REQUIREMENTS****3.1 General Requirements**

- 3.1.1 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 Pre-work Planning Meetings**

- 3.2.1 After the Notice to Proceed is issued, but prior to the start of the work, the subcontractor with necessary lower-tier subcontractor personnel, must demonstrate to the Contractor's satisfaction, knowledge and understanding of the subcontract requirements at a Pre-work Planning Meeting(s). The meeting(s) will be conducted by the Subcontractor prior to the start of each type of work, e.g., soil, concrete, steel, mechanical, or electrical, and prior to the start of performance by each of its lower-tier subcontractor.
- 3.2.2 At the meeting(s), the subcontractor's superintendent and lower-tier subcontractor's personnel responsible for supervising the work must demonstrate their knowledge and understanding of the subcontract requirements, with specific attention given to the integration of safety, environment, health, and quality assurance requirements into the work. The subcontractor must demonstrate complete knowledge and understanding of the safety requirements, work hazards, and hazard mitigation, training requirements and all work control documents.

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Knowledge and understanding of the contents of applicable documents, e.g., the Subcontract Specifications, Drawings, Special Conditions, and documents and forms referenced in the forgoing, must be demonstrated.

- 3.2.3 If subcontractor fails to demonstrate sufficient knowledge and understanding of the subcontract requirements at the pre-work planning meetings, the Contractor will not release the work and work shall not start. Pre-work planning meetings will continue to be held until the subcontractor demonstrates sufficient knowledge and understanding of the requirements. Subcontractor's failure to obtain timely release of each task will not be a basis for an extension of the performance period nor claim for delay.
- 3.2.4 Subcontractor shall provide CFR/SFR with advanced notice, at least one working day prior, of a Pre-work Planning Meeting and shall schedule the meeting sufficiently in advance to avoid impacting performance of the work. The meetings will be held at the Contractor's facilities, unless otherwise mutually agreed.
- 3.2.5 After the subcontractor satisfies the Contractor regarding the readiness of the subcontractor, the Contractor will issue a written authorization to the subcontractor, releasing it to perform each task. Multiple tasks may be released at one time, but each shall be specifically identified in writing as being released, prior to the start of performance.

### 3.3 Safety Reviews

- 3.3.1 Every work activity or phase of a project shall be reviewed before starting the work activities to ensure that they can be done safely.

**NOTE:** *The work control documents described in Appendix A are commonly used as hazard evaluations. Contact the Contractor Point-of-Contact (POC) to obtain any Contractor forms.*

- 3.3.2 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, [i.e., Job Safety Analysis (JSA), or as a minimum the pre-job briefing].
- 3.3.3 The hazards associated with the work, and the applicable hazards identified in the "Special Conditions" from the Checklist for Project/Contract Hazard Identification, Form 432.05 shall be documented in a hazard evaluation [i.e., JSA, Health and Safety Plan (HASP), Confined Space Permits, Work Orders (WO), Area Hot Work Permits and Radiological Work Permit (RWP)]. Hazard evaluations shall address the following elements:

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- 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. Mitigation methods to be used to protect workers, facilities and the environment, such as:
    - Engineered controls (barriers)
    - Administrative controls
    - Required personal protective equipment.
  - G. Mobilization and demobilization
  - H. Applicable hazards as identified in the “Special Conditions” from the Checklist for Project/Contract Hazard Identification, form 432.05
  - I. When supplementary work control documents are required
  - J. The period of effectiveness for the hazard evaluation and when the hazard evaluation (i.e., JSA) shall be re-evaluated.
- 3.3.4 The subcontractor shall identify hazardous activities that require “competent person” evaluations, as identified in 29 CFR 1926 “Construction Industry Regulations” and/or 1910 “General Industry Regulations.” Names of the subcontractor’s authorized competent persons and the OSHA regulation they are declared, as a “competent person” shall be submitted on form 432.A31 “Competent Person Roster” to the Contractor POC for entry into TRAIN.
- 3.3.5 The subcontractor shall identify hazardous activities that require training, as identified in 29 CFR 1926 “Construction Industry Regulations” and/or 1910 “General Industry Regulations.” Training documentation (roster, certificate, card, etc.), including the training topic, names and S-numbers of workers trained shall be submitted to the Contractor POC for entry into the TRAIN.
- 3.3.6 Workers who will perform the work should participate as members of the team, which assembles the JSA, specifically in verifying the sequence of the basic job steps. At least one team member that will actually be on site, performing the proposed work shall walk down the

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work site where possible. If work site(s) are not accessible other means such as video, pictures, and drawings should be utilized.

- 3.3.7 A draft JSA shall be submitted to the Contractor POC for the Contractor's review and acceptance and to ensure that the JSA's have been developed for the applicable subcontractor work hazards and hazards identified in the "Special Conditions" from the Checklist for Project/Contract Hazard Identification, Form 432.05 prior to start of work.
- 3.3.8 The POC will forward the draft JSA with comments to the subcontractor for the subcontractor's comment resolution and reviewed by signatures.
- 3.3.9 Commensurate with the risks involved in the work a safety review will be performed jointly by the Contractor and the subcontractor and will meet the following criteria:
- A. Performed by appropriate 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 3.3.5 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.
  - I. Document revisions containing significant changes should be reviewed by the same or commensurate reviewer that provided the original review.
- 3.3.10 If there are any contradictions between work control documents for a single task, the work shall be stopped until the contradictions have been reviewed and resolved, and the resolution has been properly documented.

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- 3.3.11 If the scope of work changes or if additional hazards are identified, the affected work shall stop, and one of the following shall be performed:
- A. EITHER the existing JSA or other work control document shall be revised to identify the change
  - B. OR a new JSA or work control document will be developed in accordance with these requirements and communicated to the affected employees before work is resumed.
- 3.3.12 Any change in a work control document shall be re-submitted to the Contractor POC for Contractor's review and acceptance.
- 3.3.13 All work control documents (including items such as work instructions, JSAs, Work Orders, permits, and similar documents) shall be kept at the work site.
- 3.3.13.1 On smaller projects, work control documents shall be kept in a "project box" placed at the entrance to the work site.
  - 3.3.13.2 On larger projects, if the subcontractor has placed an office trailer on the site, the documents may be kept in the trailer.

### 3.4 Hazard Orientation

- 3.4.1 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.
- 3.4.2 All employees shall sign a roster indicating their understanding and willingness to comply with the provisions of their work assignment and the requirements of the work control document.
- 3.4.3 Before starting work, supervisors/ representative shall conduct and document on form 436.10 (current revision) INL Subcontractor Pre-Job BRIEFING, a pre-job briefing meeting with all employees, documented on form number 436.10 (current revision) INL Subcontractor Pre-Job BRIEFING ATTENDANCE RECORD, to review the recognized hazards and mitigation methods for the work tasks to be performed. A pre-job briefing helps to ensure the participants are prepared, the work scope is defined, hazards and environmental impacts are understood and controlled, and any last minute questions are answered. The pre-job briefing requires an increased interaction between workers and supervision to exchange job-specific information and increase worker awareness of potential error "traps" prior to work being performed. A

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good discussion of “what could go wrong” should then be followed by what will be done to prevent errors. Discuss the following, minimum items is an Interactive Briefing:

- A. scope of work to be performed
- B. hazards of the job and mitigation of those hazards
- C. work procedures involved
- D. emergency escape routes, including actions taken to ensure escape routes remain clear throughout the job
- E. personnel roles & responsibilities, required training and work restrictions
- F. identified items from the pre-job briefing checklist (Form 436.10)

3.4.3.1 Incorporate Human Performance criteria into steps 8 and 9 of the pre-job briefing (form 436.10).

3.4.4 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 pre-job briefing.
- 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 7 consecutive days.
- G. Employee or management requests another pre-job briefing.

**NOTE:** *On workdays when a pre-job briefing is not held, the subcontractor at a minimum will hold and document a short Daily Coordination Meeting (DCM) with key personnel prior to beginning the days work. At the DCM the subcontractor’s project supervision will cover task assignments, coordination requirements, and ensure important safety considerations are*

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*reviewed so the days work activities can be timely and successfully performed.*

- 3.4.5 Employees are responsible for understanding the work activity before commencing work.
- A. Request a pre-job briefing if you feel that you need one, or when you need to clarify task scope, personal or public safety, or environmental compliance.
  - B. Actively participate in the pre-job briefing to assure all participants understand the scope of work, hazards, mitigations, and responsibilities.
- 3.4.6 Post-Job reviews will be conducted to provide feed back and improvement.
- 3.4.7 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.*

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

3.4.9 The subcontractor supervisors/ representative shall ensure that "VISITORS" to the work area are briefed using form 436.10 (Current Version) INL Subcontractor Pre-Job BRIEFING, regarding the hazards of the work area.

3.4.9.1 Pre-Job Briefing information identified on form 436.10 includes a brief description of the work activity, the actual and potential hazards and the implementation of mitigating actions identified during the hazard evaluation.

3.4.9.2 The subcontractor supervisors/ representative shall inform the visitor(s) of the minimum "visitor" requirements for entry into the work area to include, PPE and training requirements.

3.4.9.3 The briefing with "visitors" shall be documented on form number 436.10 (current revision) INL Subcontractor Pre-Job BRIEFING ATTENDANCE RECORD.

**NOTE:** "Visitor(s)" acknowledge they have the minimum required training for entry onto the jobsite by initialing in the "Training" column form 436.10

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- 3.4.9.4 “Visitors” shall be continuously escorted by an authorized person who is aware of the work activities, associated hazards, and applicable emergency or evacuation procedures.

#### **4. DEFINITIONS**

For definitions of terms used throughout the INL Subcontractor Requirements Manual, refer to LST-359.

#### **5. APPENDICES**

Appendix A, Types of Work Control Documents and Their Uses

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## Appendix A

### Types of Work Control Documents and Their Uses

#### Types of Work Control Documents

Work control documents commonly used as hazard evaluations include:

- Construction/Service Job Safety Analysis (JSA), Form 432.58
- Health and Safety Plan (HASP).
- INL Subcontractor Pre-Job BRIEFING (Form 436.10)
- INL Subcontractor Pre-Job BRIEFING Instructions (Form 436.10A).

The following types of documents may be used for hazard evaluations, but are more commonly used in support of the previously mentioned work control documents:

- Confined Space Entry Permits (see RD-2110, Confined Space)
- Designated Area Hot Work Permit and Non-designated Area Hot Work Permit (see RD-2010, Welding, Cutting, and Other Hot Work)
- Radiological Work Permit (see RD-3001, Radiological Control).
- These and other activity-controlling documents that fulfill the requirements specified in paragraph 3.3.3 are equivalent to and may be used as hazard evaluations.

#### Job Safety Analysis (JSA)

A JSA is the most appropriate hazard evaluation for routine tasks or jobs that pose low to moderate risk to workers. The JSA replaces the need to complete another hazard evaluation every time the task must be performed, provided the work area safety conditions have not changed since the JSA was initially approved. This makes the JSA a convenient tool for activities such as routine maintenance, service work and construction, but also allows for a thorough evaluation of the basic job steps, potential hazards, and mitigating action involved in the task or job with the work performers' participation.

In its primary function, the JSA describes a job, its hazards, and the means to mitigate the hazards. A JSA will be prepared for identified service subcontracts and every project site using Contractor Form 432.58, Construction/Service Job Safety Analysis. A JSA by itself does not authorize work to be performed.

NOTE: For service subcontracts the subcontractor may request the use of their company JSA. Utilizing a graded approach the SFR and the ES&H Rep will review the subcontractor's JSA to ensure the JSA meets the minimal requirements of Form 432.58.

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NOTE: With concurrence of the SFR/CFR and ES&H Rep. for short duration service construction projects the JSA may be combined with the INL Subcontractor Pre-job briefing (form 436.10).

**Health and Safety Plan (HASP)**

A HASP (for hazardous waste cleanup operations or CERCLA sites) may be used as a hazard evaluation when it addresses hazards and their mitigation. Because a HASP is prepared before a hazardous waste project or work at a CERCLA site begins, it may have to be revised or supplemented with JSAs, RWPs, etc., as new hazards are identified during the project.