



U.S. Department of Energy

~~Office of River Protection~~

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

MAY 31 2007

07-ESQ-095

Mr. W. S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354

Dear Mr. Elkins:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-07-ESQ-RPPWTP-007
– ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING APRIL 23 THROUGH MAY 14, 2007

This letter forwards the results of the U.S. Department of Energy, Office of River Protection (ORP) assessment of the Bechtel National, Inc. (BNI) OSHA injury/illness recordkeeping programs conducted from April 23 through May 14, 2007 (Attachment). The Team had no Findings.

In the area of injury/illness recordkeeping the Team concluded that reporting of work-related injuries by BNI has been accurate in the last six month period. For the September 2006 through April 2007 period, ORP found all cases reported in accordance with OSHA requirements. Corrective actions in response to one Finding from the September 2006 ORP assessment were determined to be effectively implemented. In this report, ORP is closing Finding A-06-ESQ-RPPWTP-009-F01 describing the failure to document evidence BNI had performed oversight on Waste Treatment and Immobilization Plant subcontractors.

If you have any questions, please contact me, or your staff may contact William J. Taylor, Assistant Manager, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

Shirley J. Olinger, Acting Manager
Office of River Protection

ESQ:PRH

Attachment

cc w/attach:

D. E. Gergely, BNI
D. E. Kammenzind, BNI
S. W. Sanders, PAC
C. R. Ungerecht, PAC
Administrative Record
BNI Correspondence

U.S. DEPARTMENT OF ENERGY
Office of River Protection
Environmental Safety and Quality

ASSESSMENT: Occupational Safety and Health Act Injury/Illness Recordkeeping Review

REPORT: A-07-ESQ-RPPWTP-007

FACILITY: Bechtel National, Inc. Waste Treatment and Immobilization Plant

LOCATION: Hanford Site

DATES: April 23 through May 14, 2007

ASSESSORS: Paul Hernandez, Lead Assessor

APPROVED BY: Patrick P. Carrier, Team Lead
Verification and Confirmation Team

Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of Bechtel National, Inc.'s (BNI) Occupational Safety and Health Administration (OSHA) injury/illness recordkeeping program. The assessor evaluated the procedural requirements, interviewed employees, and examined records pertaining to the assessment subject. This assessment evaluated the effectiveness of the Contractor's implementation of procedures and practices which satisfy the requirements of OSHA 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses." The assessment focused on determining the effectiveness of the processes associated with identifying, evaluating, and recording injuries and illnesses on OSHA forms and in the DOE Computerized Accident/Incident Reporting System (CAIRS) database. The assessor paid particular attention to injuries which were compensable by the Washington State Department of Labor and Industries, but were not reported as OSHA recordable. ORP is required to perform quality checks of the information reported through the CAIRS by its contractors every six months. The last assessment of BNI was performed in September 2006.

The assessor concluded reporting of work-related injuries by BNI was accurate. For the September 2006 to April 2007 period ORP found all cases reported in accordance with OSHA requirements.

ORP closed one open Finding during this assessment. The Finding dealt with the lack of documented BNI oversight over subcontractor recordkeeping programs. ORP found that corrective actions from the September 2006 ORP assessment were effectively implemented. ORP verified that BNI's earlier failure to document quarterly assessments of BNI subcontractor injury/illness recordkeeping had been corrected.

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List of Acronyms

BNI	Bechtel National, Inc
CAIRS	Computerized Accident/Incident Reporting System
DOE	U.S. Department of Energy
L&I	Labor and Industries
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration
WTP	Waste Treatment and Immobilization Plant

Occupational Safety and Health Association (OSHA) Injury/Illness Recordkeeping Review Bechtel National, Inc. (BNI)

Scope

From April 23 through May 14, 2007, the U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of BNI's OSHA injury/illness recordkeeping program.

Details

The assessor examined relevant documentation including the most recent BNI procedure for implementation of the OSHA Recordkeeping Program. The assessor performed evaluations of employee medical records, Computerized Accident/Incident Reporting System (CAIRS) database entries, and "Safety Data System (SDS) First Aid Log" data. The assessor interviewed BNI's Workers Compensation Administrator and reviewed current Labor and Industries (L&I) records for employees who had filed claims.

Review of Procedures

DOE's review of the contractor's procedure for the OSHA Recordkeeping Program determined there was a clear process described for reporting injuries for CAIRS and OSHA recordkeeping purposes. BNI Procedure 24590-WTP-GPP-SIND-023, "Injury/Illness Notification, Investigation, and Reporting," met the minimum requirements in the DOE Environmental, Safety and Health Reporting Manual, DOE M 231.1-1A.

The assessor also reviewed Procedure 24590-WTP-GPP-SIND-022, "Assessment and Issue of Noncompliance for Construction Subcontractor's Safety and Health Compliance." The assessor concluded BNI procedures were adequate in the area of injury/illness recordkeeping. There were no issues in the area of procedures.

Comparison of CAIRS Data to Medical Files

The ORP assessor had access to the CAIRS production database for BNI and subcontractors. The data evaluated ranged from September 2006 through April 2007. The ORP reviewer analyzed all cases posted in CAIRS that indicated an OSHA recordable injury including restricted or lost work days. Using the assigned case numbers from the log, the reviewer accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Reports," for each case. The contents of the 5484.3 forms were then compared to the information in the patient's medical file.

ORP reviewed case files maintained in the Waste Treatment and Immobilization Plant (WTP) onsite first aid clinic, managed by WorkCare. The ORP assessor found no

discrepancies between CAIRS data entries and patient medical records. BNI's CAIRS database was found to be accurate.

Comparison of L&I Data to CAIRS Data

The ORP assessor initiated this review using L&I data from BNI's Worker's Compensation Administrator. ORP focused on cases compensated by L&I and were not reported as OSHA recordable by the contractor. In theory, all L&I cases are not necessarily OSHA recordable and conversely all OSHA recordable cases are not necessarily compensable. However, OSHA often reviews L&I records because there may be an overlap. Many cases in which the state is compensating individuals for injuries would be work related, and would likely involve medical treatment beyond first aid.

The ORP reviewer analyzed all cases in the L&I records for the period from September 2006 through April 2007 and compared it to the information in the patient's medical file. The assessor found no underreporting of injuries or illnesses in any of the Worker's Compensation cases filed over the past six month period.

Review of Subcontractor OSHA Recordkeeping

During a 2005 ORP assessment of OSHA recordkeeping, the assessor found weaknesses in BNI's oversight of major subcontractors. BNI failed to demonstrate they had performed comparison of OSHA 300 and first aid logs to injuries reported by their subcontractors.

BNI's actions in response to this Finding included the performance of several surveillances in accordance with Procedure GPP-SIND-022, "Assessment and Issue of Noncompliance for Construction Subcontractor's Safety and Health Compliance." The procedure contains a "Quarterly Subcontractor Injury/Illness Recordkeeping Assessment Worksheet" for documenting quarterly assessments of BNI subcontractor injury/illness recordkeeping by BNI safety representatives.

In September 2006 the ORP assessor requested the previous six month's of subcontractor assessment reports and was informed that the assessments had not been documented. BNI had performed the assessments but failed to generate records for submittal to Project Document Control for logging, issuance, distribution, and records retention. (This issue was documented as Finding A-06-ESQ-RPPWTP-009-F03.)

During this current assessment the ORP assessor reviewed "Quarterly Subcontractor Injury/Illness Recordkeeping Assessment Worksheets" and "Subcontractor ES&H Implementation Checklists" provided by BNI. The worksheets and checklists provided documented evidence BNI had reviewed subcontractor OSHA logs and forms. ORP determined the corrective actions by BNI were effective. The Finding has been closed.

Items Opened

None.

Items Closed

A-06-ESQ-RPPWTP-009-F01 – There was no documented evidence BNI had performed oversight on WTP subcontractors.

During the September 2006 assessment ORP found there was no documented evidence that BNI had performed oversight on WTP subcontractors. BNI Procedure 24590-WTP-GPP-SIND-022, "Assessment and Issue of Noncompliance for Subcontractor's Safety and Health Compliance," requires the Safety Assurance Department to conduct quarterly assessments of WTP subcontractors. This BNI procedure required oversight records to be logged, issued, distributed, and retained.

The ORP assessor reviewed "Quarterly Subcontractor Injury/Illness Recordkeeping Assessment Worksheets" and "Subcontractor ES&H Implementation Checklists" provided by BNI. The worksheets and checklists provided documented evidence BNI had reviewed subcontractor OSHA logs and forms. ORP determined the corrective actions by BNI were effective. ORP verified completion of BNI's corrective actions.

As a result the Finding is considered closed.

Items Reviewed

None.

Task# ORP-ESQ-2007-0099

E-STARS™ Report
Task Detail Report
05/31/2007 0149

TASK INFORMATION

Task#	ORP-ESQ-2007-0099		
Subject	CONCUR:07-ESQ-095; ASSESSMENT REPORT A-07-ESQ-RPPWTP-007 - ASSESSMENT OF OSHA INJURY/ILLNESS RECORDKEEPING APRIL 23 - MAY 14, 2007		
Parent Task#		Status	CLOSED
Reference	07-ESQ-095	Due	
Originator	Gano, Becky	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	05/21/2007 1435	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	Long Term	View Permissions	Normal

Instructions Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list.

BCC:
ESQ OFF FILE
ESQ RDG FILE
MGR RDG FILE
M.K.BARRETT, AMD
P.P.CARRIER, ESQ
P.R.HERNANDEZ, ESQ
W.J.TAYLOR, ESQ

RECORD NOTE:

ROUTING LISTS

1	Route List	Inactive
	<ul style="list-style-type: none"> ● Hernandez, Paul R - Review - Concur - 05/31/2007 1347 <i>Instructions:</i> ● Carrier, Patrick P - Review - Concur - 05/31/2007 1348 <i>Instructions:</i> ● Taylor, William - Review - Concur - 05/30/2007 1459 <i>Instructions:</i> ● Eschenberg, John R - Review - Cancelled - 05/31/2007 1349 <i>Instructions:</i> ● Olinger, Shirley J - Approve - Approved - 05/31/2007 1110 <i>Instructions:</i> 	

ATTACHMENTS

Attachments	<ol style="list-style-type: none"> 1. 07-ESQ-095 att OSHA Assessment Report A-07-ESQ-RPPWTP-007.doc 2. 07-ESQ-095 BNI LTR Assessment Report A-07-ESQ-RPPWTP-007 OSHA Injury Illness Recordkeeping.doc
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COLLABORATION**RECEIVED**

MAY 31 2007

DOE-ORP/ORPCC

Task# ORP-ESQ-2007-0099	
COMMENTS	
Poster	Gano, Becky (Gano, Becky) - 05/31/2007 0105
	CLOSED
	Wahed Abdul concurred for John Eschenberg on 5/25/07.
TASK DUE DATE HISTORY	
<i>No Due Date History</i>	
SUB TASK HISTORY	
<i>No Subtasks</i>	

-- end of report --

Task# ORP-ESQ-2007-0099

E-STARS™ Report
Task Detail Report
05/21/2007 0238

TASK INFORMATION

Task#	ORP-ESQ-2007-0099		
Subject	CONCUR:07-ESQ-095; ASSESSMENT REPORT A-07-ESQ-RPPWTP-007 - ASSESSMENT OF OSHA INJURY/ILLNESS RECORDKEEPING APRIL 23 - MAY 14, 2007		
Parent Task#		Status	Open
Reference	07-ESQ-095	Due	
Originator	Gano, Becky	Priority	High
Originator Phone	(509) 376-6004	Category	None
Origination Date	05/21/2007 1435	Generic1	
Remote Task#		Generic2	
Deliverable	None	Generic3	
Class	Long Term	View Permissions	Normal
Instructions	<p>Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list.</p> <p>BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE M.K.BARRETT, AMD P.P.CARIER, ESQ P.R.HERNANDEZ, ESQ W.J.TAYLOR, ESQ</p> <p>RECORD NOTE:</p>		

ROUTING LISTS

1	Route List	Active
	<ul style="list-style-type: none"> ● Hernandez, Paul R - Review - Awaiting Response <i>Instructions:</i> <i>Paul Hernandez 5/21/07</i> ● Carier, Patrick P - Review - Awaiting Response <i>Instructions:</i> <i>PPC 5/21/07</i> ● Taylor, William - Review - Awaiting Response <i>Instructions:</i> <i>WJT 5/22/07</i> ● Eschenberg, John R - Review - Awaiting Response <i>Instructions:</i> <i>for WA 5/25/07</i> ● Olinger, Shirley J - Approve - Awaiting Response <i>Instructions:</i> <i>SRJ</i> 	

ATTACHMENTS

Attachments	<ol style="list-style-type: none"> 1. 07-ESQ-095 att OSHA Assessment Report A-07-ESQ-RPPWTP-007.doc 2. 07-ESQ-095 BNI LTR Assessment Report A-07-ESQ-RPPWTP-007 OSHA Injury Illness Recordkeeping.doc
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COLLABORATION