

Voluntary Protection Program

MSC-PRAC-30455

Revision 0

Effective Date: December 9, 2009

Topic: Safety and Health

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PURPOSE

This practice identifies key aspects of the Safety and Health (S&H) program for Mission Support Alliance (MSA) construction, and establishes processes to assist in providing employees with a safe and healthful workplace.

This practice sets forth the basic guidelines of the U.S. Department of Energy (DOE)-Voluntary Protection Program (VPP), as contained in Parts 1, 2, and 3 of DOE/EH-0433, that are not covered in other practices.

NOTE: *Methods, activities, programs, and processes developed and implemented to meet the “guidelines,” as contained in the document above, are appropriate to each organization and/or project’s needs and applicability.*

SCOPE

This practice provides discussion on the following topics:

- General Requirements
- Safety and Health Planning
- Program Evaluation
- Employee Notification
- Safety Committees
- Facility Baseline Hazard Assessments
- Inspections
- Employee Hazard Reporting
- Assurance of Commitment

APPLICATION

This practice applies to MSA self-perform construction personnel.

This practice does not apply to contractors, except as the MSA contractor S&H management processes affect the contractors/sub-tier contractors.

GENERAL REQUIREMENTS

Records generated during the performance of this activity are to be included in the Construction Work Package and will be managed in accordance with [MSC-PRAC-30374](#), *Construction Work Package* and [MSC-PRAC-30376](#), *Construction Document Control*.

The general requirements are based on the following 5 basic elements of the VPP.

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Management Leadership

Provides the commitment, motivating force, direction, resources, and employee empowerment for organizing and implementing activities within a working group. Management regards worker safety and health as a fundamental value. Preservation of worker safety and health takes precedence over all other goals and objectives of the organization. Contractors are held accountable for providing employees equivalent protection from hazards, and complying with contract safety and health requirements.

Employee Involvement

Provides the means through which individuals develop and/or express their own commitment to safety and health protection for themselves, as well as to their fellow workers. Each employee supports the programs designed to provide protection against workplace hazards. Management encourages and supports employees to actively participate in the activities, programs, and processes comprising by the safety and health program.

Work Analysis

Identifies existing and potential hazards and conditions, and examines causes and trends of events that, when properly analyzed, can provide management and employees with significant insight on how to prevent future events and losses. Management ensures that the worksite is analyzed to anticipate, recognize, evaluate, and document potential hazards in the work environment.

Hazard Prevention and Control

Is triggered by a determination that a hazard or potential hazard does or may exist. When feasible, hazards are managed through substitution, process engineering, or design control. When hazards cannot be eliminated, they are controlled administratively to prevent unsafe or unhealthful exposure. Administrative control is a secondary choice, and the use of personal protective equipment is prescribed as a last choice or as an interim measure. Experience determines safety and health rules. Positive recognition is the method of choice for reinforcing safety and health rules. Preventive maintenance of equipment (including ventilation systems) is implemented to minimize losses and potential exposure to hazards. Hazard elimination (prevention) or control occurs as soon as possible once a hazard is recognized.

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Safety and Health Training

Communicates requirements, hazard awareness, expectations, and appropriate actions to ensure a safe and healthy worksite. Safety and health training encourages workers to take personal ownership of the safety and health program. As appropriate, training is incorporated into specific job tasks. The extent of the training depends on the level of worker exposure to risk, and the nature of the hazards/potential hazards. (The amount of hazard information that is needed by employees varies, but contains at least information relevant to hazards that may not be readily apparent to, or within the ordinary experience and knowledge of, the worker.) Training programs and processes are maintained current to ensure that management and employees understand and recognize the hazards to which they are exposed.

SAFETY AND HEALTH PLANNING

Each January, construction project steering and regional office safety and health committees identify focus areas to improve their organization's performance. Focus areas are developed based on the previous year's experience, analysis/trending of safety and health data, results of self-evaluations and management assessments, and overall continuous improvement.

Safety Improvement Plans (SIP), containing actions designed to achieve improvement in the focus areas, are developed annually by each construction project steering and regional office safety and health committee, and communicated to affected employees.

Progress toward improving performance in the focus areas, through completion of SIP actions, is tracked by management at the project level at least quarterly.

PROGRAM EVALUATION

The company conducts an annual, companywide VPP self-evaluation of the safety and health program to assess/verify program implementation and achievement of program goal and performance objectives.

- The self-evaluation assesses the effectiveness of activities, programs, and processes related to the VPP guidelines; identifies strengths as well as areas needing improvement; and provides recommended actions to implement changes which are likely to lead to improved worker safety and health protection.
- The self-evaluation report is in narrative form.

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Recommendations from the self-evaluation are tracked to completion. Each organization and/or project identifies a method to annually assess its natural work groups and/or applicable components of the S&H program. This assessment is in addition to the annual companywide program self-evaluation. The results are used to revise the current SIP, or develop the SIP for the following year.

EMPLOYEE NOTIFICATION

MSA Construction and subcontractor employees receive an overview at the time of hire on MSA participation in, and employee rights under, the VPP.

Employees receive reinforcement through refresher training/briefings, safety meetings, bulletins, bulletin board postings, and other media.

SAFETY COMMITTEES

Each major construction project has one safety “steering” committee.

An integrating committee is established to coordinate the activities of the construction projects steering committees.

Bargaining unit employees constitute at least 50 percent of construction project integrating and at least 33 percent of steering committee membership. Bargaining unit employees volunteer to serve on committees, and are rotated to give all interested employees the opportunity to serve.

A safety committee is established to coordinate safety and health activities in the regional office for the functional support organizations.

Nonmanagement employees constitute at least 50 percent of regional office committee membership.

Each safety committee develops a charter that describes the following:

- Method of selecting members
- Minimum frequency of meetings
- Minimum training required [if any]
- Roles and responsibilities

Attendance by at least 50 percent of the members constitutes a quorum.

Management ensures that safety committees are established for, and act only on, safety and health-related issues.

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EMPLOYEE HAZARD REPORTING

Management subscribes to and communicates an “open door policy” that allows any employee, without fear of reprisal, to voice an opinion or concern, or report a hazardous/potentially hazardous condition up through the management chain. Management should encourage the employee(s) reporting the concern/condition to participate in the resolution of the concern/condition. Regular feedback to the employee(s) is critical to effective hazard reporting by employees; feedback to the employee is the responsibility of the individual who **first receives the concern/report**.

Organizations/projects may develop and implement local, informal methods of reporting hazards. Those used as “optional written methods” include the following:

- Documentation and communication of the process to affected employees
- Ready availability of optional written forms, tags, or log books
- An initial written reply to the author (if known) within 72 hours from management
- Documented reports kept in a central “log” or “equal”
- Reports are tracked to completion
- Regular (at least every 2 weeks) updates to the employee from management

The Employee Concerns Program is the formal method/program by which any MSA employee or MSA subcontractor employee may report a safety and health issue or hazard to management. Reporting may be verbal or in writing, at the employee’s choice.

ASSURANCE OF COMMITMENT

Executive and organization/functional directors visibly show their commitment to improving safety and health through VPP by signing and posting a written commitment statement.

Management secures written commitment and support for the MSA VPP from each bargaining unit representing MSA employees.

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Management transmits the following information to DOE by February 15 of each year:

- Annual rate of injury incidence and lost workday cases
- Employment figures
- Hours worked by employees and subcontractors
- Written report from the annual companywide VPP self-evaluation

The organizations/projects make available to employees, on request, the documents developed to meet the requirements in this practice.

FORMS

None

RECORDS IDENTIFICATION

Records Capture Table

Name of Document	Submittal Responsibility	Retention Responsibility
Construction work package	Construction Supervisor/Superintendent	Project Document Control

REFERENCES

[MSC-PRAC-30374](#), *Construction Work Package*
[MSC-PRAC-30376](#), *Construction Document Control*