

Contractor Safety and Health Interaction

MSC-PRAC-30456

Revision 0

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Topic: Safety and Health

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1.0 PURPOSE AND SCOPE

This Practice identifies the roles and responsibilities for implementing Safety and Health (S&H) requirements and guidelines, as specified by Occupational Safety and Health Administration (OSHA), Mission Support Alliance (MSA) and the Client (U.S. Department of Energy [DOE]) for the safety and health of the employees working at the Hanford Site.

2.0 APPLICATION

This practice applies to construction personnel, and subcontractor and contractors whose contract Statement of Work (SOW) require the adherence to this practice, this includes, but not limited to; management, supervision, craft and other employees who are actively involved in construction projects or those who enter into the construction work area. Sub-and lower-tier contractors are required to develop and effectively implement applicable scaffolding requirements to meet OSHA standards and contract specifications.

3.0 RESPONSIBILITIES

- 3.1 Safety & Health/ is responsible for the development, issuance and maintenance of this practice. All changes will be reviewed with construction management and others.
- 3.2 Construction management (i.e. construction manager (CM), construction supervisors/superintendents [CS/S], general foremen and foremen) are responsible for the implementation of these requirements and guidelines for all construction, maintenance and other project work activities (in accordance with contractual requirements), and ensuring that each employee understands their roles and responsibilities, as it applies to their work activities.

4.0 REQUIREMENTS

4.1 Client Interface

- 4.1.1 Prior to commencing facility walkthrough, engineering, and construction activities, the CS/S or Subcontracts Specialist (SCS) obtains information and guidance from the facility/project on the following:
 - Activity-specific data (such as condition reports, designs/drawings, and hazardous waste information)
 - Potential hazards such as radiation areas, high voltage sources, pressurized equipment, hazardous/toxic materials, and confined spaces
 - Permits to perform construction activities as required (such as general work authorizations, excavation, hot work, treatment, storage, and disposal facility entry)

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- Control devices (such as locks and tags) on potentially hazardous plant systems
 - Facility emergency warning signals and required responses
 - Required radiation work permits
- 4.1.2 The SCS will include pertinent information received from the facility/project in contract bid documents.
- 4.1.3 Construction hazards are communicated to all personnel (including employees, client representatives, visitors, and vendors) who enter the construction work area in applicable prejob safety planning documents. These documents are reviewed during preconstruction meetings, prejob safety briefings, or at the time of entry into a construction area/site or participation in a construction activity.
- 4.1.4 Construction areas are identified by barricading, posting, or other effective means [refer to practice [MSC-PRAC-30479](#), *Signs, Signals, and Barriers*].
- 4.1.5 MSA ensures that facility-specific training (as defined by the facility/project) is completed by employees and subcontractor employees prior to facility entry.
- 4.1.6 MSA participates in oversight inspections, appraisals, audits, surveillances, and evaluations conducted by client and other non-MSA organizations. Findings, concerns, violations, etc. are documented and tracked to completion by MSA.
- 4.1.7 All personnel share concurrent responsibility and authority to exercise stop work authority if an unsafe situation is observed.

4.2 Construction Subcontracts

- 4.2.1 S&H is advised by the SCS of the scope of a construction contract. S&H then provides the SCS with pertinent/required information.
- 4.2.2 Subcontracts & Procurement incorporates clauses into the contract documents including the scope of safety required, accident reporting requirements, and the method of surveillance and control that is exercised over the construction work with the subcontractor having “line responsibility.”
- 4.2.3 MSA program safety performs pre-award safety responsibility evaluations/determinations for subcontractors; subcontractor project safety performs pre-award safety responsibility evaluations/determinations for sub-tier contractors [refer to practice [MSC-PRAC-30463](#), *Subcontractor Safety Performance Program*].

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4.2.4 The MSA Mission Assurance Director, or designee, assigns a MSA Safety Advocate and or S&H representative for the contract in accordance with MSC-MP-41931. In addition to the requirements of MSC-MP-41931, the Safety Advocate/S&H representative, at a minimum:

- Develops a preliminary hazard assessment and includes in contract document(s).
- Provides safety review and approval of safety-related construction documents.
- Evaluates subcontractor safety and health performance.
- Develops and updates selected safety training courses.

4.2.5 Construction subcontractors and their sub-tier contractors comply with the provisions of the MSA S&H program, or equal program provided by the subcontractor and approved by the MSA safety program manager.

4.2.6 A preconstruction meeting is held with the construction subcontractor's first-line management and their sub-tier contractors prior to the start of construction. Project safety reviews safety requirements, emergency contacts, documentation requirements, etc. [refer to forms [A-6004-305](#) and [A-6004-320](#)]. The subcontractor(s) provides MSA with the following no later than 5 days prior to the start of construction or delivery of material:

- A copy of an acceptable mobilization Job-Specific Safety Analysis/Automated Job Hazard Analysis (JSA/AJHA) [including plans, permits, etc., as applicable in accordance with practice [MSC-PRAC-30462](#), *Prejob Safety Planning*].
- A list of "Competent Persons" if applicable, refer to practice [MSC-PRAC-30452](#), *Program General Requirements*.
- Written certification that all construction equipment does now and will continue to meet OSHA and (if applicable) state safety standards (including crane inspections, as applicable).
- A "list of key supervisors" identified as the designated safety and health representatives for the subcontractor and each major sub-tier contractor, if any. [Refer to practice [MSC-PRAC-30461](#), *Accident Prevention Training and Education* for training requirements.]
- A list of S&H practices to which subcontractor/sub-tier contractor employees are to be trained. [Refer to practice [MSC-PRAC-30461](#) for training and orientation requirements, and documentation/forms requirements.]
- Acceptance of MSA S&H practices, or a written, approved equivalent program.

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- 4.2.7 When subcontractor personnel are badged, they receive initial site orientation and, if necessary, radiation protection training, a medical examination, a mask fit, and a whole body count.
- 4.2.8 New, unescorted subcontractor and sub-tier contractor employees receive a documented, project-specific orientation, including training to applicable S&H practices/procedures, before being granted access to work areas (refer to practice [MSC-PRAC-30461](#)). The Preconstruction Meeting Safety and Health Checklist ([A-6004-305](#)) is used to identify the applicable S&H practices for training/orientation of employees.
- 4.2.9 At least one “key” supervisor is identified and available on the Hanford Site for each contract at all times when work is being performed.

4.3 Hoisting and Rigging

- 4.3.1 Compliance with the Hanford Site Hoisting and Rigging Manual ([DOE-RL-92-36](#), commonly referred to as HSHRM) is mandatory for subcontractors and sub-tier contractors on the Hanford Site [refer to [MSC-PRAC-30476](#), *Motorized Equipment*, [HSHRM](#), and [MSC-PRAC-30478](#), *Elevating Work Platforms and Aerial Lifts*].

4.4 Lockout/Tagout

- 4.4.1 Compliance with the MSA Lock and Tag Program is mandatory for subcontractor and sub-tier contractors on the Hanford Site (refer to [DOE-0336](#), *Hanford Site Lockout/Tagout*)

4.5 Medical

- 4.5.1 Provision has been made for initial medical emergency services and special pre- and post-exposure physical examinations that become necessary in special circumstances and after accidents.
- 4.5.2 Emergency ambulance service is provided by the local fire department.
- 4.5.3 Physical examinations may be required for workers wearing dosimetry or working with toxic materials (in accordance with the applicable Occupational Safety and Health Administration and nuclear standards and DOE requirements).

4.6 Workers' Compensation Coverage

- 4.6.1 Subcontractors provide for coverage required by the workers' compensation statutes of the state, except for work conducted in radiation areas.

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4.7 Reporting Events

- 4.7.1 Subcontractors submit required reports for any occupational injury or illness, property damage, fire, motor vehicle accident, near miss, or other unusual occurrence/event (refer to practices [MSC-PRAC-30467](#), *Event Investigation and Reporting* and [MSC-PRAC-30468](#), *Classifying and Recording Injury/Illness*).

4.8 Changes in Requirements

- 4.8.1 MSA Program Safety notifies the Construction and the Contracts & Supply Chain Management organizations of changes to MSA S&H practices/forms and other standards and requirements referenced in MSA S&H practices. Contracts & Supply Chain Management (Contract Administration) notifies subcontractors of these changes and provides updated copies of modified MSA S&H practices and forms.

5.0 PROCESS

5.1 Construction Supervisor/Superintendent Functions

- 5.1.1 The CS/S performs the following functions:

- Obtain safety submittal documents from subcontractors and transmit to MSA S&H.
- Act as liaison between subcontractors and MSA S&H during the coordination and enforcement of compliance with safety requirements and/or issues and concerns.
- Obtain work authorizations/clearances for tie-ins, coordinate arrangements for outages, obtain required permits, coordinate lockouts and/or tagouts, and provide required work control documents.
- Maintain notification and coordination protocol with the local fire department.
- Safety oversight of the subcontractor's activities during the work in accordance with practice [MSC-PRAC-30460](#), *Safety and Health Compliance Inspection and Management Walkthroughs*.
- Keep the SCS apprised of any subcontractor safety issues.

5.2 Problem Resolution

- 5.2.1 The CS/S performs the following functions:

- Attempt to resolve safety issues and concerns with subcontractor site supervision/management. Serious or difficult issues and concerns are formally transmitted to the subcontractor by the CS/S.

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- Advise the subcontractor of violations, concerns, and findings noted during performance of contracted work.

5.2.2 Initiate immediate correction of any work that is being conducted unsafely or that poses a hazard to employees or property for which MSA is responsible.

5.3 Facility Project Interface

5.3.1 The CS/S performs the following functions:

- Ensure that proper scheduling priority is provided for correction of fire system impairments, fire system restriction, and fire prevention findings, as applicable.
- Ensure coordination of fire system modifications, deletions, and system replacements with the facility/project.
- Ensure that required fire system acceptance test procedures are reviewed and approved by the facility/project.
- Coordinate with the facility/project for any work requiring deactivation of fire suppression or detection systems, to include compensatory measures taken to ensure the safety of facility employees.

5.3.2 MSA and subcontractors provide immediate facility access for emergency response crews.

5.3.3 The CS/S promptly notify the facility/project and the local fire department of the following:

- All fires, whether extinguished or not
- Smoke smells or unusual/irritating odors
- Any special hazards that require additional information for emergency response crews
- Any hazardous material spill or incident requiring response by the local fire department's hazardous materials response team
- Unplanned fire protection system impairments, outages, activations, or system trouble
- Locked exit doors and blocked or partially blocked aisles
- Any suspected emergency condition that requires response

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5.3.4 The CS/S notify the appropriate facility/project and/or the agency with jurisdiction in advance of the following planned or anticipated conditions or events:

- Planned fire system impairments
- Water outages
- Power outages
- Road closures
- Conditions that prevent fire suppression and detection systems from activating
- Conditions that could delay or obstruct emergency response vehicles.

5.4 Contractor Warranty Work

5.4.1 The CS/S identifies all safety processes related to subcontractor and/or sub-tier contractor warranty work prior to work commencing.

5.4.2 A JSA/AJHA is developed and implemented in accordance with practice [MSC-PRAC-30462](#), *Prejob Safety Planning*.

5.4.3 For short term (1 day, 1 week, or with 1 or 2 employees) warranty work, subcontractor employees are oriented to the JSA/AJHA and appropriate facility-specific requirements.

5.4.4 For long term (more than a week with several employees, etc.) warranty work, the subcontractor meets the safety requirements of the applicable contract.

5.4.5 The CS/S is responsible for safety requirements for access to the construction worksite while warranty work is in progress.

5.5 Vendors

5.5.1 MSA S&H (with input from facility/project RadCon personnel, if applicable) may approve untrained vendor representatives to be allowed temporary, escorted access to construction areas where training is normally required for workers when:

- The representative meets the Site criteria for obtaining a “Visitor” badge.
- Respirators are not required for access.
- There is no foreseen potential for exposure above established limits.

5.5.2 The Vendor representatives complete applicable orientation requirements for the facility and construction area.

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5.6 Service Subcontracts

- 5.6.1 Technical representatives specify applicable safety and health provisions for contract documents. MSA S&H reviews and approves safety and health provisions in contract documents involving “field” activities on the Hanford Site.

6.0 FORMS

Job-Specific Safety Analysis/Activity Hazard Analysis (K-2 JSA/AHA), [A-6004-280](#)

Preconstruction Meeting Safety and Health Checklist, [A-6004-305](#)

Subcontractor S&H Documentation Requirements Checklist, [A-6004-320](#)

7.0 RECORDS IDENTIFICATION

Records Capture Table

Name of Document	Submittal Responsibility	Retention Responsibility
<i>Job-Specific Safety Analysis/Activity Hazard Analysis (K-2 JSA/AHA), A-6004-280</i>	Construction Engineer	Construction Document Control
<i>Preconstruction Meeting Safety and Health Checklist, A-6004-305</i>	Construction Engineer	Construction Document Control
<i>Subcontractor S&H Documentation Requirements Checklist, A-6004-320</i>	Construction Engineer	Construction Document Control

8.0 REFERENCES

[DOE-0336](#), *Hanford Site Lockout/Tagout*

[DOE-RL-92-36](#), *Hanford Site Hoisting and Rigging Manual*

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

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

[MSC-PRAC-30452](#), *Program Policy and Requirements*

[MSC-PRAC-30460](#), *Safety and Health Compliance Inspection and Management Walkthroughs*

[MSC-PRAC-30461](#), *Accident Prevention Training and Education*

[MSC-PRAC-30462](#), *Prejob Safety Planning*

[MSC-PRAC-30463](#), *Subcontractor Safety Performance Program*

[MSC-PRAC-30467](#), *Event Investigation and Reporting*

[MSC-PRAC-30468](#), *Classifying and Recording Injury/Illness*

[MSC-PRAC-30479](#), *Signs, Signals, and Barriers*