

Safety and Health Compliance Inspection and Management Walkthroughs

MSC-PRAC-30460

Revision 0

Effective Date: November 30, 2009

Topic: Safety and Health

Safety and Health Compliance Inspection and Management Walkthroughs

PURPOSE

This practice identifies a key element of the Safety and Health (S&H) program, and establishes the requirements and responsibilities for performing safety and health inspections and management walkthroughs.

SCOPE

This practice includes the following major sections:

- General Requirements
- Safety & Health (S&H) Responsibilities
- Manager/Supervisor Responsibilities
- Occupancy Readiness Review
- Project Facilities Excellence Program
- Unsafe Equipment Tags

The requirements of this practice are consistent with the requirements published in the Hanford Mission Support Contract (MSC) Health and Safety virtual manual.

APPLICATION

This practice applies to Mission Support Alliance (MSA) construction personnel.

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*.

An inspection using a numerical scoring system is completed in work areas at least monthly.

Imminent danger conditions are corrected immediately. An on-the-spot stop work order is issued, and upper management (such as directors) is notified. Work is not resumed without a written corrective action plan approved by the MSA area safety manager.

Before each new occupancy or change of application for a facility or building, a review is conducted to ensure the facility can be safely occupied. This review is documented on a Facilities Occupancy Readiness Review form [A-6004-292](#) .

Safety and Health Compliance Inspection and Management Walkthroughs

A single inspection attended by line management and project safety (and the subcontractor[s], if applicable) can satisfy the requirement for individual inspections in this and referenced practices, so long as other applicable and related requirements are followed.

SAFETY & HEALTH RESPONSIBILITIES

General Walkthrough Inspections

MSA Safety & Health (S&H) conducts safety and health walkthroughs of work areas as determined necessary and appropriate by the area safety manager. Walkthroughs are documented on form:

- [A-6004-276](#)
- [A-6004-308](#)
- [A-6004-309](#) or equal.

NOTE: *The frequency of these inspections is generally at least weekly.*

Formal Compliance Inspections

MSA project safety conducts formal documented compliance inspections of construction areas including subcontractor work. The frequency of these inspections generally is at least monthly.

Project safety issues an inspection report, unless otherwise noted, to the responsible individual as soon as possible after completion of the inspection.

NOTE: *Information provided on the form should identify the equipment and location in sufficient detail to cause the violation to be located easily. Equipment/tool identification numbers are especially helpful.*

For all noncompliances, the violation, abatement efforts, and abatement time period are discussed and agreed upon by project safety and the responsible supervisor/manager.

Violations are designated “de minimis,” “nonserious,” “serious,” “repeated,” “imminent danger,” or “willful” and are noted on the inspection report. Stop work orders are noted on the inspection report.

Safety and Health Compliance Inspection and Management Walkthroughs

Imminent danger violations are reported to the area construction manager(s) or the assigned construction engineer so they can notify the contract client, if required. Also, the MSA safety program manager is notified, who in turn notifies upper management (such as directors).

Once the inspection is completed and it has been discussed with construction management, the inspection information is entered into the MSA Corrective Action Management (CAM) process. If no violations are observed during the inspection, it is noted on the inspection report as well.

NOTE: *Subcontractors are not required to enter inspection data into the CAM process, but are required to track abatement efforts to completion.*

When potential health problems are observed, a follow-up S&H industrial hygiene inspection or survey may be required. Subsequent information becomes part of the work package or prejob safety plan and is communicated to employees [refer to practice [MSC-PRAC-30502](#), *Industrial Hygiene Program Requirements*].

Inspect multi-shift operations to ensure compliance on all shifts.

Assist management in completing occupancy readiness reviews. Project safety signs the form when all items are satisfied. This acknowledges compliance with safety requirements for occupancy.

Violations documented in the CAM process undergo continuous and ongoing trend analysis.

Present results and recommendations from trend analyses to management to focus attention and use for follow-up inspection(s) in particular areas.

Safety and Health Compliance Inspection and Management Walkthroughs

MANAGER/SUPERVISOR RESPONSIBILITIES

Managers and supervisors conduct safety inspections for their respective areas as follows:

- Construction – daily
- Offices – quarterly (monthly for fire protection inspections)
- All others – monthly (fabrication shops, storage facilities, operating facilities, maintenance shops, etc.)

Construction engineers conduct weekly safety inspections of managed-contract projects.

All walkthroughs and inspections are documented. For construction areas, the Safety and Health Scored Inspection for Construction [A-6004-276](#), Construction Supervisor Safety Inspection Checklist [A-6004-304](#), or other “field-developed” form(s) may be used to satisfy this requirement. For shops, Craft Shop Safety Inspection Checklist [A-6004-287](#) may be used to satisfy this requirement. For offices, the Office/Building Inspection form [A-6004-299](#) may be used to satisfy this requirement. Construction engineers and subcontractors may use the Safety and Health Scored Inspection for Construction [A-6004-276](#), Construction Supervisor Safety Inspection Checklist, the Safety Self-Assessment Inspection Checklist [A-6004-309](#), or other “field-developed” form(s). At a minimum, documentation requires the following:

- Date of walkthrough
- Name, title, and signature of inspector
- Location and/or activity being assessed
- Deficiencies found
- Corrective actions for deficiencies
- Manager’s response for correction

Refer to practice [MSC-PRAC-30474](#), *Fire Prevention and Protection* for fire protection inspection requirements.

Refer to practice [MSC-PRAC-30483](#), *Compressed Gas Operations* for compressed gas cylinder storage area inspection requirements.

Safety and Health Compliance Inspection and Management Walkthroughs

Construction manager/supervisors should participate in the formal safety and health compliance inspections that are conducted in their area of responsibility. Violations are corrected immediately (or as soon as possible) with the corrective action documented and communicated to project safety.

All managers/supervisors provide for the correction of unsafe conditions and the on-going encouragement of good safety practices.

When notified of an imminent danger violation, the work is stopped until the deficiency is corrected. The MSA project and construction directors are notified, and the incident is reported to the client (if required). A corrective action plan is written by the area construction manager and submitted to the MSA area safety manager for approval.

MSA managers/supervisors notify project safety for verification of closure on any safety violation prior to it being closed on the CAM process, or on an equivalent tracking process/ method.

OCCUPANCY READINESS REVIEW

The responsible construction manager/supervisor requests support from project safety and schedules a facility occupancy readiness review inspection prior to occupancy of a new or refurbished facility. This review is documented on a Facilities Occupancy Readiness Review form [A-6004-292](#). The review addresses the following items:

- Fire protection
- Lighting
- Life safety code compliance
- Industrial hygiene
- Fire department/ambulance response
- Traffic safety

PROJECT FACILITIES EXCELLENCE PROGRAM

A project may elect to combine inspections of facilities (including documentation requirements) into a single, comprehensive Project Facilities Excellence Program, in accordance with [Appendix B](#). Implementation of this program satisfies all inspection requirements for facilities contained in this practice (facilities include offices, shops, storage areas, and laydown yards).

Safety and Health Compliance Inspection and Management Walkthroughs

NOTE: *Inspections of construction areas (daily by manager/supervisors, weekly by construction engineers, and biweekly by project safety) must continue to be performed.*

UNSAFE EQUIPMENT TAGS

Use “Danger - Don’t Use It – Unsafe” tags or equal to identify tools and equipment that are unsafe (refer to sample in [Appendix A](#)). The tagged tools and equipment are not to be used until the tag is removed.

Unsafe equipment tags are not used for authorized lockout/tagout applications.

Remove tags with the approval of the tag originator only, and return to the tag originator when the violation or deficiency is corrected or eliminated. Unauthorized removal results in disciplinary action.

NOTE: *If the tag originator is not available, the tag may be removed under the direction of the originator’s manager provided the unsafe condition has been corrected.*

The originator briefly states the violation on the face of the tag (include equipment/tool identification numbers when applicable) then signs and dates the tag.

When project safety installs unsafe equipment tags, document the conditions and corrective actions on a Safety and Health Inspection Report.

FORMS

Safety and Health Scored Inspection for Construction, [A-6004-276](#)

Craft Shop Safety Inspection Checklist, [A-6004-287](#)

Facility Occupancy Readiness Review, [A-6004-292](#)

Office/Building Inspection, [A-6004-299](#)

Construction Supervisor Safety Inspection Checklist, [A-6004-304](#)

Safety and Health Inspection Report, [A-6004-308](#)

Safety Self-Assessment Inspection Checklist, [A-6004-309](#)

PFEP Inspection Criteria, [A-6004-315](#)

Safety and Health Compliance Inspection and Management Walkthroughs

RECORDS IDENTIFICATION

Records Capture Table

Name of Document	Submittal Responsibility	Retention Responsibility
<i>Safety and Health Scored Inspection for Construction, A-6004-276; Craft Shop Safety Inspection Checklist, A-6004-287</i>	Construction Engineer	Construction Document Control
<i>Facility Occupancy Readiness Review, A-6004-292</i>	Construction Engineer	Construction Document Control
<i>Office/Building Inspection, A-6004-299</i>	Construction Engineer	Construction Document Control
<i>Construction Supervisor Safety Inspection Checklist, A-6004-304</i>	Construction Engineer	Construction Document Control
<i>Safety and Health Inspection Report, A-6004-308</i>	Construction Engineer	Construction Document Control
<i>Safety Self-Assessment Inspection Checklist, A-6004-309</i>	Construction Engineer	Construction Document Control
<i>PFEP Inspection Criteria, A-6004-315</i>	Construction Engineer	Construction Document Control

REFERENCES

[MSC-PRAC-30374](#), Construction Work Package
[MSC-PRAC-30376](#), Construction Document Control
[MSC-PRAC-30474](#), Fire Prevention and Protection
[MSC-PRAC-30483](#), Compressed Gas Operations
[MSC-PRAC-30502](#), Industrial Hygiene Program Requirements

APPENDICES

[Appendix A](#) -- Danger – Don't Use It – Unsafe Tag (Sample)
[Appendix B](#) -- Project Facilities Excellence Program

Safety and Health Compliance Inspection and Management Walkthroughs

Appendix A

Danger — Don't Use It — Unsafe



FRONT



BACK

This tag is displayed for information only.

Obtain usable tags from project safety representative.

Safety and Health Compliance Inspection and Management Walkthroughs

Appendix B

Project Facilities Excellence Program

PURPOSE

The Project Facilities Excellence Program (PFEP) is established to provide a structured comprehensive management tool for pursuing excellence in all facilities.

The PFEP's performance objectives are:

- Emphasize the importance of excellence in the areas of environmental, safety, health, conduct of operations, conduct of maintenance, and housekeeping.
- Communicate management's expectations in the execution of stated management policies and procedures.
- Facilitate management presence in the field.
- Establish a forum for employees to identify their work planning needs to management.
- Accumulate performance indicators for the program.
- Evaluate facility excellence using a subjective scoring system.
- Help managers and employees gain expertise to better identify deficiencies in a variety of disciplines.
- Find and fix deficiencies in a formalized and real-time basis.
- Validate and verify corrections of deficiencies.
- Quantitatively describe facility progress in pursuing continuous improvement toward achieving facility and operational excellence.

Safety and Health Compliance Inspection and Management Walkthroughs

ADMINISTRATION

The project director is responsible for the overall implementation of the PFEP. The project director:

- Provides the resources necessary to fully implement the PFEP.
- Appoints one or more PFEP coordinators, responsible for:
 - Developing and following a program schedule.
 - Ensuring appropriate management participation.
 - Developing and maintaining the reporting requirements of this program.
- Reviews implementation status and facility ratings at least quarterly.
- Provides management leadership for project personnel to ensure continuous improvement towards, and maintenance of, facility excellence (an overall rating of “10” for each facility).

WALKDOWN PROTOCOL

Teams

- Walkdowns are performed by teams selected by the PFEP coordinator(s).
- Each team has a team leader and team members representing health and safety, environmental management, project/construction management, and craft personnel.
- The MSA PFEP representative or responsible designee is a team member for the facility or the area being evaluated.
- The responsible facility administrator is either an escort or a team member.

Schedule

- The PFEP coordinator schedules walkdowns at least bimonthly.
- Each team leader and team member, as well as the facility manager/owner, is notified of the walkdown schedule no less than 3 weeks prior to the scheduled walkdown.
- Notification of a schedule change is the responsibility of the PFEP coordinator.

Safety and Health Compliance Inspection and Management Walkthroughs

Logistics

- Each walkdown team is assembled at a pre-designated area.
- Each team member is provided transportation to and from the facilities, as required.

Walkdown

- Each team leader uses the PFEP Inspection Criteria (form [A-6004-315](#) , which includes the following:
 - Attendance Sheet (signed by each team member)
 - Walkdown Inspection Guide
 - Walkdown Comments Sheet (the team's findings/comments compiled into a report by the team leader)
 - Housekeeping Walkdown Inspection Summary
 - Environmental Walkdown Inspection Summary
 - Health and Safety Walkdown Inspection Summary
 - Radcon Walkdown Inspection Summary
 - Conduct of Operations Walkdown Inspection Summary
 - Facility Rating (completed by the team leader after the team and the team leader determine the facility rating)
 - Walkdown Deficiency Status Report
 - Corrective Action Status Walkdown Deficiencies
 - Support/Participation
- Each team member takes notes and reports health and safety, environmental, conduct of operations, conduct of maintenance, and housekeeping deficiencies to the team leader following the walkdown. Deficiencies fixed on-the-spot are so noted.

Out-Briefing

- Out-briefing to the facility manager(s) and the PFEP coordinator(s) occurs immediately following walkdown(s).
- The team leader presents the results of the team's walkdown(s).
- The team leader considers input from each team member, the facility manager, and the PFEP coordinator for inclusion in the final report/rating.
- The PFEP coordinator documents the team's evaluation results in a written report following the out-briefing. The report includes a summary of results, rating sheet, inspection checklists, and comment sheets for each facility.

Safety and Health Compliance Inspection and Management Walkthroughs

Report

The final report for the walkdown(s) is distributed to the responsible facility manager, project director, area construction manager, and area safety manager.

Nonconformance Action Required

- The facility manager is responsible for closure of all deficiencies.
- The PFEP coordinator tracks the deficiencies to closure.

DEFICIENCIES

Documentation

All deficiencies are documented (including those closed/completed on-the-spot during walkdown).

Status (Reports Presented to Management)

Deficiencies should be fixed on-the-spot, if possible. Those that cannot are scheduled for resolution by the facility manager.

Tracking

- Tracking continues until all deficiencies are resolved (closed).
- Status information is updated monthly, transmitted to the facility manager/administrator and project director, and displayed in the area construction manager's office.

Resolution Verification

The deficiency resolution status for selected deficiencies is verified as being properly resolved (closed) when:

NOTE: *The PFEP coordinator determines which deficiencies require verification of resolution (closure).*

- The team leader or designee verifies that the respective deficiency is properly resolved (closed).
- The team leader or designee signs his/her name and the date on the deficiency resolution verification line.

Safety and Health Compliance Inspection and Management Walkthroughs

- The team leader contacts the facility administrator.
- The team leader returns all verification updates to the manager of the facility for record retention decisions.
- The PFEP coordinator closes all deficiencies on the database.
- The PFEP coordinator issues a “report of closure” to the facility manager/administrator, project director, area construction manager, and area safety manager.