

# **Pre-job Safety Planning**

**MSC-PRAC-30462**

**Revision 0**

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**Topic: Safety and Health**

## Pre-job Safety Planning

### PURPOSE

This practice identifies a key aspect of the Safety and Health (S&H) program, and establishes a process to systematically identify, evaluate, control, and communicate known and potential workplace safety and health and/or radiological hazards to employees before work activities begin.

### SCOPE

This practice includes the following major sections:

- General Requirements
- Prejob Walkthrough
- Job Safety Analysis Preparation
- Pre-job Safety Meeting
- Post-Job Review/Feedback

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

This practice applies to the following situations:

- Office activities that require:
  - Construction, maintenance or moving activities
  - Work and inspection above the floor
- Field, shop, or “out-of-office” activities that require:
  - Construction
  - Engineering
  - Estimating
  - Fabrication
  - Inspection
  - Vehicle/equipment maintenance

### APPLICATION

This practice applies to 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*.

Employees are informed of identified or potential hazards and prescribed safety measures prior to initiating work activities through review of prejob safety planning documents. In general, prejob safety planning documents include hazard analyses, permits, and other safety- and health-related work plans.

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The Employee Job Task Analysis accurately reflects the employee's activities, location, potential exposures, and other unique or project-specific issues in accordance with practice [MSC-PRAC-30508](#), *Occupational Medical Program*.

Training associated with hazards/control measures and activities identified on prejob safety planning documents are completed in accordance with practice [MSC-PRAC-30461](#), *Accident Prevention Training and Education*.

When requested, engineering provides technical support for prejob safety planning to ensure compliance with codes, standards, and regulations.

A "good faith" asbestos inspection report is submitted by the building owner/operator and reviewed before construction/maintenance work begins. A written report or statement from the building owner/operator stating that "no asbestos-containing material will be disturbed during the work effort(s)" may be substituted for the good faith asbestos inspection report. If asbestos is going to be disturbed, the report or statement is attached to the hazard analysis. An asbestos inspection report is not required for walkthrough inspections or maintenance activities where asbestos is not disturbed.

- Hazard analyses are documented as follows:
- Craft-Specific Job Safety Analysis/Position Hazard Analysis (JSA/PHA) (commonly known as K-1)
- Job-Specific JSA/AHA (commonly known as K-2), and typically the only type of JSA/AHA used by subcontractors
- Task-Specific JSA (commonly known as K-3)

**NOTE:** *Continuation sheets are available for each of these hazard analyses and are used to further identify work scope and associated hazards.*

- Asbestos Work Plan
- Lead Compliance Plan
- Hexavalent Chromium Compliance Plan
  - Contact Industrial Hygiene for the development of this plan.
- Hazardous Waste Health and Safety Plan (or equal)
- Automated Job Hazard Analysis (AJHA)

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- Other equivalent hazard analysis process/methods approved by MSA project safety

**NOTE 1:** *All types of hazard analyses are collectively referred to in this practice as JSAs/AJHAs.*

**NOTE 2:** *Attachments to JSAs/AJHAs may include the Energized Electrical Work Permit; Confined Space Hazard Identification and Confined Space Entry Permit; Hot Work Permit; Fall Protection Work Plan; Good Faith Roof Assessment Checklist, Cover Sheet, and Findings Sheet; MSDS'; Radiological Work Permit; and Excavation Permit and scan documents.*

All JSAs/AJHAs are reviewed and approved by project safety. No field activities on the worksite are performed until a JSA/AJHA covering the activity (with the appropriate hazards identified and control measures established to protect the employee) has been reviewed and approved by MSA project safety.

Subcontractor JSAs/AJHAs are submitted to MSA project safety 5 working days prior to commencing work. The JSA/AJHA is reviewed and initialed by MSA project safety when acceptable.

Any approved JSA/AJHA may be used in conjunction with or referenced in a K-2 JSA/AHA to fulfill the prejob planning requirements of this practice. However, a K-2 JSA/AHA is the minimum prejob planning document required to perform work.

Each employee reviews the JSA/AJHA for the specific task performed prior to performing the work activity. This review may be in the form of a prejob safety briefing, a one-on-one discussion with the supervisor, or reading the JSA/AJHA. The review is documented by employee signature on the Prejob Safety Planning Signoff (form [A-6004-285](#)).

The JSA/AJHA is posted in a conspicuous place at the worksite. Employees are informed where this location is. Visitors and vendors are required to review and sign the JSA/AJHA prior to entering the worksite.

**NOTE:** *On occasion, it will be impractical to post the JSA/AJHA at the worksite. However, in all cases the JSA/AJHA will be available at the worksite when activities are being performed.*

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In the event that non-routine personnel (such as inspectors or visitors) arrive on the worksite and the existing JSA/AJHA (whether developed by MSA or subcontractor) does not cover the hazards associated with their activity, a new JSA is written to cover that activity or the supervisor modifies the existing JSA/AJHA to cover the activity.

K-2 and K-3 JSAs/AJHAs (including attachments) are renewed, amended, or revised when the safety requirements change, hazards change, new hazards are identified, the work scope changes, or 6 months has elapsed since the last review; K-1 JSAs/AJHAs are renewed, amended, or revised at least every 12 months. The date on the JSA/AJHA(s) is changed to reflect the renewal/ modification. Project safety reviews and approves all changes. Employees involved in the work review the renewed/modified JSA/AJHA and resign and date form [A-6004-285](#).

### Supervision

Supervisors ensure the following activities are performed:

- Research (to the extent possible) and identify known environmental hazards in areas employees enter or in which they work.
- Identify known or potential hazards and list on the JSA/AJHA and (as required) other prejob safety planning documents. Ensure that required training and permits are completed for those applicable items on the known or potential hazards list.
- Ensure and maintain documentation of competency/qualification.
- Ensure that pertinent information from the prejob safety planning document(s) is communicated to all affected personnel before they perform work or enter the worksite.
- Ensure current prejob planning documents are at the worksite.
- Ensure compliance with this practice.

### MSA Construction Engineers And Contract Administrators

MSA construction engineers and contract administrators ensure that MSA subcontractors and lower-tier subcontractors have submitted the required JSA/AJHA(s), the JSA/AJHA(s) has been reviewed and approved by MSA project safety, and a prejob walkthrough has been conducted with the appropriate MSA project representatives (including S&H) and the subcontractor prior to the start of work.

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### Project Safety

- Provides safety and health-related program guidance for prejob safety planning.
- Reviews and approves all JSAs after the documents have been signed by appropriate supervision.
- This review and approval must be made by another safety representative who was not involved in the preparation of the documents.

**NOTE:** *Review with recommendations to change these documents is not considered involvement in preparation.*

- Ensures a prejob walkthrough on the project has been completed prior to the start of work.
- Reviews and evaluates any hazardous material and/or hazardous process that creates a potential employee exposure. Processes may include, but are not limited to, welding or cutting, confined spaces, coating application/removal, sandblasting, asbestos and lead work, and chemical use.

Once supervision completes the JSA/AJHA, project safety reviews and approves it. A specific review by industrial hygiene may be required when conditions dictate, or as requested by project safety.

If an incident or accident occurs during performance of the job or task, that portion of the work is stopped and the supervisor (along with project safety) reviews the worksite to ensure that appropriate controls are established and identified on the JSA/AJHA before allowing the work to continue.

### PREJOB WALKTHROUGH

Personnel performing a prejob walkthrough use the appropriate documents and information available to ensure hazards, or potential hazards, are correctly identified and communicated for the activity being performed.

If, after the prejob walkthrough, there is inconsistency between what the actual conditions are at the worksite and what was expected in the pre-walkthrough evaluation, the differences are resolved before any work begins and the appropriate changes noted on the JSA/AJHA.

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Completing the *Job Hazard Checklist*, [A-6004-323](#) is an option, but convenient method of documenting hazards/controls identified during the prejob walkdown. This form also provides a convenient (but again, optional) method of notifying subcontractors of the suspected/potential hazards associated with a contract/scope of work [refer to practice [MSC-PRAC-30456](#), *Contractor Safety and Health Interaction*].

Key MSA employees (such as construction supervision and craft, and project safety), the customer/client, and subcontractor (if subcontractor work) should be involved in the prejob safety planning process (such as JSA/AJHA work package development). Involvement may include prejob walkthroughs, participation in developing the JSA/AJHA, or input/changes recognized during prejob safety meetings.

### **JOB SAFETY ANALYSIS/ ACTIVITY HAZARD ANALYSIS PREPARATION**

JSAs/AHAs are prepared and address specific work activities and hazards associated with the specific work, and controls to mitigate the hazards. Further evaluation and documentation on the continuation page(s) are required for activities when any of the following situations pertain:

- Any hazard/activity on page 1 is checked “yes.”
- Hazards associated with the work to be performed are not sufficiently defined.
- Employees may be exposed to hazardous materials.
- Other significant or unusual hazards are anticipated or could become involved.

Subcontractors and sub-tier contractors may use their own JSA/AHA forms, provided the information contained in their completed form addresses the process and guidelines as outlined in this practice.

JSAs/AHAs include the following information as prescribed on the JSA/AHA form:

- Job scope and description of activities
- Listing of each activity or phase
- Identification of the hazards associated with the activities being performed, including the use or presence of hazardous chemicals
- Specific, effective safety measures (engineering, administrative, or personal protective equipment [PPE]) to be applied to eliminate or control the hazards

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- A list of specific applicable work control documents, such as maintenance instruction or equipment procedure
- Identification and detail (including drawings and other documentation) of activities/hazards for which protective measures are required to be designed, inspected, or approved by a professional engineer or Competent/Qualified Person

In addition, multi-phase construction sites must also provide identification of the specific hazards associated with each activity to be performed in that phase of work as well as the actual corrective measures planned to control those hazards.

JSAs/AHAs must provide clear instructions on how unusual or unique hazards are to be mitigated. Simply referring to a practice or “generic” JSA/AHA does not constitute sufficient documentation to satisfy JSA/AHA requirements because it does not alert employees to the unusual or unique hazards for which there is actual potential for exposure. Detailed discussion of unusual or unique hazards specific to the work activity/location is required.

Each step or phase is evaluated to identify associated hazards and potential hazards.

Safety measures/controls are first established through engineering or administrative controls. Only after these methods have been exhausted can PPE be prescribed.

JSAs/AHAs are developed in sufficient detail to preclude confusion and misunderstanding.

Consideration is given to movement, work area, coordination of multiple work groups, specific hazards, safety rules, hazardous materials, and recognition of abnormal or unexpected problems.

In addition, consideration is given to hazards related to human factors, including but not limited to, fatigue, heat stress, restricted workspace, restrictive PPE, elevated work, repetitive motion, or other ergonomic factors.

The appropriate supervision completes and signs the JSA/AHA before submitting it to project safety.

Supervision reviews and incorporates recommendations resulting from the project safety review and resolves outstanding issues.

## Pre-job Safety Planning

### **Craft-Specific Job Safety Analysis/ Position Hazard Analysis**

The K-1 JSA/PHA (form [A-6004-278](#) or equal) must be in place before the start of any work by MSA self-perform employees. The K-1 JSA/PHA identifies known hazards for work activities routinely performed by specific craft personnel (such as electricians, teamsters, or laborers) to whom the work is assigned. The intent of the K-1 JSA/PHA is to provide a base knowledge of hazards and protective measures/controls to be taken to protect employees from the known hazards associated with each craft discipline. The information provided on the K-1 JSA/PHA need not be reiterated on subsequent hazard analysis documents. However, reference to craft K-1 JSA/PHA on another JSA/AHA is acceptable.

**NOTE:** *Subcontractors and sub-tier contractors may (but are not required to) use the K-1 JSA/PHA as described above.*

### **Job-Specific Safety Analysis/Activity Hazard Analysis**

The K-2 JSA/AHA is the base document that must be in place before the start of any work.

### **Task-Specific Job Hazard Analysis**

The K-3 JSA is a process/document that refers to a discrete, specialized, and/or singular activity. This document may be form [A-6004-279](#), an Asbestos Work Plan, a Hazardous Waste Health and Safety Plan, or any form/format that adequately satisfies the general requirements of this practice pertaining to the activity. Asbestos work plans are completed in accordance with practice [MSC-PRAC-30503](#), *Asbestos Control and Management*; lead compliance plans are completed in accordance with practice [MSC-PRAC-30507](#), *Lead Control* (.).

### **PREJOB SAFETY MEETING**

The supervisor/designee conducts a daily, documented prejob safety meeting before any work activity begins and discusses the completed prejob safety planning documents with all employees directly involved in the activity. A “prejob meeting form” (such as [A-6004-325](#)) is used to document the topics covered in the meeting. Any employee who is not in attendance at the prejob meeting is not allowed to work until he/she attends a similar briefing.

**NOTE:** *The supervisor/designee invites MSA project safety to attend the initial prejob meeting, for each project/task order.*

The daily prejob safety meeting will focus on discussions of the area where work is to be performed, scope of work, equipment to be used, the hazards and control measures (including PPE), and any evacuation and emergency procedures.

## Pre-job Safety Planning

### Employee Responsibility

Each employee directly involved in the activity (including employees in support roles) signs form [A-6004-285](#) indicating that he/she understands the activity, hazards, and controls associated with the work effort as indicated on the applicable prejob safety planning documents and attachments.

**NOTE 1:** *Only those employees signing form [A-6004-285](#) are allowed to work on the job specified in the document.*

**NOTE 2:** *If an employee does not understand the safety requirements or scope of the job, the employee may not proceed with the work until the requirements and scope are clearly understood.*

### POST-JOB REVIEW/FEEDBACK

Following completion of an activity of an unusual or hazardous nature, a post-job review/feedback session is conducted, and the results documented. The Prejob Briefing Checklist, form [A-6004-325](#), may be used to document the post-job review by completing the post work activities section.

### FORMS

*PHMC Radiological Work Permit, ([A-6000-272](#))  
Craft-Specific Job Safety Analysis/Position Hazard Analysis (K-1 SA/PHA), [A-6004-278](#)  
Task-Specific Job Safety Analysis (K-3 JSA) [A-6004-279](#) Job-Specific Safety Analysis/Activity Hazard Analysis (K-2 JSA/AHA), [A-6004-280](#)  
Hot Work Permit (Welding & Burning), [A-6004-281](#)  
Energized Electrical Work Permit, [A-6004-282](#)  
Prejob Safety Planning Signoff, [A-6004-285](#)  
Fall Protection Work Plan, [A-6004-286](#) (Good Faith Roof Assessment, [A-6004-294](#) Confined Space Entry Form, [A-6004-319](#) Job Hazard Checklist, [A-6004-323](#) Prejob Briefing Checklist, [A-6004-325](#)*

## Pre-job Safety Planning

### RECORDS IDENTIFICATION

#### Records Capture Table

Name of Document	Submittal Responsibility	Retention Responsibility
<i>PHMC Radiological Work Permit, (<a href="#">A-6000-272</a>)</i>	Construction Engineer	Project Document Control
<i>Craft-Specific Job Safety Analysis/Position Hazard Analysis (K-1 JSA/PHA), <a href="#">A-6004-278</a></i>	Construction Engineer	Project Document Control
<i>Task-Specific Job Safety Analysis (K-3 JSA) <a href="#">A-6004-279</a></i>	Construction Engineer	Project Document Control
<i>Job-Specific Safety Analysis/Activity Hazard Analysis (K-2 JSA/AHA), <a href="#">A-6004-280</a></i>	Construction Engineer	Project Document Control
<i>Hot Work Permit (Welding &amp; Burning), <a href="#">A-6004-281</a></i>	Construction Engineer	Project Document Control
<i>Energized Electrical Work Permit, <a href="#">A-6004-282</a></i>	Construction Engineer	Project Document Control
<i>Prejob Safety Planning Signoff, <a href="#">A-6004-285</a></i>	Construction Engineer	Project Document Control
<i>Fall Protection Work Plan, <a href="#">A-6004-286</a></i>	Construction Engineer	Project Document Control
<i>Good Faith Roof Assessment, <a href="#">A-6004-294</a></i>	Construction Engineer	Project Document Control
<i>Confined Space Entry Form, <a href="#">A-6004-319</a></i>	Construction Engineer	Project Document Control
<i>Job Hazard Checklist, <a href="#">A-6004-323</a></i>	Construction Engineer	Project Document Control
<i>Prejob Briefing Checklist, <a href="#">A-6004-325</a></i>	Construction Engineer	Project Document Control

### REFERENCES

[MSC-PRAC-30374](#), *Construction Work Package*  
[MSC-PRAC-30456](#), *Contractor Safety and Health Interaction*  
[MSC-PRAC-30461](#), *Accident Prevention Training and Education*  
[MSC-PRAC-30503](#), *Asbestos Control and Management*  
[MSC-PRAC-30507](#), *Lead Control*  
[MSC-PRAC-30508](#), *Occupational Medical Program*