

Information Bulletin

Improper Directions Given to Subcontractor to Perform Unauthorized Work During Abnormal Situation

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Tracking No: 528

Summary: Subcontractors will only take direction from authorized personnel per applicable contracts.

Discussion of Activities: After completing oversight of a subcontracted work activity a Safety Engineer performed a required 360 walk-around of his vehicle prior to leaving the area. The worker noted a piece of drilling equipment in front of the vehicle. The worker started to move the van forward turning to miss the component. However, the accelerator was hit harder than intended and the van was driven partially over the component causing the vehicle to become stuck on the piece of drilling equipment (twelve inch core barrel).



The employee asked a subcontractor for assistance in dislodging the component from under the vehicle. This was done without considering whether the action was within the scope of the contract or should require additional hazards analysis or controls.

Analysis: Inappropriate direction was given to the subcontractor by requesting assistance without understanding contractual requirements for performing this activity without proper authorization. Additionally, actions should only be taken with proper hazard recognition and a hazard analysis in place prior to performing abnormal activities. In this event there was inadequate communication and failure to involve management. The site-specific Health and Safety Plan (HASP) nor Job Safety Analysis (JSA) addressed events similar to this situation.

Recommended Actions:

1. When unusual events occur or conditions change - stop, communicate and get management involvement.
2. Abnormal activities involving subcontractors will be addressed on a case-by-case basis and evaluated by the Buyers Technical Representative and Safety & Health personnel prior to any action.
3. Issue written notification to Project personnel and subcontractors reinforcing contract requirements for taking direction outside of the scope of contracts.

Cost Savings/Avoidance: Not Evaluated

Work Function: Construction, Driving, Human Factors, OS&H - General, Operations - Heavy Equipment, Well Drilling

Hazards: Personal Injury - Mechanical Injury (Striking/Crushing), Traffic

ISM Core Functions: Analyze Hazards, Develop/Implement Controls

Keywords: Towing, Vehicles, Equipment, Buyers Technical Representative, Subcontractors, Safety

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References: C5101-C5103 Sub Surface Investigation Health and Safety Plan. Job Specific Safety Analysis 28416-3