

FFPO Procedure Blue Sheet Form

A. Procedure Title (list manual, procedure series, or specific procedure #)

SPR Accident Prevention Manual rev. 11

Section 38 Reporting/Recording Procedures

B. Procedure Name/series type (i.e., operations, maintenance, etc.) E S & H

C. Check (✓) one of the following:

1. Procedure(s) accepted “as is” with terminology replaced as denoted in the Site Procedures Approved Terminology Replacement List for the FFPO SPR M&O contract.

2. In addition to the changes in approved terminology for the FFPO SPR M&O contract, improvements to the procedure are warranted:

Category 1 Finding (Resolution prior to contract start)

Category 2 Finding (Resolution within 90 days of contract start)

Category 3 Finding (Resolution to the Issues Management program)

D. Comments/Notes:

E. Forward a copy of this form to the FFPO Director, Business Management for revision tracking.

Signed

FFPO Reviewer Signature

03/03/14

Date

Steve Mahan

FFPO Reviewer Print Name

38. REPORTING/RECORDING PROCEDURES

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38.1. INTRODUCTION

This section provides procedures for reporting and recording of the following:

- a. Hazard Identification, Communication, and Reporting
- b. Early Hazard Recognition Program
- c. Occupational Injuries, Illnesses, and near misses
- d. Site Safety Specialist - Generated Files and Safety Reports
- e. Occupational Safety and Health Concerns

NOTE

Any SPR employee has the authority and the responsibility to STOP WORK if they witness an unsafe act or feel uncertain that the work can be performed safely. An employee will not be discriminated against nor will action be taken against him or her as a result of his/her filing an occupational safety and health concern or stopping work.

38.2. EARLY HAZARD RECOGNITION PROGRAM

38.2.1. Introduction

- a. The Early Hazard Recognition Program is a voluntary safety, health, and environmental program designed to allow anyone on the SPR to report any situations that could have lead to and injury or an accident easily and without negative consequences.
- b. Reporting of potential hazard is a positive activity designed to promote a culture of concern among employees for one another's safety and concern for the environment, and to give DM's employees an additional, proactive opportunity to prevent accidents and incidents. In addition, OSHA VPP strongly urges that potential hazards be reported to prevent future accidents.
- c. This sub-section establishes the procedures and responsibilities for reporting and recording potential hazards. Figure 38-1 is a flow diagram of the hazard reporting process.
 1. Although the Early Hazard Recognition Program is required, reporting is voluntary.
 2. Employees may identify themselves when reporting potential hazards or report them anonymously.
 3. Early hazard recognition includes causes and corrective action information for potential safety, health, and environmental incidents.
 4. Documenting information on these incidents in the Early Hazard Recognition Program allows lessons learned to be available and benefit all SPR personnel.

38.2.2. General

- a. The Early Hazard Recognition Program is designed to give employees the opportunity to report, without reprisal, any witnessed activities, experiences or conditions that could have resulted in an incident or an event that could have had more severe safety or environmental consequences, but does not meet the criteria for Occurrence Reporting and Processing System (ORPS) "near miss" reporting.
- b. This program is intended to prevent incidents, control hazards, and identify and correct weaknesses in the existing safety and environmental management systems, monitor change, and analyze possible trends that may have an adverse effect on safety, health, or the environment over time.
- c. The Early Hazard Report form will allow employees to give feedback or suggestions regarding mitigation of reported potential hazards. Potential hazards may be reported on the forms posted at the sites and in New Orleans, on the phone or on the S&H website.
- d. All reports will be evaluated and causes will be identified, trended, and resolved, (when possible), to prevent future incidents. If the hazard cannot be resolved/removed, it will be mitigated.
- e. The analysis of potential corrective actions will be initiated using the contents of the report and will typically be conducted by the Site Safety Specialist or New Orleans S&H staff.
- f. An employee shall never be discriminated against nor will action ever be taken against him or her as a result of filing a report.
- g. Feedback will be provided to the employee on the action taken to eliminate or mitigate the hazard.

38.2.3. Procedures

38.2.3.1. Reporting (Figure 38-1)

Report any potential hazard using one of the following methods:

- a. Website: Submit information via the Early Hazard Recognition Electronic Form located on the Safety and Health (S&H) SharePoint site. The site also provides a record of all reports submitted.
- b. Mail: Complete and send the Early Hazard Recognition index cards to the New Orleans coordinator at mail route EF- 20.
- c. Email: Send an email S&H mailbox with the subject title of Early Hazard with the description of the potential hazard (address: Safety & Health DM).
- d. Phone: Leave a message on the Strategic Petroleum Reserve (SPR) Listen Up Hotline.

NOTE

The Listen-Up Hotline replaced the ES&H Hot Line, formerly 1-800-258-0547
Option #6.

- e. Fax: E-Fax the completed form, index card, or event description to 504-818-5581 (S&H mailbox).
- f. In Person: Submit it to the Site Safety Specialist.

38.2.3.2. Data Collecting and Processing

- a. The NO EHRP Coordinator will enter submitted reports into a tracking database.
- b. The S&H Department will work with the SSS or ES&H Manager to identify corrective actions (if needed) and work to eliminate or mitigate any identified causal factors. All potential hazard reports will be evaluated for cause and trended.
- c. The NO EHRP Coordinator or SSS will inform the employee who reported the potential hazard when the corrective action is completed. Hazard reports can also be tracked by accessing the ES&H SharePoint site in the S&H section under the link Early Hazard Recognition Program.
- d. A potential hazard report can be submitted as a Lessons Learned if it can be applicable to all sites or other DOE facilities.

CAUTION

If the employee believes that the potential hazard presents an unsafe activity or feel uncertain of safely performing the work, the employee shall stop work and notify the ES&H manager or SSS immediately.

NOTE

All potential hazard reports will be accepted and addressed. If there is doubt as to whether a reported potential hazard should be reported as a near miss, the NO coordinator or Site Safety Specialist will forward a copy to the OCC, who will determine whether to report the item in the ORPS.

38.3. REPORTING AND RECORDING OCCUPATIONAL INJURIES/ILLNESSES AND NEAR MISSES

38.3.1. Introduction

This sub-section establishes the procedures and responsibilities for reporting and recording occupational injuries/illnesses and near misses. Figures 38-2 and 38-3 are flow diagrams of these processes. Figure 38-3 shows the workflow of the safety statistics process for injury and illness.

38.3.2. General

- a. The purpose of the investigation report is to convey in clear and concise language the results of the investigation (the facts surrounding the occurrence, the analysis of those facts, conclusions drawn, and recommendations in order to prevent a recurrence.
 1. The investigation report constitutes a record to document the objective analysis of an accident and to identify root cause(s), including identification of unsafe acts and procedural deficiencies.
 2. The reporting method is consistent with the Department of Energy's Occurrence Reporting and Processing System (ORPS).
 3. Any corrective actions directed by the appointing or reviewing official are based largely on the contents of the report.
- b. All accident incidents are investigated, following the requirements provided by DOE Order 231.1B, ES&H Reporting; 225.1B, Accident Investigation (March 2011); and DM's Conduct of Operations at the SPR.
- c. The conduct of a Headquarters' investigation is not mandatory but based upon a determination made by Heads of Headquarters' elements
 1. There are five criteria used to determine when and if DOE will appoint an Accident Investigation Board (AIB):
 - a) Human Effects
 - b) Loss of Control of Radioactive Material
 - c) Environmental Release of Hazardous Material
 - d) Property Effects
 - e) Other Effects.
 2. Of these, (b) does not apply to the SPR and (e) is anything else that Secretary or Deputy Secretary chooses to investigate.
- d. The order does not discuss field office accident investigations or those conducted by contractors. This section of the APM provides requirements for investigations conducted by the SPR M&O contractor.
- e. This section also implements the contractor requirements to support Federal investigations of accidents included in the Contractor Requirements Document of DOE O225.1B.
- f. Contractors/Subcontractors are responsible for investigating their accidents, although DOE or the M&O contractor may choose to perform their own investigation in addition to the contractor's.

38.3.3. Accident Types

The table below describes the various types of accidents that may initiate a DOE accident investigation.

ACCIDENT TYPES	
TYPE	DEFINITION
Human Effects (Limited to human injuries and illnesses)	a. An injury or chemical or biological exposure that results in, or is likely to result in, the fatality of an employee or member of the public. b. Any single accident that results in the hospitalization for more than five calendar days, commencing within seven calendar days of the accident, of one or more DOE, contractor, or subcontractor employees or members of the public due to a serious personal injury or acute chemical or biological exposure. c. Any single accident resulting in three or more DOE, contractor, or subcontractor employees having lost-workday cases. d. Accidents involving Federal or contractor employees driving vehicles while on official Government business, on or off Government property, if the consequences result in meeting a-c above
Loss of Control of Radioactive Material	Does not apply to the SPR
Environmental Release of Hazardous Material	a. The environmental release of a hazardous material from a DOE facility (on site or off site), in an amount greater than five times the reportable quantities specified in 40 CFR Part 302. b. The release of a hazardous material from a DOE facility that meets the criterion for classification as a Site Area or General Emergency in DOE Order 151.1C. c. Any offsite transportation incident involving hazardous materials that would require immediate notice, d. A catastrophic release of a highly hazardous chemical in the workplace.
Property Effects	a. An estimated loss of or damage to DOE property equal to or greater than \$2.5 million dollars b. Cleanup costs equal to or greater than 2.5 million dollars
Other Effects	a. Any accident of series of accidents for which the AIB is deemed appropriate by the Security or Deputy Secretary

38.3.4. Reporting Procedures

All accidents/injuries/illnesses that happen on SPR facilities or impact SPR employees shall be reported. The tables below describe the procedures for reporting at operating facilities. Reporting requirements apply to all contractors working on DOE facilities.

PROCEDURES FOR REPORTING AT OPERATING FACILITIES	
Position or Department	Responsibility
ALL	a. Immediately report all occupational injuries/illnesses to the control room operator, regardless of severity. b. Anyone may call 911 immediately if they feel it is necessary, however, calling the control room will result in a faster response.

PROCEDURES FOR REPORTING AT OPERATING FACILITIES	
Position or Department	Responsibility
Control Room Operator	a. Notify the ERT, Protection Force Support Responders, and 911 if needed, and the employee’s supervisor, site safety specialist, site director and NO OCC. b. Notify portal security officers to assist with ambulance entry to the site.
Supervisor	a. Notify the managed care provider as soon as possible.
Ambulance or Security Contractor Personnel	a. Report information on where the employee is being transported to the supervisor

NOTE

Personnel suffering minor injuries that do not require professional medical treatment shall be provided with appropriate first aid by personnel trained in first aid, logged on the First Aid Injury Log (OSF91-0013), and the managed care contractor shall be notified (See Work Care work instruction AAA9008.8 for more detailed information).

PROCEDURES FOR REPORTING AT NEW ORLEANS OFFICE	
Position or Department	Responsibility
ALL	a. All occupational injuries/illnesses are reported to 9-911 immediately if needed, and then to the Protective Force Security Contractor.
Protective Force Security Contractor	a. Provide First Aid/CPR to the extent of their training and remain with the employee until medical response personnel arrive. b. Report the injury to the OCC. c. Provide the supervisor with update and information of where the employee is being transported if the employee is being transported to a hospital.
The OCC	a. Notify Safety, Operations, and the DOE counterpart
Supervisor	a. Notify the managed care contractor

NOTE

During the evacuation, re-entry, and recovery phases the site(s) impacted by the event (hurricane, flood, tornado, etc.) may not have the resources to complete the supervisor’s accident report and analysis documentation required. If this is the case, notification of all first aid cases and injuries should be forwarded through the Incident Command System (ICS) to the S&H representative assigned to the Emergency Operations Center (EOC). Using the supervisor's first report of injury provided to the EOC, this representative will prepare the report as necessary. The report will be sent to the site for review and concurrence upon completion.

38.3.4.1. Off-site Treatment Requirements

- a. If offsite treatment is not required:
 - 1. The First Aid Injury and Bloodborne Pathogens Exposure Incident Log (OSF91-0013) is completed by person providing first aid.
 - 2. The Supervisor's Report of Injury/Illness (OSF89-0013) is completed.
- b. If offsite treatment is required:

1. An Authorization for Emergency Medical Treatment form (OSF83-0151) is completed. This applies only to DM employees.

NOTE

In case of an emergency, medical treatment is not to be delayed to complete paperwork. The employee has his or her own choice of physician or may use the DM-contracted clinic.

2. The First Aid Injury and Bloodborne Pathogens Exposure Incident Log is completed by person providing first aid.
3. The Supervisor's Report of Injury/Illness is completed.

38.3.5. Accident Reporting Requirements and Investigation Activities

- a. See Table 38.2 Accident Reporting Requirements and Investigation Activities for additional information.
- b. DOE reporting procedures are governed by DOE Orders 231.1 and 225.1B.
- c. All investigations will be performed in accordance with DOE Order 225.1B and M&O's Conduct of Operations at the SPR (COPS).
- d. DM will support Federal investigations of accidents related to activities under the contract. DM will:
 1. Maintain a capability to respond to accidents, mitigate accident consequences, assist in collecting and preserving evidence, and assist during the conduct of the investigations. Assistance provided includes preserving and documenting the accident scene.
 2. Prepare, implement, and track to completion approved corrective action plans that are identified as DM action by the Accident Investigation Board.

38.3.6. Appointing the Board for Investigations

- a. Boards for Headquarters investigations will be appointed according to DOE Order 225.1B.
- b. Contractor-led accident investigations are conducted by a qualified safety professional working for the company whose employee has been injured or made ill appointed by the contract Project Manager.

NOTE

M&O contractor accidents, previously called Category C accidents, as identified by the Field Office DOE Project Manager or the M&O Project Manager may be investigated by a board appointed by the DOE project manager or the DM project manager.

- c. Accidents involving DOE employees are investigated by a DOE safety professional.
- d. Accidents involving M&O personnel, DOE property, or facilities for which the M&O contractor has responsibility are usually investigated by a safety professional employed by the M&O but may be investigated by a member of the DOE safety staff or a team made up of both.
- e. Accidents involving DM contractor/subcontractor employees are usually investigated by the contractor/subcontractor safety personnel and when directed by the Site Director by the Site

Safety Specialist. DM may choose to conduct their own investigation if they feel that a subcontractor's report to be biased or inadequate.

- f. The DOE Project Manager or the DM Project Manager can direct that an expanded contractor accident investigation be completed if the accident merits investigation beyond routine reporting on the DOE 5484.3 form.
- g. All accidents will be reported on the DOE 5484.3 form whether they will be investigated by an accident board or not. The DOE Form 5484.3 will be coordinated through the Site Safety Specialist prior to being forwarded to the M&O Safety and Health department for provision to DOE within 7 working days of the accident.
- h. In the event that a subcontractor employee or member of the public is involved, legal will be contacted immediately.

38.3.7. Expanded Contractor Investigation Reports

Some accidents require extensive analysis and documentation, but do not warrant the level of effort of a Headquarters investigation. These accidents will be designated "Expanded Contractor Investigations" and will involve an in-depth investigation according to the requirements provided by this section. Expanded contractor investigations require an appointed investigation board and a formal accident report.

38.3.7.1. Expanded Contractor Investigation Procedures

- a. Determination of the need for an Expanded Contractor Investigation will be made within 48 hours following the initial report of an accident.
 1. The DOE Project Manager may direct and/or approve an Expanded Contractor Investigation.
 2. The Project Manager of the contract may direct and/or approve an Expanded Contractor investigation.
 3. The DM ES&H Director may direct an Expanded Contractor investigation with the approval of the DM Project Manager.
 4. The S&H Manager will review the standard DOE Form 5484.3 accident reports and determine if the accidents merit an Expanded Contractor Investigation and make a recommendation to the ES&H Director.
- b. Appointment of a Contractor investigation team.
 1. The contract project manager will formally appoint an investigation team within 48 hours of the accident. A letter to the SPR Program Manager will document this decision, including the required completion date for the report and a list of the investigators. The contract project manager may delegate this authority to the ES&H Director.
 2. If responsibility is so delegated, the ES&H Director will appoint the investigation team, establish the completion deadline, and document the decision.
 3. The investigation team will be led by someone with training in accident investigations (either DOE 225.1B training and/or Taproot® training). If the lead investigator has had the DOE training, at least one member of the team shall have Taproot® training or experience.
 4. The lead investigator must be someone who is not within the management chain of the organization to which the accident victim reports, i.e., an Operations or Maintenance manager shall not lead an accident investigation of an injury occurring during maintenance. However, members of the same directorate may act as technical experts and may be represented on the investigation team.
 5. The lead investigator will contact members of the investigation team, notifying them of their responsibilities, making travel arrangements, assigning team duties, etc.

6. The Site Director will hand over the accident scene, entry log, photographs and other evidence to the lead investigator and document this action.
- c. Nature of the accident investigation:
 1. Taproot® investigations: Taproot® has been chosen by DM and approved by DOE operations as the format to be used to analyze accidents and document root causes. It was chosen because it is a proven, nationally known instrument that is consistent with the revised ORPS reporting process. It also includes the elements used in the DOE Accident Investigation training.
 2. Human Performance Improvement (HPI) Interventions: Some Expanded Contractor investigations will be determined to merit an HPI intervention, either when the initial team is appointed or when the team decides that the causes of an accident may be human error and/or latent organizational weaknesses.
 - a) Initiation of an HPI intervention is at the discretion of the DOE Project Manager or DM Project Manager and may be delegated to the DM ES&H Director. The HPI coordinator or the DM S&H Manager can recommend that an intervention be conducted.
 - b) The DM Project Manager or his designee will document the decision to direct an HPI intervention by memo.
 - c) An HPI team, which must include members who have received HPI training, will follow the HPI intervention process established by the DM HPI coordinator. HPI intervention teams may have only 1-2 trained members.
 - d) The completion date must allow time for the team to review their findings and add the resulting conclusions to the formal accident report.
 3. Expanded Contractor Investigation Report Format
 - a) An Expanded Contractor accident report will begin with an Executive Summary that briefly explains the accident, identifies root cause(s) and contributing causes, and summarizes the recommendations of the investigation board. If an HPI intervention has been directed, a short summary of its conclusions will be included.
 - b) The second section of the report will describe in detail how the accident occurred and the appointment of the accident investigation board.
 - c) The third section will describe the root cause(s) and contributing causes that led to the accident and the reasoning/evidence that supports this analysis. HPI analysis and causes should be summarized in this section.
 - d) The fourth section will present the investigation team's recommendations, including any recommendations arising from the HPI analysis.
 - e) Names shall not be used in the accident report, other than those of the accident investigation team. Persons involved in the accident will be referred to by job title.
 - f) When possible the report should use photographs to augment the written description of the accident scene and consequences.
 - g) The report may be presented in draft to DM senior management for factual review and comment, but no changes will be made except to correct inaccurate information and revise any conclusion no longer supported by the facts.
 - h) Report appendices will include:
 - 1) A copy of the 5484.3 form for the accident. (Note: A 5484.3 is required even though the investigation is documented in the report. Names and other information that specifically identifies the individuals involved will be deleted)
 - 2) A timeline for the accident.
 - 3) A copy of the Supervisor's First Report of an Accident/Incident. (Note: Names and other information that specifically identifies the individuals involved shall be deleted.)

- 4) Copies of pertinent supporting documentation such as certifications, equipment maintenance records, operators’ manuals, training, etc. at the discretion of the investigation lead.

CAUTION
 Copies of interviews, witness statements, and other information obtained in confidence will be classified as Official Use Only (OUO) and shall not be included in the report.

- i. A cover letter and the report will be presented to the M&O Project Manager and the Contracting Officer.
- j. The M&O Contracting Officer will transmit a copy of the report to the DOE Contracting Officer.
- 4. Tracking and Closure of Expanded C Recommendations
 - a) Accident recommendations/judgment of needs shall be entered into the DOE Action Tracking System (DATS) as safety issues.
 - b) The M&O Project Manager or his designee will assign actionees and due dates to each recommendation/judgment of need that is assigned to the M&O contractor.
 - c) Actionees will be informed of their designation and the associated due date via e-mail by the investigation team leader.
 - d) S&H will document a risk assessment for each of the entries in the ATS. The system will notify the actionee by e-mail.
 - e) Accident investigation recommendations shall be tracked to closure.
 - f) The accident investigation lead will be responsible for closing the ATS entry upon verification of satisfactory completion of corrective actions. He or she may delegate this responsibility.
 - g) Status of the recommendations will be briefed at the M&O weekly senior staff meeting by the directorate responsible for action.

NOTE
 The DOE Project Manager may direct that accident recommendations be tracked in the DOE Action Tracking System (DATS).

NOTE
 The investigation team should review their findings for potential lessons learned and input those identified into the Lessons Learned Database. Anyone may identify and submit a lesson learned. There is no limit to how many may be submitted.

38.3.7.2. Expanded Contractor Investigation Responsibilities

Responsibilities pertaining to Expanded Contractor Investigation can be found in Table 38.3

38.4. CORRECTIVE ACTIONS

Corrective Actions Responsibilities are located in table 38.4

38.4.1. Criteria to Close Corrective Actions

- a. Tasks requiring configuration changes or completed by accomplishment of maintenance recommendations will be physically verified by the site director and confirmed by the senior site representative.
- b. Tasks requiring construction will be physically verified by the site director and confirmed by the senior site representative, according to existing procedures.
- c. Tasks requiring procedure changes will be verified by locating the completed procedure in a permanent M&O document.
- d. Documentation of closed information will be entered in ATS or DATS.
- e. Completed ATS items will be closed in the ATS database upon verification of closure.
- f. Completed DATS items will be closed by the DOE Project Manager or his designee.

38.5. SITE SAFETY SPECIALIST-GENERATED FILES AND SAFETY REPORTS

38.5.1. Introduction

Safety personnel shall document findings including observations, inspections, and recommendations concerning conditions or practices that are considered hazardous; that involve property damage; or that violate DM policy, federal or state regulations, laws or other applicable codes or standards.

38.5.2. Site Safety Specialist Files

- a. Formal site safety specialist-generated files will be maintained at each SPR site.
- b. Separate files will be maintained for at least the following subjects.
 1. The OSHA 300 log, which shall be posted annually in February
 2. Documented site safety specialist findings
 3. Site safety specialist-generated correspondence which establish S&H - related decisions
 4. A copy of approved 5484.3 accident investigation forms
 5. Monthly and quarterly Site Safety Specialist inspections and required assessment reports
 6. SCAT inspection reports
 7. Site Safety Management Council Minutes
 8. Copies of items 2, 5, 6 and 7 will be provided to New Orleans S&H for posting in the Contractor Assurance System (CAS) files in SharePoint.
 9. Documentation of Security Force oversight.

38.5.3. Procedures

- a. Upon observing any safety deficiency or violation, the Site Safety Specialist will attempt to correct the hazard or unsafe condition immediately when it is within his or her capability.
 1. If the site safety specialist is unable to correct the hazard or unsafe condition, it will be flagged, tagged, roped off, or somehow marked to alert other employees.
 2. Interim corrective action shall be taken immediately to mitigate, control, or remove the hazard.

3. If an unsafe act is observed or if they are concerned about whether the work can be performed safely, the Site Safety Specialist will stop the work and contact the control room and the appropriate supervisor or SMTR.
 4. The Site Safety Specialist will document all findings and notify the supervisor by memo or a site-produced form.
 5. A copy of every Site Safety Specialist finding will be sent to the ES&H manager and a copy will be kept in the Site Safety Specialist files for audit purposes.
 6. Site Safety Specialists inspections include the entire site, regardless of who is performing the work in any given area (DM, contractor, or subcontractor).
- b. The supervisor or SMTR shall ensure the identified hazard is mitigated, informing the Site Safety Specialist of the action taken.
 - c. The Site Safety Specialist-documented findings may be closed when a work order has been written that will remove or permanently control the hazard.
 - d. If the line supervisor, or the SMTR and appropriate manager, fails to respond to the documented findings, the Site Safety Specialist will advise the ES&H manager
 - e. The Site Safety Specialist may forward a copy of any findings to the Safety and Health director or the Executive Safety Council for information or for action outside of the site's capability. When these findings cannot be resolved working within the work order system, the item will be entered in ATS if it remains open more than 30 days.
 - f. Status of uncorrected findings more than 30 days old will be provided to the Site Safety Management Council chairperson (site director) and the responsible party shall update the ATS findings monthly
 - g. The Site Safety Specialist will forward the documented findings through the ES&H manager to the SSMC chairperson for the monthly SSMC meeting for review.

38.6. OCCUPATIONAL SAFETY AND HEALTH CONCERNS

38.6.1. Introduction

This subsection establishes the method by which company personnel may present concerns about any condition or practice that may be hazardous to safety and health or in violation of a prescribed safety or health policy or regulation.

38.6.2. Procedures

The following procedures shall be used when reporting a safety or health concern.

- a. The employee shall first contact his/her supervisor and attempt to resolve the problem by conducting a joint inspection with the Site Safety Specialist and/or Safety Monitor of the conditions or circumstances identified in the concern.
- b. If a site employee desires anonymity, he or she may submit a written concern to the site director on DM's Occupational Safety and Health Employee Concern form (OSF96-0009). The forms are made readily available to employees by the Site Safety Specialist. Alternatively the employee may call the 1-866-706-0057 (Listen Up) hot line. Listen Up is run by an external service and reports are strictly confidential.
- c. The site director shall designate an appropriate member of the SSMC to investigate the concern. The findings will be presented to the site director within three working days. If the concern is called into New Orleans to the Safety and Health Director, she or he will present the information to the Site Director for site action or institute corrective action.

- d. If the Site Director decides that action is needed to remedy the problem, corrective measures will be initiated. Safety and Health will decide what action is needed to correct problems submitted to the department anonymously. A written response to the concern will be posted on the site employees’ bulletin board within three workdays following the decision by the Site Director or S&H manager.
- e. The status of recommended corrective actions will be reviewed in the monthly SSMC meetings. If the corrective actions cannot be carried out by a work order and the problem is still outstanding after 30 days, the concern will be entered into ATS.
- f. If the employee filing the concern does not believe that any of the steps above have remedied the situation, he or she may file a formal concern with the DOE senior site representative, or call the DOE ES&H Hotline (5030), or report the problem directly to the SPR Project Manager and the DM Project Manager at the Tripartite Safety Council.

NOTE
 All written concerns and documentation of corrective action taken are to be kept in the site files for five years.

38.7. TABLES: REPORTING/RECORDING PROCEDURES

TABLE 38.1. EARLY HAZARD RECOGNITION PROGRAM RESPONSIBILITIES MATRIX	
Position or Department	Responsibility
Site Director	a. Support the Early Hazard Recognition Program by reviewing status of potential hazard reports with site ES&H staff
New Orleans EHRP Coordinator	a. Maintain the Early Hazard Recognition Program database. b. Work with the SSS or ES&H Manager to ensure that corrective actions are taken. c. Inform the affected site and employees when corrective actions have been taken. d. Provide a report by request to the SSS for discussion with employees.
Site Safety Specialist	a. Act as the Site program coordinator and coordinate with the NO coordinator. b. Submit all potential hazards reported to the NO coordinator and share them with the site safety committees. c. Provide status of potential hazard reports to NO Coordinator.
ES&H Manager	a. Submit all potential hazard reports to the NO coordinator b. Provide status of potential hazard reports to NO coordinator for closure.
Site Safety Management Council, (SSMC)	a. Create action plans for potential hazard reports submitted by the SSS. b. Request help and assign actions from departments that can address the problem. c. Inform the Site or the NO coordinator when the actions are completed.
Department Manager	a. Address potential hazard reports submitted to your department for correction. b. Notify employees of any hazards or risks that remain.

TABLE 38.1. EARLY HAZARD RECOGNITION PROGRAM RESPONSIBILITIES MATRIX

Position or Department	Responsibility
	c. Discuss potential hazard reports with employees that were submitted from the SSS or discussed at the SSMC. d. Let the SSS or the NO coordinator know when corrections have been assigned and completed.
Supervisor/Foreman	a. Encourage employees to report potential hazards. b. Submit all potential hazard reported by employees to the NO coordinator or SSS c. Review potential hazard reports with employees during safety meetings.
Employees	a. Stop work if imminent danger exists. b. Submit potential hazard reports. c. Take immediate action to mitigate the danger yourself or fix the problem, if you are qualified and it is safe to do so. d. Apply interim control measures such as notifying the Control Room, placing cones, posting a watch, roping off an area with caution tape, posting warning signs, or erecting barricades until the situation can be fixed.
Safety and Health Director	a. Appoint the Early Hazard Recognition Program Coordinator. b. Report items for entry as potential hazards. c. Initiate potential hazard investigations and/or interventions and assist with action plans when needed. d. Maintain records of potential hazard reported and their solution. e. Assure that employee that has reported a potential hazard is kept informed of its ongoing status.

TABLE 38.2. Accident Reporting Requirements and Investigation Activities

Position or Department	Responsibility
Site Director	a. Supervise accident-related activities until an accident board lead has been appointed. b. Delegate specific accident-related actions as needed to support the subsequent investigation. c. Formally turn over the scene and any evidence collected to the accident investigation lead upon their arrival. d. Decide whether preserving the scene as it was at the time of the accident is feasible and will not damage/deteriorate the evidence or present an additional hazard or whether evidence should be collected from the scene, documented, and safely stored e. If possible leave the evidence in situ until OSHA has a chance to examine the scene
Site Security Specialist	a. As soon as the medical needs have been met, ensure that the accident scene is secured (preserved) by security officers b. Mark the area in which the accident occurred c. Restrict access within that area to those designated by the Site Director to perform investigation-related activities d. Ensure that anyone entering the restricted area signs in and out on an entry log and that the evidence is not disturbed without authorization, if evidence is disturbed, document the action taken.

TABLE 38.2. Accident Reporting Requirements and Investigation Activities

Position or Department	Responsibility
	e. Maintain the log as an accident record
Site Safety Specialist or the Site Director’s designee(s)	a. Conduct and document individual and private witness interviews b. Ensure that interviews are conducted by personnel not involved in the accident c. View and document the conditions with photographs and sketches d. Ensure photographs of the accident scene are labeled and dated. e. If physical damage to equipment occurred that will result in property loss, ensure that the equipment is photographed. f. Ensure photographs contain some means of determining relative size, location, and date g. If the accident injuries meet the requirements for OSHA notification, notify the appropriate OSHA office and report the accident within the allotted time period and document the call and notify New Orleans S&H that this has been done h. If an accident/incident is determined to be OSHA/DOE recordable record all data on the OSHA 300 Log and Summary of Occupational Injuries and Illnesses
Lead Investigator	a. Decide whether preserving the scene as it was at the time of the accident is feasible and will not damage/deteriorate the evidence or present an additional hazard or whether evidence should be collected from the scene, documented, and safely stored b. If possible leave the evidence in situ until OSHA has a chance to examine the scene c. If DOE Headquarters appoints the board, the lead investigator may request that the scene be maintained intact until they arrive
Security Force officers	a. Photograph the scene/evidence and sequester witnesses, but only under the direction of the lead investigator or the Site Director b. Verify the evidence is not disturbed. c. Protect the accident area as directed.

TABLE 38.3. EXPANDED CONTRACTOR INVESTIGATION REPORT RESPONSIBILITIES

Position or Department	Responsibility
Site Director	a. Ensure compliance with requirements for reporting and recording of occupational injuries/illnesses. b. Act as lead investigator and be responsible for preserving the scene of an accident, collecting witness statements, photographs, and other evidence until a lead investigator has been appointed. c. Designate a site workers’ compensation representative. d. Review DOE Individual Accident/Incident Report 5484.3 forms (see appendix) and approve them prior to submission to the NO Safety and Health department and review status of the open actions at monthly Safety Management Council meetings. e. Ensure the OCC is notified as required in Conduct of Operations and forward required reports to the OCC.
Control Room Operator	a. Notify the ERT if needed, site director, site safety specialist, and employee’s supervisor or SMTR for subcontractor employees of any reported injury/illness.

TABLE 38.3. EXPANDED CONTRACTOR INVESTIGATION REPORT RESPONSIBILITIES

Position or Department	Responsibility
	b. Call for an ambulance for serious injuries. c. Notify the front gate to facilitate entry. d. Notify the New Orleans OCC of any reported accident/injury/illness or near miss.
Operations Control Center (OCC)	a. Notify the M&O Safety department, M&O Operations, and the DOE counterpart
Department Manager	a. Evaluate all accidents and incidents occurring within the department quarterly, review for any trends, and identify cause(s) with assistance from the site safety specialist. Present this information to the Site Safety Management Council (SSMC). b. Recommend corrective action(s) to supervision to prevent future occurrences
Supervisor/Foreman	a. Assist the ERT to coordinate appropriate first aid, medical treatment, or CPR. Ensure only first aid- and CPR-qualified personnel perform first aid and CPR. (In New Orleans, the security subcontractor will provide first aid/CPR services. 9-911 will be called to obtain an ambulance if required.) Maintain status of the employee’s medical condition, and coordinate with Human Capital as needed. b. Complete the Supervisor's Report of Injury/Illness and submit it to the Site Safety Specialist within 24 hours of notification or on the next scheduled workday. Any Supervisor's Report of Injury/Illness resulting in recommended action will be brought to the SSMC for review, lessons learned, and tracking. c. Ensure that the employee completes an Authorization for Emergency Medical Treatment (see appendix) and Choice of Physician (see appendix) prior to treatment whenever offsite medical treatment is required for an occupational injury or illness. In the event of an accident requiring emergency medical treatment, treatment is not to be delayed to complete paperwork. Distribute the forms, as specified. d. Complete or ensure that personnel administering first aid have completed the First Aid Injury and Bloodborne Pathogens Exposure Incident Log for all occupational injuries or illnesses. e. (The supervisor responsible for corrective action will) sign the 5484.3 form on Line 40, track and ensure closure of assigned action items, and notify the site safety specialist when actions are closed. f. Review the physician’s written report, and release to return to work form immediately upon the employee's return following an occupational injury or illness involving lost workdays. Coordinate any restricted work conditions with the employee and Human Capital as needed. Provide the original report to the site workers’ compensation representative for maintenance in the central file. g. When an employee is sent to the doctor or hospital for a work-related injury or illness and no lost workdays are involved, the employee shall have a return to work slip from the attending physician. h. Provide employees the form specified in ASR3200.10 Section 3.4

TABLE 38.3. EXPANDED CONTRACTOR INVESTIGATION REPORT RESPONSIBILITIES

Position or Department	Responsibility
	(Reporting and Processing Workers' Compensation Injuries). i. Prior to the employee's return to work consider whether a fit for duty evaluation should be made.
Site Safety Specialist	a. Report all occupational injuries/illnesses to the NO Safety department within 24 hours of notification. b. Ensure that the injury is entered on the First Aid Injury and Bloodborne Pathogens Exposure Incident Log, if onsite treatment is given. c. Submit a copy of the Supervisor's Report of Injury/Illness to the New Orleans Safety department within 24 hours and provide the original to the workers' compensation representative for maintenance in the central files. d. Determine OSHA/DOE recordability of occupational injuries/illnesses. e. Maintain an up-to-date site OSHA 300 Log and post the previous year's summary from February 1 - April 30. f. Follow up on each case to ensure that 5484.3 forms are prepared in all cases when required by recordkeeping guidelines. g. Perform an investigation and complete DOE form 5484.3 if injury/illness is determined to be OSHA/DOE recordable. h. Obtain the signature of the supervisor responsible for recommended corrective action, and submit the form to the New Orleans Safety department within 8 calendar days of notification of an OSHA/DOE recordable injury/illness. i. Provide a copy to the site workers' compensation representative for maintenance in the central files. If an open action exists, include a designee and estimated completion date. Number each recommendation sequentially. Ensure open action items are being acted upon by site supervision. j. Advise and assist management in fulfilling their responsibilities. k. Be trained in accident investigation techniques. The required course will be specified by the Training and Development department. l. Conduct accident investigations as directed by site management. m. Photograph and preserve evidence.
Worker Compensation (WC) Site Representative	a. Notify the WC analyst of a work related injury by telephone as soon as possible. b. Provide all required forms to the WC analyst as soon as possible. c. Provide the employee with all forms that may be required by state. d. Submit all subsequent medical records, state or hearing notices, medication requests, citations, or petitions to the WC analyst. e. Serve as a liaison with WC analyst on any medical or return to work issues. f. Continue to communicate with the injured employee until he or she is released to return to work full duty.
Injured Employee	a. If possible, immediately notify their supervisor and the control room operator, at the sites, and the OCC in NO. b. Complete required forms and the Authorization for Emergency

TABLE 38.3. EXPANDED CONTRACTOR INVESTIGATION REPORT RESPONSIBILITIES	
Position or Department	Responsibility
	Medical Treatment and Choice of Physician. c. Return the completed Authorization for Emergency Medical Treatment form to the supervisor immediately or within 24 hours of the accident/injury. d. Keep the immediate supervisor apprised of medical conditions and the disability status as it relates to work
Employee Trained in First Aid	a. If currently trained in first aid/CPR, ensure the control room is notified and provide treatment only to the extent of your training. b. If providing first aid document treatment on First Aid and Bloodborne Pathogen Exposure Incident Log.
New Orleans Safety and Health	a. Maintain files for all SPR sites of all forms and reports related to occupational injury or illness, including the Supervisor's Report of Injury/Illness and the DOE 5484.3 form (if applicable). b. Input the DOE 5484.3 form electronically into the CAIRS database. Submit a copy of the original DOE form 5484.3 to the DOE Safety department within 14 calendar days of the occurrence of an OSHA/DOE recordable occupational injury or illness as defined by DOE Order 231.1 c. Review OSHA/DOE recordable injuries/illnesses at the quarterly meeting of the Executive Safety Committee. d. Track open recommended corrective actions from investigations to closure using the ATS. e. Review the accident investigation and identify any Lessons Learned for inclusion in that program. There should be at least one (minimum). f. Provide support to sites to identify trends and to prevent recurrences.
Systems Safety Department	a. Review 5484.3 accident reports for applicability to systems and prior to a PHA
Contractor/ Sub-contractor	a. Follow all of the reporting requirements in the APM for first aids, potential hazards, and accidents/injuries. b. Follow all notification requirements, including notifying the Control Room immediately to expedite notification of 911 and facilitate their quick arrival. This is also how the ERT will be activated for immediate response. c. Investigate accident/injuries; identify root causes, and corrective action plan. d. Ensure that employees returning to work are Fit for Duty.

TABLE 38.4. CORRECTIVE ACTIONS RESPONSIBILITIES MATRIX	
Position or Department	Responsibility
The M&O contractor	a. Responsible for tracking two categories of corrective actions resulting from an accident or incident: 1) all recommended corrective actions extended 5484.3 investigations that do not result in permanently disabling injuries or fatalities. 2) corrective actions from investigations of accidents that did result

TABLE 38.4. CORRECTIVE ACTIONS RESPONSIBILITIES MATRIX

Position or Department	Responsibility
	in disabling injuries or fatalities assigned to the M&O by the SPR project manager. (The Judgment of Needs section of these investigations shall be converted to corrective actions with the responsible individual identified.) Corrective actions for accidents resulting in disabilities and fatalities will be entered and tracked in the DOE Action Tracking System (DATS).
ES&H Director	a. Monitor the progress of DM corrective actions and report the status of Class A and B recommendations, if any, quarterly to the DOE Assistant Project Manager for Technical Assurance. b. Enter Class C accident actions requiring configuration or procedural changes into the Assessment Tracking System (ATS), flagged for independent reporting. Update status monthly with information provided by the actionee. c. Monitor the progress of all Class C recommendations and report their status to the M&O project manager as requested.
Operations & Maintenance Director	a. Ensure that the site directors complete actions required to abate the hazards assigned to the site and report this action to the senior site representative. b. Review Engineering Change Proposals (ECPs) intended to address a corrective action, in accordance with Configuration Management system requirements, to ensure change proposals are cost-effective and operationally correct. c. Enter status for those corrective actions in ATS for which O&M is the owner, monthly

TABLE 38.5. ROLES AND RESPONSIBILITIES UPON RECEIPT OF SITE SAFETY SPECIALIST-GENERATED FILES AND SAFETY REPORTS

Position or Department	Responsibility
ES&H Managers and Department Managers	a. Ensure that this subsection is available to all supervisors and that they understand its requirements. b. Ensure that, within two workdays of receiving the site safety specialist findings, the supervisor or SMTR provides a written response to the site safety specialist regarding the corrective actions taken and their status. c. Ensure that information on identified hazards is entered into the Work Order System and/or into the ATS if the hazard cannot be corrected by a work order and the corrective action is not completed within 30 days. d. Ensure all supervisors' or SMTRs' written responses and the original findings are kept in the site safety specialist file.
Supervisors and SMTR	a. Discuss the findings with the site safety specialist b. complete the Supervisor's Report of Injury/Illness. c. Initiate corrective action appropriate to the findings. d. Provide a written response to the site safety specialist within two workdays of receiving the site safety specialist's findings. e. Support the site safety specialist when work has been stopped because of a situation involving imminent danger. Do not begin work

TABLE 38.5. ROLES AND RESPONSIBILITIES UPON RECEIPT OF SITE SAFETY SPECIALIST-GENERATED FILES AND SAFETY REPORTS	
Position or Department	Responsibility
	until the safety issue is resolved and the danger abated. f. Respond immediately to site safety specialist’s findings involving the safety of personnel, hazardous conditions or practices, or violations of DM policy, federal or state regulations, or other applicable codes and standards. g. Identify and evaluate other areas in which the same hazardous conditions may exist.
Site Safety Specialist	a. Stop work if there is an unsafe activity or feel uncertain that the work can be performed safely. b. Contact the person to whom the findings will be submitted, and review the report contents with him or her. c. Present site safety specialist findings to management personnel as necessary according to this subsection, ensuring that the site director receives a copy of every written report. d. Ensure that the findings and responses are maintained in the site safety specialist file. e. Ensure findings status is documented and retrievable. f. Present the site safety specialist findings to the ES&H manager for forwarding to the SSMC chairperson monthly.
Safety and Health Director	a. Ensure site items submitted for review by the Executive Safety Council are presented at the next scheduled meeting. b. Resolve within ten workdays issues submitted to the New Orleans c. Safety department for action, when possible. d. Assist DM directors in resolving findings submitted to them for their action.

TABLE 38.6. OCCUPATIONAL SAFETY AND HEALTH CONCERNS ROLES AND RESPONSIBILITIES MATRIX	
Position or Department	Responsibility
Site Directors	a. Appoint an appropriate member of the SSMC to investigate the concern and recommend corrective action if the concern is found to be valid. b. Review the findings of the investigation of the concern. c. Initiate the recommended corrective actions to remedy the problem. d. Provide a written response to employee concerns within three working days and post it on the employees’ bulletin board. e. Enter recommended corrective action into the Work Order System if correctable by work order. If the recommended corrective action cannot be carried out by work order and is still outstanding, enter the concern into ATS within 30 days. f. Act immediately to investigate concerns involving imminent danger. g. Initiate actions to stop all work related to a concern of a condition determined to involve an unsafe act or if the work cannot be performed safely. h. Ensure that this subsection is available to all employees.

TABLE 38.6. OCCUPATIONAL SAFETY AND HEALTH CONCERNS ROLES AND RESPONSIBILITIES MATRIX

Position or Department	Responsibility
	i. Ensure employee concern forms are available to all employees. j. Ensure that written concerns and documentation of the corrective action taken are maintained in site files for five years. k. Provide the safety and health manager with a copy of all written and anonymous concerns and intended site action.
Site Safety Management Council	Review and track the status of the recommended corrected actions for all occupational safety and health concerns submitted at their site.
Supervisors	a. Attempt, with the help of the site safety specialist, to resolve any occupational safety and health concern with the employee through an inspection/review of the conditions. b. Review the concern procedure with employees and make sure they understand it.
Site Safety Specialist	a. Provide assistance in investigating occupational safety and health concerns and recommending actions to correct the problem. b. Investigate concerns alleging working conditions involving imminent danger, and if concerns are valid and work has not been stopped, stop it immediately and address the issue. c. Enter the concern into ATS if it is not entered into the Work Order System and corrective actions are not completed within 30 days of the site director's approval. d. Ensure the availability of employee concern forms.
Employees	Report safety concerns and identified hazards to their supervisor, the site safety specialist, or a safety monitor.
Safety and Health Director	a. Provide procedures for employees to report safety and health concerns. b. Review and act upon all written occupational safety and health concerns submitted. c. Provide a written action plan to the employee filing the concern or, if the concern was filed anonymously, ensure that the response is posted, within three working days. d. Maintain a record of all written concerns submitted along with documentation of the corrective action taken in the Safety department files.

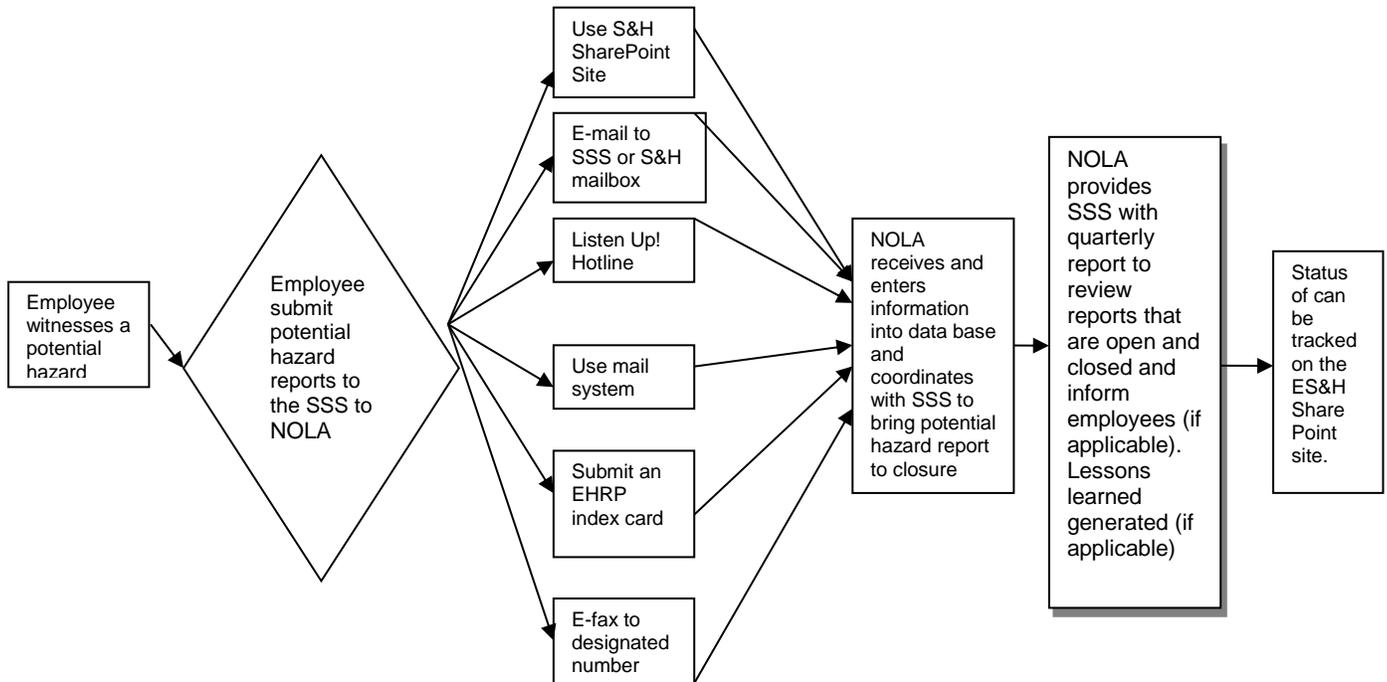


Figure 38-1. Early Hazard Reporting Flow Chart

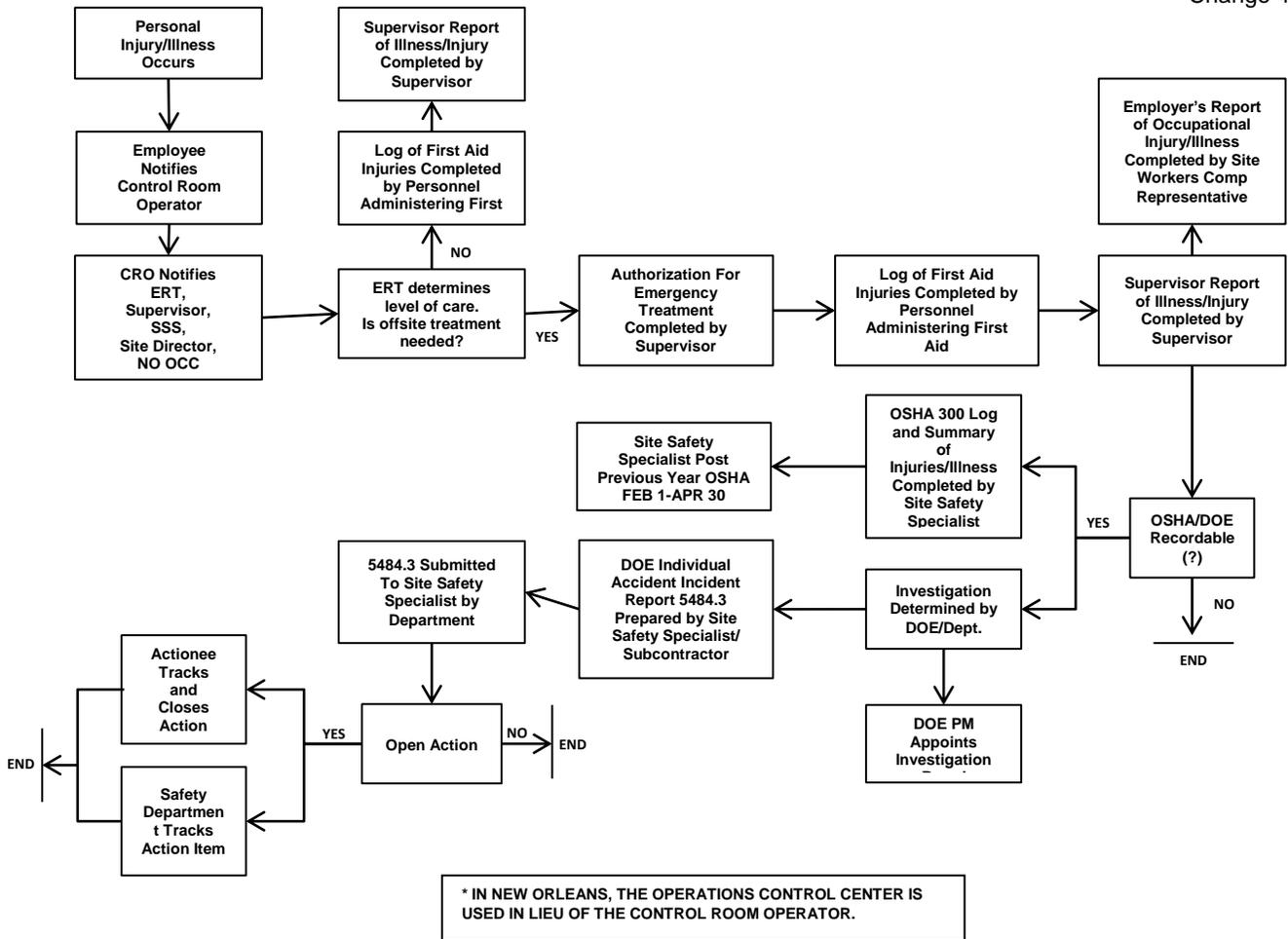


Figure 38-2. Occupational Injury/Illness Reporting

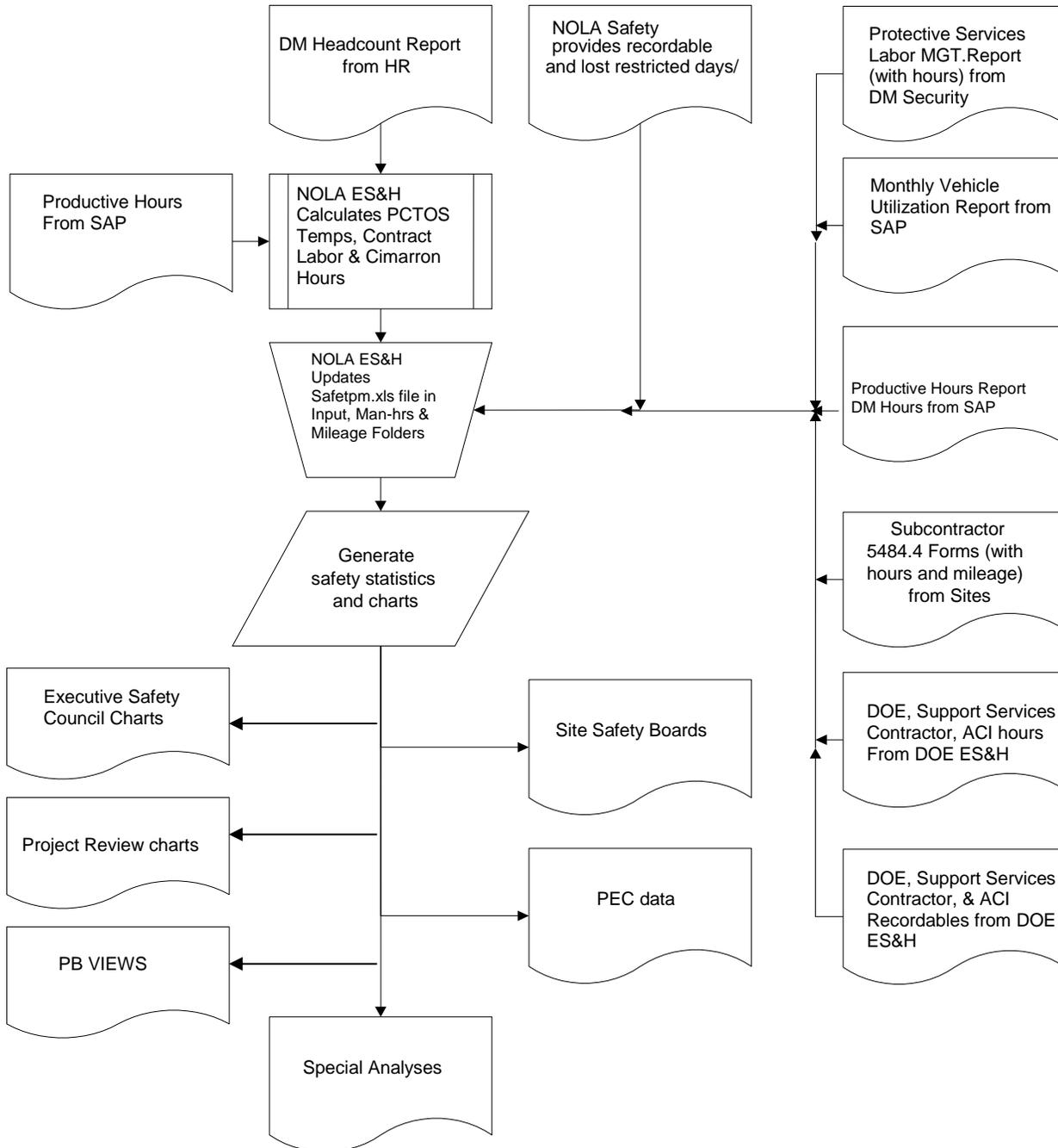


Figure 38-3. Workflow of Safety Statistics Process for Injury and Illness