

**GENERAL
SAFETY, HEALTH AND SECURITY RULES
FOR
SUBCONTRACTOR ON-SITE SERVICES**

CH2M HILL BWXT West Valley, LLC (CHBWV)

NOTE: Refer to CHBWV Form WV-0175, *Integrated Safety Management Requirements for Subcontractors*, for the WVDP assigned personnel contact information and training requirements.

GENERAL SAFETY PROVISIONS

1.0 INTEGRATED SAFETY MANAGEMENT REQUIREMENTS

1.1 Safety Responsibility

In performing work under this contract, the subcontractor shall perform work safely, in a manner that ensures adequate protection of employees, the public, and the environment.

The subcontractor is accountable for the safe performance of work under this subcontract and shall exercise a degree of care commensurate with the work and the associated hazards. Specifically, the subcontractor shall, in the performance of work, ensure that:

- 1.1.1 All subcontractor employees physically performing work, as well as those who supervise these personnel are held responsible for their safety, as well as the safety of the public and environment. Personnel shall follow all safety requirements specified in this contract or through procedures, permits, and other hazard controls implemented as a result of this contract.
- 1.1.2 Clear lines of authority and responsibility between the contractor (CHBWV) and subcontractor (including safety and health personnel) shall be maintained. **For WVDP on-site field work, the primary interface shall be between the CHBWV Subcontractor Technical Representative (STR) and the Subcontractor Superintendent/Safety Representative. For office tasks the primary interface is between the CHBWV Control Account Manager and Subcontractor.** In addition, specific direction relative to the safe performance of work may be provided by CHBWV Environmental, Safety and Health, and/or Radiological Controls personnel.
- 1.1.3 Subcontractor personnel shall have the technical experience, knowledge, skills, and abilities that are necessary to safely discharge their responsibilities in accordance with this contract.
- 1.1.4 Documentation of all training equivalencies must be coordinated through the CHBWV Requisitioner and submitted by Approval Request to the CHBWV Training Department. All equivalencies related to medical testing shall be submitted directly to the CHBWV Health Services Office.
- 1.1.5 Cost and schedule shall not compromise the safe conduct of work. The subcontractor shall promptly evaluate and resolve any noncompliance with applicable purchase order and safety requirements (as defined in this specification). If the subcontractor fails to provide resolution or if, at any time, its acts or failure to act causes substantial harm or an imminent danger to the environment or health and safety of employees or the public, the CHBWV buyer or other CHBWV personnel may issue an order stopping work in whole or in part. The subcontractor is responsible for compliance with the safety requirements applicable to this purchase order regardless of the performer of the work.

1.2 Hazards Identification

Before physical work is performed, the associated hazards shall be evaluated and an agreed-upon (CHBWV and subcontractor) set of safety requirements and hazard controls established. If the subcontractor does not have a CHBWV-approved hazard analysis process, then the CHBWV process as described in policy WV-921, *Hazards Identification and Analysis* shall be utilized by CHBWV personnel in conjunction with subcontractor personnel. CHBWV Work Permits shall be utilized by the subcontractor to address specific controls for identified hazards.

1.3 Work Controls

Administrative and engineering controls tailored to prevent and mitigate hazards identified through paragraph 1.2 above shall focus on the reduction or elimination of the hazards and to prevent accidents and unplanned releases and exposures.

Prior to the physical performance of work, the conditions and requirements to be satisfied for performing such work shall be agreed upon jointly by CHBWV and the subcontractor.

- 1.3.1 As a minimum, a walk-down of the job by the CHBWV Project Manager, a Subcontract Technical Representative (STR) for field work, cognizant engineer, subcontractor superintendent, Radiological Controls (RC), and other relevant disciplines and pre-job briefings shall be conducted prior to work activities to assure that subcontractor personnel clearly understand their respective roles and responsibilities, that the designated hazard controls (engineered and/or administrative) are in place, and to ensure that all employees understand the potential hazards and the required protective measures.
- 1.3.2 The STR, with IH&S assistance, as appropriate, shall prepare an Industrial Work Permit for the on-site vendor or subcontracted service per SHIP-201, *Industrial Work Permits*.
- 1.3.3 During periods of construction (i.e., excluding weekends, weather delays, or other periods of work inactivity), the construction subcontractor MUST have a designated representative on the construction worksite who is knowledgeable of the project's hazards and has full authority to act on behalf of the construction subcontractor. The subcontractor's designated representative MUST make frequent and regular inspections of the construction worksite to identify and correct any instances of noncompliance with project safety and health requirements in accordance with a CHBWV approved Quality Assurance Program.

2.0 SAFETY MANAGEMENT SYSTEM (SMS)

2.1 Subcontractor SMS

It is highly recommended that subcontractors work to the CHBWV safety plan. However, the subcontractor may choose to provide its own safety program for review and approval. CHBWV and DOE approval of the subcontractor safety plan is required prior to start of work at the CHBWV site. This safety plan shall demonstrably illustrate how it satisfies the requirements of 48 CFR 970.5204-2, Integration of Environment, Safety, and 10 CFR 851, Worker Safety and Health Program.

2.2 Integrating with the CHBWV SMS and QA Program

The subcontractor shall manage and perform physical work per this purchase order in accordance with the following processes:

- 2.1.1 All work shall be adequately defined such that it can be safely performed. Specific objectives for completing the work shall be established and resources allocated. The subcontractor shall submit all work procedures to CHBWV for formal review and approval prior to the physical performance of work. Work documents for activities that affect Quality shall be approved in accordance with a CHBWV QA program.
- 2.1.2 Hazards associated with the defined work shall be determined consistent with paragraph 1.2 above. No work shall be performed without an adequate level of hazard analysis.

- 2.1.3 Following the evaluation of hazards (paragraphs 1.2 and 2.1.2.), appropriate controls shall be implemented. These controls include any specific controls identified as a result of evaluation of specific work tasks. These controls also include the basic controls identified in paragraph 3, and any other controls specified in documents of this purchase order.
- 2.1.4 Subcontractor personnel shall follow all procedures and work instructions as written, and implement all hazard controls as specified through these work documents and/or Industrial Work Permits and/or Radiological Work Permits. Subcontractor employees shall inform CHBWV of any safety issues which occur during the performance of work per this specification.
- 2.1.5 All accidents involving injury or illness shall be reported immediately to the CHBWV STR and site medical personnel. All property damage caused by an accident shall be reported to the CHBWV STR who shall convey the information to the Plant Systems Operations Supervisor (PSOS), Security and appropriate management. The subcontractor shall be responsible for documenting all injuries and/or illnesses involving their employees on their OSHA 300 log.
- 2.1.6 Upon work completion, the subcontractor shall inform the STR of any issues or areas for improvement relative to the hazard controls applied to the work.

3.0 BASIC CONTROLS

3.1 Industrial Safety

- 3.1.1 Any unsatisfactory condition(s) shall be reported to the CHBWV STR, corrective action taken immediately, and documented on a daily safety inspection form.
- 3.1.2 All work areas, means of egress, and emergency exits are to be maintained free from accumulation of rubbish or debris. Blocking of emergency exits will not be allowed prior to approval of an alternate emergency egress plan, submitted via an Approval Request. Subcontractors shall conduct daily safety checks of areas where their employees are working.
- 3.1.3 The subcontractor will submit a list of any major equipment to be brought on site complete with manufacturer data and serial number. This equipment must be properly serviced, maintained, and in safe operating condition and is subject to a site inspection by safety personnel.
- 3.1.4 Use of asbestos and lead are prohibited. Burning, welding, and grinding in other than designated areas is prohibited.
- 3.1.5 All flammable liquid safety cans shall be equipped with a self closing cap, automatic pressure relief, and flame arrestor. Safety cans shall be constructed of metal and properly labeled. The capacity of the safety cans shall not exceed 5 gallons. All safety cans shall have a UL-Listed, FM approved or OSHA-compliant label.
- 3.1.6 All electrical work performed shall be in compliance with OSHA, Subpart L, NFPA 70E, and local requirements established in SHIP-218, *Electrical Safety* and SOP 00-11, *Troubleshooting and Maintenance of Electrical Equipment*.
- 3.1.7 Minimum required body protection shall be worn by personnel at the WVDP Site excluding the Ashford Office Complex (AOC).

Minimum required body protection consists of:

- A. Shirt with sleeves of 4" or greater.
- B. Long pants.

- C. Sturdy work shoes with following attributes:
 1. Appropriate tread for walking conditions
 2. Closed toe, top, sides, and heel.
 3. Heels no greater than 2" high.
- D. Yellow high visibility safety vest or equivalent.

3.1.7 Additional PPE requirements will be dictated by the appropriate controls identified in work/hazard control documents, postings, Work Permits, Job Safety Analyses, and other documents.

3.2 Radiological Safety

NOTE: *Radiological Controls requires 24 hours advanced notice in order to survey equipment that may have previously been used in a radiological area for release from the site.*

- 3.2.1 Prior to bringing equipment into radiological buffer zones, all packing and excess materials shall be removed from equipment whenever practical to minimize volume of waste to be surveyed upon removal from the building.
- 3.2.2 A Radiological Work Permit (RWP) must be obtained prior to performing any work in radiological controlled areas or disturbing any soil. A weekly look ahead schedule is to be submitted to the STR for the Plan of the Week (POW) meeting.

3.3 Environmental Safety

- 3.3.1 Whenever possible, non-ozone depleting substances should be used. These substances include degreasing agents used during welding procedures. Class I and II ozone depleting substances may be used with restrictions. The subcontractor shall submit by AR, for approval, requests to use Class I or II ozone depleting substances when substitutes are not available.
- 3.3.2 The subcontractor shall provide to CHBWV Procurement, via Approval Requests (AR), a list of all required materials that could be considered hazardous materials, or are addressed by the U.S. Department of Transportation (DOT) and/or Superfund Amendments and Reauthorization Act of 1986 (SARA Title III), 40 CFR 261, and 6NYCRR 371, prior to delivery to the CHBWV job site. This list shall include, but not be limited to, quantities, site delivery schedule, a storage plan, and empty container/waste disposal plans. Safety Data Sheet (SDS) forms for all items shall also be submitted via the AR process. All SDS' submitted shall be the latest issue. If the SDS revision date is over three years old the subcontractor shall provide certification from the manufacturer that the SDS is the latest revision.
- 3.3.3 The subcontractor shall ensure that all hazardous materials brought on site are either: 1) stored in accordance with approved procedures and removed from the site upon completion of the work or termination of the purchase order; 2) totally consumed; or 3) removed from the site by the end of the work day.
- 3.3.4 Hazardous materials/wastes are prohibited from disposal in the CHBWV trash containers, dumpsters, or roll offs. Subcontractors generating hazardous wastes on-site must manage the waste in accordance with applicable CHBWV procedures and are not permitted to transport hazardous wastes off site. The responsible STR must be notified of hazardous waste generation activities. CHBWV shall direct the disposition of hazardous wastes generated at the site. All wastes will be monitored by CHBWV Radiological Controls personnel prior to the removal of any waste from a radiological controlled area. Disposal of combustible materials by burning is strictly prohibited.

- 3.3.5 Placement of any liquid or liquid containing wastes in the CHBWV dumpsters, to the ground, storm sewers, ditches, to the site treatment facilities, otherwise disposing of liquids is prohibited unless authorized otherwise.
- 3.3.6 If any asbestos bearing material is found in performance of this purchase order, the STR shall be contacted before proceeding. CHBWV will remove all asbestos. All unlabeled pipe insulation shall be assumed to contain asbestos.
- 3.3.7 The use of mercury on site shall be limited when a suitable substitute can be used; for example a spirit filled psychrometer. The subcontractor shall submit an AR for approval prior to using any equipment that contains or uses mercury.
- 3.3.8 Subcontractors shall take all possible precautions to minimize the amount of any wastes generated including utilizing the least hazardous materials, taking appropriate preventative measures to prevent spills and releases
- 3.3.9 Spill response supplies shall be located in the vicinity of the work area for immediate accessibility.
- 3.3.10 Responsibility for the cleanup of any hazardous materials/wastes, caused by the subcontractor=s failure to comply with the specified requirements, may be borne by the subcontractor.

4.0 SITE SAFETY

4.1 Picture Badges

- 4.1.1 Site Specific Picture Badges are required for any individual anticipated to be at the WVDP site more than eighty (80) hours in any one (1) year period.
- 4.1.2 A Homeland Security Presidential Directive #12 (HSPD-12) credential is required for any individual anticipated to be at the WVDP site for more than six (6) months in a lifetime. An HSPD-12 requires the submittal of Standard Form 85 (SF-85) by the US Office of Personnel Management, in conjunction with the DOE. Any individual found unsuitable for issuance of an HSPD-12 credential will be denied access to all WVDP facilities.
- 4.1.3 All "Non-Picture Badged Workers" and "Non-Picture Badged Visitors" must be escorted by picture-badged personnel except for personnel from another prime contractor for a DOE facility, or DOE employees.
- 4.1.4 Upon termination or the last day of employment, subcontractor personnel are required to complete and submit the Subcontract Personnel Separation Clearance Form WV-4404 to the Security Department upon exiting the site.
- 4.1.5 All Seller personnel without picture badges must sign a visitor control register upon entering the WVDP.

4.2 Package and Personnel Control

- 4.2.1 All subcontractor personnel will be subject to search upon entering and exiting the security area and are subject to search upon exiting the limited area. This search is performed for prohibited articles and government property. Contraband or prohibited articles at the WVDP are as follows:
 1. Firearms, other dangerous or deadly weapons, explosives, incendiary and explosive devices;
 2. Privately owned recording equipment (audio, video, optical, or data);
 3. Privately owned electronic equipment with a data exchange port capable of being connected to automated information system equipment;
 4. Privately owned computers and associated media;
 5. Radioactive devices;

6. Controlled substances including illegal drugs and associated paraphernalia (less prescription medicine); and
7. Other items prohibited by law.

Subcontractors whose personnel are found in possession of any of the above items will be requested by CHBWV to take disciplinary action.

4.3 Vehicles

- 4.3.1 Vehicles are not permitted into the WVDP Site for personal use. Automobiles are prohibited unless specific CHBWV approval is obtained.
- 4.3.2 Vehicles will be searched upon entering the security area. A vehicle search is completed in approximately five to ten minutes; however, longer delays may be experienced if other vehicles are waiting to be searched. Vehicles are also subject to search upon exiting the limited area.
- 4.3.3 No vehicles, trailers, materials or equipment are to be located or stored within 10 feet of any permanent security fence. Prior approval by the CHBWV Security Department is required in advance of placing anything in this zone.
- 4.3.4 Vehicle parking is available in the general parking area.
- 4.3.5 Vehicles will abide by all site traffic control posting.
- 4.3.6 All vehicles, one-half ton and larger shall be equipped with a functioning, audible backup alarm.
- 4.3.7 All occupants of vehicles shall wear seat belts/shoulder harnesses while the vehicle is in motion.
- 4.3.8 Cell phone use while operating a motor vehicle is prohibited, except as authorized by IS&HS as only means of communication during certain operations.

4.4 Wiretapping, Eavesdropping and Monitoring Devices

- 4.4.1 Wiretapping or eavesdropping devices are strictly prohibited on the WVDP site. The subcontractor is required to instruct all personnel to report the discovery of any such devices through their supervisor to the CHBWV Security Manager. In the case of discovery, the devices are not to be removed, disconnected or tampered with until properly authorized by the CHBWV Security Manager.
- 4.4.2 The use of portable radios for two-way communication must be approved by the CHBWV Security Manager prior to use on the WVDP site. Radio frequencies and the number of portable units used by the subcontractor will be provided to CHBWV.

4.5 Visitors and Vendors

- 4.5.1 Visitors and vendors are given "What do site visitors need to know?" badges with safety information and important telephone extensions.

5.0 SUBSTANCE ABUSE PREVENTION POLICY

Subcontractors and all lower tier subcontractors that require a CHBWV Picture Badge (i.e., anticipated to be at the WVDP site for more than eighty (80) hours in any one (1) year period, shall have an approved Drug Testing Program in accordance with 10 CFR Part 707 or shall be required to comply with the current CHBWV Drug Testing requirements contained in WV-556, *CHBWV Workplace Substance Abuse Prevention Policy*.

6.0 WORKER SAFETY AND HEALTH PROGRAM (CIVIL PENALTIES UNDER 10 CFR 851)

Section 3173 of Public Law 107-314, Bob Stump National Defense Authorization Act for Fiscal Year 2003 amends the Atomic Energy Act (AEA) by adding Section 234C, Worker Health, and Safety Rules for Department of Energy Nuclear Facilities. The Department of Energy has promulgated Procedural Rules (10 CFR 851), Worker Safety and Health Program, to comply with Section 234C. These rules govern the conduct of contractor activities at DOE sites. Violation of the applicable rules will provide a basis for the assessment of civil penalties under the CFR ruling on contractors (and their subcontractors and suppliers) that are indemnified by the Price Anderson Amendments Act, 42 U.S.C. 2210(d). Title 10 CFR 851 sets forth the procedures DOE will use in exercising its enforcement authority, including the issuance of "Notices of Violation" and the resolution of an administrative appeal in the event CHBWV or the subcontractor elects to petition the Office of Hearings and Appeals for review.

This Order is subject to the requirements of 10 CFR 851 if under its terms, the supplier is required to perform work on the CHBWV Site. Reference DEAR 970.5223-1 titled "Integration of Environment, Safety and Health Into Work Planning and Execution" invoked elsewhere in these General Provisions.

Severity of Violations. DOE may assess civil penalties of up to \$95,000 per violation per day. If any violation is a continuing violation, each day of the violation shall constitute a separate violation for the purpose of computing the civil penalty.

- (1) A Severity Level I violation is a serious violation. A serious violation shall be deemed to exist in a place of employment if there is a potential that death or serious physical harm could result from a condition which exists, or from one or more practices, means, methods, operations, or processes which have been adopted or are in use, in such place of employment. A Severity Level I violation would be subject to a base civil penalty of up to 100% of the maximum base civil penalty of \$95,000.
- (2) A Severity Level II violation is an other-than-serious violation. An other-than serious violation occurs where the most serious injury or illness that would potentially result from a hazardous condition cannot reasonably be predicted to cause death or serious physical harm to employees but does have a direct relationship to their safety and health. A Severity Level II violation would be subject to a base civil penalty up to 50% of the maximum base civil penalty (\$47,500).

Indemnification of CHBWV. To the extent permitted by law, the Supplier assumes full responsibility and shall indemnify, save harmless, and defend CHBWV and its principal subcontractors, their agents, officers, employees, and directors from any civil liability under Section 234C of the Act or the implementing regulations at 10 CFR Sections 851, arising out of the activities of the Supplier, its lower-tier subcontractors, suppliers, agents, employees, officers, or directors. The Supplier's obligation to indemnify and hold harmless shall expressly include attorneys fees and other reasonable costs of defending any action or proceeding instituted under Sections 234C of the Act or the implementing regulations at 10 CFR Section 851. A copy of the implementing regulations of 10 CFR Section 851, will be made available to the Supplier upon request.

7.0 REFERENCE DOCUMENTS

SHIP-201, *Industrial Work Permits*
SHIP-218, *Electrical Safety*
SOP 00-11, *Troubleshooting and Maintenance of Electrical Equipment*
WV-921, *Hazards Identification and Analysis*
WV-556, *CHBWV Workplace Substance Abuse Prevention Policy*