



Worker Safety and Health Enforcement Program Update

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<http://energy.gov/hss/services/enforcement>



Worker Safety and Health Enforcement Activities



Notices of Violation	
LATA Environmental Services of Kentucky, LLC	Heat Stress Exposure and UF ₆ Release
Bechtel National Inc.	Worker amputation/material handling
Los Alamos National Security, LLC	Worker shock and three related events
Savannah River Nuclear Solutions, LLC	Worker fall/severe injury
Brookhaven Science Associates, LLC	Worker fall/severe injury



Worker Safety and Health Enforcement Activities



Enforcement Letters	
URS/Separations Process Research Unit	Fall Protection Occurrences
Alliance for Sustainable Energy (NREL)	Electrical Shock Near Miss
Los Alamos National Security, LLC	Beryllium Sampling and Recordkeeping
Wastren Advantage/Oak Ridge	Breathing Air Loss Event
Alliance for Sustainable Energy (NREL)	Drum Rupture and Flash Event



Worker Safety and Health Enforcement Activities



Current Investigations
Lithium Fire/Explosion
Mechanized Material Handling Equipment Events
Molten Salt Burn
Acid Burn
Laser Safety Program Events
Chlorine Exposure
Subcontractor WSHP Implementation
Lithium Hydride Exposure
Firearm Discharge



Lessons Learned from Enforcement Activities



- Ensure work is performed within the defined scope
- Clarify to workers the hazards and controls associated with their assigned tasks – don't rely exclusively on skill-of-the-craft
- Engage Subject Matter Experts in work planning and control
- Consider NFPA 70E when evaluating electrical safety deficiencies
- Communicate DOE regulatory expectations to subcontractors



Lessons Learned from Enforcement Activities

(Continued)



- Use assessments to identify noncompliances before they result in events and worker injury/illness
- Perform self-critical evaluations of events and noncompliant conditions, including emergency response actions
- Determine the extent of noncompliant condition(s)
- Effectively address causal factors, noncompliances, and extent of condition(s) to prevent recurrence



Regulatory Compliance Challenges



- Procedures incorporated into WSHP (851.10(a)(2)(ii))
- Hierarchy of controls (851.22(b))
- Fall protection (1910 and 1926)
- Thermal stress (ACGIH)
- Ergonomic hazards (ACGIH)
- Exposure assessments and industrial hygiene program (851 Appendix A.6)
- Occupational medicine programs (851 Appendix A.8)



Worker Safety and Health Assistance Activities



- Nuclear Waste Partnership, LLC (WIPP) – Followup
- LATA Environmental Services of Kentucky
- Lawrence Livermore National Laboratory
- National Security Technologies (NNSS)
- Lawrence Berkeley National Laboratory
- CHPRC – postponed to 2014



Request for Investigation

Part 851.40(c)



Any worker or worker representative may request that the Director initiate an investigation or inspection...relating to the scope, nature and extent of compliance with 851.

Requests in 2013:

- Violation of Missouri DOT signage rule
- Workers accessing tunnels
- Adverse weather communications
- Discrimination claim
- Fitness for duty process
- Employee exposure record concern
- Industrial hygiene instrument use
- Worker retaliation



Questions?

