



U.S. Department of Energy
Office of River Protection

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08-ESQ-234

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Mr. L. J. Simmons, Project Manager
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354

Dear Mr. Simmons:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-08-ESQ-RPPWTP-009
– ASSESSMENT OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
(OSHA) INJURY/ILLNESS RECORDKEEPING SEPTEMBER 15 THROUGH 18, 2008

This letter forwards the results of the U.S. Department of Energy, Office of River Protection (ORP) assessment of the Bechtel National, Inc. (BNI) OSHA Injury/Illness Recordkeeping Programs conducted from September 15 through 18, 2008 (Attachment). The Team had no findings.

In the area of injury/illness recordkeeping the Team concluded that reporting of work-related injuries by BNI has been accurate in the last six month period. For the April through September 2008 period, ORP found all cases reported in accordance with OSHA requirements.

If you have any questions, please contact me, or your staff may contact Paul R. Hernandez, Verification and Confirmation Division, (509) 376-2209.

Sincerely,

John R. Eschenberg, Assistant Manager
Waste Treatment and Immobilization Plant

ESQ:PRH

Attachment

cc w/attach:

W. S. Elkins, BNI
D. E. Gergely, BNI
D. E. Kammenzind, BNI
J. E. Filip, PAC
G. M. McCann, PAC
Administrative Record
BNI Correspondence

U.S. DEPARTMENT OF ENERGY
Office of River Protection
Environmental Safety and Quality

ASSESSMENT: Occupational Safety and Health Act Injury/Illness Recordkeeping
Review

REPORT: A-08-ESQ-RPPWTP-009

FACILITY: Bechtel National, Inc. Waste Treatment and Immobilization Plant

LOCATION: Hanford Site

DATES: September 15 through 18, 2008

ASSESSORS: Paul R. Hernandez, Lead Assessor

APPROVED BY: Kenneth A. Hoar, Director
Verification and Confirmation Division

Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of Bechtel National, Inc.'s (BNI) Occupational Safety and Health Administration (OSHA) Injury/Illness Recordkeeping Program. The assessor evaluated the procedural requirements, interviewed employees, and examined records pertaining to the assessment subject. This assessment evaluated the effectiveness of the Contractor's implementation of procedures and practices which satisfy the requirements of OSHA 29 Code of Federal Regulations 1904, "Recording and Reporting Occupational Injuries and Illnesses." The assessment focused on determining the effectiveness of the processes associated with identifying, evaluating, and recording injuries and illnesses on OSHA forms and in the DOE Computerized Accident/Incident Reporting System (CAIRS) database. The assessor paid particular attention to injuries which were compensable by the Washington State Department of Labor and Industries, but were not reported as OSHA recordable. ORP is required to perform quality checks of the information reported through the CAIRS by its contractors every six months. The last assessment of BNI was performed in April 2008.

The assessor concluded reporting of work-related injuries by BNI was accurate. For the April to September 2008 period ORP found all cases reported in accordance with OSHA requirements.

ORP reverified the effective closure of a past finding during this assessment. The finding dealt with the lack of documented BNI oversight over subcontractor recordkeeping programs. ORP found that corrective actions from the September 2006 ORP assessment continued to be effectively implemented. ORP reverified that BNI's earlier failure to document quarterly assessments of BNI subcontractor injury/illness recordkeeping had been corrected.

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List of Acronyms

ANOVA	AnovaWorks
BNI	Bechtel National, Inc
CAIRS	Computerized Accident/Incident Reporting System
DOE	U.S. Department of Energy
L&I	Labor and Industries
ORP	Office of River Protection
OSHA	Occupational Safety and Health Administration

Occupational Safety and Health Association (OSHA) Injury/Illness Recordkeeping Review of Bechtel National, Inc. (BNI)

Scope

From September 15 through 18, 2008, the U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of BNI's OSHA injury/illness recordkeeping program.

Details

The assessor examined relevant documentation including the most recent BNI procedure for implementation of the OSHA Recordkeeping Program. The assessor performed evaluations of employee medical records, Computerized Accident/Incident Reporting System (CAIRS) database entries, and "Safety Data System (SDS) First Aid Log" data. The assessor interviewed BNI's Workers Compensation Administrator and reviewed current Labor and Industries (L&I) records for employees who had filed claims.

Review of Procedures

DOE's review of the contractor's procedure for the OSHA Recordkeeping Program determined there was a clear process described for reporting injuries for CAIRS and OSHA recordkeeping purposes. BNI Procedure 24590-WTP-GPP-SIND-023, "Injury/Illness Notification, Investigation, and Reporting," met the minimum requirements in the DOE Environmental, Safety, and Health Reporting Manual, DOE M 231.1-1A.

The assessor also reviewed Procedure 24590-WTP-GPP-SIND-022, "Assessment and Issue of Noncompliance for Construction Subcontractor's Safety and Health Compliance." The assessor concluded BNI procedures were adequate in the area of injury/illness recordkeeping. There were no issues in the area of procedures.

Comparison of CAIRS Data to Medical Files

The ORP assessor had access to the CAIRS production database for BNI and subcontractors. The data evaluated ranged from April through September 2008. The ORP reviewer analyzed all cases posted in CAIRS that indicated an OSHA recordable injury including restricted or lost work days. Using the assigned case numbers from the log, the reviewer accessed the applicable DOE Form 5484.3, "Individual Accident/Incident Reports," for each case. The contents of the 5484.3 forms were then compared to the information in the patient's medical file.

ORP reviewed case files maintained in the Waste Treatment and Immobilization Plant onsite first aid clinic, managed by AnovaWorks (ANOVA) formerly known as WorkCare. The ORP assessor found no discrepancies between CAIRS data entries and patient medical records. BNI's CAIRS database was found to be accurate.

Comparison of L&I Data to CAIRS Data

The ORP assessor initiated this review using L&I data from BNI's Worker's Compensation Administrator. ORP focused on cases compensated by L&I and were not reported as OSHA recordable by the contractor. In theory, all L&I cases are not necessarily OSHA recordable and conversely all OSHA recordable cases are not necessarily compensable. However, OSHA often reviews L&I records because there may be an overlap. Many cases in which the state is compensating individuals for injuries would be work related, and would likely involve medical treatment beyond first aid.

The ORP assessor analyzed all cases in the L&I records for the period from April through September 2008 and compared it to the information in the patient's medical file. ORP interviewed the ANOVA medical staff who treated injured employees to obtain an understanding of initial injuries and subsequent treatment. As a result of document reviews and interviews the assessor found seven injuries that appeared to be OSHA recordable which BNI had determined were not. ORP requested additional information and was provided with objective evidence that justified the BNI position. In most cases the employees had pre-existing injuries or conditions that degraded over time and required medical treatment beyond first aid. There was no evidence of discernable events at the workplace that would have significantly aggravated the employees' medical conditions. ORP reviewed the documented details of each case and concurred that BNI was not required to declare the injuries OSHA recordable. As a result of these detailed reviews the assessor found no underreporting of injuries or illnesses in the Worker's Compensation cases filed over the past six month period.

Review of Subcontractor OSHA Recordkeeping

During a 2005 ORP assessment of OSHA recordkeeping, the assessor found weaknesses in BNI's oversight of major subcontractors. BNI failed to demonstrate they had performed comparison of OSHA 300 and first aid logs to injuries reported by their subcontractors.

BNI's actions in response to this finding included the performance of several surveillances in accordance with Procedure GPP-SIND-022, "Assessment and Issue of Noncompliance for Construction Subcontractor's Safety and Health Compliance." The procedure contains a "Quarterly Subcontractor Injury/Illness Recordkeeping Assessment Worksheet" for documenting quarterly assessments of BNI subcontractor injury/illness recordkeeping by BNI safety representatives.

In September 2006 the ORP assessor requested the previous six month's of subcontractor assessment reports and was informed that the assessments had not been documented. BNI had performed the assessments but failed to generate records for submittal to Project Document Control for logging, issuance, distribution, and records retention. (This issue was documented as Finding A-06-ESQ-RPPWTP-009-F03.)

During this current assessment the ORP assessor reviewed "Quarterly Subcontractor Injury/Illness Recordkeeping Assessment Worksheets" and "Subcontractor ES&H Implementation Checklists" provided by BNI. The worksheets and checklists provided documented evidence BNI had reviewed subcontractor OSHA logs and forms. ORP determined BNI's corrective actions in response the 2006 Finding continue to be effectively implemented.

The assessor concluded reporting of work-related injuries by BNI was accurate. For the April through September 2008 period ORP found all cases reported in accordance with OSHA and DOE requirements.

Items Opened

None.

Items Closed

None.

Items Reviewed

None.