

Program Description Document

Subcontractor Requirements Program Description



Fluor Idaho, LLC, is the Idaho Cleanup Project Core contractor for the U.S. Department of Energy

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 1 of 8
---	--

Subcontractors	Program Description Document	For Additional Info: http://EDMS	Effective Date: 01/31/17
----------------	------------------------------	---	--------------------------

Manual: Subcontractor Requirements

Change Number: 352743

*The current revision can be verified on EDMS.

1. PURPOSE

The subcontractor requirements program was established to ensure a consistent and controlled method of providing requirements for subcontractors and direct-hire craft as they perform work at the Idaho Cleanup Project (ICP) for Fluor Idaho, LLC (Fluor Idaho).

2. APPLICABILITY

This program applies to subcontractors that provide services to Fluor Idaho. The subcontract or other procurement documents govern the work performed.

For direct hire performed work, applicability will be determined by use of Form 540.10 as outlined in MCP-4021. For simplicity and document integrity throughout the Subcontract Requirements Manual (SRM), the term “subcontractor/supplier” may also include “direct hire craft” as determined through acquisition strategy.

3. PROGRAM OVERVIEW

The individual disciplines and organizations within Fluor Idaho may be assigned ownership of specific program requirements within their area of expertise. They will be responsible to analyze requirements and requirement changes associated with their respective disciplines, and to determine applicability to subcontractor work activities.

The subcontractor requirements program has been developed to ensure consistent and high-quality products and services are provided safely.

This program provides a consistent approach to ensuring that all work is accomplished in accordance with the applicable and stated requirements. When identified in the subcontract documents, this program eliminates the requirement for independent and unique programs that would otherwise be required for individual projects.

The subcontractor requirements program consolidates requirements and expectations from various programs and disciplines to support the overall goal of the safe and efficient performance of subcontracted work at the ICP. This program focuses primarily on the areas of environmental assurance (EA), worker safety and health (S&H), radiological control (RADCON), security, and quality assurance (QA). This program provides a mechanism for disseminating these elements as they apply to work activities to subcontractors. The program specifies these work requirements through program requirement documents (PRDs) that provide subcontractors with programmatic requirements and references to applicable external regulations.

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 2 of 8
---	--

4. PROGRAM DESCRIPTION

4.1 Program Requirements Documents

The Program Requirements Documents (PRDs) provide a consistent approach to ensuring that applicable requirements are flowed to subcontractors. These PRDs are selected for each specific work scope and eliminate the requirement for independent and unique subcontractor expectation documents.

This program and associated PRDs have been developed to provide the interfaces between subcontractors and the Fluor Idaho infrastructure. The PRDs as selected for each subcontract provide the necessary and sufficient requirements to meet all compliance expectations.

4.2 Environmental, Safety and Health Integration

In performing work at the ICP, the subcontractor shall perform work safely, i.e., in a manner that ensures adequate protection for employees, the public, and the environment, and shall be accountable for the safe performance of work. The subcontractor shall exercise a degree of care commensurate with the work and the associated hazards. The subcontractor shall ensure that management of environmental as well as worker safety and health functions and activities become an integral but visible part of the subcontractor's work planning and execution processes. The subcontractor shall ensure in the performance of the work that:

- Line management is responsible for the protection of employees, the public, and the environment. Line management includes those subcontractor and lower-tier subcontractor employees managing or supervising workers.
- Clear and unambiguous lines of authority and responsibility for ensuring EA and S&H functions and activities are established and maintained at all organizational levels.
- Personnel possess the experience, knowledge, skills and abilities that are necessary to discharge their responsibilities.
- Resources are effectively allocated to address EA and S&H programmatic and operational considerations. Protecting workers, the public and the environment is a priority whenever work is planned and performed.
- Before work is performed, the associated hazards are evaluated and an agreed upon set of standards and requirements are established which if properly implemented provide adequate assurance that workers, the public, and the environment are protected from adverse consequences.
- Administrative and engineering controls to prevent and mitigate hazards are tailored to the work being performed and its associated hazards.

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 3 of 8
---	--

Emphasis should be on designing to work and/or controls to reduce or eliminate the hazards and to prevent accidents and unplanned releases and exposures.

- The conditions and requirements to be satisfied for operations to be initiated and conducted are established and agreed upon by Fluor Idaho and the subcontractor. These agreed upon conditions and requirements are captured in subcontract documents. Where invoked, the Subcontractor Requirements Manual (SRM) provides the primary tie to Fluor Idaho safety and health infrastructure.

4.3 Primary Program Elements

The primary elements of the subcontractor requirements program address requirements as they apply to subcontractor activities at the ICP in the following areas:

- Worker Safety and Health
- Environmental concerns
- Quality Assurance
- Radiological Control
- Security.

Proper implementation of these program elements is essential to ensuring a safe workplace where employees produce high quality products and services. The management and employees of Fluor Idaho subcontractors working must have a “ZERO Injury” commitment.

4.4 Hazard Prevention and Control

Effective hazard prevention and control requires a demonstrated commitment from a partnership of subcontractor and Fluor Idaho employees and management to proactively recognize and minimize hazards; ultimately creating a workplace free of injuries and illnesses. The worker safety and health process and Integrated Safety Management System must be integrated into all aspects of ICP work activities.

The hierarchy that has been established for mitigating hazards that cannot be eliminated is (1) engineering controls, (2) administrative controls, and (3) the use of Personal Protective Equipment (PPE). Hazard prevention and control is addressed through both preventative and corrective measures; the first being worksite analysis, the second being accident and incident investigations.

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 4 of 8
---	--

Worksite analysis (work hazard evaluation) provides a mechanism for identifying and mitigating worksite hazards. The requirements for worksite analysis are addressed in PRD-1501, Work Control.

Accident and incident investigations are conducted to determine and correct root causes. Subcontractor supervision is required to investigate any accidents, incidents, or near misses that may occur within their area(s) of responsibility and must provide immediate notification to the Fluor Idaho point-of-contact (POC), i.e., subcontractor technical representative (STR) or subcontract administrator (SCA) if such an event occurs. In addition, subcontractor personnel are required to assist any associated Fluor Idaho or DOE investigation.

5. SUBCONTRACTOR RESPONSIBILITIES

5.1 Subcontractor Senior Management Responsibilities

Subcontractor senior management has the ultimate responsibility for implementing the elements of the subcontractor requirements program by:

- Ensuring that the requirements of all invoked PRDs are met
- Establishing and implementing risk assessments to preserve employee health and well-being against occupational hazards
- Establishing and maintaining a program that recognizes employees who follow safe and healthful work practices and perform high quality work
- Ensuring the proper posting of worker protection and employee rights and responsibilities documentation
- Allow workers to participate in the following activities on official time:
 - Observe monitoring or measuring of hazardous agents
 - Have access to DOE safety and health publications
 - Have access to the Fluor Idaho Worker Safety and Health Plan
 - Have access to the standards, controls, and procedures applicable to work at the ICP
 - Have a representative accompany specified DOE management persons during workplace inspections
 - Requesting and receiving inspection and accident investigation results
- Establishing a system that allows employees to report EA, S&H, RADCON, and QA concerns and ensures timely assessment and resolution

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 5 of 8
---	--

- Notifying workers when monitoring indicates the worker was overexposed to hazardous materials
- Providing limited information (limited by Freedom of Information Act and/or privacy considerations) on any recordkeeping log to workers
- Providing DOE Form 5484.3's that contains the employee's name as the injured or ill worker to the employee
- Establishing and enforcing a disciplinary action policy for employees who willfully or negligently violate program procedures, activities, or standards
- Ensuring that employees are not subject to discrimination or reprisal for executing good faith activities or assigned functions
- Ensuring that program requirements are passed down to subtier subcontractors.

5.2 Subcontractor Field Supervision Responsibilities

Subcontractor field supervision is expected to support senior management in implementing the EA, S&H, RADCON, and QA programs, with supervisors having the first line of responsibility. Field supervision will implement the programs by:

- Identifying hazards associated with activities and controlling or eliminating those hazards when planning and executing work
- Identifying and evaluating potential hazards and potential process or program deficiencies associated with each aspect of a project and communicate these to employees
- Assigning and communicating safety roles, responsibilities, and accountabilities to employees
- Ensuring that employees are cognizant of hazards in their workplaces and adjacent areas, and that they understand their assigned duties
- Notifying the Fluor Idaho POC of any stop work action
- Ensuring that the conditions of a work stoppage are appropriately investigated and documented
- Conducting surveillance of work environments
- Investigating and tracking incidents, near misses, and errors; determining causes; taking corrective actions to prevent recurrence; and performing trend analyses
- Ensuring that identified deficiencies are tracked to closure

**SUBCONTRACTOR REQUIREMENTS PROGRAM
DESCRIPTION**

Identifier: PDD-1001

Revision*: 8

Page: 6 of 8

- Following administrative procedures to enforce disciplinary action when program requirements or instructions are violated
- Ensuring employees are enrolled in applicable medical surveillance activities
- Ensuring that a high standard of housekeeping is maintained
- Providing employees with appropriate and adequate instruction in:
 - Stop work authority
 - Employee rights and responsibilities
 - Job duties and hazards
 - Safety notification process
 - Accident prevention aspects of each job
 - Use, issue, storage, and disposal of PPE
 - Use of materials, tools, and equipment
 - Alarm initiation and response
 - Emergency reporting
 - Evacuations
 - Fire extinguisher use
 - Disciplinary action plan
- Conducting pre-job briefings and plan-of-the-day (POD) meetings
- Participating in monthly subcontractor safety meetings
- Addressing safety hazards and work quality deficiencies that are identified by employees and responding in a timely manner
- Making appropriate notifications to the Fluor Idaho POC for occupational injury, illness, near miss, unplanned exposure, or work quality deficiency
- Ensuring that personnel can perform their work tasks safely and effectively within the confines of any temporary or permanent work restrictions
- Verifying that employee training is appropriate and current for the work activities to be performed and that the employees are qualified to perform their work.

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 7 of 8
---	--

5.3 Subcontractor Employee Responsibilities

Subcontractor employees are expected to take responsibility for their own health and safety, for the safety of fellow workers, and for the quality of the products and services they produce by:

- Recognizing and reporting hazards and work quality deficiencies
- Using and maintaining tools, equipment, and PPE in the prescribed manner
- Stepping Back. All workers have the right and responsibility to step back. A step back is an action taken for a potentially unsafe condition that may be corrected by the performing subcontractor/employee and/or the cognizant line management with minimal effort and time.
- Stopping Work. All workers have the right and responsibility to stop work whenever an act or condition endangers workers, the public, the environment, facilities, or equipment, or the quality of work or products.
- Declining to perform an assigned task because of a reasonable belief that, under the circumstances, the task poses an imminent danger of death or serious physical harm to the worker
- Practicing good housekeeping in assigned work areas
- Working within the constraints of subcontractor requirements program requirements, hazard evaluations, and approved work control documents
- Participating as required in medical surveillance programs
- Immediately reporting to direct management any occupational injuries, illnesses, near misses, potential exposures to hazardous agents, or work quality deficiencies
- Immediately reporting to direct management any non-occupational injury, illness, or condition that might affect or limit employee capability to safely perform assigned job duties
- Participating in:
 - Safety committees
 - Safety meetings
 - Worksite inspections and hazard evaluations
 - POD meetings
 - Weekly tool box safety meetings
- Requesting any needed information about hazards in the workplace
- Conforming to the requirements of a drug free workplace.

SUBCONTRACTOR REQUIREMENTS PROGRAM DESCRIPTION	Identifier: PDD-1001 Revision*: 8 Page: 8 of 8
---	--

- Not utilizing devices requiring headphones or ear buds for listening in Fluor Idaho facilities when operating equipment, including government motor vehicles. (Personal music players may be used while riding the bus or in a van pool to and from work, or in outside work areas during lunch periods.) . All text messaging is to be avoided:
 - While driving a government vehicle
 - While driving a personal vehicle on INL Site controlled property
 - While walking on INL Site controlled property, including all office areas.
- As a driver, using cell phones only when the vehicle is parked in a safe location or when using a hands-free set.

6. SUBCONTRACTOR TRAINING REQUIREMENTS

Subcontractors must provide training to their personnel to ensure that they are aware of:

- The hazards in the subcontractor-controlled workplace
- How workplace hazards are controlled
- Worker responsibilities associated with the products and services they provide
- Applicable requirements of the Subcontractor Requirements Manual.

Training may be general, site-specific, or task-specific, depending on the level of awareness and competency required.

Subcontractor management and supervision must receive documented training to enhance their roles in implementing the subcontractor requirements program.