

National Energy Technology Laboratory (EG&G)

I. Summary Description

EG&G Technical Services has established a comprehensive Integrated Safety Management (ISM) Program for its operations. All subcontractors performing work under EG&G's guidance are required to either follow the EG&G ISM program or develop a program which operates under the seven guiding principles of ISM. Additionally, all subcontractors are contractually required to follow all OSHA and EPA regulations. Prime subcontractors operating under EG&G contracts generally adopt EG&G's program.

EG&G's subcontractors are selected on the basis of cost and technical selection factors. Safety and health performance is one of the technical selection factors. This includes past accident and severity rates for the past three years. A weighting factor is applied to each of the criteria, and ratings are given by technical personnel. Cost is also assigned a weighting factor. All subcontractors chosen on Federal Projects are selected in accordance with the Federal Acquisition Regulation (FAR).

All EG&G subcontractors are contractually bound to follow all provisions of EG&G Rider 1, "Environmental, Safety, and Health for Construction, Alterations, and Support Services Subcontractors." Rider 1 includes compliance with all provisions of 29 CFR 1910 "OSHA General Industry Standards," 29 CFR 1926 "OSHA Construction Standards", and 40 CFR, "Protection of the Environment." Specific requirements are specified for Special Work Permits, Personal Protective Equipment, First Aid, Fire Protection, Tools and Equipment, Electrical, Environmental, Hazard Communication, Compressed Gas Cylinders, and Fall Prevention. Subcontractor personnel are required to perform daily inspections to ensure compliance with the standards. Where applicable, state and local regulations must be followed. A Subcontract Administrator Technical Representative (SATR) is appointed for each subcontract. They are responsible, in conjunction with the ES&H group, to perform periodic checks to ensure subcontractor compliance.

All subcontractor personnel are required to attend a site contractor ES&H orientation session. These sessions are administered by EG&G ES&H professionals and are documented. These briefings cover the site's ES&H program, general site information, and emergency information.

Line management for subcontractors assume the responsibility for operations under their direction. EG&G personnel maintain an open line of communication with subcontractor management on all Environmental, Safety, and Health issues associated with the work. EG&G personnel provide oversight to ensure that all ES&H requirements are being met and that all work is performed in a safe environment.

EG&G and its subcontractors have clear and established lines of authority for ensuring safety and environmental compliance. The Program Manager, or the equivalent

individual in the subcontractor's organization, is responsible for ensuring that any changes made to the organization during the performance of work will have no adverse impact on the firm's ISM program.

All subcontractors are required to assign work to those individuals who are competent to carry out the assigned work in a safe and environmentally responsible manner. All personnel are required to possess all required training, licenses, and certifications necessary to perform their assigned duties.

EG&G ensures that its subcontractors receive authorization to work only after ensuring that any controls necessary to eliminate or mitigate hazards present at the job site are in place and operational. Periodic safety meetings will be held, with the EG&G SATR and subcontractor management and ES&H personnel in attendance. These meetings will address ES&H issues associated with the work being performed by the subcontractors. EG&G ES&H personnel are available for consultation with subcontractors at all times to evaluate issues associated with the work.

Identification of the appropriate standards and requirements to effectively control hazards associated with planned work are an essential part of the ISM programs followed by EG&G subcontractors. The staff of EG&G ES&H professionals are responsible for identifying additional standards not addressed in Rider 1 prior to commencement of subcontractor operations.

Hazard controls must be designed to fit the subcontractor activities in which hazards exist. Engineering controls are recommended as the first line of defense against safety and health hazards. When engineering controls are not feasible, administrative controls are implemented. When the preceding controls are not available or feasible, personal protective equipment (PPE) is used to reduce the likelihood of injury. The SATR and EG&G ES&H professionals consult with the subcontractor's management and ES&H staff to design and evaluate hazard controls.

No work is permitted to start without explicit authorization from EG&G's SATR and the subcontractor's management. Readiness to begin work includes clear evidence, including documentation, that the proposed work can be performed safely and in an environmentally responsible manner.

All work activities performed by EG&G subcontractors shall be based on the five core ISM functions. The functions are applied as a continuous cycle with the degree of rigor appropriate to address the type of work and the hazards involved

All subcontractor tasks are clearly defined within the statement of work developed by EG&G. Any changes to the statement of work which could affect the overall safety of personnel performing the work must be approved by EG&G.

As stated above, hazards will be identified prior to commencement of the work. Subcontractor personnel, working with EG&G ES&H professionals, will identify

potential hazards associated with the work. Applicable ES&H standards and requirements will be identified.

Based on the identified hazards, appropriate hazard controls are selected and implemented prior to operations. Hazard controls are approved by EG&G ES&H professionals and the SATR prior to operations. Management ensures that all work is performed while using the required hazard controls. Any work by subcontractors shall be halted if all designated controls are not being used.

Subcontractor management is required to gather feedback information on the overall effectiveness of their company's ISM program, including the adequacy of training and controls, and shall identify and implement opportunities for improving the definition and planning of work and the overall execution of the ISM program. Several feedback mechanisms shall be used, including formal and informal assessments performed by management; reviews of injury/accident reports; employee workplace safety inspections; management meetings; employee suggestions for improved ES&H performance; and periodic ES&H training sessions.

EG&G maintains oversight over all subcontractor activities and ensures that the subcontractor ISM plan is being implemented. Subcontracts are closed out with concurrence of the SATR for the project. The SATR notifies the Subcontract Administrator that the subcontract has been completed in accordance with the technical requirements and ES&H requirements.

II. Point of Contact (POC)

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III. For a list of available reference documents, please contact the POC.