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Companywide	Management Control Procedure	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 09/19/22
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Manual: Subcontractors Requirements

Change Number: 374537

\*The current revision can be verified on EDMS

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## 1. PURPOSE

This document provides requirements for conducting regular safety surveillance to ensure compliance with subcontractor requirements. This document highlights requirements referenced in the requirements section, as well as contractor requirements. Any applicable regulatory or contractor requirements must be followed, with the most stringent requirement being met.

## 2. APPLICABILITY

This document applies to all subcontractors working at the Idaho Cleanup Project (ICP) as specified in their contract with contractor. Stricter requirements may be imposed by subcontractors upon their employees or sub-tier contractors. The requirements of this document must be followed by subcontractors; however, the means of implementation may vary as determined by the subcontractor.

## 3. REQUIREMENTS

- 3.1 When performing safety surveillance, the level of detail will be dependent on the work activities being performed, the frequency of surveillance, and the hazards associated with the work, as outlined in this section. When safety surveillances are documented, the subcontractor must *categorize* (see def.) any findings as Category I, II, or III and take appropriate actions to mitigate the issue and attempt to prevent reoccurrence of the finding.
- 3.2 Work activities involving construction, demolition, dismantlement, and environmental restoration which have moderate to high hazard levels require continued vigilance for accident prevention and the following surveillance activities shall be performed:
  - 3.2.1 During periods of work activity, the subcontractor's designated project safety representative and the subcontractor's superintendent for work shall conduct a daily surveillance – which do not need to be documented – of the workplace to identify and correct hazards and noncompliance with safety and health requirements; to examine changing work conditions to ensure that the proper hazard controls are in place for the continuation of work; ensure the proper work control documents are being followed; and to provide management attention to the work activity.

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**NOTE:** *The subcontractor's designated project safety representative and superintendent shall be documented.*

- 3.2.2 The subcontractor's designated project safety representative (or alternate) shall conduct and document a weekly surveillance of all work areas (including sub-tier's work areas) jointly with a representative of the contractor.
- 3.2.3 A documented quarterly surveillance will be conducted by the subcontractor's superintendent and project safety representative (if different) jointly with a representative of the contractor. This review shall address the following subjects:
- A. Ensuring that all noncompliance issues have been corrected or mitigated, including deficiency noted in the daily and weekly work assessments
  - B. Identifying any recurring noncompliance issues
  - C. Reviewing the contract and program requirements documents to ensure compliance.
- 3.3 The contractor will document other surveillances that are performed for reasons such as self-assessments, inspection schedules, code/standard compliance, employee concerns, contractor concerns, etc. when the surveillance resulted in findings categorized as Category I or II deficiency.
- 3.4 Low hazard level activities (other than construction, demolition, dismantlement, and environmental restoration) will include periodic surveillances as outlined below:
- 3.4.1 Ensure that continuous activities (activities and areas associated with routine work such as offices, an operating process, a laboratory, or a maintenance shop) are inspected and documented at least quarterly.
- NOTE:** *These inspections may be accomplished in monthly increments, so that each area is inspected at least once per quarter.*
- 3.5 A copy of the documentation for surveillance activities shall be maintained on file and made available for contractor review upon request.
- 3.6 When the contractor has performed a documented safety surveillance, the subcontractor shall categorize the findings as Category I, II, or III.
- 3.7 When the contractor has performed a documented safety surveillance, the subcontractor shall provide all Category I and II deficiencies with a written corrective action plan to the contractor's point of contact within one week of being notified of any findings, unless otherwise directed by the Subcontractor Administrator.

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**NOTE:** *The subcontract technical representative will screen the deficiencies provided by the contractor for entry into the company's issue management system*

3.8 As necessary and for all Category I deficiencies, the subcontractor shall issue a stoppage of work per PRD-1004.

#### **4. DEFINITIONS**

*Categorize:* The process of determining the type of finding and the associated corrective actions. All documented safety surveillance will have each finding categorized as one of the following Categories:

- I Imminent danger - we all have a duty to stop work if imminent danger exists and report to appropriate management.
- II Serious - substantial risk or non-compliance. Needs immediate corrective action and reporting to appropriate management.
- III Non serious or minor - action to be taken to improve the margin of safety.

#### **5. REFERENCES**

None

#### **6. APPENDIXES**

None