

**LANL Waste Characterization, Reduction, and Repackaging Facility DOE ORR
7/21**

**OCCUPATIONAL AND INDUSTRIAL SAFETY AND HYGIENE PROGRAM
(OSH)**

OBJECTIVE

OSH.1: LANS has established and implemented Occupational and Industrial Safety and Hygiene (OISH) programs to ensure safe accomplishment of work at WCRR. Sufficient numbers of qualified personnel as well as adequate facilities and equipment are available to support WCRRF operations. (CRs 1, 4, 6, and 7)

CRITERIA

1. The IH Program has conducted current and comprehensive exposure assessments. An adequate monitoring program is in place including equipment. (Exposure to radioactive contamination will be evaluated in the Radiological Protection Functional Area). (TSR; 10 CFR 851, CRD 18)
2. The Occupational Safety program has incorporated hazards and appropriate controls for the WCRR work activities such as ladder safety, electrical, Lockout/Tagout, hotwork, and vehicular safety. (TSR; 10 CFR 851)
3. Hoisting and rigging program complies with TSR requirements concerning spotters (TSR 5.6.10) and engineered lifts (5.10.3). Forklift management and operational procedures comply with TSR controls. (TSR; 10 CFR 851)
4. Adequate numbers of Industrial Hygiene and Occupational Safety professionals are assigned and perform effectively (work place surveillances, work package reviews, walk-down, etc).
5. Adequate facilities are available to ensure WCRRF operational support in the area of occupational and industrial safety.
6. The level of knowledge of occupational and industrial safety personnel concerning their roles and responsibilities for WCRR operations is adequate. (DOE O 440.1A, DOE O 5480.20A)

APPROACH

Requirement:

- 10 CFR 851, *Worker Safety and Health Program*

Document Review:

- Review Contractor Management Self Assessment Report (MSA), and Contractor Operational Readiness Review (CORR) Report and corrective actions for all findings to determine if:
 - All Pre-Start Findings are resolved and the corrective actions are appropriate for the issue determined.
 - All Post-Start Findings have approved corrective action plans and the corrective actions are appropriate for the findings.

- The breadth of the contractor reviews covered all areas needed to ensure safe operations and protect the public, employees and environment.
- Review exposure assessment results, MSDS and sampling plans, records and baseline results to ensure that:
 - LANL has performed adequate and current exposure assessments
 - LANL has an adequate monitoring program
 - Corrective actions for exposure assessments are tracked to closure
- LANL Safety and Health Plan/process that includes WCRR
- Plans/process documents that implement the TSR requirements for OSH, IH, and Waste and hazardous materials Management
- LANL M&TE control and calibration programs including support of IH monitoring equipment.
- WCRRF hoisting and rigging program implementing documentation
- WCRRF forklift use and operator qualification program implementing documentation
- CORR Final Report and Corrective Action Closure packages for findings in this functional area.
- Exposure assessment results
- In process sampling plans, records, and baseline results
- Material Safety Data Sheets
- Work packages and Hazard Analysis procedures for work and operational activities associated with WCRR.
- LANS management assessment reports for assessments of OISH programs and activities

Interviews:

- Occupational Safety and Industrial Hygiene and Supervisors and Workers in the WCRR to ensure:
 - The level of knowledge of personnel in the WCRR facility concerning roles and responsibilities is sufficient to ensure appropriate response to normal and abnormal situations.
 - Personnel in the WCRR facility have a sufficient understanding of the Occupational Safety programs and Technical Safety Requirements.
 - The number of personnel and work load is commensurate with the work performed in the facility
 - That current comprehensive exposure assessments have been performed and that an adequate monitoring program is in place.

Observations:

- WCRR operations demonstrations to ensure:
 - Monitoring activities are performed in accordance with Occupational Safety programs requirements and Technical Safety Requirements.
 - Waste container acceptance inspections are performed in accordance with TSRs and waste permits.
 - Personnel in the WCRR facility have a sufficient level of knowledge to perform the jobs required.
- Walkthrough of WCRR to observe work activities in progress and facility conditions
- OISH routine and unique monitoring activities including area and personnel sampling and surveillance activities.
- WCRR operational demonstrations.