



**Independent Assessment of
Occupational Injury and Illness
Recordkeeping
by the
Central Plateau Cleanup Company, LLC
at the Hanford Site**

August 2022

Office of Enterprise Assessments
U.S. Department of Energy

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Acronyms

CAIRS	Computerized Accident/Injury Reporting System
CFR	Code of Federal Regulations
CPCCo	Central Plateau Cleanup Company, LLC
CRAD	Criteria and Review Approach Document
CY	Calendar Year
D&D	Decontamination and Decommissioning
DART	Days Away, Restricted or Transferred
DAW	Day Away from Work
DOE	U.S. Department of Energy
EA	Office of Enterprise Assessments
EHSS	Environment, Health, Safety and Security
Hanford	Hanford Site
HMIS	Hazardous Material Information System
HPT	Health Physics Technician
NCO	Nuclear Chemical Operator
OFI	Opportunity for Improvement
OII	Occupational Injury and Illness
OMP	Occupational Medical Provider
OSHA	Occupational Safety and Health Administration
OS&IH	Occupational Safety & Industrial Hygiene
PAPR	Powered Air Purifying Respirator
RCT	Radiological Control Technician
RL	Richland Operations Office
RTW	Return to Work
RWD	Restricted Workday
SME	Subject Matter Expert
STS	Standard Threshold Shift
USO	Utility System Operator
WC	Workers' Compensation

INDEPENDENT ASSESSMENT OF OCCUPATIONAL INJURY AND ILLNESS RECORDKEEPING BY THE CENTRAL PLATEAU CLEANUP COMPANY, LLC AT THE HANFORD SITE

Executive Summary

The U.S. Department of Energy (DOE) Office of Enterprise Assessments (EA) conducted an independent assessment of occupational injury and illness (OII) recordkeeping at the Hanford Site on May 9-13, 2022. This assessment evaluated the OII recordkeeping program and accuracy of case records at the Central Plateau Cleanup Company, LLC (CPCCo). DOE relies on the accuracy of contractor OII reporting to evaluate its safety performance.

EA identified the following strengths:

- CPCCo employees reported that they received support from their supervisors when injured and that they could report injuries without fear of retaliation.
- DOE Richland Operations Office (RL) conducts comprehensive and thorough oversight of CPCCo OII recordkeeping and reporting.

EA identified the following weaknesses, including two findings:

- CPCCo did not properly classify, record, and/or report 18 of 27 OII cases reviewed in the OSHA 300 logs and in the Computerized Accident/Injury Reporting System (CAIRS). (Finding)
- CPCCo did not adequately correct identified OII case misclassifications as identified by RL or address the underlying cause for the misclassifications. (Finding)
- CPCCo did not assign a properly trained case management specialist in OII recordkeeping and authorized reporting in CAIRS.
- CPCCo did not consistently pursue the collection of OII-related medical diagnosis and treatment information from injured employees' medical providers to support determination of recordability of injury events.
- CPCCo did not record an OSHA-recordable CAIRS case on its OSHA 300 log and 300A summary and did not ensure that its subcontractor recorded an OSHA-recordable CAIRS case on its OSHA 300 log and 300A summary.
- CPCCo reported two of the five OSHA-recordable cases late in CAIRS.
- CPCCo's quarterly quality checks were not effective in ensuring that all information was thorough, accurate, and consistent.
- Potential work-related COVID-19 cases could have been missed due to lack of sufficient contact tracing information to support determination of work-relatedness.

In summary, CPCCo has not developed or implemented a satisfactory recordkeeping program that adequately identifies, investigates, and classifies OII cases and maintains quality records. RL provided comprehensive and thorough oversight of CPCCo OII recordkeeping and reporting and had appropriately requested CPCCo to reclassify identified misclassified OII cases. Until the concerns identified in this report are addressed or effective mitigations are put in place, CPCCo OII information cannot be relied on as an accurate representation of the number or severity of employee workplace injuries and illnesses.

INDEPENDENT ASSESSMENT OF OCCUPATIONAL INJURY AND ILLNESS RECORDKEEPING BY THE CENTRAL PLATEAU CLEANUP COMPANY, LLC AT THE HANFORD SITE

1.0 INTRODUCTION

The U.S. Department of Energy (DOE) Office of Worker Safety and Health Assessments, within the independent Office of Enterprise Assessments (EA), assessed the effectiveness and accuracy of occupational injury and illness (OII) recordkeeping and reporting by the Central Plateau Cleanup Company, LLC (CPCCo) at the Hanford Site (Hanford) pursuant to requirements established by DOE 10 CFR 851, *Worker Safety and Health Program* and DOE Order 231.1B, *Environment, Safety and Health Reporting*. DOE relies on the accuracy of contractor OII reporting to evaluate its safety performance and to assess the overall effectiveness of its safety and health programs. CPCCo's contract with DOE for Hanford environmental cleanup began on January 25, 2021. This assessment also evaluated the oversight provided by the DOE Richland Operations Office (RL).

This assessment was conducted as part of a focused assessment of the accuracy of recordkeeping and reporting of DOE work-related COVID-19 respiratory disease cases and was requested by RL. Document collection began in April 2022, and the onsite assessment was conducted on May 9-13, 2022.

2.0 METHODOLOGY

The DOE independent oversight program is described in and governed by DOE Order 227.1A, *Independent Oversight Program*, which is implemented through a comprehensive set of internal protocols, operating practices, assessment guides, and process guides. This report uses the terms “best practices, deficiencies, findings, and opportunities for improvement (OFIs)” as defined in the order.

As identified in the assessment plan, *Plan for the Independent Assessment of Occupational Injury and Illness by the Central Plateau Cleanup Company at Hanford, April 2022*, this assessment considered requirements related to DOE OII recordkeeping as required by 10 CFR 851. EA used sections of criteria and review approach document (CRAD) EA-32-07, *Occupational Injury/Illness Recordkeeping*, dated April 14, 2022. In addition to the CRAD, criteria contained in a letter from the Director of the Office of Environment, Health, Safety and Security (EHSS) (formerly the Office of the Associate Undersecretary for Environment, Health, Safety and Security), dated October 6, 2020, *Guidance and FAQs for Recording and Reporting COVID-19 Cases*, were used to assess the implementation of DOE OII recordkeeping directions for recording work-related COVID-19 cases.

Prior to the onsite portion of the assessment, EA used the locally maintained CPCCo OII event spreadsheet to select 186 prime contractor and 47 subcontractor OII events and 68 COVID-19 case files from calendar year (CY) 2021 and the first quarter of CY 2022 for initial review. While on site, EA conducted detailed reviews of 27 of the 233 OII case files and interviewed 18 available workers about their cases. In addition, EA reviewed 27 of the 68 COVID-19 case files and interviewed an additional 18 workers. EA also interviewed key personnel responsible for identifying, investigating, and classifying OII cases and reporting records in DOE's Computerized Accident/Injury Reporting System (CAIRS) and examined key documents, such as procedures and training records. Furthermore, EA verified the consistency between CPCCo and subcontractor OII case files and the corresponding CAIRS logs (Occupational Safety and Health Administration [OSHA] 300 *Log of Work-Related Injuries and Illnesses*, 300A *Summary of Work-Related Injuries and Illnesses*). The members of the assessment team, the Quality Review Board, and management responsible for this assessment are listed in appendix A.

There were no previous findings for follow-up addressed during this assessment.

3.0 RESULTS

3.1 Program Administration

This portion of the assessment evaluated the CPCCo program documents that govern the identification, classification, and determination of recordability for OII cases, the reporting of case records in CAIRS, and the training of OII case management specialists.

CPCCo has established generally adequate program documents for identifying, classifying, and accurately determining recordability of OII cases and reporting case records in CAIRS. CPCC-MP-SH-32219, *10 CFR 851 CPCCo Worker Safety and Health Program Description*, identifies CPCC-PRO-SH-077 as the implementing procedure for OII recordkeeping and classification. CPCC-PRO-SH-077 provides satisfactory procedures for reporting prime contractor and subcontractor injuries and illnesses to its Occupational Safety & Industrial Hygiene (OS&IH) organization for OII case management. However, EA identified two weaknesses with CPCC-PRO-SH-077:

- Contrary to 10 CFR 851.11(a)(3)(i), CPCC-PRO-SH-077 does not provide methods for the case management specialist to comply with 29 CFR 1904 OII recordkeeping and classification requirements (see **Deficiency D-CPCCo-1**). The lack of specific instructions limits CPCCo's ability to conduct quality evaluations and maintain accurate records. CPCC-PRO-SH-077 provides no implementing instructions beyond direction to follow 29 CFR 1904.
- Contrary to 29 CFR 1904.7, CPCCo does not obtain all appropriate OII-related medical treatment records to support OII case classifications (see **Deficiency D-CPCCo-2**). The lack of OII-related medical treatment records compromises the accuracy of OII case classifications and diminishes future data trending accuracy. Although medical information is made known to the workers' compensation (WC) administrator organizations (Washington State Labor & Industry and Penser North America, Inc., the company that administers CPCCo's WC program), medical information is not consistently communicated to or requested by the OII case management specialist. An example is the *Individual Encounter Report* (no number identified) generated by the occupational medicine provider that includes OII case medical information key to OSHA case classification but is not provided to the CPCCo OII case management specialist.

The CPCCo *Case Manager User Manual* (no number identified) for the entry of required information into CAIRS is comprehensive. CPCCo has appropriately established three CAIRS organizational reporting codes that reflect its current organizations: CPCCo prime contract workers, construction subcontractors, and service subcontractors. Reviewed workhours and OII recordable cases were properly submitted for each of the CAIRS organizational reporting codes.

Individuals who are assigned OII recordkeeping duties are required to be trained in recordkeeping and OII case classification requirements. In addition, training from EHSS is required for record keepers to have access to CAIRS accounts for reporting OII cases. However, contrary to DOE Order 231.1B attachment 3, section 1.i, the OII case management specialist was not trained in OII recordkeeping, case classifications, or CAIRS direct data entry (see **Deficiency D-CPCCo-3**). The lack of training can result in the misclassification of OSHA injury and illness cases. Additionally, without CAIRS data entry training for the assigned case manager, CPCCo needed to use another individual with CAIRS authorization to manage CPCCo CAIRS accounts. Prior to the EA onsite visit, the only assigned OII case management specialist was remotely interviewed. The reviewed training records and interview with this person confirmed that the required formal training was not completed. This individual is no longer employed by CPCCo and the CPCCo manager, responsible for OSHA injury and illness recordkeeping and reporting, asked a former employee who was well-qualified, trained, experienced, and able to be reauthorized for CAIRS access to temporarily fill this position while recruiting. EA noted that a designated backup case management specialist was not assigned to be able to meet OII case reporting requirements when the primary OII case management specialist was not available, such as during vacation or sick leave (see **OFI-CPCCo-1**).

OII recordkeeping requirements are adequately flowed down to subcontractors and sub-tier contractors through the subcontract document SP-5 *Special Provisions – On Site Services*. Subcontractors are appropriately required to provide immediate notification of injuries to CPCCo and provide a monthly report of subcontractor labor hours. Subcontractor performance is addressed in sections 3.2 and 3.3 of this report.

Program Administration Conclusions

CPCCo has established generally adequate program documents for identifying, classifying, and accurately determining recordability of OII cases, and reporting case records in CAIRS. OII recordkeeping requirements are adequately flowed down to subcontractors. However, CPCCo procedures for evaluating workplace injuries and illnesses in accordance with OSHA requirements lack specific methods to ensure a compliant program. Specifically, procedures do not ensure OSHA definitions of restricted work are used in recordability determinations. Furthermore, CPCCo does not obtain all OII medical treatment information required to support accurate OII case classifications, and CPCCo did not assign a properly trained OII case management specialist for OII recordkeeping and authorized reporting in CAIRS.

3.2 Case Classification and Recording

This portion of the assessment evaluated CPCCo's classification and recording of workplace injury and illness cases.

All interviewed workers reported that they received support from their supervisors and OS&IH subject matter experts (SMEs) immediately after the events and during their restricted duty periods. Employees also confirmed that they could report injuries without fear of retaliation. However, CPCCo's classification and recording of workplace injury and illness cases is inadequate. Contrary to 10 CFR 851.23(a)(2) and DOE Order 231.1B, Attachment 3, Section 1.b., c., and d., CPCCo did not properly classify, record, and/or report in OSHA 300 logs and CAIRS 18 of the 27 reviewed OII cases (see **Finding F-CPCCo-1**). EA did not have enough facts to classify two of the 27 cases; the injured employees were not available to be interviewed and the written documentation was incomplete. Misclassifying OII cases results in an inaccurate representation of the number and severity of injuries and limits feedback for targeting needed safety improvements. Appendix B, *Results of Case File Reviews*, provides an evaluation of the 27 selected CPCCo OII case classifications.

OSHA standard 29 CFR 1904.7(b)(4) prescribes the criteria for recording workplace injuries and illnesses that result in restricted work. According to the OSHA standard, restricted work occurs when (1) the employer keeps the employee from performing one or more of the routine functions of their job or from working the full workday that they would otherwise have been scheduled to work or (2) a physician or licensed health care professional recommends that the employee not perform one or more of the routine functions of their job or not work the full work day that they would otherwise be scheduled to work. OSHA defines the term routine functions in the standard as, "those work activities the employee regularly performs at least once per week."

CPCCo appropriately accommodates injured worker's medical/work restrictions, allowing the workers to safely perform some work without taking any days away from work. However, CPCCo does not properly classify these cases as a recordable Days Away, Restricted or Transferred (DART) restricted workday (RWD) cases due to the injured worker not being able to perform one or more of their other routine functions. One example of this practice involved a worker who was diagnosed with a fractured finger after securing a tarp on a container. The employee was fitted with a splint which prevented them from wearing gloves. This restriction prevented the employee from performing routine work. The employee was reassigned to work that did not require them to be dressed out. The injury resulted in 102 restricted workdays according to occupational medical provider (OMP) documents. CPCCo did not record the injury on the OSHA 300 log or enter it into CAIRS. This practice of accommodating the employee with different productive work during the employee's recovery time was misused as a reason not to record injuries on the OSHA 300 log as required by the standard. The interviews with the OII

case management specialist and OS&IH leadership indicated that a lack of understanding of OSHA RWD requirements was the principal cause of injury or illness misclassification.

Additionally, CPCCo did not properly record two workplace hearing loss cases on the 300 logs or enter them into the CAIRS database in accordance with 29 CFR 1904.10. In CY 2019, WC case number SM06618 documented a standard threshold shift (STS) in both ears. During the next annual audiogram in 2020, the STS was confirmed, and the employee's baseline was appropriately reset in accordance with 29 CFR 1904.10(b)(2). The second case (SM06605) involved a worker who had a confirmed STS in their right ear in CY 2020 and whose baseline was appropriately reset. The previous contractor's OII case management specialist did not make the required entries in CAIRS for either of these two cases during the years that the STSs were first identified, and the cases were not entered in the previous contractor's OSHA 300 log. Since the contract transition, CPCCo has not updated the OSHA 300 logs or CAIRS database with these WC-covered hearing loss cases as required by DOE Order 231.1B, attachment 1, section 2.a.(2).

Case Classification and Recording Conclusions

Workers reported that they received support from their supervisors and OS&IH SMEs after the events and during their restricted duty periods. They also uniformly reported that they harbored no fear of retaliation for reporting workplace injuries to supervisors. However, CPCCo did not properly classify, record, and/or report, using the OSHA medical/work restriction classification, 18 of 27 OII cases evaluated during this assessment and did not update two hearing loss cases on the OSHA 300 logs or in the CAIRS database.

3.3 Records Quality

This portion of the assessment evaluated workhour exposure reporting, OII case OSHA recording, and quarterly quality checks.

Workhour Exposure Reporting

CPCCo work hour exposure reporting in CAIRS for OII case incidence rate calculations is adequate. CPCCo appropriately uses financial records to determine prime contractor and subcontractor workhours of exposure. For CY 2021, CPCCo used actual hours worked as reported in financial records to update CAIRS. In CY 2022, CPCCo started using 166.67 hours per month per worker as reported in financial records for calculating workhours of exposure in CAIRS. Both methods are satisfactory for calculating workhours of exposure in CAIRS, however, CAIRS data entry guidance recommends the use of actual workhours, when available. Additionally, the reviewed CAIRS records demonstrate that CPCCo reported workhours in CAIRS by the 10th of the month following each calendar quarter, as required by DOE Order 231.1B, attachment 3, section 1.e. CPCCo also appropriately used the CAIRS workhour exposure documentation to complete its OSHA Form 300A. Workhours recorded in CAIRS and on the signed/certified CY 2021 OSHA Form 300A summary are consistent.

OII Case OSHA Recording

The CPCCo OSHA 300A summary for CY 2021 was appropriately certified by the company president by the required deadline of the first day of February, notwithstanding the misclassified cases identified in section 3.2 of this report. However, contrary to DOE Order 231.1B, attachment 1, sections 2.a.(1) and (3) and attachment 3, sections 1.b, 1.c, and 1.d, CPCCo and its subcontractor (Watts Construction) each omitted one OSHA recordable case from their OSHA 300 logs and 300A summaries (see **Deficiency D-CPCCo-4**). Inconsistent records can lead to inaccurate recordable incidence rates and decreased safety performance. Specifically, the following cases were not recorded:

- CAIRS case number 40060, a DART case with 34 days away from work (DAWs), was reported in CAIRS as

requested by RL oversight results but was not recorded on the CPCCo OSHA 300 log or 300A summary.

- CAIRS case number 2021-001, a DART case with four DAWs, was reported in the subcontractor CAIRS organization code but was not recorded on the Watts Construction subcontractor OSHA 300 log or 300A summary.

OII Case CAIRS Reporting

CPCCo reporting of OII case information in CAIRS was not consistently timely. For the cases that CPCCo recorded, additional DART days were adequately updated in CAIRS by the 10th of the month following each calendar quarter, as required. However, contrary to DOE Order 231.1B, attachment 3, section 1.d, CPCCo did not report two of the five recordable OII cases in the CAIRS database within the time required (see **Deficiency D-CPCCo-5**). Late reporting of recordable injuries lowers contractor-specific and DOE-wide safety performance incidence rates temporarily and can provide incorrect information to DOE field and program offices. DOE contractors are required by DOE Order 231.1B to enter recordable cases on their OSHA 300 logs within seven days and in CAIRS by the 15th or last day of the month after the injury. Two recordable OII cases were entered into the CAIRS database 29 and 181 days late.

Quarterly Quality Checks

CPCCo does not ensure the quality of OII records or case classifications effectively, as evidenced by the quality issues identified in this report. Contrary to DOE Order 231.1B, attachment 3, section 1.f, CPCCo quarterly quality checks were not effective in ensuring that all OII information was thorough, accurate, and consistent (see **Deficiency D-CPCCo-6**). Ineffective quality checks may not identify case-specific quality issues or programmatic issues needing management attention. The OII case management specialist responsible for the original case documentation and classifications conducted the quarterly quality checks. This case manager specialist may be biased when reviewing his or her own work and may not have the questioning attitude that an independent reviewer without previous input might have. In addition, CPCCo does not require subcontractors to provide its OSHA 300 logs or 300A summaries to cross check for the subcontractor recordable OII cases missed (see **OII-CPCCo-2**).

Through a series of surveillance and operational awareness reports RL oversight appropriately identified CPCCo OII cases that were not properly classified from March 2021 through March 2022, including three DART cases with RWDs, and in a February 15, 2022, follow-up letter to CPCCo, RL requested that CPCCo correct the misclassifications. RL case classifications were confirmed by the DOE OII recordkeeping authority in EHSS in accordance with DOE Order 231.1B, section 5(e)5. However, contrary to DOE Order 231.1B, attachment 3, section 1.h, CPCCo did not adequately correct the misclassifications as directed by RL (see **Finding F-CPCCo-2**). Allowing case classification errors to remain in OII records decreases the integrity of OII records. Two cases were not recorded on the CPCCo OSHA 300 log and 300A summary as directed and were not entered into CAIRS. A third case was properly entered as a DART case into CAIRS, as directed, but CPCCo did not record the case on the CPCCo OSHA 300 log and 300A summary, as required. The principal cause of the RL-identified case misclassification was the misunderstanding of the proper application of the OSHA RWD case classification requirements. This was also the underlying cause of most of the misclassified OII cases identified by EA in section 3.2 of this report.

Records Quality Conclusions

CPCCo adequately determined work hours for OII case incidence rate calculation in CAIRS and on its OSHA 300A summary. OII records were generally maintained well, except for some inconsistent case information between CAIRS and the OSHA 300 log and 300A summary and the late recording and reporting of two recordable cases. However, the CPCCo quarterly quality checks did not ensure the quality of OII records or case

classifications, and they did not adequately correct OII case misclassifications, as requested by RL, or address the underlying cause for the misclassifications.

3.4 COVID-19 Work-Related Determinations

This portion of the assessment evaluated CPCCo's determination of COVID-19 work-related cases.

CPCCo implements a generally adequate process for the recording of COVID-19 work-related OII cases. SOMC19-CS-004A2, *Hanford Worker Contact Tracing Program*, guides the Hanford OMP COVID-19 team in conducting contact tracing for CPCCo employees who are symptomatic and/or test COVID-19 positive to identify close contacts at the workplace. SOMC19-CS-004A2 includes current CDC COVID-19 guidance on quarantining or isolating COVID-19 cases. The OMP COVID-19 team is adequately trained in contact tracing, and they provide contact tracing results to CPCCo. CPCCo uses this close contact information to determine whether a COVID-19 case is "likely" or "unlikely" work-related. CPCCo used the contact tracing results and applied the *DOE Environment, Health, Safety, and Security Guidance and Frequently Asked Questions for Recording and Reporting COVID-19 Cases* to determine that none of its COVID-19 cases were likely work-related.

The 18 worker interviews and 27 of the 68 reviewed COVID-19 case files resulted in the following identified gaps in contact tracing:

- Eleven of the 27 case files did not include a contact tracing worksheet, leaving the adequacy of contract tracing in question. Inadequate contact tracing could lead to missed work-related close-contact cases.
- Three of the 27 cases lacked details regarding potential close contacts in the workplace environment. For example, the contact tracing documentation did not consider workers sharing rides with a worker who later developed symptoms as potential close contacts.
- Three of the 18 interviewees, who should have been contacted, stated that they were not contacted for contact tracing. For example, the OMP individual encounter notes for a case file has the entry "unable to contact trace."

Accordingly, inadequate contact tracing may have resulted in missed work-related close-contact cases and inaccurate work-related COVID-19 determinations.

COVID-19 Work-related Determinations Conclusions

Overall, CPCCo appropriately applied the DOE and OSHA guidance to determine whether a particular case of COVID-19 is reportable as work-related. However, inconsistencies in contact tracing and documentation of tracing information may have prevented identification of potential work-related close contacts and recording of COVID-19 work-related OII cases.

3.5 Richland Operations Office Oversight

This portion of the assessment evaluated RL SME OII competency and experience, and oversight of CPCCo's OII recordkeeping and reporting program.

RL has a technically competent and experienced general support services contractor SME (RL SME) who oversees CPCCo OII recordkeeping and reporting. The RL SME is responsible for the day-to-day oversight of CPCCo OII recordkeeping, reporting directly to the RL Safety & Health Division director. The RL SME has satisfactory training in DOE/OSHA recordkeeping requirements and DOE CAIRS reporting and has significant experience in DOE prime contractor and subcontractor OII recordkeeping activities.

RL provides comprehensive and thorough oversight of CPCCo OII recordkeeping and reporting. The RL SME appropriately conducts assessments, operational awareness oversight, and quarterly quality assurance reviews of CPCCo OII records. The RL SME oversight reports were comprehensive and technically accurate regarding DOE OII recordkeeping requirements. RL SME oversight identified OII case misclassifications effectively and directed CPCCo to reclassify these OII cases as OSHA recordable and report the cases in CAIRS. In addition, the RL SME identified possible patterns with other Hanford contractors regarding the lack of timeliness of reporting OII cases on the OSHA 300 log and in CAIRS, as well as the inappropriate classification of OII cases that should be DART cases with RWDs. RL identified OII recordkeeping and reporting as an area for improvement in the CPCCo contract performance evaluation.

Richland Operations Office Oversight Conclusions

RL uses a technically competent and experienced contract support SME who oversees CPCCo OII recordkeeping and reporting. The RL SME provides comprehensive and thorough oversight of CPCCo OII recordkeeping and reporting. RL was effective in identifying CPCCo case misclassifications, as well as possible poor Hanford-wide recordkeeping patterns.

4.0 BEST PRACTICES

No best practices were identified during this assessment.

5.0 FINDINGS

Findings are deficiencies that warrant a high level of attention from management. If left uncorrected, findings could adversely affect the DOE mission, the environment, the safety or health of workers and the public, or national security. DOE line management and/or contractor organizations must develop and implement corrective action plans for findings. Cognizant DOE managers must use site- and program-specific issues management processes and systems developed in accordance with DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*, to manage the corrective actions and track them to completion.

Central Plateau Cleanup Company, LLC

Finding F-CPCCo-1: CPCCo did not properly classify, record, and/or report 18 of 27 OII cases reviewed in the OSHA 300 logs and CAIRS. (10 CFR 851.23(a)(2) and DOE Order 231.1B, attachment 3, section 1.b., c., and d.)

Finding F-CPCCo-2: CPCCo did not adequately correct identified OII case misclassifications as requested by RL or address the underlying cause for the misclassifications. (DOE Order 231.1B, attachment 3, section 1.h)

6.0 DEFICIENCIES

Deficiencies are inadequacies in the implementation of an applicable requirement or standard. Deficiencies that did not meet the criteria for findings are listed below, with the expectation from DOE Order 227.1A for site managers to apply their local issues management processes for resolution.

Central Plateau Cleanup Company, LLC

Deficiency D-CPCCo-1: CPCC-PRO-SH-077 does not provide methods to comply with 29 CFR 1904 OII recordkeeping requirements. (10 CFR 851.11(a), .23(a)(2), and .26(a)(2))

Deficiency D-CPCCo-2: CPCCo does not obtain all required OII medical treatment information to support accurate OII case classifications. (10 CFR 1904.7(b)(1)(iv))

Deficiency D-CPCCo-3: CPCCo did not assign a properly trained OII case management specialist for OII recordkeeping, case classifications, and CAIRS direct data entry authorization. (DOE Order 231.1B, attachment 3, section 1.i)

Deficiency D-CPCCo-4: CPCCo and its subcontractor (Watts Construction) each omitted one OSHA recordable case from their OSHA 300 logs and 300A summaries. (DOE Order 231.1B, attachment 1, sections 2.a.(1) and (3) and attachment 3, sections 1.b, 1.c, and 1.d)

Deficiency D-CPCCo-5: CPCCo did not report two of the five recordable OII cases in the CAIRS database within the time required. The two cases were late by 29 and 181 days. (DOE Order 231.1B, attachment 3, section 1.d)

Deficiency D-CPCCo-6: CPCCo quarterly quality checks were not effective in assuring the quality of OII records or case classifications. (DOE Order 231.1B, attachment 3, section 1.f)

7.0 OPPORTUNITIES FOR IMPROVEMENT

EA identified two OFIs to assist cognizant managers in improving programs and operations. While OFIs may identify potential solutions to findings and deficiencies identified in assessment reports, they may also address other conditions observed during the assessment process. These OFIs are offered only as recommendations for line management consideration; they do not require formal resolution by management through a corrective action process and are not intended to be prescriptive or mandatory. Rather, they are suggestions that may assist site management in implementing best practices or provide potential solutions to issues identified during the assessment.

Central Plateau Cleanup Company, LLC

OFI-CPCCo-1: Consider assigning a designated backup OII case management specialist who is fully trained in OII recordkeeping and authorized to enter OII recordkeeping data in CAIRS for CPCCo when the primary OII case management specialist is unavailable.

OFI-CPCCo-2: Consider using independent OII SMEs as part of the quarterly quality checks of CPCCo OII records, including the coordination of quality checks with RL SMEs. In addition, consider adding subcontract specifications that require subcontractor quarterly submittals of OSHA 300 logs and annual submittal of 300A summaries to support the quarterly quality checks.

Appendix A Supplemental Information

Dates of Assessment

Onsite Assessment: May 9-13, 2022

Office of Enterprise Assessments (EA) Management

John E. Dupuy, Director, Office of Enterprise Assessments
William F. West, Deputy Director, Office of Enterprise Assessments
Kevin G. Kilp, Director, Office of Environment, Safety and Health Assessments
David A. Young, Deputy Director, Office of Environment, Safety and Health Assessments
Kevin M. Witt, Director, Office of Nuclear Safety and Environmental Assessments
Charles C. Kreager, Director, Office of Worker Safety and Health Assessments
Jack E. Winston, Director, Office of Emergency Management Assessments
Joseph J. Waring, Director, Office of Nuclear Engineering and Safety Basis Assessments

Quality Review Board

William F. West, Advisor
Kevin G. Kilp, Chair
Joseph Lewis
Shannon L. Holman
Michael A. Kilpatrick

EA Assessment Team

Nimalan Mahimaidoss, Lead
Kimberly G. Nelson
David Olah
James C. "Chris" Cantwell
Terry E. Krietz

Appendix B
Results of Case File Reviews

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
3/17/21 40034	<p>Report Only</p> <p>Office of Enterprise Assessments (EA) Note: Not recorded on OSHA 300 log</p>	<p>A pipefitter was pulling pipe wrench with poor ergonomics to gain leverage and noticed strength loss and pain in the right arm. The occupational medical provider (OMP) noticed that the employee has a history of right shoulder injuries on 11/2014 and 9/2015. The pipefitter was diagnosed with right shoulder strain.</p> <p>The employee missed 26 days of work and was paid workers' compensation.</p> <p>The case was listed on the event log, but the case summary was not available for EA review. Although workers' compensation indemnity was paid, the case was not on the Occupational Safety and Health Administration (OSHA) 300 log.</p> <p>Required Classification: EA could not make a factual determination on recordability in this case. The injured employee was not available to be interviewed and the case file documentation was incomplete.</p>
3/25/21 40038	<p>First Aid</p> <p>EA Note: Not recorded on OSHA 300 log</p>	<p>An instrument and control technician seated in the back seat of a car was checking to see if they had all their tools when they discovered a missing wrench. An employee in the front seat had the wrench and reached back to hand it to them. The employee in the back seat was hit in the head by the wrench. Later the same day, the instrument technician was driving home and experienced blurry vision. The instrument technician contacted the supervisor, who took the employee to OMP.</p> <p>The employee was transported to a local medical facility and diagnosed with a closed head injury.</p> <p>Required Classification: Recordable, DART case with four DAWs and seven RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
4/14/21 40049	First Aid EA Note: Not recorded on OSHA 300 log	<p>A nuclear chemical operator (NCO) threw out their lower back when they were closing a large door. The NCO visited OMP and was diagnosed with a sprain/strain of an unspecified site of the back. The NCO returned to work with no restrictions and was referred to a specialist. On 4/21/21, the NCO returned to OMP for evaluation and specialist diagnosis. The employee returned to work (RTW) with restrictions. On 9/14/21, the employee's status was changed to DAW, not RTW by OMP.</p> <p>The case was not on the 300 log. Workers' compensation indemnity was paid.</p> <p>Required Classification: Recordable, DART case with 146 RWDs.</p> <p>CPCCo will need to determine whether any DAWs must be recorded in accordance with the requirements of 29CFR 1910.7(b)(3)(viii).</p>
4/21/2021 40056	Not Work-related EA Note: Not recorded on OSHA 300 log	<p>A subcontractor carpenter was in a snorkel lift pinning metal roofing in an awkward position when the employee experienced back pain and was escorted to OMP by a supervisor. The employee was diagnosed with a muscle spasm. The employee was released from OMP with work restrictions until 4/26/21. In addition, the employee went to a personal chiropractor for treatment.</p> <p>Required Classification: Recordable, DART case with five RWDs.</p>
5/11/21 40062	First Aid EA Note: Not recorded on OSHA 300 log	<p>A millwright was supporting a stainless-steel high efficiency particulate air (HEPA) filter and when rotating it around put too much weight on the right arm and heard it pop. The employee was transported to OMP and diagnosed with bicep tendon strain, lateral epicondylitis. The employee returned to work with no use of right arm. On 5/24/21, the employee returned to work with no restrictions.</p> <p>Required Classification: Recordable, DART case with 13 RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
5/27/21 40072	First Aid EA Note: Not recorded on OSHA 300 log	<p>A health physics technician (HPT) rolled their right ankle on an uneven surface in a demolition zone. The employee was sent to OMP where they were diagnosed with a sprain and released with no restrictions on the Thursday before Memorial Day weekend with instructions to return to the OMP on Tuesday 6/1/21 before returning to work. The employee returned to OMP as directed on Tuesday 6/1/21 for evaluation and was released to work with restrictions: no climbing ladders and avoid walking on uneven or unstable (e.g., gravel) surfaces. On 6/22/21, the employee was released back to work with no restrictions by OMP.</p> <p>Required Classification: Recordable, DART case with 25 RWDs.</p>
6/7/21 40075	Recorded as DART case with two DAW on OSHA 300 log; Reported in Computerized Accident/Injury Reporting System (CAIRS)	<p>An HPT was exchanging an air sample in the plutonium finishing plant when they stepped off a berm into a ditch, leaned forward, and heard a pop in the knee. The HPT notified their supervisor and was transported to OMP where they were then transported by ambulance to Kadlec for further observation. The employee was given Motrin and a saline lock was placed on their right knee. Paramedics administered fentanyl and placed an air splint on the knee. The employee was eventually diagnosed with a hamstring rupture.</p> <p>The HPT was off work from 6/7/21 to 6/10/21 and placed on work restrictions: no lifting/carrying over 25 pounds, seldom lift 10 pounds for up to 1 hour a day, occasionally lift 5 pounds for up to 3 hours a day, no performing work from ladder, climbing ladders, bending, or stooping, kneeling, crawling, operating foot controls or climbing stairs until 6/24/21.</p> <p>Required Classification: Recordable, DART case with three DAWs and 14 RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
6/9/21 40079	Not work-related EA Note: Not recorded on OSHA 300 log	<p>A radiological control technician (RCT) was conducting normal duties, which included walking outside on the side of hills and uneven surfaces when a pain in the right knee was felt. The RCT reported to OMP who examined the RCT and provided non-prescription medication. The RCT was diagnosed with likely mechanical pain related to muscle imbalance and released with restrictions: no work on uneven/unstable surfaces and kneeling/squatting to tolerance until follow-up on 6/16/21. The RCT was seen again on 6/16/21 and released with restrictions: limited kneeling crawling/squatting to employee tolerances and avoid walking on uneven/unstable surfaces until 6/30/21.</p> <p>Required Classification: EA could not make a factual determination on recordability in this case. The injured employee was not available to be interviewed and the case file documentation was incomplete.</p>
6/10/21 40080	First Aid	<p>An NCO stood up while laying paper on the floor and cut their head on the sharp corner of an electrical panel, lacerating their right temple. The employee was sent to OMP and then to local medical clinic and was treated with first aid.</p> <p>Required Classification: Not Recordable, First Aid</p>
6/28/21 40093	First Aid; "Non-managed Subs for Tracking" on the occupational injury and illness (OII) Event list. EA Note: This case is not on the HMIS CAIRS case log and is not reported on the OSHA 300 log.	<p>A subcontracted teamster performing CPCCo work was stepping up onto the back of a water truck and felt a pop in the hip, and pain in hip, buttocks, and thigh. The employee reported to OMP and was diagnosed with a strain/sprain of an unspecified site of the hip/thigh. The employee was given a non-prescription pain reliever. The employee was released from OMP with a restriction: no climbing ladders/stairs or truck. Restriction was modified at the employer's request to replace the truck with a commercial motor vehicle and remove stairs to allow the employee to drive a pickup and enter the work trailer. The employee was released from the restriction on 6/30/21.</p> <p>Required Classification: Recordable, DART case with two RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
7/12/21 40103	First Aid EA Note: Not recorded on OSHA 300 log	<p>An NCO working in a radiological area was pulling a bag out of a garbage can and felt a sharp pain and ripping pain in the left shoulder. The employee was seen by OMP and diagnosed with a strain/sprain of the left shoulder, possible rotator cuff injury. The employee was treated with ice and provided a sling and released with restrictions: limit use of left shoulder and arm, no pushing, pulling, lifting, or carrying, periodic use of cold pack and sling. The employee returned to OMP on 7/19/21 to be reassessed and complained of additional pain and continued with the same restrictions until 7/26/22.</p> <p>Required Classification: Recordable, DART case with 14 RWDs.</p>
7/28/2021 40116	Not Work-related EA Note: Not recorded on OSHA 300 log	<p>A Utility System Operator (USO) was working throughout the morning performing normal duties. The employee took a smoke break and was attempting to stand up after sitting at a picnic table and lost consciousness, fell, and struck their head, causing a secondary head injury.</p> <p>The USO was transported to Kadlec Hospital via ambulance, received IV fluids, and was diagnosed with dehydration. The USO was released to work on 7/30/21 without restrictions. The USO was provided first aid for the head wound.</p> <p>Required Classification: Recordable due to loss of consciousness per 29 CFR 1904.5(b)(4)(ii). Recordable, DART case with two DAWs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
8//05/21 40118	First Aid EA Note: Not recorded on OSHA 300 log	<p>A decontamination and decommissioning (D&D) employee was placing a tarp on an Environmental Restoration Disposal Facility container with another employee and in the process of securing the tarp when the employee felt a pop on the first finger knuckle of their right hand. The employee was sent to OMP. The employee's knuckle was discolored and had been darkening in color over time and they had difficulty grasping. The employee was diagnosed with a strained right index finger. A rigid splint was applied to protect the finger and the employee was released to return to work.</p> <p>The employee left OMP and went to a walk-in clinic, where an x-ray was conducted, and they were diagnosed with a small fracture in the finger.</p> <p>The event was not categorized on the event log. The case was not on the OSHA 300 log, although workers comp indemnity SM06616 was paid.</p> <p>OMP released the employee from restriction on 11/15/2021.</p> <p>Required Classification: Recordable, DART case with 102 RWDs.</p>
8/11/21 40124	Not Work-related EA Note: Not recorded on OSHA 300 log	<p>A pipefitter working outside with a water truck, fully suited out in double layer Tyvek powered air purifying respirator (PAPR) and triple layer gloves, in direct sunlight at 85 degrees, while moving hoses and turning valves, became lightheaded, started sweating, breathing heavily, and getting clammy. The employee was seen by OMP and diagnosed with heat exhaustion. The employee returned to work with restriction: limit heavy work in encapsulating ensembles. The RTW plan was discussed with the employee, supervisor, and safety. The employee may work outside in heat without a Tyvek suit and PAPR at temperatures below 85 degrees. After a follow-up on 1/4/22, the employee returned to work without restrictions.</p> <p>Required Classification: Recordable, DART case with 145 RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
9/9/21 40136	Report Only EA Note: Not recorded on OSHA 300 log	<p>An industrial safety/health technician threw out their back while bending over to pick up a lock from the ground. The employee was seen by OMP and diagnosed with lumbar sprain/strain. The employee returned to work with restrictions: no working from elevated heights above 20 feet while walking on catwalks less than 5 feet wide, no lifting carrying over 15 pounds, limited bending stooping twisting, avoid walking on uneven surfaces. The final reviewed evaluation at OMP states that the employee was not released to work until 11/1/21</p> <p>Required Classification: Recordable, DART case with at least six DAWs and 16 RWDs. (CPCCo needs to evaluate total days away)</p>
10/5/21 40148	Recorded on OSHA log as DART case with 7 DAWs 0 RWDs Reported in CAIRS	<p>A millwright picked up 35-pound plate to install on a fan and experienced a slowly developing pain throughout the shift to the point of being unable to walk. The employee was transported to OMP and initially diagnosed with lumbar strain/sprain. The employee was away from work for seven days. During the follow-up with a specialist, the employee was diagnosed with lumbar radiculopathy. On 10/12/21, the employee returned to work with restrictions: no pushing pulling, lifting, carrying greater than 25 pounds, no climbing ladders, and prescription meds. On 3/14/22, the employee returned to work with no restrictions.</p> <p>Required Classification: Recordable, DART case with seven DAWs and 154 RWDs.</p>
10/19/21 40157	First Aid	<p>An instrument and control technician stepped on an animal bone on site when leaving work for the day. The employee was seen by OMP and given a tetanus vaccine. The employee returned to work with no restrictions.</p> <p>Required Classification: Not Recordable, First Aid.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
10/18/21 40158	EA Note: Not recorded on OSHA 300 log	<p>An NCO was reaching up to grab a heavy tarp off a truck using his right arm and started to feel pain. The NCO was seen by OMP and diagnosed with a right shoulder sprain/strain and released with restrictions: no lifting over 10 lbs. with right arm and avoid work above shoulder height. OMP met with the employee's supervisor to discuss an RTW plan.</p> <p>Required Classification: Recordable, DART case with seven RWDs.</p>
10/25/21 40160	First Aid EA Note: Not recorded on OSHA 300 log	<p>An RCT was placing an instrument weighing approximately 5 pounds on a shelf above their head and heard a pop. The employee reported a limited range of motion and pinching pain when raising their arm above chest level. The employee was sent to OMP and diagnosed with shoulder strain/sprain. An OMP representative spoke with the employee's supervisor who said that they could give the employee work that does not involve lifting with their right arm and is not overhead work for the next few days. OMP released the employee to work with no restrictions.</p> <p>An interview with the employee revealed that their work schedule was adjusted, and they were not assigned any field work, which was a routine part of the employee's weekly schedule prior to the workplace injury.</p> <p>Required Classification: Recordable, DART case with five RWDs.</p>
11/10/21 40166	Report Only	<p>A waste processing operator (D&D) sneezed and felt back pain. The employee was transported to OMP and diagnosed with thoracic strain. The employee returned to work with no restrictions and no prescription meds or other treatment.</p> <p>Required Classification: Not Recordable.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
12/7/21 40178	First Aid	<p>An NCO lifted a roll of drum liners onto right shoulder and felt pain in right shoulder blade/rib area and was diagnosed with thoracic sprain and strain of the upper right back. The NCO reported to OMP and was given a non-prescription pain reliever and released with no restrictions.</p> <p>Required Classification: Not Recordable.</p>
1/11/21 40193	First Aid	<p>An NCO slipped on ice while removing tumble weeds and caught themselves so that they did not fall to the ground. The employee was sent to OMP and was diagnosed with lumbar strain and right quadriceps strain. The employee was released to work without restrictions.</p> <p>Required Classification: Not Recordable.</p>
2/7/22 40196	First Aid EA Note: Not recorded on OSHA 300 log	<p>An HPT was completing routine surveillance at the top of a mezzanine and twisted their ankle on the stairs. The HPT was transported to OMP and diagnosed with an unspecified ankle strain and given first aid. The employee was released with without work modifications based on a conversation with OMP and the frontline supervisor. According to OMP notes, the supervisor agreed to “keep her in the equipment room” during recovery. The employee returned to work without restrictions on 2/24/22.</p> <p>Required Classification: Recordable, DART case with 17 RWDs.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
2/15/22 40199	First Aid EA Note: Not recorded on OSHA 300 log	<p>An RCT was performing training while fully suited, including a PAPR. The employee was on a Zephyr monitor, which failed to trigger when the heart rate was high. The RCT experienced dizziness, weakness, headache, and nausea and sweated through the clothing under their personal protective equipment. The employee was examined by OMP and diagnosed with heat exhaustion. OMP gave the employee a prescription drug for nausea.</p> <p>The employee returned to work with the restriction of no B-level personal protective equipment and no zone work until 2/22/22. Safety and the supervisor agreed with the restriction. The employee followed up with OMP and the restriction extended to 4/19/22, then was lifted on 4/20/22 by OMP.</p> <p>The DOE-ASMT-2022-2102 Operational Awareness Report to CPCCo indicates that this case was misclassified and should be an RWD DART case.</p> <p>Required Classification: Recordable, DART case with 65 RWDs.</p>
2/22/22 40205	Report Only	<p>An HPT was climbing six floors while carrying sampling equipment and experienced shortness of breath, chest tightness, and a severe headache. The employee was seen by OMP, and the case was noted as non-occupational. The employee was released and returned to work with no restrictions.</p> <p>Required Classification: Not Recordable.</p>
3/10/22 40214	First Aid	<p>A trainer attempting to ascend stairs pivoted their left leg on the first step and felt a pop in the left knee and sharp pain behind knee. The employee was sent to OMP, diagnosed with occupational strain to the left knee, and released back to work without restriction. The employee was encouraged to use ice/heat packs and non-prescription ibuprofen.</p> <p>Required Classification: Not Recordable.</p>

Results of Case File Reviews Central Plateau Cleanup Company, LLC (CPCCo)		
Injury Date/Case Number	CPCCo Classification	Case Summary and Required Classification
1/16/22 (Not on OII Event Log)	Not Work-related EA Note: Not recorded on OSHA 300 log	<p>An NCO was using a long pole tool and moving equipment underwater in a basin within a week of returning from an approximately five month or longer assignment in the control room at the emergency operations center. The employee noted a dull pain in the right shoulder that gradually became worse and intensified. The employee was sent to OMP and diagnosed initially with a sprain/strain to the shoulder and arm.</p> <p>The employee followed up with offsite medical care, received medical care and a referral to an orthopedic doctor and subsequently physical therapy. The employee was eventually diagnosed with small rotator cuff tears and a pinched nerve. On 1/25/22, the employee received a cortisone injection from a third-party provider</p> <p>OMP placed the employee on work restriction on 1/26/22 and the employee was released from restricted duty on 5/9/22</p> <p>The DOE-ASMT-2022-2120 Operational Awareness Report to CPCCo indicates that this was misclassified and should be an RWD DART case.</p> <p>Required Classification: Recordable, DART case with approximately 107 RWDs. CPCCo needs to closely review this case to determine the RWD count.</p>