

**Independent Assessment of
Occupational Injury and Illness
Recordkeeping and Reporting
at the
Y-12 National Security Complex
Uranium Processing Facility**

March 2025



**U.S. DEPARTMENT
of ENERGY**

**Office of Enterprise
Assessments**

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Acronyms

APMO	Y-12 Acquisition and Project Management Office
BNI	Bechtel National, Inc.
CAIRS	Computerized Accident/Incident Reporting System
CFR	Code of Federal Regulations
CNS	Consolidated Nuclear Security, LLC
CORE	CORE Occupational Medicine
CRAD	Criteria and Review Approach Document
DART	Days Away, Restricted or Transferred
DOE	U.S. Department of Energy
EA	Office of Enterprise Assessments
ES&H	Environment, Safety, and Health
FY	Fiscal Year
HCP	Hearing Conservation Program
IRIS	Incident Reporting and Information System
OFI	Opportunity for Improvement
OHS	Occupational Health Services
OII	Occupational Injury and Illness
OSHA	Occupational Safety and Health Administration
SME	Subject Matter Expert
STS	Standard Threshold Shift
UPF	Uranium Processing Facility
Y-12	Y-12 National Security Complex

INDEPENDENT ASSESSMENT OF OCCUPATIONAL INJURY AND ILLNESS RECORDKEEPING AND REPORTING AT THE Y-12 NATIONAL SECURITY COMPLEX URANIUM PROCESSING FACILITY

Executive Summary

The U.S. Department of Energy Office of Enterprise Assessments (EA) conducted an independent assessment of occupational injury and illness (OII) recordkeeping and reporting at the Y-12 National Security Complex (Y-12) Uranium Processing Facility (UPF) from September to November 2024 at the request of the National Nuclear Security Administration's Y-12 Acquisition and Project Management Office (APMO). This assessment evaluated the OII recordkeeping program and accuracy of case records from calendar year 2022 through the third quarter of 2024. Consolidated Nuclear Security, LLC (CNS) is the management and operating contractor for Y-12 and has subcontracted Bechtel National, Inc. (BNI) to construct the UPF. The OII recordkeeping and reporting program at the UPF is implemented by BNI and lower-tier subcontractors. This assessment also evaluated the oversight related to OII recordkeeping and reporting provided by APMO.

EA identified the following strength:

- The CNS Y-12 Occupational Health Services hearing loss determination form used by the Medical Director provides a comprehensive format for reviewing standard threshold shift (STS) cases to determine work-relatedness.

EA also identified several weaknesses, including two findings, as summarized below:

- BNI improperly classified 17 of 108 reviewed first aid cases and work-relatedness determinations, which resulted in these cases not being recorded in the relevant Occupational Safety and Health Administration (OSHA) log and Computerized Accident/Incident Reporting System (CAIRS) database. (Finding)
- CNS oversight of BNI's OII recordkeeping program was not sufficiently comprehensive to ensure BNI correctly records and classifies OII cases at the UPF project. (Finding)
- BNI did not record the 10 reviewed STS cases into the OSHA log within the required time frame.
- BNI did not ensure that OSHA 300 logs for BNI/CNS employees and BNI subcontractors contain sufficient details for injuries under columns E and F, as required by OSHA.
- Approximately 30% of 33 interviewed employees indicated that they were hesitant to report injuries and incidents due to concerns about potential retaliation.

In summary, BNI's written program is comprehensive and meets the regulatory requirements for OII recordkeeping and reporting, and APMO provides effective oversight of BNI's OII program implementation. However, BNI has not implemented a satisfactory recordkeeping program that adequately classifies OII cases. In the cases reviewed, BNI improperly classified some first aid and work-relatedness cases, which resulted in these cases not being recorded in the relevant OSHA log and CAIRS. Further, CNS oversight of BNI OII recordkeeping program was not sufficiently comprehensive to ensure that BNI correctly records and classifies injuries. Other weaknesses included BNI not recording STS cases within the established OSHA timeline requirement, not including sufficient details on OSHA 300 logs, and some workers being hesitant to report injuries and incidents due to fear of retaliation. Until the concerns identified in this report are addressed or effective mitigations are put in place, BNI 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 AND REPORTING AT THE Y-12 NATIONAL SECURITY COMPLEX URANIUM PROCESSING FACILITY

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), conducted an assessment of the effectiveness and accuracy of occupational injury and illness (OII) recordkeeping and reporting by Bechtel National, Inc. (BNI) at the Y-12 National Security Complex (Y-12) Uranium Processing Facility (UPF), pursuant to requirements established by 10 CFR 851, *Worker Safety and Health Program*, and DOE Order 231.1B, *Environment, Safety and Health Reporting*. This assessment also evaluated the oversight provided by the National Nuclear Security Administration's Y-12 Acquisition and Project Management Office (APMO). EA conducted the assessment from September to November 2024 at the request of APMO, in accordance with the *Plan for the Independent Assessment of Occupational Injury and Illness Recordkeeping and Reporting by Consolidated Nuclear Security, LLC at the Y-12 National Security Complex Uranium Processing Facility, October 2024*.

Upon its completion, the UPF will support key missions, including the long-term viability, safety, and security of uranium processing capabilities in the U.S. Consolidated Nuclear Security, LLC (CNS) is the management and operating contractor for Y-12. CNS has subcontracted BNI to construct the UPF and manage lower-tier subcontractors supporting design and construction activities. The OII recordkeeping and reporting program at the UPF is implemented by BNI and lower-tier subcontractors. BNI has subcontracted CORE Occupational Medicine (CORE) to provide occupational medicine support for the UPF project. APMO has overall Federal UPF project management and oversight responsibilities.

2.0 METHODOLOGY

The DOE independent oversight program is described in and governed by DOE Order 227.1A, *Independent Oversight Program*, which EA implements 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, this assessment considered the requirements of 10 CFR 851 and DOE Order 231.1B related to DOE OII recordkeeping and reporting. EA used sections of CRAD EA-32-07, Revision 1, *Occupational Injury/Illness Recordkeeping*.

Prior to the onsite assessment, EA reviewed BNI OII program documents, BNI and lower-tier subcontractor Occupational Safety and Health Administration (OSHA) logs, and 656 OII cases from calendar year 2022 through the third quarter of 2024 provided by BNI. EA also remotely interviewed key personnel and managers responsible for developing and executing associated programs. During the onsite assessment, EA interviewed 33 workers, conducted follow-up interviews, and performed detailed reviews of 108 case files and medical records associated with the 656 OII cases. This information was used to determine the accuracy of OII recordkeeping and reporting injury classification, and correctness of entries into the OSHA OII forms as required by 29 CFR 1904, *Recording and Reporting Occupational Injuries and Illnesses*, and DOE Order 231.1B for Computerized Accident/Incident Reporting System (CAIRS) reporting. The members of the assessment team, the Quality Review Board, and the management

responsible for this assessment are listed in appendix A. Detailed results of EA's OII case file reviews are provided in appendix B.

EA conducted a previous assessment of construction safety at the UPF in 2021 as documented in EA report *Independent Assessment of Construction Safety at the Y-12 National Security Complex Uranium Processing Facility, February 2022*. The current assessment examined the completion and effectiveness of corrective actions for the EA finding identified in the previous assessment. Results of the corrective action review are included in section 3.5 of this report.

3.0 RESULTS

3.1 Program Administration

This portion of the assessment evaluated the BNI program documents that govern the identification, classification, determination of recordability, and reporting of all OII cases associated with the UPF project.

OII requirements are appropriately flowed down to all levels of contractors at the UPF project. CNS flows down 10 CFR 851 and DOE Order 231.1B requirements to BNI for implementation through contract clause E-SD-2009, *Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements*. BNI appropriately flows down 10 CFR 851 and OSHA's recordable injury and illness (29 CFR 1904, subpart C, *Recordkeeping Forms and Recording Criteria*) requirements to its lower-tier subcontractors through *Construction or Engineer, Procure and Construct (EPC) Subcontracts- Exhibit B- Special Conditions*, section SC-11, *Environmental, Safety and Health (ES&H)*. This document appropriately requires lower-tier subcontractors to report an injury or illness to BNI within two business days of learning of the event and submit the UPF subcontractor safety hours and performance monthly report (detailing injuries, illnesses, first aid, and incidents) by the third of every month. Subcontractors make their own determination of OSHA recordability, although they sometimes seek guidance from BNI on classification.

The workforce at UPF consists of BNI employees, CNS Y-12 craft and non-manual (non-craft) employees working under a service agreement with BNI (referred to as "direct hire personnel"), and subcontractors hired directly by BNI. All workers at UPF are eligible to receive onsite first aid treatment by CORE, a proactive measure to ensure that immediate care is available in case of injury. As needed, advanced diagnostics and/or medical treatment beyond first aid is provided by CNS Y-12 Occupational Health Services (OHS) for direct-hire personnel, while BNI and subcontractors use their own occupational medical providers.

BNI program documents are generally adequate for identifying, classifying, determining the recordability of, and reporting OII cases in accordance with 10 CFR 851, DOE Order 231.1B, and 29 CFR 1904 (when properly determined to be work-related) with some implementation weaknesses identified in section 3.2 and appendix B of this report. The primary OII program documents, core process (CP)-104, *Injury and Illness Reporting and Recordkeeping*; DI-SH-801768-A003, *Desktop Work Instructions - UPF Injury and Illness Reporting and Recordkeeping*; and CP-108, *UPF Event Management and Investigation*, appropriately assign roles and responsibilities, and provide a process to address questions that may arise regarding OII classification. The BNI ES&H Manager is responsible for determining the OSHA recordability of an injury/illness and leverages routine communication with CORE, the BNI OII Case Manager, and CNS Y-12 OHS staff to appropriately support the sharing and discussion of case information and management.

BNI's recordkeeping procedures are comprehensive and generally effective in OII identification, classification, and recording as well as CAIRS-reporting requirements. The BNI ES&H incident investigation coordinator and BNI ES&H data analyst, responsible for CAIRS data entry, are knowledgeable and appropriately trained and authorized. BNI uses the Incident Reporting and Information System (IRIS) tracking tool to record and store all UPF work- and non-work-related injury and illness records.

Procedure UPF-CP-312, *BNI Hearing Conservation Program* [HCP], section 3.5, appropriately discusses the responsibilities of the occupational medical provider in conducting baseline and annual audiograms for workers enrolled in the HCP, determining whether a standard threshold shift (STS) has occurred and if so, subsequently notifying the worker and the BNI Project Industrial Hygienist. Finding 1 of Y-12 APMO HCP awareness activity (dated December 21, 2022) identified that noise exposure assessments were not being conducted on direct-hire CNS personnel identified with an STS to determine whether the hearing loss was work-related and subsequently recordable as a hearing loss case in the OSHA 300 log (per Y73-203, *Occupational Noise Exposure and Hearing Conservation Program*, and 29 CFR 1904.10, *Recording criteria for cases involving occupational hearing loss*). APMO approved a corrective action plan, COR-5.4.2022-8289, *Approval of Corrective Action Plan Regarding UPF Hearing Conservation Program Implementation for Uranium Processing Facility*, on May 20, 2022, and issued a closure acceptance on January 13, 2023, closing the finding. BNI conducted noise exposure assessments on the 10 STS cases that EA reviewed.

Program Administration Conclusions

BNI has established generally adequate program documents for identifying, classifying, and accurately determining the recordability of OII cases and reporting case records in CAIRS. Staff with assigned OII responsibilities are knowledgeable and trained. OII recordkeeping requirements are appropriately flowed down to subcontractors.

3.2 Case Classification and Recording

This portion of the assessment evaluated BNI's response to workplace injury and illness cases and the subsequent classification and recording of the incidents.

BNI generally responds appropriately to worker injuries and illnesses. All 33 interviewed workers reported that they had access to onsite medical care immediately after sustaining injuries at work. However, approximately one-third of the interviewed workers stated that they had a poor experience at CORE related to persistent questioning by CORE staff to validate the work-relatedness of the injury. These workers felt that CORE focused on the potential recordability of an injury rather than documenting the worker's account of the injury. While most interviewed workers confirmed that they could report injuries without fear of retaliation, approximately 30% reported that they are hesitant to report injuries and incidents due to concerns relating to potential consequences. (See **OFI-BNI-1.**)

BNI correctly classified 91 of the 108 (83%) reviewed OII cases. Specifically:

- 76 of 85 cases (89%) selected from 531 occupational cases recorded in the UPF OII incident log
- 5 of 13 cases (38%) selected from the 92 non-occupational cases provided by BNI
- All 10 cases (100%) selected from the 33 HCP STS cases provided by BNI.

While BNI classified the majority of reviewed OII cases accurately, the following weaknesses were identified:

- Contrary to 29 CFR 1904.5, *Determination of work-relatedness*, and 1904.7, *General recording criteria*, and DOE Order 231.1B, attachment 3, sections 1.b, 1.c, and 1.d, BNI improperly classified 17 of 108 (16%) reviewed first aid cases and work-relatedness determinations, which resulted in these cases not being recorded in the relevant OSHA log and CAIRS database. (See **Finding F-BNI-1**.) Misclassifying OIIs, particularly those requiring recordable treatment or restricted/lost workdays, minimizes the severity of injuries, may result in workers not receiving appropriate medical care, and limits feedback for targeting needed safety improvements. Specifically:
 - BNI incorrectly classified seven occupational cases as first aid instead of recordable. These cases involved medical treatment beyond first aid (e.g., prescription medication, physical therapy) and/or included days away or restricted work time. These occupational cases included a subset of first aid cases where instructions provided by CORE were “no restrictions - return to work at your own pace.” The assigned work should have been classified as restricted duty per 29 CFR 1904.7(b)(4)(i), *How do I decide if the injury or illness resulted in restricted work*. Five interviewed employees confirmed that they were unable to perform multiple routine tasks within their UPF job task analysis, and individuals responsible for work assignments were given leeway to assign less demanding or other tasks over multiple days, resulting in restricted workdays.
 - BNI incorrectly classified the Days Away, Restricted or Transferred (DART) count for two recordable occupational cases. In one case, lost workdays were not counted, and in the other case, restricted workdays were omitted.
 - Eight of the 13 reviewed non-occupational cases were determined to be work-related as they occurred in the work environment and either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Seven of these cases met the recordable criteria due to resulting medical treatment beyond first aid and/or restricted/lost workdays, while one required a first aid classification.
- Contrary to 29 CFR 1904.29(b)(3), *How quickly must each injury or illness be recorded*, and 1904.10, *Recording criteria for cases involving occupational hearing loss*, BNI did not record the 10 reviewed STS cases in the OSHA 300 log within the prescribed 7-day period. (See **Deficiency D-BNI-1**.) Not recording illnesses within the required time frames may lead to inaccurate recordkeeping. Although all 10 reviewed STS cases were correctly classified as non-occupational, a comparison of the dates between CNS Y-12 OHS STS notification letters (advising employees of an STS) and the Medical Director’s hearing loss determination of work-relatedness revealed differences ranging from a minimum of 4 weeks (2 cases) to more than 6 months (2 cases). OSHA requirements state that an OII must be recorded as work-related within seven days of discovery, and, if a case is later determined to not be work-related, the case can be lined out in the log. OSHA permits a 30-day period for retesting to confirm the STS; however, medical documentation provided for the 10 cases did not indicate that any retests were performed. BNI showed no evidence that it entered these 10 STS cases into its log and then struck them out once the Medical Director determined that they were not work-related.

OII case record reviews and interviews with workers demonstrated that CORE provided some injured workers with multiple days of first aid treatment (i.e., a return to the medical trailer two or three times per shift to receive ice treatment and anti-inflammatory medication). A recent OSHA Standard Interpretation (*Enforcement Guidance Under OSHA’s Recordkeeping Regulation When First Aid, Active Release Techniques (ART), and Exercise/Stretching Are Used to Treat Musculoskeletal Injuries and Illnesses*, issued May 2, 2024) states that this practice may indicate that an employer is using this to avoid the application of medical treatment beyond first aid. The interpretation letter goes on to clarify with the following example: “[I]f a work-related injury or illness is treated only with multiple doses of nonprescription medication (e.g., ibuprofen or acetaminophen) at nonprescription strength, and the employee continues to work a full day and perform all routine job functions, the injury or illness is not

recordable...If the application of first aid to a work-related musculoskeletal injury or illness keeps the employee from performing one or more routine functions of the job, or from working the full workday..., then the employee's work has been restricted and the case is recordable." (See **OFI-BNI-2.**)

CNS's oversight of BNI's OII recordkeeping and reporting program has not been effective. The April 2024 CNS OII assessment (CNS ES&H general assessment APA-2HC-E0A0-000104-001, *UPF Injury and Illness Reporting and Recordkeeping*) concluded that satisfactory conditions were met based on the seven lines of inquiry established for the assessment and identified two OFIs. These OFIs pertained to creating a shared CAIRS management document folder and establishing additional classification awareness training for BNI employees entering incidents into IRIS. Additionally, CNS management assessment AS-4417, *OSHA Recordkeeping Management Assessment*, conducted in 2022 only identified one finding relating to a BNI case manager not completing OII training. However, these assessments were not sufficiently comprehensive to identify the significant issues identified by EA in this report. Accordingly, contrary to DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*, attachment 1, section 2.b.(2), CNS oversight of BNI OII recordkeeping program was not sufficiently comprehensive to ensure that BNI correctly records and classifies OII cases at the UPF project. (See **Finding F-CNS-1.**) Not adequately ensuring that BNI accurately records and classifies injuries requiring recordable treatment could result in inaccurate OII safety performance data and limited feedback for targeted improvements.

Case Classification and Recording Conclusions

All interviewed workers reported that they have access to onsite medical care immediately after sustaining injuries at work. BNI classified the majority of reviewed OII cases accurately. However, for some of the reviewed OII cases, weaknesses were identified associated with improper classification of first aid cases and work-relatedness determinations, as well as timely entry of STS cases into the OSHA log. In addition, some workers were hesitant to report injuries. Finally, CNS has not ensured that BNI has implemented an OII recordkeeping program that accurately records and classifies injuries.

3.3 Records Quality

This portion of the assessment evaluated the records quality associated with work hour exposure reporting, OII case OSHA recording and CAIRS reporting, and quarterly quality checks.

Work Hour Exposure Reporting

CNS and BNI appropriately use UPF Project Controls records and subcontractor safety hours and performance monthly reports to determine UPF project hours worked by direct-hire and subcontractor personnel. A review of tracked hours, compared to the monthly reports, demonstrated that work hours are appropriately reported into CAIRS, as required by DOE Order 231.1B, attachment 3, section 1.e. However, all UPF hours and injuries are recorded under one Y-12 construction subcontractor CAIRS organizational code (0558105). Consequently, hours and injuries under this code include other construction subcontractors across Y-12 that are unrelated to the UPF project, precluding the ability to track UPF project-specific injury and illness metrics and work hours. (See **OFI-CNS-1.**)

OII Case OSHA Recording and CAIRS Reporting

Most of the recordable UPF injury information entered in BNI and subcontractor OSHA 300 logs and the IRIS-generated project incident log correlated well with the information entered in CAIRS, notwithstanding the misclassified cases discussed in section 3.2 of this report. Between calendar year 2022 and the third quarter of 2024, 21 UPF cases were entered into CAIRS, with about 95% of those

cases meeting DOE Order 231.1B requirements. Excluding the discrepancies identified in this report, the reported CAIRS cases with applicable DART days adequately corresponded with the number of OSHA log days counted, demonstrating that the DART count was accurate. However, contrary to 29 CFR 1904.29(b)(1), *What do I need to do to complete the OSHA 300 Log*, BNI does not ensure that OSHA 300 logs for BNI/CNS employees, and BNI subcontractors on the UPF project contain sufficient details under columns E and F, as required by OSHA. (See **Deficiency D-BNI-2.**) Without sufficient details, important data may not be available to inform employers and employees about injury and illness trends and overall safety performance. BNI took corrective actions to address a previous weakness identified by APMO, and to address the issues related to maintenance of OSHA 300 logs for BNI and its subcontractors. BNI sent a letter to all subcontractors (dated December 6, 2023) requiring logs to be project-specific and emphasizing OSHA form requirements. However, two of the three subcontractors that had recordable injuries in 2024 listed injuries in non-UPF project locations (i.e., different states) on their UPF-specific OSHA logs. The entries neither adequately described the location where the injury or illness occurred nor provided a detailed description of what had occurred, including the object or substance that directly injured the employee and the specific part of the body that was injured. BNI has revised and updated *Construction or Engineer, Procure and Construct (EPC) Subcontracts- Exhibit B Special Conditions*, in response to APMO findings, to require subcontractors to submit their respective OSHA 300 logs on a quarterly basis, effective December 20, 2024.

Quarterly Quality Checks

CNS and BNI appropriately perform and document quarterly quality checks of UPF OII and work hour data as required by DOE Order 231.1B, attachment 3, section 1.f. The required quarterly checks were performed on time and appropriately documented using forms provided in the DOE Operating Experience (OPEX) Awareness article *Policy Awareness: CAIRS Documented Quality Checks*, dated April 2022. Recordkeeping staff are well-trained on how to use CAIRS and IRIS, and use the information from each database, event investigation reports, OSHA logs, UPF Project Controls, and the BNI OII Case Manager to ensure that data is accurate and updated. As of the first quarter of 2023, BNI has consistently performed quality checks through the third quarter of 2024.

Records Quality Conclusions

BNI has consistently ensured that UPF work hours are entered each quarter and performed quarterly quality checks, as required. Most of the reviewed UPF OII cases were adequately reported in CAIRS and recorded on OSHA logs in a timely manner. However, the level of detail on OSHA 300 logs for BNI employees and its subcontractors is not always sufficient.

3.4 Federal Oversight

This portion of the assessment evaluated APMO's oversight of BNI OII recordkeeping and reporting programs for the UPF project.

APMO has a technically competent and experienced general support services contractor staff that provides effective ES&H oversight, including BNI OII recordkeeping and reporting. The ES&H staff reports directly to the Construction and Environment Safety and Health Director. The APMO OII subject matter expert (SME) who conducts OII oversight has training in DOE/OSHA recordkeeping requirements and DOE CAIRS reporting and has significant experience in prime contractor and subcontractor OII recordkeeping activities.

APMO provides effective oversight of BNI OII recordkeeping and reporting. The APMO OII SME appropriately conducts and documents assessments, surveys, and operational awareness oversight of BNI OII programs. Completed oversight activities related to OII include *Y-12 APMO Assessment of UPF Occupational Medicine Program*, August 2022; *Y-12 APMO HCP Awareness Activity*, December 2022; and *Y-12 APMO Awareness Activity of UPF of OSHA Recordkeeping and CAIRS*, April 2023. The April 2023 oversight report was comprehensive and technically accurate regarding identified weaknesses in the improper determination of employees' injury work-relatedness and inadequate completion of BNI/CNS and subcontractors' OSHA 300 logs that were missing information required by OSHA. APMO appropriately communicated these results to CNS.

Federal Oversight Conclusions

The APMO OII SME provided effective oversight of BNI recordkeeping and reporting and appropriately identifies weaknesses in BNI's determination of employees' injury work-relatedness and completion of CNS/BNI and subcontractors' OSHA 300 logs. APMO appropriately communicates oversight results to CNS.

3.5 Follow-up on Previous EA Findings

This portion of the assessment examined the completion of corrective actions for the finding documented in a previous EA report, *Independent Assessment of Construction Safety at the Y-12 National Security Complex Uranium Processing Facility*, February 2022.

Finding F-CNS-1 stated that the fiscal year (FY) 2021 assessment schedule lacked sufficient coverage of high-consequence construction safety activities. Of the 176 scheduled assessments and audits, only 7 were related to construction activities with the potential for significant worker safety and health impacts.

The corrective actions taken were sufficient to address this finding. Specifically, Y15-95-816, *UPF Issues Management Process*, was revised to include provisions for incorporating ES&H issues within the issues management process. Data from Chekhov (an online application for preparing, scheduling, and documenting construction safety walkthroughs and any resulting safety issues) is now used to develop leading indicators for the UPF project metrics. These metrics provide input for the risk-based development of the integrated assessment schedule.

The integrated assessment schedule was developed and approved with a more comprehensive risk-based evaluation, addressing high-consequence construction safety activities. As a result, for FY 2024, 24 of the 137 scheduled assessments and audits focused on construction activities with potential significant impacts on worker safety and health. Similarly, for FY 2025, 18 of the 92 scheduled assessments and audits focus on these high-consequence construction activities.

Follow-up on Previous EA Findings Conclusions

The corrective actions taken to address the 2022 EA finding have adequately resolved the identified issue related to the assessment schedule for high-consequence construction safety activities.

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.

Bechtel National, Inc.

Finding F-BNI-1: BNI improperly classified 17 of 108 reviewed first aid cases and work-relatedness determinations, which resulted in these cases not being recorded in the relevant OSHA log and CAIRS database. (29 CFR 1904.5 and 1904.7; DOE Order 231.1B, att. 3, secs. 1.b, 1.c, and 1.d)

Consolidated Nuclear Security, LLC

Finding F-CNS-1: CNS oversight of BNI OII recordkeeping program was not sufficiently comprehensive to ensure that BNI correctly records and classifies OII cases at the UPF project. (DOE Order 226.1B, att. 1, sec. 2.b.(2))

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.

Bechtel National, Inc.

Deficiency D-BNI-1: BNI did not enter the 10 reviewed STS cases into the OSHA log within the required time frame. (29 CFR 1904.29(b)(3))

Deficiency D-BNI-2: BNI does not ensure that OSHA 300 logs for BNI/CNS employees and its subcontractors on the UPF project contain sufficient details under columns E and F, as required by OSHA. (29 CFR 1904.29(b)(1))

7.0 OPPORTUNITIES FOR IMPROVEMENT

EA identified the OFIs shown below 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.

Bechtel National, Inc.

OFI-BNI-1: Consider conducting a safety culture assessment at the UPF project to understand why workers are hesitant to report injuries and incidents.

OFI-BNI-2: Consider reviewing the OSHA Standard Interpretation *Enforcement Guidance Under OSHA's Recordkeeping Regulation When First Aid, Active Release Techniques (ART), and Exercise/Stretching Are Used to Treat Musculoskeletal Injuries and Illnesses* (dated May 2, 2024) with CORE to ensure that its injury and illness determination and reporting practices associated with providing multiple days of first aid treatment for musculoskeletal injuries are compliant.

Consolidated Nuclear Security, LLC

OFI-CNS-1: Consider using a unique CAIRS organizational code to track UPF project-specific injury and illness metrics and work hours.

Appendix A Supplemental Information

Dates of Assessment

September 11 to November 6, 2024

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Appendix B
Results of Case File Reviews

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
1	135452106	1/11/2022	First aid	<p>A worker contacted a piece of metal wire mesh as they were retrieving their flashlight. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
2	135467342	2/9/2022	First aid	<p>A worker felt lower back discomfort while receiving scaffold material at elevation. The worker received first aid treatment and was released back to work with no restrictions.</p> <p>Required classification: First aid</p>
3	135486968	3/25/2022	Recordable	<p>A worker struck their head against a job box bar causing a laceration. The worker was provided treatment beyond first aid and returned to work with no restrictions.</p> <p>Required Classification: Recordable</p>
4	135495357	4/5/2022	First aid	<p>A worker felt back discomfort while kneeling to cut drywall. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
5	135505056	4/28/2022	First aid	<p>A worker drilled a screw and contacted their gloved finger. The worker was provided treatment beyond first aid and returned to work with no restrictions. However, information in the medical file noted that antibiotics were prescribed the day of the injury, and work restrictions were given. Bechtel National, Inc. (BNI) reclassified this case from recordable to first aid on 6/14/2022.</p> <p>Required Classification: Recordable, prescribed medication and work restrictions</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
6	135505279	4/28/2022	First aid	<p>During scaffold dismantling, a worker's pelican hook contacted their mouth, causing contusions, a laceration, and loose teeth. The worker was transported to the local hospital emergency department where first aid treatment was provided and follow-up dental treatment was recommended.</p> <p>Required Classification: Recordable, medical treatment beyond first aid (further dental care needed)</p>
7	135506553	4/29/2022	First aid	<p>A worker was using a powder-actuated tool when it recoiled, resulting in chest discomfort. The worker was provided first aid treatment for a chest sprain and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
8	135513180	5/11/2022	First aid	<p>A worker was carrying a tool bag, twisted, and began to experience discomfort. The worker was given first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
9	135514816	5/13/2022	First aid	<p>A worker was installing a section of sheet metal duct and began to experience back discomfort. The worker was provided first aid treatment for a lower back strain and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
10	135524239	6/4/2022	First aid	<p>A worker operating a single manlift felt their left knee pop when they twisted their body. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
11	135529247	6/18/2022	Non-occupational	<p>While installing formwork, a worker felt discomfort in their right bicep. The worker was taken to the Uranium Processing Facility (UPF) medical clinic for evaluation. As a result of the injury, the worker received medical treatment beyond first aid (prescription medication) and Days Away, Restricted or Transferred (DART).</p> <p>Required Classification: Work-related, Recordable, DART case</p>
12	135526386	6/11/2022	First aid	<p>While driving, a worker struck a parked vehicle. The worker was provided first aid treatment for shoulder/neck strain.</p> <p>Required Classification: First aid</p>
13	135734056	6/13/2022	Recordable	<p>A worker descended a scaffold ladder and was entering a gate onto the second landing. As the worker detached the self-retracting lanyard pelican hook, the cable retracted upward and contacted their mouth. The worker initially received first aid treatment and returned to work with no restrictions. New information received in November 2022 revealed that the worker received treatment beyond first aid.</p> <p>Required Classification: Recordable</p>
14	135548509	8/10/2022	First aid	<p>A worker tasked with erecting a scaffold was struck by a falling scaffold plank. The worker received first aid treatment.</p> <p>Required Classification: First aid</p>
15	135548389	8/10/2022	Recordable	<p>A worker was torquing bolts when the socket slipped, causing the worker's right thumb to be pinched between the wrench and a piece of angle iron. The worker received treatment and was released to full duty, with no restrictions. However, the worker continued to experience discomfort and was sent to Y-12 Occupational Health Services, where a tuft fracture was identified.</p> <p>Required Classification: Recordable</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
16	135554468	8/30/2022	First aid	<p>A worker was accessing their work area, which involved a 10-inch stepdown onto a piece of equipment, and rolled their left foot, causing discomfort. The worker received first aid treatment and was released back to work with no restrictions.</p> <p>Required Classification: First aid</p>
17	135559346	9/7/2022	First aid	<p>A worker felt discomfort in their right shoulder while operating a handheld drill overhead. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
18	135560626	9/9/2022	<p>Recordable</p> <p>EA Note: DART incorrectly reported</p>	<p>While entering a building to perform an inspection, a worker lost their balance and fell onto their left wrist, resulting in left wrist and left triceps avulsion fractures. Worker underwent surgery and was given restrictions.</p> <p>Required Classification: Recordable, however BNI did not count lost workdays (LWDs) and all restricted workdays (RWDs)</p>
19	135564446	9/21/2022	First aid	<p>A worker was placing scaffold components onto their right shoulder when they felt lower back discomfort. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
20	135583355	10/19/2022	First aid	<p>A worker standing on a step ladder finished cutting a piece of conduit with a bandsaw and felt right shoulder discomfort. The worker received first aid treatment and was released back to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
21	135583390	10/19/2022	First aid	<p>A worker was acting as a spotter during an aerial lift operation. When the operator repositioned the lift, it moved in an unanticipated manner, causing the lift to contact the left leg of the worker. The worker received first aid treatment and was released back to work with no restrictions</p> <p>Required Classification: First aid</p>
22	135593783	11/11/2022	Recordable	<p>A worker was cutting conduit using a portable band saw when the band contacted the base of the worker's right thumb, resulting in a laceration. The worker was escorted to the UPF medical clinic and received treatment beyond first aid and returned to work with no restrictions.</p> <p>Required Classification: Recordable</p>
23	135604673	12/14/2022	First aid	<p>A worker was positioned on their back while welding in a constricted location when they felt right shoulder discomfort. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
24	135607068	12/27/2022	First aid	<p>A worker walking on snow-covered ground to an office trailer slipped and fell. The back of their head made contact with the ground. The worker received first aid treatment with no restrictions.</p> <p>Required Classification: First aid</p>
25	135614412	1/17/2023	First aid	<p>A worker was walking and sustained a same-level fall. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
26	135614476	1/17/2023	First aid	<p>A worker attempted to pull themselves up from a kneeling position with their right arm, when they felt right arm discomfort. The worker received first aid treatment and returned to work with no restrictions. Case was originally deemed occupational and later changed to non-occupational and back to occupational.</p> <p>Required Classification: First aid</p>
27	135615056	1/18/2023	Non-occupational	<p>A worker was climbing a scaffold ladder for a routine inspection. As they entered through the scaffold gate, they felt discomfort in their right knee. The worker received medical treatment beyond first aid (physical therapy) and DART.</p> <p>Required Classification: Work-related, Recordable, DART case</p>
28	135616932	1/24/2023	<p>Recordable</p> <p>EA Note: DART correctly recorded</p>	<p>A worker was in the process of adjusting a whaler on a concrete form when they pinched their left index finger, causing a fracture. The worker received work restrictions.</p> <p>Required Classification: Recordable</p>
29	135624591	2/13/2023	First aid	<p>A worker experienced wrist and back discomfort while installing straps on a flatbed truck. The worker was provided first aid treatment and released back to work with no restrictions.</p> <p>Required Classification: First aid</p>
30	135624735	2/14/2023	First aid	<p>A worker descending a stairway felt discomfort in their right foot, resulting in a sprain. The worker was provided first aid treatment and released back to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
31	135634107	3/6/2023	Recordable	<p>A worker was moving a portable pipe rack when a piece of pipe shifted and contacted a laborer in the upper lip. The laborer was taken off site for further evaluation and received treatment beyond first aid and returned to work with no restrictions.</p> <p>Required Classification: Recordable</p>
32	135634067	3/6/2023	First aid	<p>A worker was moving a portable pipe rack when a piece of pipe shifted and contacted a laborer in the neck. The laborer was taken to the UPF medical clinic where they received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
33	135634373	3/6/2023	Non-occupational	<p>A worker was descending a set of stairs while using the handrail when they lost their balance and slipped on the last two steps. The worker had right knee discomfort and was escorted to the UPF medical clinic. The worker was evaluated by medical and released back to work with no treatment and no restrictions. However, the worker requested Emergency Medical Services (EMS) transport, which was provided. As a result of the injury, the worker received medical treatment beyond first aid (surgery) and DART.</p> <p>Required Classification: Work-related, Recordable, DART case</p>
34	135636807	3/13/2023	First aid	<p>A worker was placing trash into a chute when their right elbow was punctured by a piece of protruding metal. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
35	135638616	3/21/2023	First aid	<p>A worker accessing their work area had to crawl under two pipes and experienced discomfort to their right, upper leg. The worker received first aid treatment on site. The worker was evaluated off site and received medical treatment beyond first aid (prescribed medication and physical therapy). In addition, the worker was assigned tasks not previously performed.</p> <p>Required Classification: Recordable, DART case</p>
36	135640802	3/29/2023	First aid	<p>A worker walking to a bus rolled their left ankle and, while ascending the bus steps, rolled their left ankle again. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
37	135646659	4/10/2023	First aid	<p>A worker felt right shoulder discomfort while passing scaffold material upward. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
38	135647834	4/13/2023	First aid	<p>A worker was receiving scaffold material from a co-worker when they felt lower back discomfort. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required classification: First aid</p>
39	135658785	5/12/2023	First aid	<p>A worker was attempting to hang a piece of wallboard atop a lower sheet when the wallboard slipped. The worker caught the wallboard with their left hand, causing discomfort to their left shoulder. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
40	135658794	5/12/2023	First aid	<p>A worker was fabricating handrails at a table when a co-worker placed a piece of stock material on the table, contacting the worker's left middle finger. The worker was provided first aid treatment and sent off site for further evaluation.</p> <p>Required Classification: First aid</p>
41	135659887	5/16/2023	Non-occupational	<p>A worker experienced left shoulder discomfort while raising a box truck rollup door. As a result of the injury, the worker received medical treatment beyond first aid (surgery) and DART.</p> <p>Required Classification: Work-related, Recordable, DART case</p>
42	135666971	6/1/2023	First aid	<p>A worker was descending a scaffold ladder when they slipped from the second or third rung to ground level, landing on their right side. At the time of the incident, no treatment was received; however, the worker was sent off site for further evaluation for right arm discomfort the following day. The diagnosis was a nondisplaced fracture, and work restrictions were prescribed from 6/5 to 6/26/2023.</p> <p>Required Classification: Recordable, DART case</p>
43	Not Available	6/1/2023	Non-occupational	<p>A worker walked into the CORE Occupational Medicine trailer with symptoms of a personal medical emergency. Due to the symptoms and worker's history, CORE Occupational Medicine recommended that the worker be transported by EMS to the Emergency Department.</p> <p>Required Classification: Unable to make determination because of insufficient information</p>
44	135669907	6/14/2023	First aid	<p>A worker experienced back discomfort while carrying two scaffold pans. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
45	135672463	6/21/2023	Recordable	<p>A worker was traversing a scaffold platform in a crawling motion when personal jewelry in their left ear caught an adjacent sprinkler head. This caused the jewelry to be torn from the worker's ear, resulting in a laceration-type injury. The worker was provided treatment beyond first aid.</p> <p>Required Classification: Recordable</p>
46	13567344	6/26/2023	First aid	<p>A worker rolled their right ankle while walking to the restroom. The worker was provided first aid treatment for a sprained/strained ankle and returned to work with no restrictions.</p> <p>Required classification: First aid</p>
47	135677687	7/5/2023	First aid	<p>A worker was using a powder-actuated tool when the tool jarred their right hand, causing discomfort in their right wrist. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
48	Not Available	7/17/2023	Non-occupational	<p>A worker walked into the UPF medical clinic with signs and symptoms of illness. The worker reported a similar event occurring several years before. The worker was transported to the Emergency Department by EMS.</p> <p>Required Classification: Non-occupational</p>
49	135683149	7/25/2023	First aid	<p>A worker felt left shoulder discomfort while removing 6-inch by 6-inch by 8-foot timbers from a forklift. The worker received first aid treatment for a left shoulder strain and was released with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
50	135683206	7/25/2023	Recordable EA Note: DART correctly recorded	<p>A worker was retrieving a survey tripod from their work location when they experienced a same-level fall, landing on both arms and their right knee. The worker received first aid treatment for bilateral arm abrasions, right knee abrasions, and back discomfort. The worker returned to work with no restrictions. The worker went off site for further evaluation and was diagnosed with a nondisplaced fracture that required surgery. The worker was on work restrictions prior to and following surgery.</p> <p>Required Classification: Recordable</p>
51	135690998	8/9/2023	First aid	<p>A worker experienced a same-level fall while walking back to their assigned work area. The worker received first aid treatment for knee abrasions and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
52	135697071	8/28/2023	First aid	<p>A worker reported back discomfort after lifting a Garlock guardrail system steel base. The worker received first aid treatment for a lower back strain and was released to work with no restrictions.</p> <p>Required Classification: First aid</p>
53	135697873	8/30/2023	First aid	<p>While leaving their work area, a worker tripped over a hose with their right foot, resulting in a same-level fall. The worker reported discomfort in their left wrist. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
54	135697533	8/29/2023	First aid	<p>A worker was using a battery-powered drill when the drill bit bound up, causing the drill body to turn unexpectedly. This movement resulted in the worker experiencing discomfort in their right wrist. The worker received first aid treatment and was released with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
55	135708883	9/19/2023	Non-occupational	<p>A scaffold carpenter was crawling on a scaffold (wearing knee pads) and raised up from a kneeling position when they felt left knee discomfort. As a result of the injury, the worker received medical treatment beyond first aid (surgery) and DART.</p> <p>Required Classification: Work-related, Recordable, DART case</p>
56	135714834	10/4/2023	First aid	<p>A worker and a co-worker were using a pallet jack to relocate an electrical cabinet. While being moved, the cabinet hit an obstruction, causing it to begin to tip. The worker used their right arm to stop the tipping motion, resulting in the worker experiencing discomfort to their right elbow and shoulder. The worker was provided first aid treatment and released with no restrictions.</p> <p>Required Classification: First aid</p>
57	135720543	10/18/2023	First aid	<p>A worker was pulling wire cable in a cable tray when they felt discomfort in their right shoulder. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
58	135722256	10/23/2023	<p>Recordable</p> <p>EA Note: DART correctly recorded</p>	<p>A worker was using a battery-powered band saw when the worker changed their supporting hand placement, resulting in a right pinky laceration. The worker was provided treatment beyond first aid and returned to work with no restrictions. On 10/26/2023, this case was upgraded to a restricted work case.</p> <p>Required Classification: Recordable</p>
59	135726842	11/2/2023	First aid	<p>A worker bumped their hard hat on Unistrut while climbing a permanent ladder, resulting in headache/neck discomfort. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
60	135730666	11/8/2023	Recordable	<p>A worker was descending a scaffold ladder when their snap hook contacted their right cheek and nose, resulting in a laceration injury. The worker was taken to the UPF medical clinic for assessment and then transported by company personnel off site for treatment beyond first aid.</p> <p>Required Classification: Recordable</p>
61	135731940	11/13/2023	First aid	<p>A worker was installing a vertical 7-foot section of 1.5-inch diameter conduit when they experienced an onset of left shoulder discomfort. The worker was assessed and received first aid treatment for a left shoulder strain. The worker returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
62	135734826	11/22/2023	First aid	<p>A worker was using fan belts to manually rotate an un-energized fan/pulley system when they pinched the middle finger of their gloved left hand between the fan belt and pulley. The worker experienced an onset of discomfort in their finger. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
63	135761253	1/10/2024 EA Note: Late entry into CAIRS	Recordable	<p>A worker was ascending a set of stairs when their right leg contacted a sharp object (razor blade) secured to a scaffold. The worker received sutures and returned to work with no restrictions.</p> <p>Required Classification: Recordable</p>
64	135763814	1/17/2024	First aid	<p>A worker was walking to their work area on a designated external pathway when they experienced a same-level fall, resulting in discomfort in their right shoulder. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
65	135764412	1/18/2024	First aid	<p>A worker was traversing their outdoor work area when they experienced a same-level fall, resulting in left leg and left arm discomfort. The worker received first aid treatment and was released to work with no restrictions.</p> <p>Required Classification: First aid</p>
66	135774004	2/3/2024	Non-occupational	<p>A worker was ducking under a horizontal ledger when their right foot caught under a lower horizontal ledger, causing the worker to trip (same-level fall), landing on their knees and right hand. The worker received medical care beyond first aid (physical therapy).</p> <p>Required Classification: Work-related, Recordable</p>
67	135798609	3/20/2024	First aid	<p>A worker was in the process of backing out of a corner on the deck platform when they contacted a scaffolding component, resulting in discomfort to their right-side middle back. The worker was assessed, provided first aid treatment, and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
68	135799529	3/21/2024	Recordable	<p>A worker was removing a zip-tie from two sections of pipe when the tool contacted the worker's left arm, resulting in a laceration. The worker was transported to an offsite facility for further evaluation and received treatment beyond first aid (sutures).</p> <p>Required Classification: Recordable</p>
69	135816636	4/18/2024	First aid	<p>While on a scaffold, a worker contacted their right arm on a portion of installed Unistrut, causing discomfort. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
70	135820047	4/24/2024	First aid	<p>A worker was handling gypsum board when they felt discomfort in their left elbow after lifting the board. As a result of the injury, the worker received medical treatment beyond first aid (surgery).</p> <p>Required Classification: Recordable, DART case</p>
71	135825788	5/2/2024	<p>Recordable</p> <p>EA Note: RWDs were not recorded</p>	<p>A worker was attempting to drive a wedge pin in a horizontal scaffold runner when their hammer deflected off the overhead, contacting their left thumb, causing discomfort. As a result of the injury, the worker received medical treatment beyond first aid and was on restricted duty.</p> <p>Required Classification: Recordable, DART case</p>
72	135828312	5/4/2024	First aid	<p>A worker was handing off a 7-foot scaffold pan to a co-worker during a disassembly. While leaning to hand off the scaffold pan, the worker's right toe caught on the lip of a secured piece of plywood being used for dropped object protection. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
73	135830533	5/6/2024	Non-occupational	<p>A worker experienced a slight tingle while welding on a scaffold. The worker was evaluated by the UPF medical clinic and released back to work with no treatment and no restrictions.</p> <p>Required classification: Work-related, not recordable</p>
74	135851148	6/5/2024	First aid	<p>A worker was tasked with cable tray installation. A section of cable tray was being repositioned when it made contact with the worker's left arm. The worker received first aid treatment and was released back to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
75	135851544	6/5/2024	First aid	<p>A worker was drilling the lower flange of an HVAC elbow at ground level when the drill bit became stuck, causing the gloved right thumb of the worker to contact the upper flange of the elbow. The worker received first aid treatment and worked out of an office trailer for several weeks, restricting them from performing regular duties during this time.</p> <p>Required Classification: Recordable, DART case</p>
76	135856415	6/10/2024	Non-occupational	<p>A worker was passing up scaffold material from the ground when they felt discomfort in their left shoulder. The worker was provided first aid treatment and returned to work.</p> <p>Required Classification: Unable to make determination because of insufficient information</p>
77	135861164	6/18/2024	First aid	<p>A worker felt discomfort on the left side of their neck. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
78	135863801	6/20/2024	First aid	<p>A worker walking on a project walk-path rolled their right ankle, causing discomfort. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
79	135867064	6/25/2024	First aid	<p>A worker was torquing bolts from an aerial work platform and began to feel discomfort in their right elbow. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNi Classification	Case Summary and Required Classification
80	135892542	6/28/2024	Non-occupational	<p>A worker contacted their co-worker via phone regarding a personal medical condition. The affected worker requested transport to the Emergency Department via EMS transport.</p> <p>Required classification: Not work-related, non-occupational</p>
81	135872825	7/2/2024	First aid	<p>A worker transitioning from walking on a steel plate at a building exit to a designated project walk-path rolled their right ankle, resulting in discomfort. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
82	135878042	7/9/2024	First aid	<p>A worker felt a pop in their left wrist while lifting a threading machine with the lift handles and felt discomfort in their wrists. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
83	135879569	7/11/2024	Non-occupational	<p>A worker was sweeping a stairwell landing platform when their left foot made contact with a scaffold pole wooden mud seal, causing the worker to lose their balance. The worker caught themselves by grabbing the stairwell handrail, resulting in discomfort to the right shoulder. As a result of the injury, the worker received medical treatment beyond first aid (surgery) and restricted work.</p> <p>Required Classification: Work-related, Recordable, DART case</p>
84	135940378	7/16/2024	Non-occupational	<p>A worker at the project began to experience medical symptoms. UPF medical first responders were called to assist the worker.</p> <p>Required Classification: Not work-related, non-occupational</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
85	135889503	7/24/2024	First aid	<p>A worker was on break from grinding when they repositioned a small table fan while wearing goggles. Shortly afterward, the worker began to experience eye discomfort. The worker went to the UPF medical clinic for left eye irritation. Organic debris (a foreign body) was observed and removed from the left eye. The worker received first aid treatment and was released back to work with no restrictions.</p> <p>Required Classification: First aid</p>
86	135888916	7/24/2024	First aid	<p>A worker was lifting a 20-pound fire extinguisher when they experienced discomfort to their right shoulder. The worker was provided first aid treatment for a right shoulder strain and released back to work with no restrictions.</p> <p>Required Classification: First aid</p>
87	135892763	7/30/2024	First aid	<p>A worker reached to retrieve a drill extension tool when their gloved right middle finger contacted a piece of metal. The metal penetrated the glove and contacted the worker's right middle finger. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
88	135893638	7/31/2024	First aid	<p>A worker was manually handling scaffold components when they inadvertently pinched their gloved right middle finger between the components. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
89	135901302	8/7/2024	First aid	<p>Three workers were on a scaffold pulling wire with mule tape when the tape broke unexpectedly. This resulted in the three workers losing their balance; however, no workers fell. Two of the workers contacted their upper back, and one worker contacted their head on installed commodities. All three workers were provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
90	135906071	8/13/2024	First aid	<p>A worker was performing overhead welding activities when a bead of slag fell onto their shirt and neck. The worker felt discomfort from the contact of the slag on their lower neck. The worker was provided first aid treatment for a minor burn and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
91	135910530	8/19/2024	First aid	<p>A worker was returning to a standing position when they struck their head on a bolted flange, resulting in a head laceration. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
92	135911088	8/19/2024	First aid	<p>While descending stairs, a worker slipped, resulting in their arm being pulled backwards and rolling their ankle. The worker reported discomfort in their shoulder and ankle. The worker received first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
93	135913760	8/22/2024	Recordable	<p>A worker was in the process of disposing of a pallet jack into a skip pan, when the worker pinched their gloved right ring finger, resulting in an injury. The worker was evaluated and provided treatment beyond first aid. The worker returned to work with no restrictions.</p> <p>Required Classification: Recordable</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
94	135931694	9/9/2024	First aid	<p>A worker was working from a scaffold removing slack from cables within a cable tray, when they experienced right shoulder discomfort. The worker was assessed, received first aid treatment, and released to work with no restrictions. Further medical follow-up resulted in treatment beyond first aid (medication, physical therapy, and work restrictions).</p> <p>Required Classification: Recordable, DART case</p>
95	135935245	9/12/2024	First aid	<p>A worker was walking underneath a pipe rack when they struck their hard hat on a structural beam. The worker was evaluated and received first aid.</p> <p>Required Classification: First aid</p>
96	135936256	9/13/2024	First aid	<p>A worker was descending a scaffold when they felt a sting. The worker received first aid treatment and was released to work with no restrictions.</p> <p>Required Classification: First aid</p>
97	135938677	9/16/2024	First aid	<p>A worker was on a scaffold installing tubing when they lost their balance and struck their right elbow on a piece of structural tube. The worker received first aid treatment and was released to work with no restrictions.</p> <p>Required Classification: First aid</p>
98	135949531	9/30/2024	First aid	<p>While a worker was lifting (upward) a chain-fall, they experienced discomfort in their left shoulder. The worker was provided first aid treatment and returned to work with no restrictions.</p> <p>Required Classification: First aid</p>
Reviewed Standard Threshold Shift (STS) Cases				
1	STS	4/25/2024	Non-occupational	<p>The STS was not work-related, as confirmed by interview and personal dosimetry data.</p> <p>Required Classification: Non-occupational</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
2	STS	6/18/2024	Non-occupational	<p>The STS was not work-related, as confirmed by interview and personal dosimetry data.</p> <p>Required Classification: Non-occupational</p>
3	STS	11/14/2023	Non-occupational	<p>The STS was not work-related. Per the health questionnaire, the worker has not worked in noise-posted areas. This was confirmed by personal dosimetry data.</p> <p>Required Classification: Non-occupational</p>
4	STS	4/10/2023	Non-occupational	<p>The STS was not work-related. The personal dosimetry data was below the Occupational Safety and Health Administration (OSHA) 50% dose. An interview was requested, but the worker was not available.</p> <p>Required Classification: Non-occupational</p>
5	STS	6/7/2023	Non-occupational	<p>The STS was within a single frequency, which is not typical of noise-induced hearing loss.</p> <p>Required Classification: Non-occupational</p>
6	STS	4/6/2023	Non-occupational	<p>The STS was not work-related, though the health questionnaire indicated: Noise from other work; worked around loud machinery and other loud tools; and worked in noise-posted area. The personal dosimetry was < 28% OSHA dose.</p> <p>Required Classification: Likely non-UPF work-related. Non-occupational</p>
7	STS	7/26/2023	Non-occupational	<p>The STS was not work-related. The health questionnaire indicated loud noise exposure at other than work, and personal dosimetry that was <10% OSHA dose.</p> <p>Required Classification: Non-occupational</p>
8	STS	9/22/2022	Non-occupational	<p>The STS was not work-related. This was confirmed via interview and personal dosimetry results. The worker does not work in noise-posted areas.</p> <p>Required Classification: Non-occupational</p>

#	Local OII Case #	Injury Date	BNI Classification	Case Summary and Required Classification
9	STS	8/17/2022	Non-occupational	<p>The STS was not work-related as the health questionnaire stated: No exposure to loud noise. This was confirmed with dosimetry.</p> <p>Required Classification: Non-occupational</p>
10	STS	9/24/2024	Non-occupational	<p>The STS was not work-related as confirmed by interview. The worker operates equipment in closed cabs with no loud noise exposure. This was confirmed with dosimetry.</p> <p>Required Classification: Non-occupational</p>