

**NNSA POLICY LETTER**

**NAP-6A**

Approved: 5-13-14

**FEDERAL EMPLOYEE OCCUPATIONAL  
SAFETY AND HEALTH PROGRAM**

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**NATIONAL NUCLEAR SECURITY ADMINISTRATION  
Office of Safety and Health**

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## **FEDERAL EMPLOYEE OCCUPATIONAL SAFETY AND HEALTH PROGRAM**

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1. **PURPOSE.** Assure the safety and health of National Nuclear Security Administration (NNSA) employees through the establishment, maintenance, and implementation of a Federal Employee Occupational Safety and Health (FEOSH) Program as required by the *Occupational Safety and Health Act of 1970 (Public Law 91-596)*, and Department of Energy (DOE) Order (O) 440.1B, Admin Change 1, *Worker Protection Program for DOE (Including National Nuclear Security Administration) Federal Employees* (or successor document).
2. **CANCELLATION.** NAP-6, *Federal Employee Occupational Safety and Health Program for National Nuclear Security Administration Headquarters Employees*, dated December 19, 2002.
3. **APPLICABILITY.**
  - a. **NNSA Applicability.** This Policy applies to all NNSA Federal organizations with the exception of those listed in 3.b.
  - b. **Equivalencies/Exemptions.**
    - (1) **Equivalency.** In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at 50 USC sections 2406 and 2511 and to ensure consistency through the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this Directive for activities under the Director's cognizance, as deemed appropriate.
    - (2) **Exemption.** Activities conducted under the Nuclear Explosives and Weapons Safety Program relating to the prevention of accidental or unauthorized nuclear detonations are excluded from this Policy to the extent a requirement under DOE O 440.1B Admin Change 1 cannot be implemented for a particular facility in a manner that does not compromise the effectiveness of such activities.
4. **BACKGROUND.** Section 19 of the *Occupational Safety and Health Act of 1970* requires each Federal agency to develop and implement a safety and health program that is designed to protect its Federal employees from workplace hazards, illnesses, and injuries.

NNSA line management implements its responsibility for worker safety and health through the NNSA FEOSH program. When fully implemented, this program will be implemented through a set of integrated program plans. A Headquarters FEOSH program plan covers all personnel not assigned to Field Elements. Separate, Field Element FEOSH program plans cover personnel assigned to each Field Element. Together with DOE O 440.1B, Admin Change 1 (or successor document), this NAP

establishes the fundamental FEOSH roles, responsibilities and considerations that each program plan must address.

Title 29 CFR 1960 requires each agency appoint a Designated Agency Safety and Health Official (DASHO) who is responsible for the effective management and implementation of the agency's FEOSH Program. The Chief of Health, Safety, and Security (HS-1) is the appointed DASHO for DOE, including the NNSA. The Office of Health and Safety (HS-10) provides Departmental FEOSH programs with programmatic support and policy guidance.

5. **REQUIREMENTS.** This policy defines roles and responsibilities and expectations regarding protection of employees. It implements requirements established within Federal laws and regulations, or DOE directives system. Requirements included in DOE O 440.1B Admin Change 1, *Worker Protection Program for DOE (Including the National Nuclear Security Administration) Federal Employees*, or successor document, are included by reference to minimize duplication.
  - a. Headquarters (including headquarter elements in Albuquerque) and each Field Element must establish implementing FEOSH programs consistent with the requirements and responsibilities in this Policy, and consistent with the expectations in Appendix 1, *Federal Employee Occupational Safety and Health Program*.
  - b. Headquarters and each Field Element must ensure funding is planned for the following:
    - (1) Sufficient personnel to implement and administer the safety and health program at all levels, including necessary administrative costs such as training, travel, and personal protective equipment;
    - (2) Abatement of unsafe or unhealthful working conditions, including ergonomic evaluations and equipment;
    - (3) Necessary safety and health sampling, testing, and diagnostic tools and equipment;
    - (4) Necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations;
    - (5) Program promotional costs such as publications or posters;
    - (6) Technical information, documents, books, standards, codes, periodicals, and publications; and
    - (7) Medical surveillance programs for employees.

- c. Headquarters and Field Element FEOSH procedures must include processes to maintain FEOSH related records in a manner consistent with the DOE Records Management Program and Federal confidentiality requirements.
  - d. All Federal personnel must have the authority to pause work in an orderly and safe manner at NNSA facilities if they determine there is an immediate danger to life and health.
6. RESPONSIBILITIES. Responsibilities included in DOE O 440.1B Admin Change 1, *Worker Protection Program for DOE (Including the National Nuclear Security Administration) Federal Employees*, or successor document, are included by reference to minimize duplication.
- a. Administrator.
    - (1) Monitor delegated responsibilities and the overall performance of safety management of federal employees.
    - (2) Ensure funding is available for meeting FEOSH requirements.
    - (3) Approve the Headquarters FEOSH program plan.
  - b. Associate Administrator for Safety and Health
    - (1) Maintain this NAP.
    - (2) Develop and maintain, on behalf of the Administrator and in coordination with heads of all Headquarters Elements, the Headquarters FEOSH program plan.
    - (3) Advise heads of Headquarters and Field Elements on the effective management and implementation of their FEOSH responsibilities.
    - (4) Consolidate the results of annual FEOSH self-assessments for inclusion in the DOE annual report to the Secretary of Labor on FEOSH activities.
    - (5) Provide feedback on the effectiveness of the overall NNSA FEOSH program and the adequacy of controls.
  - c. Deputy/Associate Administrators, General Counsel
    - (1) Assign a FEOSH coordinator for their organization to work with other FEOSH coordinators to ensure an integrated and consistent NNSA program, and identify that person to the NA-SH FEOSH coordinator.

- (2) Ensure funding is available for meeting FEOSH requirements for which they are responsible.
  - (3) Implement their responsibilities as identified in the Headquarters FEOSH program, to include ensuring that:
    - (a) Their employees receive appropriate safety and health training;
    - (b) Workplace inspections are completed;
    - (c) Safety hazards are abated;
    - (d) Exposure records are maintained; and
    - (e) Manager and supervisor performance in meeting FEOSH objectives is regularly assessed.
- d. Field Office Managers.
- (1) Implement measures to ensure that all Federal and contractor personnel have the authority to pause work in an orderly and safe manner at NNSA facilities when they believe there is an immediate danger to life or health.
  - (2) Develop, approve, implement, and maintain FEOSH plans for their elements that are consistent with the requirements and responsibilities of this Policy, and consistent with the guidance in Appendix 1, *Federal Employee Occupational Safety and Health Program*.
  - (3) Assign a FEOSH coordinator for their organization to work with other FEOSH coordinators to ensure an integrated and consistent NNSA program; identify that person to the NA-SH FEOSH coordinator.
  - (4) Manage the day-to-day implementation of the FEOSH Program in their respective organizations, to include:
    - (a) Ensuring their employees receive appropriate safety and health training;
    - (b) Completing workplace inspections;
    - (c) Ensuring safety hazards are abated;
    - (d) Maintaining exposure records; and,

- (e) Regularly assessing manager and supervisor performance in meeting FEOSH objectives.

e. First Line Supervisors.


- (1) Assure that information on the NNSA FEOSH program and its requirements are made available to employees.
- (2) Support FEOSH awareness activities, workplace inspections, investigation of safety and health concerns, hazard communication, abatement and control, employee training, and other safety and health related initiatives.
- (3) Ensure that records associated with FEOSH activities are maintained.
- (4) Promote safe and healthy work practices for employees they supervise.

7. REFERENCES.

- a. Section 19 of the *Occupational Safety and Health Act of 1970*, Public Law 91-596, 91<sup>st</sup> Congress, S. 2193, December 29, 1970
- b. Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*
- c. Title 10 CFR Part 835, *Occupational Radiation Protection*
- d. Title 10 CFR Part 850, *Chronic Beryllium Disease Prevention Program*
- e. Title 29 CFR Part 1910, *Occupational Safety and Health Standards*
- f. Title 29 CFR Part 1926, *Safety and Health Regulations for Construction*
- g. Title 29 CFR Part 1960, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs*
- h. DOE O 225.1B, *Accident Investigations*, (or successor document)
- i. DOE O 231.1B, *Environment, Safety and Health Reporting*, (or successor document)
- j. DOE O 232.2, *Occurrence Reporting and Processing of Operations Information*, (or successor document)
- k. DOE O 440.1B Admin Change 1, *Worker Protection Program for DOE (Including National Nuclear Security Administration) Federal Employees*, (or successor document)

- l. DOE O 442.1A, Department of Energy Employee Concerns Program, (or successor document)
  - m. DOE P 450.4A, *Integrated Safety Management Policy*, (or successor document)
8. CONTACT. The Office of Safety and Health (NA-SH) at (202) 586-3885. NA-SH can also be reached at [safety-nnsa@nnsa.doe.gov](mailto:safety-nnsa@nnsa.doe.gov), or 505-845-5743.

BY ORDER OF THE ADMINISTRATOR:

  
Frank G. Klotz  
Administrator

Appendixes:

1. Federal Employee Occupational Safety and Health Program for Employees
2. Example of a Self-Certification Telework Safety Checklist



**APPENDIX 1: FEDERAL EMPLOYEE OCCUPATIONAL SAFETY AND HEALTH  
PROGRAM FOR EMPLOYEES**

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## **1.0 PURPOSE**

The purpose of this appendix is to describe the FEOSH Program for employees. This document provides all personnel with information necessary to understand how to provide a safe and healthful work environment.

## **2.0 PROGRAM STRUCTURE AND GOALS**

Headquarters and each Field Element will each have a FEOSH plan that applies to their assigned personnel. It is expected that there will be a site-specific FEOSH program for each Field Office, the Office of Secure Transportation, and a single plan for Headquarter employees that addresses Headquarters personnel in Forrestal, Germantown, and Albuquerque, including employees in leased spaces and overseas installations. Each sub-element within these groups may develop additional plans and policies as necessary.

Since the premise of any high reliability organization is to provide continuous improvement, NNSA has established the following goals to improve the effectiveness of the agency's worker protection program. Headquarters and Field Element programs are expected to develop site-specific FEOSH goals and specific objectives supporting each goal, at least annually, to ensure continuous improvement.

- a. Conduct safety and health training to ensure that all employees understand their safety and health responsibilities, and how to identify and communicate hazards.
- b. Conduct regular inspections and ensure hazards are abated in a timely manner.
- c. Provide a comprehensive and effective ergonomics program and ensure issues are resolved in a timely manner.
- d. Provide for the safety of employees in a manner that ensure worker safety and health at least as effective as this FEOSH program when Federal employees are working at facilities controlled and regulated outside of the NAP and when working overseas.

Headquarters and Field Elements should develop a set of procedures as needed to ensure effective implementation of their FEOSH program, considering the mission, size, and organization. Such procedures should establish:

- a. Goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses,
- b. Plans and procedures for evaluating the agency's occupational safety and health program effectiveness at all operational levels, and
- c. Priorities for identifying and mitigating factors, which cause occupational accidents, injuries, and illnesses in the agency's workplaces so that appropriate corrective actions can be taken.

Several key elements must exist to implement an effective FEOSH Program, and should be implemented in FEOSH program plans. These elements are consistent with Integrated Safety Management and the DOE Voluntary Protection Program (VPP), and should be reflected in Headquarters and Field Element programs:

- a. Management commitment;
- b. Employee involvement;
- c. Analysis of hazards in the workplace;
- d. Hazard prevention and control;
- e. Safety and health training;
- f. Program evaluation; and
- g. Feedback and continuous improvement

The following sections provide a brief discussion of these program elements.

## **2.1 Management Commitment**

NNSA management commitment and employee involvement are critical to the successful implementation of the NNSA FEOSH Program. In an effective program, management regards worker safety and health as a fundamental value to be emphasized as much as other organizational goals.

Management commitment to employee safety should be evident as part of the performance evaluation of supervisory personnel. Performance evaluations for supervisors should address their roles in meeting requirements of the FEOSH program, consistent with assigned responsibilities and authorities for assuring employee safety and health.

### **2.1.1 Management and Supervisory Responsibilities**

Management and Supervisors are responsible for the overall integrity and implementation of the FEOSH Program for the personnel they supervise, consistent with their FEOSH program plan and supported by their organizational FEOSH points of contact. Supervisors are responsible for assuring that information on the NNSA FEOSH program and its requirements are made available to employees and that the *Occupational Safety and Health Protection for DOE Employees* poster is displayed where it is accessible to all workers.

Supervisors support FEOSH awareness activities, workplace inspections, investigation of safety and health concerns, hazard communication, abatement and control, employee training, and other safety and health related initiatives. NNSA Elements may form FEOSH Committees to assist in fulfilling those responsibilities. In addition, supervisors are responsible for ensuring that records associated with FEOSH activities are maintained, consistent with their organizational FEOSH programs.

Managers and supervisors are responsible for the safety and health practices of their employees in their respective work areas and during their work activities when away from their assigned office or on official travel. Furthermore, supervisors have the authority to remove an employee from their work area, and (as do all personnel) have authority to pause work if they perceive an immediate threat to safety or health.

Heads of Headquarters and Field Elements are expected to understand their safety posture, based on collection and analysis of information. Heads of Elements are responsible for implementation and periodic evaluation of their FEOSH program, and to be forthcoming with successes, challenges, and resource concerns that could impact safety and health. The concepts of Integrated Safety Management and the organization behaviors and traits leading to strong safety culture are expected to be considered in implementing worker protection. The following activities may be used to gather information and clarify expectations:

- a. Setting and reviewing FEOSH program goals on an annual basis, or more regularly if warranted.
- b. Completing workplace inspections and FEOSH program assessments.
- c. Investigating and resolving identified safety and health issues. The act of resolving issues inherently provides awareness of NNSA program effectiveness and identifies areas for improvement.
- d. Providing workers appropriate avenues to raise safety concerns, including safety and health committees.
- e. Coordinating as appropriate with DOE FEOSH program leadership to ensure FEOSH program improvement.

Heads of Elements should ensure that their FEOSH programs include provisions to:

- a. Provide required safety data reporting including OSHA 300 entries and log data, occurrence Reporting and Processing System (ORPS), lessons learned, and required input into the annual Departmental FEOSH report.
- b. Ensure federal workers are protected to a level at least equal to the site contractor employees.
- c. Broadly share results of annual FEOSH inspections and other related assessments with employees.
- d. Seek opportunities to improve the program quality, safety issue management, and worker awareness.
- e. Consider safety an integral aspect of achieving the NNSA mission.
- f. Ensure that all Federal and contractor personnel have the authority to pause work in an orderly and safe manner at NNSA facilities when they believe there is an

immediate danger to life or health. (The NNSA Office of safety and health may be contacted for draft language for a Contractor Requirements Document if that is the mechanism chosen to meet this requirement.)

### **2.1.2 FEOSH Coordinator**

The FEOSH coordinator is the representative of the NNSA Element for implementation of their FEOSH responsibilities. Heads of Elements should hold their FEOSH Coordinators accountable for the following aspects of the FEOSH Program, and obtain feedback from them on the execution of these responsibilities:

- a. Ensure that required workplace inspections are conducted, ensuring that high-risk or identified problem areas are included.
- b. Assist in investigating employee concerns and reports related to unsafe/unhealthful working conditions.
- c. Facilitate prompt abatement of occupational safety and health hazards, and monitor progress of corrective actions in the workplace.
- d. Encourage employee participation and involvement in FEOSH activities.
- e. Provide regular feedback to management concerning occupational safety and health hazards.

FEOSH Coordinators may form committees at appropriate levels at agency establishments or groupings of establishments consistent with the mission, size, and organization of the agency and its collective bargaining configuration. Committees should be formed at the lowest practicable local level. The principal function of committees is to monitor and assist in the execution of the agency's safety and health policies and programs at the workplaces within their jurisdiction.

### **2.1.3 Budget**

Management commitment is most evident in the degree to which resources are made available to support the FEOSH program. Care must be taken to preserve FEOSH funding as a priority and is required by the Office of Management and Budget. Attention to ensuring that adequate funds are available for quality of life improvements in the workplace, such as ergonomic chairs and keyboards for office personnel, is a concrete expression of management commitment to their personnel.

### **2.1.4 Reporting and Recordkeeping Requirements**

Supervisors are responsible for reporting and investigating work related incidents - including those resulting in injuries and illnesses - and analyzing related data for trends and lessons learned. Requirements for reporting, investigating, and trending are contained in DOE O 231.1B, *Environment, Safety and Health Reporting*, DOE O 232.2, *Occurrence Reporting and Processing of Operations Information*, and DOE O 225.1B, *Accident Investigations* (or successor documents).

Supervisors also have certain responsibilities related to recordkeeping practices. Records must be maintained consistent with the DOE Records Management Program and Federal confidentiality requirements for the following:

- a. workplace inspections
- b. hazard analyses and surveys
- c. exposure monitoring, assessment
- d. medical surveillance
- e. worker process and procedure reviews
- f. employee safety and health concerns
- g. other FEOSH-related activities.

These records must be accessible to employees and their representatives upon request.

Regarding the annual FEOSH report to the Occupational Safety and Health Administration, NA-SH will consolidate the input received from headquarters program offices and Field Offices to develop the NNSA portion of the DOE Annual report to OSHA.

## **2.2 Employee Involvement**

Employee involvement provides the means through which workers develop and/or express their commitment to safe and healthful practices for themselves and for their fellow workers.

### **2.2.1 Employee Rights and Responsibilities**

All employees have rights as well as responsibilities in maintaining a safe and healthy workplace. Pursuant to DOE O 440.1B, employees have the right to:

- a. Have access to FEOSH program information
- b. Know what identified occupational hazards exist, and actions taken to abate or mitigate risks
- c. Pause work IMMEDIATELY without fear of reprisal, should a situation arise that puts them or a co-worker in immediate danger.
- d. Report unsafe work conditions or practices to their supervisor or other appropriate authority without fear of reprisal
- e. Request inspections of unsafe or unhealthful working conditions
- f. Accompany safety and health inspectors on workplace inspections
- g. Receive timely notification of resolution for reported issues

- h. Observe workplace safety and health monitoring activities and be notified of monitoring results
- i. Have access to workplace inspection and accident investigation reports; and
- j. Participate in FEOSH activities on official time.

Employee responsibilities are commensurate with the right to work in a safe and healthful environment. Each employee is responsible to act in ways that promote safety. Specifically, employees must:

- a. Comply with applicable DOE and site-specific safety and health policies and directives,
- b. Pause work immediately if they perceive a risk of injury to either themselves or a co-worker,
- c. Use personal protective equipment when required,
- d. Report recognized hazards to their immediate supervisor, and,
- e. Report work-related injuries or illnesses to their supervisor.

Additional information on employee rights and responsibility are available to all employees on the Office of Health, Safety, and Security (HSS) web site at <http://hss.doe.gov/sesa/corporatesafety/feosh/>.

### **2.2.2 Reporting Employee Concerns and Hazards**

Identifying and reporting potentially unsafe or unhealthful working conditions is the responsibility of all employees. Conditions may include environmental, safety and health, or facility related issues. The routine order for reporting safety and health concerns is:

- a. Immediate supervisor
- b. FEOSH Coordinator
- c. Employee Concerns Manager
- d. NNSA FEOSH point of contact (NA-SH 2)
- e. DASHO
- f. OSHA

Employee concerns must be investigated in accordance with DOE O 442.1A, *Department of Energy Employee Concerns Program*. Depending on the nature of the concern, other avenues include Equal Employment Opportunity, Differing Professional Opinions, and the Office of the Ombudsman.

### **2.3 Analysis of Hazards in the Workplace**

Managers, supervisors, and employees should analyze the hazards to employees at their normal duty station and while on official travel. Hazard analysis is a comprehensive process for identifying existing and potential workplace conditions that may cause employee injury or illness and identifying appropriate controls. Hazard analysis should involve supervisors and workers working with safety and health professionals to identify hazards and implement controls.

The following methods can be used to identify work-related hazards:

- a. Hazard analysis (e.g., job safety analysis and comprehensive safety and health surveys)
- b. Accident/incident investigations
- c. Routine self-assessment
- d. Inspections

Title 29 CFR 1960.25 states: "*All areas and operations of each workplace, including office operations shall be inspected at least annually.*" In addition, all accidents, including accidents involving property damage only, should be investigated. These inspections shall be "*conducted by inspectors qualified to recognize and evaluate hazards of the working environment and to suggest general abatement procedures.*" Inspectors should consult with enough employees to represent the sentiments of the workforce during inspections to obtain their input on workplace safety and health programs and conditions.

The work-related hazards faced by the majority of employees fall into two general categories. The first category is most commonly associated with an office environment, including telework locations. These hazards include, but are not limited to, improper design of computer workstations, uneven walking and working surfaces, improper use of electrical equipment, and office storage and clutter.

The second category includes industrial hazards associated with site visits to operating facilities within NNSA sites. Employees performing site visits must follow all site-specific policies and procedures, (e.g., training requirements, use of personnel protective equipment, wearing of dosimeters, etc.) that have been established by the respective DOE field offices or their operating contractors. Hazards include elevated heights, chemical hazards, radiological hazards, and machinery.

### **2.4 Hazard Prevention and Control**

Managers and employees must prevent or control the real or potential hazards that are identified through hazard analysis or other means. Prompt abatement of unsafe or unhealthful working conditions is required by 29 CFR 1960.30, 10 CFR 835, 10 CFR 850, and DOE Order 440.1B.

The preferential order of achieving hazard prevention and control is:



- a. Elimination of the hazard
- b. Substitution
- c. Engineering controls
- d. Work practice controls
- e. Administrative controls
- f. Personal protective equipment (PPE)

Employee safety and health should be considered during the earliest stages of facility design work or activity planning. However, employees may face new and previously unpredicted hazards that must be mitigated or abated. For newly identified workplace or work activity hazards, corrective actions should be prioritized according to worker risk. If a hazard cannot be corrected immediately, then prompt interim protective measures should be taken prior to final abatement. When required, Personal Protective Equipment (PPE) (e.g., hardhat, prescription safety glasses, safety shoes, etc.) is to be provided at no cost to the employee.

At any time, if a employee becomes aware of a previously unidentified hazard or perceives a risk of potential injury or exposure to chemical, ergonomic, or physical (including radiological) hazards, they should notify their supervisor immediately. If the risk of bodily harm is great, employees shall stop work until the hazard can be evaluated and appropriate controls implemented.

The Office of Safety and Health, NA-SH, maintains a list of subject matter experts that can provide additional information on specific hazards. NA-SH can be reached at [safety-nnsa@nnsa.doe.gov](mailto:safety-nnsa@nnsa.doe.gov), or at either (202) 586-3885 or 505-845-5743.

## **2.5 Safety and Health Training**

All employees must have the needed skills to perform their assigned tasks in a safe and healthful manner. Appropriate safety and health training is to be provided to senior managers, supervisors, and employees. Employees should consult their immediate supervisor to ensure activity-specific training needs have been identified and completed. Field FEOSH Coordinators should be contacted regarding training that is specific to hazards encountered while visiting a NNSA facility.

Annual FEOSH training for NNSA is provided by HSS. The Office of Safety and Health (NA-SH) personnel are part of the beta test team for each new module introduced each year. Headquarters and Field Elements may rely on the HSS training to address general FEOSH training, supplementing it as needed to address local workplace hazards.

## **2.6 FEOSH Program Evaluation**

Title 29 CFR 1960.79 requires that NNSA develop and implement a program of self-evaluations to determine the effectiveness of their occupational safety and health programs.

NNSA Headquarters and each NNSA Field Element performs a self evaluation. The self-evaluations are to include qualitative assessments of the extent to which their safety and health programs are:

- a) Developed in accordance with the requirements set forth in Executive Order 12196 and this part, and
- b) Implemented effectively in all field activities.

NA-SH-2 consolidates the results for inclusion in the DOE annual report to the Secretary of Labor on FEOSH activities as requested by HSS-1, the DOE DASHO.

In addition, Headquarters and Field Elements track and report on their performance in achieving the goals and objectives of their FEOSH program.

Pursuant to Executive Order 12196, the Occupational Safety and Health Administration may conduct program evaluations or unannounced inspections of Federal workplaces. It is NNSA policy to cooperate with OSHA compliance personnel and seek their assistance in improving NNSA workplace safety and health, provided national security concerns are properly addressed.

### **2.6.1 Annual Inspections**

Line management uses supervisor inspections to maintain awareness of work activities and its hazards and controls. These inspections may be coordinated by the FEOSH Coordinator. All areas and operations of each workplace, including office operations, are inspected at least annually. More frequent inspections shall be conducted in all workplaces where there is an increased risk of accident, injury, or illness due to the nature of the work performed. Sufficient unannounced inspections and unannounced follow-up inspections should be conducted to ensure the identification and abatement of hazardous conditions.

Coordinated inspections should occur in situations when multiple agencies' have responsibility for safety and health. NNSA workplaces containing classified information shall provide access to the spaces to safety and health inspectors who have obtained the appropriate security clearance.

### **2.6.2 Submission to Annual FEOSH Report**

Field Offices submit their annual FEOSH reports to NA-SH-2 in accordance with the timeline from the annual data call provided by NA-SH-2. NA-SH-2 shall then compile the information and submit the report to the DOE DASHO in the timeline prescribed by DOE. The annual report will describe the agency occupational safety and health program of the previous fiscal year and objectives for the current year. The report shall include a summary of the agency's self-evaluation findings and any additional requirements that OSHA requests that year.

Guidelines for agency annual reports to OSHA are prescribed in OSHA Publication 2014. The Secretary of Labor shall notify agencies by January 1 of any changes to the guidelines for the subsequent year's report.

### **2.6.3 Performance Metrics for FEOSH Performance**

Headquarters and the Field Elements are encouraged to develop appropriate performance metrics to allow ongoing monitoring of their performance. The metrics should be a combination of lagging measures, such as injury/illness rates, and leading indicators, such as percent of employees completing training. Leading indicators are valuable in that they provide information before a loss event has actually occurred. Consistent with the goals outlined in this document, following are examples of performance metrics for FEOSH programs.

- a. Percent of employees receiving FEOSH training
- b. Percent of work spaces inspected
- c. Percent of corrective actions more than 90 days overdue
- d. Percent of findings from ergonomic evaluations not addressed within 45 days
- e. Number of management/worker safety and health meetings each year.

### **2.7 Feedback and Continuous Improvement**

ISM Core Function 5, *Provide Feedback and Continuous Improvement*, provides the framework for the FEOSH Feedback and improvement process. Feedback is gathered in various ways, such as through ORPS data.

The concept of continuous improvement implies that line management establishes formalized mechanisms and processes for identifying and capturing safety and health related deficiencies, as well as for tracking the implementation and effectiveness of associated corrective actions. The process of ensuring that corrective actions are timely, complete, and effective depends on clearly identified responsibility for timely implementation. To avoid recurrence of safety and health incidents, management should establish a process for disseminating lessons learned to affected personnel, both internally and across the DOE complex. The following information is from DOE G 450.4-1C Attachment 2, and has been tailored to FEOSH.

#### **Basic Attributes**

- a. Extent-of-condition reviews are conducted as determined by the FEOSH Program Manager using a graded approach.
- b. Opportunities for improving work execution and planning are identified and implemented.
- c. Line and independent oversight or assessment is conducted upon request to the FEOSH Program Manager, or to address emerging issues identified by the FEOSH Program Manager.
- d. Line and independent oversight or assessment is conducted at all levels by DOE.

- e. Oversight and assessment activities verify that FEOSH Program controls are effective.
- f. FEOSH performance measures or indicators and performance objectives are developed, tracked, and action is taken when metrics indicate that it is warranted.
- g. Line managers use available FEOSH performance measures and indicators as part of the self-assessment process.
- h. Feedback (including worker input) and lessons learned are used to improve safety and work performance.
- i. Oversight or assessment results are managed to ensure that lessons are applied throughout NNSA and the field office.
- j. Issues are identified (including worker input) and managed to resolution.
- k. Root causes of problems are determined, and effective corrective action plans are developed and implemented in a timely manner.
- l. Corrective action effectiveness reviews are conducted using a graded approach.

### **3.0 WORKPLACE HAZARDS**

This section provides information on hazards that may generally exist in workplaces, and should be addressed by FEOSH programs. The information is provided for hazard awareness and is not intended to be all-inclusive.

#### **3.1 Office Hazards**

The majority of work conducted by employees is in office settings, including telework locations. Typical hazards of these settings are described in this section. The discussion provided may be useful when introducing new employees into the office environment.

When visiting DOE and DOE contractor facilities, employees must abide by site-specific safety and health programs. Employees can contact site safety and health personnel while on travel if they have questions about worksite hazards, personal protective equipment, or safety and health protocols. Employees needing further direction or consultation concerning these or other work-related hazards should contact their supervisor and/or FEOSH Coordinator.

##### **3.1.1 Ergonomics**

Computer workstation and other office equipment should be configured to the comfort of the user. Position computer monitors so the top of the screen is at or below eye level. Chairs should be adjustable and provide support to the lower back and upper extremities. When seated, feet should rest either on the floor or on a footrest. Further information on proper ergonomic practice may be found on the HSS webpage. If in doubt or someone is experiencing ill-health effects potentially related to their workstation setup, they should report their concerns to their supervisor

and contact the FEOSH Coordinator to schedule an ergonomic evaluation. Concerns identified during the evaluation must be addressed in a timely manner, and the employee should be kept informed throughout the process.

### **3.1.2 Electrical Hazards**

Most offices contain a considerable amount of electrical equipment such as computers, printers, and small appliances such as coffee makers, toasters, heaters, and fans. Caution should be used in setting up electrical equipment to prevent circuit overload and tripping hazards. Never plug extension cords into other extension cord, a practice known as daisy chaining. Organize the office space so that cords are not crossing aisles or walkways. Before setting up electrical equipment, always inspect the integrity of the cord and appliance itself. If an electrical appliance appears faulty, stop using it immediately, unplug it, remove it from service, tag it as "non-operational," and report it to a supervisor. Always use an electrical appliance for its intended purpose only.

### **3.1.3 Indoor Air Quality**

New construction, remodeling, adjacent activities, and similar situations may introduce airborne contaminants into the workplace. Heating, ventilation, and air conditioning (HVAC) systems may not reduce the levels of the contaminants to acceptable levels. Employees should report nuisance odors or dusts to their immediate supervisor and/or FEOSH Coordinator.

Administrative or engineering controls must be identified and implemented whenever feasible to keep the exposure of employees to air contaminant within the limits prescribed in 29 CFR 1910.1000, *Air Contaminants*.

### **3.1.4 Fire Protection and Life Safety**

Every employee is responsible for promoting fire safety. Reporting real or potential fire hazards and ensuring those hazards are corrected are necessary actions that help to eliminate the risk of a fire. If a perceived fire hazard cannot be corrected immediately, report it to your supervisor and facility management immediately. Employees and supervisors must keep work areas, means of egress, and hallways free of clutter. Know the correct evacuation route(s) from the office and the muster station. Fire extinguishers are provided in buildings; resident building personnel should be trained on their use.

### **3.1.5 Housekeeping**

Clean and organized work areas help minimize office-related accidents and injuries. Proper storage of paperwork, work materials, and equipment will also help the overall professional appearance of the work area. Discarding and archiving old documents and articles; cleaning and vacuuming regularly; and avoiding fluid spills on carpeting and upholstered surfaces will support good indoor air quality and the overall safety and health of the work environment.

### **3.1.6 Walking/working surfaces**

Walking/working surfaces must be kept free of objects/debris that is likely to cause slips, trips, or falls. The floor of every workplace must be maintained in a clean and dry condition. Where wet processes are used, drainage must be maintained and false floors, platforms, mats, or other dry standing places should be provided where practicable. To facilitate cleaning, every floor, working place, and passageway must be kept free from protruding nails, splinters, holes, or loose boards.

### **3.1.7 Bloodborne Pathogens**

In the event of an accident, properly trained employees may need to administer first aid to a co-worker, thereby putting themselves at risk of exposure to blood or other body fluids. If providing first aid where blood or body fluids are present, employees should wear gloves or use a barrier (absorbent cloths topped with a plastic liner) to help reduce their risk of exposure. Washing hands vigorously with soap and water immediately following an exposure will also help to eliminate potential exposure to bloodborne pathogens and resulting health risks. Employees need to report any such exposure to their supervisor as soon as possible.

### **3.1.8 Motor Vehicle Safety**

Though not an office hazard, employees often operate government or privately owned motor vehicles during the course of their employment. Supervisors should assure that employees are properly licensed to operate any assigned motor vehicles and/or powered industrial equipment. All employees are required to wear seat belts and observe posted speed limits and other traffic rules. Supervisors should support awareness campaigns and incentive programs to encourage safe driving by employees both on and off the job.

Use of electronic devices (e.g. cell phones, tablets, and computers) is prohibited while operating motor vehicles (including GOVs, POVs, and rental vehicles) in the course of accomplishing official government duties.

### **3.1.9 Telework**

Teleworking can be a valuable tool for employee morale and productivity; however, there are challenges with its implementation. Employees who are teleworking must still comply with agency policies while they are teleworking, including the requirement to keep their work area free of hazards and report any injuries promptly.

Since the agency does not conduct home inspections, employees must ensure their work places are free of hazards. A checklist should be completed by the employee to verify that their telework space is a safe and healthy place to perform their duties. See Appendix 2 for an example of a home office safety and health checklist.

### **3.1.10 Workplace Violence**

Workplace violence or other types of unprofessional physical or verbal conduct will not be tolerated within NNSA. This type of behavior may result in disciplinary action, including

termination of employment. Employees should call the emergency number for their location (e.g., 166 if they are in the Forrestal building) if there is an immediate threat. As with any other type of workplace hazard, employees are responsible for reporting incidents of this nature to their supervisor and the FEOSH Coordinator. If the threat of bodily harm is apparent or someone is acting aggressively, employees should immediately notify site security and in some cases, local law enforcement authorities.

## **3.2 Industrial Hazards**

### **3.2.1 Chemical Exposures**

Federal employees at the headquarters locations in Washington, DC, Germantown, and Albuquerque do not experience routine hazards greater than those commonly accepted by the public. Such hazards include incidental exposure to bathroom cleaning chemicals, graphics chemicals and similar chemicals brought in by the Federal employees. Employees are not to bring in hazardous chemicals that when released would harm the employee or co-workers. Should an employee need to bring in other than small quantities (comparable to airplane volume restrictions), this action should be coordinated with NA-SH for approval.

Federal workers will follow the site Hazard Communication (HAZCOM) and chemical safety program requirements for entering areas presenting hazardous chemical exposures. Field Element and/or contractor processes should ensure that visitors are made aware of site-specific occupational hazards to which they may be exposed.

If a person is exposed to a chemical, they must use the emergency management system for getting assistance. Employees must report incidents to line management using the reporting requirements of this FEOSH program.

### **3.2.2 Radiation Hazards**

Federal workers must follow the site radiation protection program requirements when entering areas where radioactive material is present. Although Federal employee generally do not handle radioactive material, they will follow the site radiological protection program, including training, wearing personal protective equipment, dosimeters, and complying with all other aspects of the local program. These requirements apply to employees working abroad, including at non-DOE facilities.

## **3.3 Occupational Health**

Work-related hazards faced by the majority of employees involve the relatively minor hazards most commonly associated with an office environment. However, some employees may be exposed to hazards while performing site visits at NNSA facilities and traveling outside the United States where they may encounter physical, chemical and biological hazards. These requirements apply to employees working abroad, including at non-DOE facilities.

Headquarters and Field Elements must implement an Occupational Medical Program when there is reasonable anticipation of encountering physical, chemical and/or biological hazards. This

may include employees whose duties require on-site inspections, on-site evaluations and/or on-scene emergency response functions.

### **3.3.1 Required Components of Occupational Medical Programs**

Occupational Medical programs must include the applicable elements established in DOE O 341.1a, *Federal Employee Health Services* (or successor document), including but not limited to:

- a. Emergency response plans (DOE O 341.1a paragraph 4.b.1). NNSA work locations in the DC area and Albuquerque can rely on local government 911 emergency services in accordance with the OSHA interpretation of 29 CFR 1910.151(b);
- b. Medical evaluations to determine federal employees' fitness for duty (DOE O 341.1a, paragraph 4.b.(2)(c));
- c. Baseline, periodic, post-incident, and termination medical evaluations for employees in positions having been identified as having hazardous exposures or the potential for exposures(DOE O 341.1a, paragraph 4.b.(2)(d)); and,
- d. Procedures to ensure that employees traveling outside the contiguous United States are advised of pertinent health issues, receive appropriate immunizations, and are cleared before departure, in accordance with DOE O 341.1a paragraph 4.b.(3).

### **3.3.2 Medical Service and First Aid**

First aid supplies for employee self use should be limited to basic supplies for minor cuts and scratches to insure injuries are properly reported. Other first aid requirements are covered under paragraph 3.3.1 above.

### **3.4 Contractor Selection and Oversight**

Contractor worker protection program budgets should be reviewed to determine if the appropriate amount is allocated to safety to the extent that Federal programs rely upon contractor programs for FEOSH. Contractor worker safety is outside the scope of this document. Any direction contractors receive from federal staff must be consistent with 10 CFR 851.

### **3.5 Employees Deployed and Working in Overseas Installations**

Employees may have permanent or temporary duties involving travel outside the United States. Prior to their departure, all employees traveling outside the United States should consult with appropriate medical personnel regarding travel advisories, health precautions, and suggested immunizations to reduce the risk of travel-related illnesses or other health consequences. Providing such advice is a Federal responsibility. In some locations, such as at Forrestal and Germantown, the Department has established Federal Employee Health Units that provide this service.



Proper advance planning by employees will help to prevent accidents. Supervisors must know the scope of work that is expected of their employees and the need for training, monitoring, personal protective equipment, and medical clearance. If travel is outside the United States, contact the DOE Foreign Travel Management System (FTMS) about specific health precautions, travel advisories, and need for immunizations, that are recommended by the World Health Organization and the Centers for Disease Control (<https://ftms.doe.gov/> - you will need to request an account to use this site; application is online at the site).

During official travel, if an employee has a medical/health examination to be "cleared" to perform their assigned duties (e.g., respirator clearance), a copy should be forwarded to the DOE FTMS to facilitate future clearance.

### **3.6 Safety Considerations in Overseeing Work for Others**

Work for others, such as research for the Department of Homeland Security or the Department of Defense, is an important aspect of NNSA's mission and is the source of additional funding in uncertain time. However, such work involves potential problems with both responsibility and unknown hazards. Field Office health and safety personnel must have a process in place to maintain situational awareness of the work that goes on at NNSA sites.

When the work occurs at NNSA facilities, NNSA safety requirements must be followed at a minimum. There may also be additional requirements from the funding agency as well. When the work occurs offsite, NNSA policies that protect the individual must be followed, as well as the safety policies of the host site. If any new hazards will be introduced or generated in NNSA facilities as a result of the work, the work plan must be reviewed and approved by safety and health professionals at the Field Office.

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**APPENDIX 2: Example of Self-Certification Telework Safety Checklist**

Employee's Name: \_\_\_\_\_ Rating Official's Name: \_\_\_\_\_

The purpose of this form is to ensure that the terms of the Flexiplace agreement are fulfilled. The employee, if declaring that the Flexiplace site is his/her home, agrees to maintain it in a reasonably safe condition, keeping it hazard-free and normally free from distractions. If the employee answers "no" to any of the questions below, the rating official and the employee must discuss the issue so that both the employee and the rating official understand the condition of the agreement. The checklist will be made available to the Headquarters workers' compensation specialist if the employee is injured at home and files a claim for compensation under the Federal Employee Compensation Act.

<b>Part I - Workplace Environment</b>	<b>Yes</b>	<b>No</b>
1. Are temperature, noise, ventilation, and lighting levels adequate for maintaining your normal level of job performance?		
2. Are all stairs with four or more steps equipped with handrails?		
3. Are all circuit breakers and/or fuses in the electrical panel labeled as to intended service?		
4. Do circuit breakers clearly indicate if they are in the open or closed position?		
5. Is all electrical equipment free of recognized hazards that would cause physical harm (frayed wires, bare conductors, loose wires, flexible wires running through walls, exposed wires to the ceiling)?		
6. Will the building's electrical system permit the grounding of electrical equipment?		
7. Are aisles, doorways, and corners free of obstructions to permit visibility and movement?		
8. Are file cabinets and storage closets arranged so drawers and doors do not open into walkways?		
9. Are chairs free of any loose casters (wheels) and are the rungs and legs of the chairs sturdy?		
10. Are the phone lines, electrical cords, and extension wires secured under a desk or alongside a baseboard?		
11. Is the office space neat, clean, and free of excessive amounts of combustibles?		
12. Are floor surfaces clean, dry, level, and free of worn or frayed seams?		
13. Are carpets well secured to the floor and free of frayed or worn seams?		
14. Is there enough light for reading?		

<b>Part II - Computer Workstation (if applicable)</b>	<b>Yes</b>	<b>No</b>
15. Is your chair adjustable?		
16. Do you know how to adjust your chair?		
17. Is your back adequately supported by a backrest?		
18. Are your feet on the floor or fully supported by a footrest?		
19. Are you satisfied with the placement of your monitor and keyboard?		
20. Is it easy to read the text on your screen?		
21. Do you need a document holder?		
22. Do you have enough leg room at your desk?		
23. Is the screen free from noticeable glare?		
24. Is the top of the screen eye level?		
25. Is there space to rest the arms while not keying?		
26. When keying, are your forearms close to parallel with the floor?		
27. Are your wrists fairly straight when keying?		

Employee's signature \_\_\_\_\_ Date \_\_\_\_\_

Comments:

Supervisor's signature \_\_\_\_\_ Date \_\_\_\_\_