

ISSUED

Effective Date: 10/01/15

WP 15-GM.02  
Revision 10

# Worker Safety and Health Program Description

Cognizant Section: Industrial Safety & Health

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*An AECOM-led partnership with B&W and AREVA*

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**CHANGE HISTORY SUMMARY**

<b>REVISION NUMBER</b>	<b>DATE ISSUED</b>	<b>DESCRIPTION OF CHANGES</b>
4	08/11/11	<ul style="list-style-type: none"> <li>• Add Lawrence Berkeley Laboratory and Sandia National Laboratories to scope of work.</li> <li>• Added new Flow-Down chart</li> <li>• Added to step 7.2 paragraph to TRUPACT Mobile Loading</li> <li>• Added to step 7.3 Bullet on generator site work conducted at a civilian, DOD or Naval Reactors sites</li> <li>• Added to section 10.0 information on TRUPACT-III</li> <li>• Added 04-IM1000 to step 6 under section 11.0</li> <li>• Added 12-IS.03, 12-IS3002, and 12-IH1022 to step 5 of section 13.0</li> <li>• Added 12-IS3002 to first paragraph and 12-IS0301 to second to last paragraph of section 14.0</li> <li>• Added 12-IS.01-6 to step 4, 12-IS.03 to steps 10 and 11 under section 15.0</li> <li>• Removed last sentence of step 2.A under section 16.0</li> <li>• Changed FAPs to PFOs</li> </ul>
5	09/12/12	<ul style="list-style-type: none"> <li>• Deleted references to Oak Ridge National Laboratory, Sandia National Laboratories, Lawrence Berkeley Laboratory, and Hanford Sites.</li> <li>• Changed AMWTP to ITG in document.</li> <li>• Updated Abbreviations and Acronyms</li> <li>• Section 2.0, Added new Safety Policy statement.</li> <li>• Section 2.0, Added last part beginning "Annual safety goals...."to end of section.</li> <li>• Steps 5.2.2 and 6.3.2, Deleted these steps for ORNL.</li> <li>• Steps 5.2.6 and 6.3.6, Deleted these steps for Hanford Site.</li> <li>• Steps 5.2.7 and 6.3.7, Deleted these steps for Lawrence Berkeley Laboratory.</li> <li>• Steps 5.2.8 and 6.3.8, Deleted these steps for Sandia National Laboratories.</li> </ul>

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<b>REVISION NUMBER</b>	<b>DATE ISSUED</b>	<b>DESCRIPTION OF CHANGES</b>
5 Cont.	09/12/12	<ul style="list-style-type: none"> <li>• Section 10.0, Deleted 3<sup>rd</sup> paragraph referring to the shielded canisters as an augmentation of the 72-B waste canister.</li> <li>• Section 13.0, #1, WIPP added last sentence "Continued monitoring results are used to prioritize funding for hazard correction and the design for future controls."</li> <li>• Section 15.0, item #1, last paragraph added last sentence "An updated survey for beryllium potential exposure...implemented."</li> <li>• Section 15.0, item #11, added last part beginning "For WIPP it is applicable...10 CFR 851."</li> <li>• Section 16.0, item #2.A, added "Improvement initiatives are in progress....schedule changes, accordingly."</li> <li>• Section 16.0, item #5, added "Security Services at the Skeen Whitlock Building are not DOE work scope, and therefore 10 CFR 851 does not apply to their armed services."</li> <li>• Section 16.0, items #5A, B, C, D, E, Updated references.</li> <li>• Section 16.0, item #6, added last sentence "For security operations conducted by WIPP security...is acceptable."</li> <li>• Section 16.0, item #9, deleted part "The WIPP site incorporated several....Corrective Action Plan."</li> <li>• Section 19.0, deleted part "There were four NFPA exemptions...are complete."</li> <li>• Section 21.0, Compliance Reference List, updated references.</li> </ul>
6	11/14/12	<ul style="list-style-type: none"> <li>• Editorial revision in accordance with MD 1.1.</li> </ul>
7	01/10/13	<ul style="list-style-type: none"> <li>• Corrected contract number in section 1.0 and definition of CCP in subsection 4.1 in accordance with MD 1.1.</li> </ul>
8	09/09/13	<ul style="list-style-type: none"> <li>• Editorial revision to update references and make minor corrections.</li> </ul>

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9	10/23/14	<ul style="list-style-type: none"> <li>• Updated Acronyms and Abbreviation list and Reference list.</li> <li>• Added paragraph to section 3.0 on fire and radiological release.</li> <li>• Added to section 5.0 LANL, ORNL, and SNL.</li> <li>• Added paragraph to subsection 5.1.1 about additional hazards due to February incidents are being thoroughly analyzed.</li> <li>• Removed from subsection 5.2 reference to SUMMA<sup>®</sup> canisters.</li> <li>• Added new subsections 5.2.5 and 5.2.6 with interface and responsibilities regarding scope of work for NWP at ORNL and SNL.</li> <li>• Added new subsections 6.3.5 and 6.3.6 regarding characterization activities at ORNL and SNL.</li> <li>• Added bullet to subsection 7.3 on any other entity contracted to serve as location for temporary storage.</li> <li>• Added paragraph to section 10.0 on no compliance orders have been issued.</li> <li>• Removed paragraphs from section 10.0 on TRUPACT III.</li> <li>• Added paragraph to sections 14.0 and 16.0 on improvements in hazard prevention in development.</li> <li>• Removed from section 16.0 (9) statement on the motor vehicle safety program.</li> <li>• Added to section 16.0 (12) statement on training for work place violence has been provided to employees.</li> </ul>

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10	10/01/15	<ul style="list-style-type: none"> <li>• Added on page 9, reference for safety quote, Integrated Safety Policy, MP 1.28.</li> <li>• Editorial revisions on pages 10, 13, 17, and 18 to update recovery actions, subcontractor program, and punctuation.</li> <li>• Updated hazards on page 12 to include heat stress and high winds.</li> <li>• Updated VPP on page 16 to current status (MERIT)</li> <li>• Added to bullet beneath step 6.1, "local law enforcement."</li> <li>• Deleted on page 42, the referenced documents.</li> <li>• Editorial revision on page 56 to delete two obsolete procedures and update name on another.</li> <li>• Added on page H-7, Cascade Building.</li> <li>• Fixed spacing, paragraph, and minor editorial changes throughout the document.</li> </ul>

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**ABBREVIATIONS AND ACRONYMS**

ACGIH	American Conference of Governmental Industrial Hygienists
ANL	Argonne National Laboratory
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
CBDPP	(DOE) Chronic Beryllium Disease Prevention Program
CBFO	Carlsbad Field Office
CCP	Central Characterization Program
CEMRC	Carlsbad Environmental Monitoring and Research Center
CFR	Code of Federal Regulations
CH	contact-handled
CWI	CH2M-WG Idaho, LLC
DOE	U.S. Department of Energy
EAP	Employee Assistance Program
EDMS	Electronic Document Management System
EPA	(U.S.) Environmental Protection Agency
FHA	Fire Hazards Analysis
FPP	Fire Protection Program
GET	General Employee Training
GSA	General Services Administration
ICRP	International Commission on Radiological Protection
INL	Idaho National Laboratory
ISM	integrated safety management
ISMS	integrated safety management system
ITG	Idaho Treatment Group, LLC
JHA	Job Hazards Analysis
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security, LLC
LWA	Land Withdrawal Act
M&O	management and operating
MOU	memorandum of understanding
MSDS	Material Safety Data Sheets
MSHA	Mine Safety and Health Administration
NDA	nondestructive assay
NDE	nondestructive examination

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NFPA	National Fire Protection Association
NIOSH	National Institute Occupational Safety and Health
NWP	Nuclear Waste Partnership LLC
ORNL	Oak Ridge National Laboratory
OSHA	Occupational Safety and Health Administration
PAAA	Price Anderson Amendments Act
PPE	personal protective equipment
RH	remote-handled
SMP	safety management program
SNL	Sandia National Laboratories
SRS	Savannah River Site
STR	subcontractor technical representative
TLV	threshold limit value
TRAMPAC	Transuranic Waste Authorized Methods for Payload Control
TRU	transuranic
VE	visual examination
VPP	Voluntary Protection Program
WHB	Waste Handling Building
WIPP	Waste Isolation Pilot Plant
WSHPD	Worker Safety and Health Program Description

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## **1.0 INTRODUCTION**

In December 2002, Congress directed the U.S. Department of Energy (DOE) to promulgate regulations on worker safety and health requirements to cover contractors with Price Anderson Amendments Act (PAAA) indemnification agreements in their contracts. The result of that directive is Title 10, *Energy, Code of Federal Regulations* (CFR), Part 851, "Worker Safety and Health Program" (the 851 Rule), published on February 9, 2006, as effective February 9, 2007. The final rule was built on existing contract practices and processes to achieve safe and healthful workplaces. The rule was intended to be complementary to integrated safety management (ISM). As such, it was expected that contractors would not establish redundant worker protection programs to comply with the rule, but that the final rule established an effective worker safety and health program. The program is expected to reduce or prevent injuries, illnesses, and accidental losses by providing DOE contractors and their workers with a safe and healthful workplace that integrates current safety and health programs and processes. Hazards are to be identified, abated, controlled, or otherwise mitigated in a manner that provides reasonable assurance that workers are adequately protected.

Nuclear Waste Partnership LLC (NWP) is under contract to the DOE Carlsbad Field Office (CBFO) for the management and operation of the Waste Isolation Pilot Plant (WIPP). NWP systematically integrates safety and environmental stewardship into management and work practices to accomplish the WIPP mission of disposing of defense generated transuranic (TRU) and TRU mixed waste while protecting the worker, the public, and the environment. Mission scope includes characterization activities at several generator sites to ensure acceptability of the waste shipped for disposal at the WIPP to meet the nation's cleanup goals. The scopes for generator site characterization activities are defined in the CBFO primary contract DE-EM0001971, in generator site memoranda of understanding (MOUs) interface agreements, or in subcontracts.

## **2.0 PURPOSE**

This NWP Worker Safety and Health Program Description (WSHPD) identifies the elements, methods, and processes by which NWP meets the requirements in the 851 Rule while also incorporating the requirements of the *Integrated Safety Management System Description* (WP 15-GM.03) (the ISMS Description), and the NWP Voluntary Protection Program (VPP). This document provides no new safety or health requirements. Instead, it serves as a program description of the NWP safety programs, associated policies, requirements, processes, methods and procedures, providing compliance with the requirements of 10 CFR Part 851. The ISMS Description is the means by which worker safety and health requirements described in this WSHPD are integrated into mission work activities performed by NWP in accordance with its Safety Commitment to WIPP: "The management of NWP is committed to ensuring that we each go home as healthy as we arrived, by providing an exemplary safety and health program, demanding and maintaining the highest safety performance, and promoting

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employee involvement in the successful continuation of these programs." The WIPP Integrated Safety Management Policy (MP 1.28) states: "Safety – the requirement/expectation/demand – to ensure we all go home as healthy as we arrived." Accordingly, the purpose of the NWP safety program is to establish safety and health requirements that provide workers with a safe and healthful workplace in which hazards are abated, controlled, or otherwise mitigated. Annual safety goals are established to ensure continuous improvement as discussed in the ISMS Description, and the annual VPP reports, based on DOE guidance, input from senior management, and employee involvement through safety committees, in coordination with CBFO. The Worker Protection Program Policy is the implementing document for the VPP program. Employee involvement plays a vital role at WIPP in ensuring a strong safety culture for implementation of the WSHPD.

### **3.0 WASTE ISOLATION PILOT PLANT DESCRIPTION**

WIPP is located in southeastern New Mexico in Eddy County, approximately 26 miles east of Carlsbad. The WIPP site is designed to permanently dispose of TRU waste from United States nuclear weapons research and production programs. The WIPP mined repository is located 2,150 feet underground in a stable ancient salt formation. Site facilities include structures, buildings, and underground excavations.

Contact handled (CH) TRU waste disposal operations began March 26, 1999, and remote-handled (RH) waste operations began in 2007. Use of the TRUPACT-III shipping container began in 2011. Operations began after the successful demonstration of compliance with applicable state and federal laws and applicable regulations, and completion of the operational readiness reviews. Operations start-up began after approvals were received as required in the U.S. Environmental Protection Agency (EPA) Compliance Certification, and the Hazardous Waste Facility Permit.

On February 5, 2014, an underground mine fire involving a salt haul truck occurred at the WIPP. On February 14, 2014, a radiological release event occurred in the underground, and waste disposal operations were shut down and remain shut down. Operations will be scheduled to resume after the successful implementation of improved controls and processes and the related demonstration of compliance with these new expectations.

In fiscal year (FY) 2015, process improvements have been significant, with updates to work control, hazard analysis, radiological protection, and emergency preparedness, as well as improvements to physical systems. Additional improvements to underground system such as ventilation are in progress.

### **4.0 COORDINATION WITH OTHER SITE CONTRACTORS**

Title 10 CFR §851.11 states that contractors are to coordinate with other contractors responsible for work at the covered workplaces to ensure that there are clear roles,

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responsibilities and procedures to ensure the safety and health of workers at multiple-contractor workplaces. The WSHPD also includes the roles and responsibilities of host sites referencing the Host Site 851 Plans (Host Site Plan[s]) to serve as a roadmap for the specific host site procedures that apply to NWP activities.

#### **4.1 Central Characterization Project**

NWP also manages and operates the Central Characterization Program (CCP), which deploys mobile/modular waste characterization units to generator sites, providing a standardized characterization and certification capability to certify TRU waste for disposal at the WIPP. The CCP was established to provide cost effective TRU waste characterization, confirmation, and certification, including generation-level and project-level data validation and verification in accordance with programmatic compliance documents. The National TRU Program uses the CCP to assist small quantity sites that have limited or no TRU waste characterization and certification capability, and to supplement the capability of the large quantity sites. The CCP is staffed by NWP and subcontractor personnel.

NWP addresses safety and health considerations for host site operations through an interface agreement with each host facility. The interface agreement specifies the respective responsibilities of NWP and the host facility regarding provision of facilities, utilities, maintenance support, safety support, environmental support, and operational responsibilities. Division of operational responsibilities between NWP and host sites is described in the interface agreement for each site. CCP operations conducted at the host site must comply with applicable requirements with the host site and NWP. These requirements, as related to 10 CFR Part 851 implementation, are defined in interface documents and are included in the WSHPD by facility. NWP provides periodic review of host sites to ensure that responsibilities for worker protection are being met.

#### **4.2 Other Companies Conducting Work at WIPP**

The WSHPD is applicable to NWP subcontractors providing services at any covered workplace. DOE laboratories (Los Alamos National Laboratory [LANL] and Sandia National Laboratories [SNL]), the Carlsbad Field Office Technical Assistance Contractor, and other DOE direct contracts, whether conducting research or performing specific work projects at the WIPP site, are directly contracted to the DOE and therefore responsible for their own 851 Plans, or are covered under their parent company 851 Plan. Additional interfaces and responsibilities for DOE direct contracts as related to safety aspects at WIPP governed by NWP are defined further in WP 02-EC.12, *Site Users and Tenants Guide for Organizations, Personnel, or Companies that Perform Work on U.S. DOE Property or Rights of Way on or Around the Waste Isolation Pilot Plant Site*.

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## **5.0 SCOPE AND APPLICABILITY**

Title 10 CFR §851.11, states: "If a contractor is responsible for more than one covered workplace at a DOE site, the contractor must establish and maintain a single worker safety and health program for the covered workplaces for which the contractor is responsible." The 851 Rule and, therefore, the WSHPD, apply to the conduct of NWP activities at WIPP, Idaho National Laboratory (INL), Argonne National Laboratory (ANL), Savannah River Site (SRS), LANL, Oak Ridge National Laboratory (ORNL), SNL, and other small quantity sites as applicable.

The WSHPD also describes how NWP complies with the requirements set forth in Subpart C that are applicable to the covered workplace(s) with the referenced policies and procedures providing the actual methods of implementation.

### **5.1 WIPP Site**

#### **5.1.1 NWP**

NWP is the management and operating (M&O) contractor for the WIPP site. The WIPP site is located in an area of low population density. There are no industrial, commercial, institutional, recreational or residential structures within the WIPP site boundary. The WIPP surface structures accommodate the personnel, equipment, and support services required for the receipt, preparation, and transfer of TRU waste from the surface to the underground.

The primary surface operations at the WIPP are conducted in the Waste Handling Building (WHB), which is divided into the CH waste handling area, the RH waste handling area, and support areas. The waste disposal area encompasses 100-acres on a horizon located 2,150 feet beneath the surface in a deep, bedded salt formation. Waste is transferred from the surface to the disposal horizon through the waste shaft using a hoist and conveyance.

Waste arrives at the WIPP in drum assemblies, standard waste boxes, ten-drum overpacks, or canisters. The principal operations at the WIPP involve the receipt and disposal of TRU mixed waste. During the event recovery period, waste is not being received.

Normal hazards associated with WIPP operations include mining activities, high voltage, compressed gases, confined spaces, handling of radiological and nonradiological hazardous materials, nonionizing radiation, high noise levels, mechanical and moving equipment, working at heights, construction, heat stress and other weather extremes such as high winds. Waste handling operations at WIPP do not involve high temperature and pressure systems or electromagnetic fields; however, they may include hazards associated with high temperature and pressure within waste container, specifically drums. This situation may exist if characterization from generator sites was

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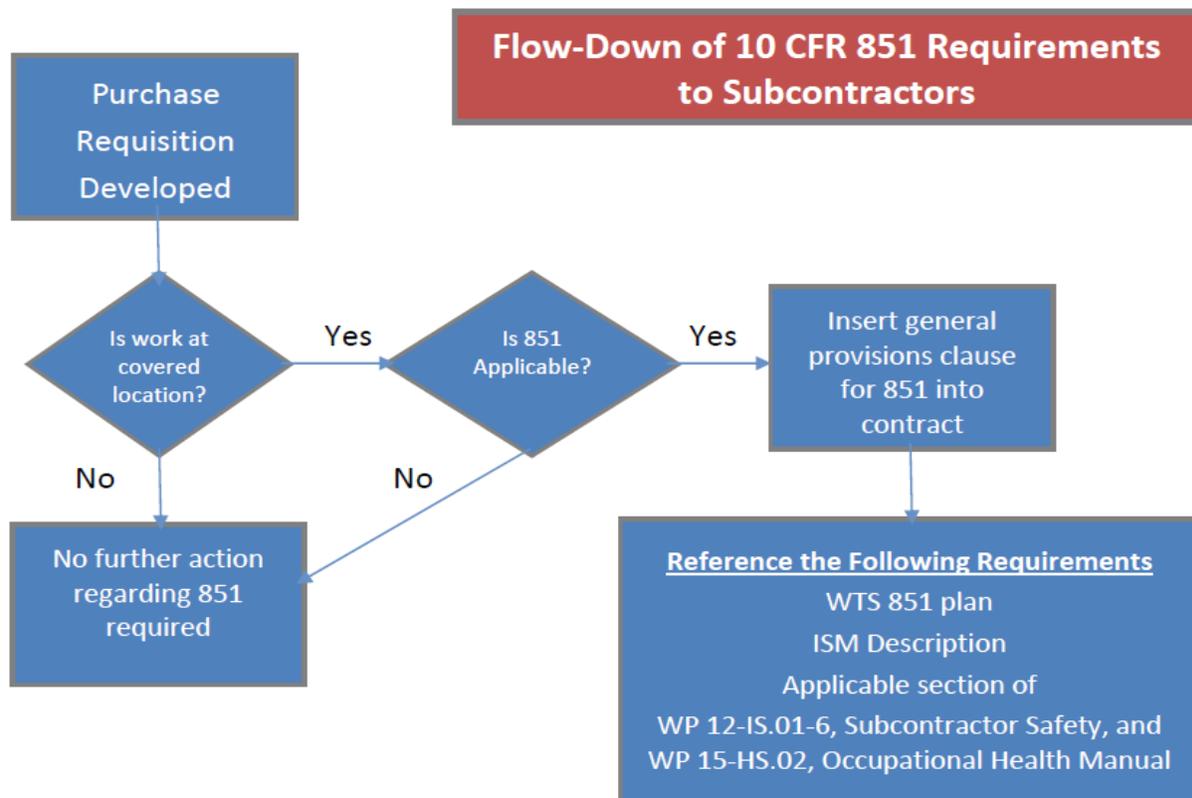
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less than adequate. WIPP has put systems in place to share information and increase oversight to detect waste container heat and pressure problems.

Additional hazards due to the two February events are being thoroughly analyzed and controls have been implemented as part of the recovery planning. These include aspects of radiological contamination clean-up, assessing equipment function, monitoring filter impacts, and improvement of hazard analysis, emergency drills, work planning, and preventative maintenance. In the interim, WIPP has additional controls as discussed in Management Directive (MD) 1.5, *Interim Operational Restrictions and Requirements*.

**5.1.2 Subcontractors**

NWP has implemented a process to assure that the requirements of 10 CFR Part 851 are appropriately flowed down to subcontractors performing work at NWP covered sites in accordance with the following flowchart. The subcontractor Technical Representative Program has been enhanced to include more emphasis on field presence and oversight.



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The process includes specific procurement clauses for subcontractors to work under the applicable requirements of the WSHPD, as well as work control requirements, safety reviews, occupational medical requirements and others to ensure effective implementation of 10 CFR Part 851. NWP is responsible for flowing down worker protection requirements to subcontractors at any tier to the extent necessary to ensure compliance. These requirements are included in the terms and conditions of agreement of each subcontract before work at the WIPP or CCP sites may begin. NWP and its subcontractors coordinate in accordance with WP 12-IS.01-6, *Industrial Safety Program – Visitor, Vendor, User, Tenant, and Subcontractor Safety Controls*, to ensure clear roles, responsibilities and procedures to achieve an integrated approach to ensuring worker safety and health consistent with 10 CFR §851.11(a)(2)(ii).

## **5.2 Generator Sites**

NWP and its subcontractor personnel work at a number of DOE generator sites where NWP has no direct contractual authority for overall site operations. NWP has therefore negotiated interface agreements with each generator site's M&O contractor. These interface agreements define NWP and generator site responsibilities regarding safety oversight and safety support for generator site operations. NWP fully expects each generator site's M&O contractor to proactively address its safety commitments to CCP operations at those sites. NWP also understands that the safety and health of NWP and its subcontractor personnel remains the responsibility of NWP, regardless of location. NWP management commitment for generator site personnel is further delineated in the applicable sections of this program description. Specific activities at each site include providing nondestructive examination (NDE), nondestructive assay (NDA), and visual examination (VE). At each of the sites, some sampling is conducted, such as flammable gas per Transuranic Waste Authorized Methods for Payload Control (TRAMPAC) requirements. There are components based on management commitment and the fact that NWP always retains corporate responsibility for the protection of its workers that are further delineated in the applicable sections of this program description.

### **5.2.1 SRS**

The interfaces and responsibilities regarding the overall scope of work for NWP at SRS are defined in CCP-PO-004, *CCP/SRS Interface Document*. The host site has primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety basis, and environmental permits. The scope of work for NWP and its subcontractors at SRS is based on the responsibilities for the characterization of CH and RH waste.

### **5.2.2 LANL**

The interfaces and responsibilities regarding the overall scope of work for NWP at LANL are defined in CCP-PO-012, *CCP/LANL Interface Document*. As the host site, LANL

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has primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety basis, and environmental permits.

### **5.2.3 INL**

The interfaces and responsibilities regarding the overall scope of work for NWP at INL are defined in CCP-PO-024, *CCP/INL Interface Document*; CCP-PO-501, *CCP/INL RH TRU Waste Interface Document*; and CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control* (CCP RH-TRAMPAC). The host site's Advanced Mixed Waste Treatment Project (AMWTP), Idaho Treatment Group, LLC (ITG), and CH2M-WG Idaho, LLC (CWI) have primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety basis, and environmental permits. These same responsibilities apply to the additional scope of work at INL for transportation of CH and RH TRU waste. It should be noted, however, that NWP always retains corporate responsibility for the protection of its workers, as further delineated in the applicable sections of this program description.

### **5.2.4 ANL**

The interfaces and responsibilities regarding the overall scope of work for NWP at ANL are defined in CCP-PO-500, *CCP/ANL RH-TRU Waste Interface Document*. As the host site's M&O contractor, UChicago Argonne, LLC, has primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety basis, and environmental permits.

### **5.2.5 ORNL**

The interfaces and responsibilities regarding the overall scope of work for NWP at ORNL are defined in CCP-PO-027, *CCP/TRU Waste Processing Center/ORNL Interface Document*. Wastren Advantage, Inc., is the host site's M&O contractor at the Transuranic Waste Processing Center (TWPC), and has primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety bases, and environmental permits.

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### **5.2.6 SNL**

The interfaces and responsibilities regarding the overall scope of work for NWP at SNL is defined in CCP-PO-510, *CCP/SNL Interface Document*. This includes the fact that as the host site, SNL has primary responsibility for assuring that requirements for safety are met, including radiological control, emergency management, industrial safety, industrial hygiene, security, safety bases, and environmental permits.

## **6.0 COVERED WORKPLACES/ACTIVITIES**

Per 10 CFR §851.3, a covered workplace is a place at a DOE site where a contractor is responsible for performing work in furtherance of a DOE mission. Considered covered workplaces/activities applicable to this WSHPD are described below.

### **6.1 WIPP Site**

The WIPP site includes the Land Withdrawal Act (LWA) defined area, surface operations, and the underground.

Under the overall WIPP safety program, per the ISMS Description, everyone that enters the WIPP site is provided a level of protection in accordance with VPP STAR status. As stated in DOE guidance on who must comply with the 851 Rule, although they are afforded safety protection through ISM, the following entities are specifically excluded from the WSHPD.

- Emergency response groups such as off-site municipal fire departments, local law enforcement, and mine rescue teams from area mines,
- Various university groups, laboratories and other research entities conducting research, if the research being conducted is not funded by or within the scope of the DOE,
- State and municipal departments that may be maintaining highways, conducting audits, etc., and
- General public or companies passing through the land withdrawal area for recreational purposes or to conduct work that is not funded by the DOE.

### **6.2 Carlsbad Buildings**

#### Skeen-Whitlock Building and Cascade Building

This is a covered worksite for NWP and its subcontractor personnel. The Skeen-Whitlock Building is a General Services Administration (GSA) building. GSA services provided are not covered in the WSHPD. NWP's subcontractor Regulatory

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Environmental Services (RES) occupies a portion of the Cascade Building's second floor which is leased from a private entity. This is also a covered worksite for NWP and its subcontractors but the landlord services are the responsibility of the building owners.

WIPP Records Center

This is a covered worksite for NWP subcontractors. Landlord services provided by Cowperwood Management are not covered in the WSHPD.

### **6.3 CCP Sites**

Characterization activities conducted at CCP sites by NWP and its subcontractors are considered covered work scope. Therefore, if CCP activities are taking place at a DOE site, it is also a covered workplace. The following sites are current covered workplaces/activities.

#### **6.3.1 INL**

Characterization activities conducted at the INL by NWP and its subcontractors will be addressed in the specific sections below based on interface agreements, contract scopes of work, the Host Site 851 Plans, and this WSHPD. At INL, there are four different work scopes described in actual statements of work: characterization activities related to CH waste at AMWTP, CH waste for CWI, RH waste for CWI, and transportation.

#### **6.3.2 LANL**

Characterization activities conducted at LANL by NWP and its subcontractors are addressed in the specific sections below based on interface agreements, contract scopes of work, the Los Alamos National Security, LLC (LANS), 851 Plan, and this WSHPD.

#### **6.3.3 SRS**

Characterization activities conducted at the SRS by NWP and its subcontractors are addressed in the specific sections below based on interface agreements, contract scopes of work, the SRS 851 Plan, SRNS-RP-2008-00001, and this WSHPD.

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### **6.3.4 ANL**

Characterization activities conducted at ANL by NWP and its subcontractors are addressed in the specific sections below based on interface agreements, contract scopes of work, the UChicago Argonne, LLC, 851 Plan, and this WSHPD. The CH characterization activities at ANL have been completed, and RH characterization activities will resume after recovery activities are complete.

### **6.3.5 ORNL**

Characterization activities conducted at ORNL by NWP and its subcontractors are addressed in the specific sections below based on interface agreements, contract scopes of work, the ORNL/TWPC 851 Plan, and this WSHPD.

### **6.3.6 SNL**

Characterization activities conducted at SNL by NWP and its subcontractors are addressed in the specific sections below based on interface agreements, contract scopes of work, the SNL 851 Plan, and this WSHPD. The CH characterization activities at SNL have been completed, and RH characterization activities will resume after recovery activities are complete.

### **6.3.7 Small Quantity Sites – Characterization Activities**

Characterization activities conducted at small quantity sites by NWP and its subcontractors are addressed in section 10.0, *New Work Scopes*. As the time frame for each is limited, they are not listed individually in this plan, which is updated annually unless there is a specific unique component that is not in accordance with section 10.

## **7.0 EXCLUSIONS**

### **7.1 Scopes Not Covered**

In accordance with 10 CFR §851.2(c), the WSHPD does not apply to transportation to or from a DOE site. Therefore, the WSHPD is not applicable to transportation subcontracts such as the WIPP bus subcontract, nor is it applicable to incidents/accidents off the DOE site premises involving employees or GSA vehicles. While incidents will be investigated and Occurrence Reporting requirements will be met, the 851 Rule will not be considered applicable to transportation issues.

In accordance with 10 CFR §851.2(b), the WSHPD does not apply to radiological hazards or nuclear explosives operations to the extent regulated by 10 CFR Parts 20, 820, 830, or 835. Though related components may be referenced due to inclusion in the overall ISMS or VPP, they are not applicable to 10 CFR Part 851.

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Specific non-applicable areas (based on the fact that the scope of work, though located on the WIPP site, is not DOE-funded) include research by university groups, laboratories and other research entities conducting activities in the WIPP underground research/experimental areas. This exclusion also applies to any public use of the land withdrawal area on the basis that it is not DOE-funded work. Personnel performing research within the property protection area are still protected by the ISMS and VPP. Personnel conducting non-DOE-funded work within the land withdrawal area are also protected. They are required to implement WP 02-EC.12, with preapprovals of job hazard analyses (JHAs), safety plans, and implementing documentation, which ensures that appropriate risks have been identified for them as well as for the support work scope provided by NWP personnel or subcontractors.

Additionally, DOE guidance and language in the rule states that merely providing supplies does not fall within the scope of Part 851. Also, such services will not be tracked for Occupational Safety and Health Administration (OSHA) reporting. Thus, this WSHPD does not apply to companies and agencies providing supply services to WIPP, such as the following:

- Vending machine suppliers; copy machine maintenance personnel
- Delivery personnel, such as UPS or office supply companies
- Utilities personnel servicing, for example, power and communication lines

The occupational medicine portion of this WSHPD does not apply to subcontractors that (1) work at one of the covered workplaces/activities for less than 30 days in a 12-month period, and (2) are not required to be enrolled in a medical or exposure monitoring program due to lack of potential for exposure.

## **7.2 Carlsbad Areas Not Covered**

Laboratory work conducted by NWP employees at the Carlsbad Environmental Monitoring and Research Center (CEMRC) is not covered, since the CEMRC is not a DOE site.

The TRUPACT Mobile Loading facility on Airport Avenue is a LANL work scope facility and is covered under the LANL 851 Plan.

## **7.3 Other Locations Not Covered**

The WSHPD is not applicable to the following:

- Office workers who are not located at DOE sites. Though conducting DOE work, office personnel at, for example, Albuquerque, New Mexico; Denver, Colorado; and Tacoma, Washington, are not working at DOE sites and thus do not fall under the auspices of the WSHPD.

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- Work conducted in the field that is not on a DOE site, such as emergency response training on shipping routes, emergency response at a non-DOE site (such as mine rescue), and competitions and conferences held off site.
- Generator site work conducted at a civilian site, a Department of Defense site, or a naval site such as Bettis Atomic Power Laboratory.
- Any other entity (commercial, private) that is contracted to NWP to serve as a location to temporarily store/stage TRU waste (e.g., Waste Control Specialists LLC).

**8.0 GENERAL REQUIREMENTS (SUBPART B PROGRAM REQUIREMENTS, 10 CFR §851.10, GENERAL REQUIREMENTS)**

The NWP overall safety program is based on the ISMS, the VPP, and this WSHPD, providing an integrated forum for safe and compliant operations, a focus on continuous improvement, and the expectations for a proactive safety culture. This foundation meets the requirements of §851.10 (a) and (b), providing a place of employment that is free from recognized hazards that are causing or have the potential to cause death or serious physical harm to workers, and ensuring that work is performed in accordance with applicable requirements of Part 851, and with the worker safety and health program for NWP covered workplaces. The written worker safety and health program consists of the WSHPD and the referenced programs, policies, and procedures. The WSHPD describes how NWP complies with the requirements set forth in Subpart C that are applicable to the hazards associated with NWP scope of work, and how NWP complies with any compliance orders issued by the Secretary pursuant to §851.4.

The only direct VPP program inclusion for purposes of meeting 851 Rule expectations through this WSHPD is Management Policy (MP) 1.12, *Worker Protection Policy*.

**9.0 ADMINISTRATION OF THE WORKER SAFETY & HEALTH PROGRAM (10 CFR §851.11[b], [c]) (10 CFR §851.12, AND 10 CFR §851.13)**

The WSHPD is maintained by the NWP Environmental, Safety and Health Department Manager with updates submitted for approval to the CBFO Manager as the Head of DOE Field Element. A copy of the approved program is maintained in the Electronic Document Management System (EDMS) and in the CCP controlled document system to ensure access by affected workers and their designated representatives.

The effective implementation date of the initial WSHPD was May 24, 2007, although CBFO approval was obtained prior to that date. Since the WSHPD aligns with and references responsibilities in various Host Site 851 Plans, full implementation was delayed until May 24, 2007, to allow sufficient time for host site plans to be fully in place, so that the implementation date was the same for all covered workplaces and work

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scopes within the WSHPD. Therefore, the annual review of this program is submitted per contract-scheduled dates each year.

Any required updates of the WSHPD are submitted when a significant change or addition to the program is made, which may include a change of WIPP M&O contractor or prime contractor at the generator sites where NWP conducts characterization activities.

An annual review is conducted, and either an updated worker safety and health program, or a letter stating that no changes are necessary in the currently approved worker safety and health program, is submitted to DOE/CBFO for approval.

Revisions/updates include incorporation in the worker safety and health program any changes, conditions, or workplace safety and health standards directed by the DOE consistent with the requirements of the 851 Rule, the DOE Acquisition Regulation 970.5204-2, laws, regulations, and DOE directives and associated contract clauses. Updates go through the NWP review process, with concurrence by the CBFO before subsequent implementation. The WIPP Bargaining Units are also notified of any updates upon receipt of CBFO approval of those updates pursuant to §851.11(d). NWP Human Resources ensures that WSHP requirement changes that affect the labor agreement are appropriately addressed with the Bargaining Unit consistent with federal labor laws. There are no affected bargaining units with NWP characterization activities. Subcontractors employing Bargaining Unit personnel are responsible for conducting their own notifications.

## **10.0 NEW WORK SCOPE**

New work scope, including changes in current recovery scope at WIPP will continue to be incorporated under the current WSHPD. New work scope involving CCP activities at the generator sites and related Part 851 responsibilities will be aligned in interface agreements as follows:

- Management Responsibilities and Worker Rights and Responsibilities – Joint responsibilities under the Host Site Plan and WSHPD.
- Hazard Identification and Assessment – Host site responsibility under its Host Site Plan.
- Hazard Prevention and Abatement – Joint responsibilities under the Host Site Plan and the WSHPD.
- Compliance with Safety and Health Standards – Host site responsibility under its Host Site Plan for beryllium program per 10 CFR Part 850, including beryllium medical surveillance, 29 CFR Part 1910, "Occupational Safety and Health Standards," and National Fire Protection Association (NFPA) standards.

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Joint responsibility for 29 CFR Part 1904, "Recording and Reporting Occupational Injuries and Illnesses," and the rest is anticipated to not be applicable.

- Construction Safety – May be applicable. Host site responsibility under its Host Site Plan. Though construction will not be part of the work scope, if construction is being conducted in close proximity, the hazards will be identified and controls placed to ensure appropriate worker protection.
- Explosives Safety, Firearms Safety, and Biological Safety – Anticipated to not be applicable.
- Fire Protection, Pressure Safety, and Industrial Hygiene – Host site responsibility under its Host Site Plan.
- Occupational Medical – WSHPD responsibility, with local facility emergency response per the Host Site Plan.

If the interface agreement for the new work scope aligns with the above responsibilities, the new work scope can be added to the WSHPD with the next scheduled annual update. If the responsibilities vary from the above list, the WSHPD must be changed accordingly.

No compliance orders have been issued by the Secretary to WIPP in accordance with 10 CFR §851.4. If a compliance order is received, the resultant CBFO approved corrective action plan will become an attachment to this plan as an editorial change until the corrective actions have all been completed.

### **11.0 MANAGEMENT RESPONSIBILITIES (SUBPART C, §851.20([a]))**

NWP is committed to the safety and health of its workforce. This section is applicable to NWP facilities and work scopes, including subcontractors working at the covered workplaces in accordance with their statement of work. This commitment is specifically demonstrated in the following documents reflecting appropriate Part 851 implementation.

1. Written policy, goals, and objectives for the worker safety and health program are established through the implementation of steps in the NWP ISMS Description, through the CBFO interface and budget/contract process, and through MP 1.29, *Mission, Goals, and Responsibilities*.
2. As reflected in MP 1.12, NWP uses qualified worker safety and health staff to direct and manage the safety program, provide subcontractor safety oversight, and interface with host site worker safety and health staff to ensure appropriate safety oversight of characterization.

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3. NWP assigns worker safety and health program responsibilities, evaluates personnel performance, and holds personnel accountable for worker safety and health performance. These activities are formally established in MP 1.7, *Employee Performance Appraisal and Development*, and MP 1.12. Safety assessments of subcontractors working at NWP covered worksites are conducted in accordance with the Contractor Assurance Program.
4. NWP provides mechanisms to involve workers and their elected representatives in the development of the worker safety and health program goals, objectives, and performance measures, and in the identification and control of hazards in the workplace. At the WIPP site, this is done through a variety of mechanisms as described in MP 1.12, including the use of safety committees. Subcontractors are invited to participate in safety committees and other safety activities at WIPP such as safety fairs and awareness activities. For characterization activities, NWP personnel and subcontractors are encouraged to volunteer and join the various host site safety committees and activities, as well as being involved in the development of CCP-specific goals, and participating in tasks to identify and control hazards in their work areas. NWP worksites activities include participation in WIPP Safety Campaigns (including contests, submission of ideas for safety goals, receiving periodic packages of wellness information, home safety campaign handouts, etc.). CCP personnel and subcontractors have the additional benefit of participating in the host site employee involvement program activities. For example, several CCP employees at host sites are currently participating in Human Performance Improvement initiatives.
5. NWP provides workers and subcontractors at covered workplaces with access to information relevant to the worker safety and health program including Lessons Learned, the Porcelain Press, informational flyers, pre-job briefings, and other activities as committed to in MP 1.12.
6. NWP establishes procedures for workers to report without reprisal job-related safety hazards and occurrences and to make recommendations about ways to control those hazards. These processes include MP 1.12, WP 12-IS.01, *Industrial Safety Program – Structure and Management*, and WP 15-GM1002, *Issues Management Processing of WIPP Forms*. WP 12-IS.01 provides a method for prompt response to hazard reports and recommendations.
7. MP 1.12 provides for regular communication with workers about workplace safety and health matters.
8. MP 1.2, *Stop-Work Policy*, establishes the process to permit workers including subcontractors to stop work or decline to perform an assigned task because of a reasonable belief that the task poses an imminent risk of death, serious

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physical harm, or other serious hazard to workers, in circumstances where the workers believe there is insufficient time to use normal hazard reporting and abatement procedures.

9. MP 1.12 and WP 12-IS.01 contain the methods used to inform workers of their rights and responsibilities by appropriate means, including posting the DOE designated worker protection poster in the workplace where it is accessible to workers, including subcontractors.

## **12.0 WORKER RIGHTS AND RESPONSIBILITIES (SUBPART C, §851.20[b])**

This section is applicable to NWP covered workplaces and work scopes. Knowledge and support of Worker Rights and Responsibilities are central to the NWP safety culture. These rights and responsibilities are unique in several respects. For example, the Federal Mine Safety and Health Act of 1977 (Mine Act) formally requires a "miner's representative" to ensure the miners feel free to present issues to mine inspectors. Very early in the WIPP project, management supported the position of allowing each person to be his or her own "miner's representative." In later years, a bargaining unit formed, but remained committed to individual rights and responsibilities for safety as the tradition had already been established in Mine Act implementation and the VPP, through open door policies, WIPP Forms, and other such forums that demonstrated the expectations key to our safety culture. Employees are made aware of their rights and responsibilities as workers starting with New Employee Orientation and General Employee Training (GET). The rights and responsibilities specified in 10 CFR Part 851 are implemented through posting of the DOE VPP Rights on NWP Human Resource Bulletin Boards at covered workplaces, and through implementation of WP 12-IS.01; WP 12-IH.02, *WIPP Industrial Hygiene Program Manual*; MP 1.2; MP 1.12; and MP 1.28, *Integrated Safety Management*. These rights and responsibilities are also presented in the *Employee Safety Programs Handbook*, which each employee receives as part of GET. They include:

1. The right to participate in activities described in this section on official time.
2. The right to have access to DOE safety and health publications; the worker safety and health program for the covered workplace; the standards, controls, and procedures applicable to the covered workplace; the safety and health poster that informs the worker of relevant rights and responsibilities; and limited information on any recordkeeping log (OSHA Form 300). Access is subject to Freedom of Information Act requirements and restrictions, and the DOE Form 5484.3 (the DOE equivalent to OSHA Form 301) that contains the employee's name as the injured or ill worker.
3. The right to be notified when monitoring results indicate the worker was exposed to hazardous materials.

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4. The right to observe monitoring or measuring of hazardous agents and have the results of their own exposure monitoring.
5. Any employee is allowed to accompany any management, auditors, inspectors, etc., during physical inspections of the workplace for the purpose of aiding the inspection. As appropriate, employees are consulted on matters of worker safety and health.
6. The DOE VPP rights posted on the HR bulletin board areas state that employees may request and receive results of inspections and accident investigations.
7. The right to express concerns related to worker safety and health.
8. The right to decline to perform an assigned task because of a reasonable belief that, under the circumstances, the task poses an imminent risk of death or serious physical harm to the worker coupled with a reasonable belief that there is insufficient time to seek effective redress through normal hazard reporting and abatement procedures.
9. MP 1.2 implements the worker right and responsibility to stop work when the worker has a concern for employee safety, the safety of the environment, or the quality of the activity being performed.

### **13.0 HAZARD IDENTIFICATION AND ASSESSMENT (SUBPART C, §851.21)**

NWP has established procedures to identify existing and potential workplace hazards and assess the risk of associated worker injury and illness. Procedures include methods to:

1. Assess worker exposure to chemical, physical, biological, or safety workplace hazards through appropriate workplace monitoring.

#### WIPP

At the WIPP site, in accordance with WP 12-IH.02 and WP 12-IH.02-1, *WIPP Industrial Hygiene Program – Health Hazard Assessment*, initial or baseline surveys of work areas or operations are conducted to identify and evaluate potential worker health risks. Baseline hazard analysis and the emergency management hazards surveys are conducted as part of the hazards assessments. The Biennial Status Report and Assessment Strategy provides a periodic baseline of potential hazards on a systemic, sitewide basis, in accordance with DOE G 440.1-3, *Occupational Exposure Assessment*, and DOE STD-6005-2001, *Industrial Hygiene Practices*, for the dataset used for the baseline. Safety monitoring is conducted in accordance with WP 12-IS.01.

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Hazard identification methods used also support the WIPP Fire Hazard Analysis (FHA) program. Continuous workplace monitoring includes analysis of potential hazards such as heat stress in WP 12-IS.01-5, *Industrial Safety Program - Hazardous Locations and Working Surfaces*. Monitoring and controls include work within the land withdrawal act area, such as chemical exposures for vegetation-related work through the material safety data sheet (MSDS) program. Continued monitoring results are used to prioritize funding for hazard correction and the design of future controls.

Characterization Sites

Per the interface documents, workplace monitoring is conducted by the host site under the Host Site Plan.

2. Document assessment for chemical, physical, biological, and safety workplace hazards using recognized exposure assessment and testing methodologies and using accredited and certified laboratories.

WIPP

In accordance with WP 12-IH.02-1, documentation of exposure assessments for chemical, physical, and biological agents and ergonomic stressors is conducted using National Institute for Occupational Safety and Health (NIOSH) or OSHA exposure assessment methodologies, as applicable and available, and use of American Industrial Hygiene Association accredited industrial hygiene laboratories is mandated.

Characterization Sites

Per the interface documents, selection of appropriate exposure assessment and testing methodologies and laboratories is conducted in accordance with the Host Site Plan, and is not the direct responsibility of NWP.

3. Record observations, testing, and monitoring results.

WIPP

Observations, testing, and monitoring results are recorded in accordance with the requirements listed in WP 13-1, *Nuclear Waste Partnership LLC Quality Assurance Program Description*.

Characterization Sites

Per the interface documents, recording of observations, testing, and monitoring results are conducted in accordance with the Host Site Plan.

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4. Analyze designs of new facilities and modifications and repairs to existing facilities and equipment for potential workplace hazards.

WIPP

At WIPP, this requirement is implemented through WP 09, *Conduct of Engineering*.

Characterization Sites

The host facility is responsible for new facilities and modifications and repairs to existing facilities, which are not part of the NWP characterization scope. Any modification to NWP equipment is controlled through CCP-CM-001, *Equipment Change Authorization and Documentation*. Plans for installation of new equipment or modification of existing equipment are submitted to the host site for safety review.

5. Evaluate operations, procedures, and facilities to identify workplace hazards.

WIPP

At WIPP, this requirement is implemented through integrated assessments such as the Emergency Planning Hazards Survey conducted in accordance with DOE O 151.1C, *Comprehensive Emergency Management System*, the Operations Safety Team walkdowns, and the inspections implemented through MP 5.16, *Landlord Program*. Daily workplace evaluations by workers and management include pre-use inspections of tools and equipment, including forklifts, cranes, slings, and personal protective equipment (PPE), as well as overall workplace conditions, in accordance with the NWP ISM Description. Hazard identification processes used at WIPP include WP 12-IS.03, *Electrical Safety Program Manual*, and WP 12-IS3002, *Job Hazard Analysis Performance and Development*, for stored energy sources. Heavy loads, rigging and hoisting, are addressed in WP 10-AD3007, *Use and Control of Rigging Components*; WP 12-IS.01-3, *Industrial Safety Program - Equipment and Tools*; WP 12-IS.01-12, *Industrial Safety Program – Hoisting and Rigging*, WIPP OPS-402, *Incidental Rigger Qualification Card*; and M-24, *Mobile Crane Operator Qualification Card*. Fall protection, scaffolding, and ladders are addressed in WP 12-IS.01-5. Subcontractor controls for each of the above areas are contained in WP 12-IS.01-6. Evaluation of hazards includes chemical and particulate hazards addressed in WP 12-IH.02-12, *WIPP Industrial Hygiene Program - Cryogenics, Refrigerants, and Process Gases*; WP 12-IH.02-11, *WIPP Industrial Hygiene Program - Polychlorinated Biphenyls (PCBs)*; WP 12-IH.02-1, for diesel emissions; WP 12-IH1022, *Sampling for Carbon Tetrachloride in the WIPP*, and WP 12-IH.02-4, *WIPP Industrial Hygiene*

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*Program – Hazard Communication and Hazardous Materials Management Plan*, which includes the MSDS program. Confined spaces are addressed in WP 12-IH.02-2, *WIPP Industrial Hygiene Program – Confined Spaces*.

Characterization Sites

This is a shared responsibility with the host facility. The host facility is responsible for facility hazards, though NWP holds employees and subcontractors responsible for identifying workplace hazards, including facility hazards as required in the ISM Description. NWP operating procedures are evaluated for workplace hazards as part of the formal document review process in accordance with CCP-QP-010, *CCP Document Preparation, Approval, and Control*.

6. Perform routine job activity level hazard analyses.

WIPP

At the WIPP site, job activity level hazard analyses are developed in accordance with WP 12-IS3002, which includes program updates with subcontractor requirements in WP 12-IS.01-6.

Characterization Sites

Job hazard analyses are fully incorporated in specific CCP Health & Safety Plans as delineated in CCP-QP-002, *CCP Training and Qualification Plan*, and CCP-QP-009, *Work Control Process*. In most cases, the JHAs are developed by the host site.

7. Review site safety and health experience information.

WIPP

At the WIPP site, safety and health experience information is reviewed in site safety statistical reports, through WP 13-1 trending; WP 15-PA.01, *Operating Experience/Lessons Learned Program*; and the qualitative safety performance measures from the NWP ISMS Description. Lessons learned are developed, screened, distributed, and implemented with feedback provided as part of the Operating Experience Program in accordance with DOE O 210.2A, *Corporate Operating Experience Program*. The program analyzes events, occurrences, issue trends, causal factors, and related areas to identify NWP learning organization needs to ensure continuous improvement.

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Characterization Sites

This is a shared responsibility with the host site and is done through the Host Site Plan and CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*.

8. Consider interaction between workplace hazards and other hazards such as radiological hazards.

WIPP

WIPP-007, *Hazard Identification Summary Report for WIPP Operations*, evaluates the combinations of hazards identified at WIPP and Carlsbad facilities. The controls are specific to the hazards, and combinations of controls are chosen for the hazards that exist in any one location. Workplace hazards and other hazards such as radiological hazards are analyzed in the *Documented Safety Analysis Safety Management Program (SMP) Chapters 6 through 17*, as well as the implementation direction provided in WP 12-IS.01 procedures.

Characterization Sites

Since the radiological programs are under the cognizance of the host site, this function is accomplished by the host site, in accordance with the Host Site Plan.

NWP does not have oversight of any closure facilities at this time; therefore, the section of Part 851 pertinent to that area is not part of the WSHPD.

**14.0 HAZARD PREVENTION AND ABATEMENT (SUBPART C, §851.22)**

NWP establishes and implements a hazard prevention and abatement process to ensure that identified and potential hazards are prevented or abated in a timely manner. That process is applicable to NWP work scope and is incorporated in WIPP documents: WP 12-FP.01, *WIPP Fire Protection Program*; MP 1.12; WP 12-IS3002; WP 12-IS.01; MP 1.2; WP 15-PC3609, *Preparation of Purchase Requisitions*; and WP 12-IS.01-6.

1. For hazards identified either in the facility design or during the development of procedures, controls must be incorporated in the appropriate facility design or procedure.
2. For existing hazards identified in the workplace, contractors must:
  - (i) Prioritize and implement abatement actions according to the risk to workers;

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- (ii) Implement interim protective measures pending final abatement; and
- (iii) Protect workers from dangerous safety and health conditions.

NWP selects hazard controls described in the NWP ISMS Description based on the following hierarchy.

1. Elimination or substitution of the hazards where feasible and appropriate
2. Engineered controls where feasible and appropriate
3. Work practices and administrative controls that limit worker exposures
4. Personal protective equipment

NWP addresses hazards when selecting or purchasing equipment, products, and services using a graded approach at the WIPP site in accordance with WP 09-CN3005, *Graded Approach to Application of QA Controls*, and WP 12-IS0301, *Nationally Recognized Testing Laboratory Process*, and for the characterization activities at the host sites in accordance with CCP-QP-001, *CCP Graded Approach*. The process of using a graded approach applies controls to items and activities that affect quality and safety at WIPP, based on the importance of the item or activity and the impact should it fail. The controls for safety include required safety reviews and approvals of related work orders, training requirements, and implementation of codes, standards, and other requirements.

Current NWP programs provide controls that must be used (e.g., qualification and training, work control, or calibration).

Improvements in hazard prevention and abatement are currently in development in response to the February 2014 events. These improvements will be incorporated into the applicable procedures referenced in this description accordingly.

### **15.0 SAFETY AND HEALTH STANDARDS (SUBPART C, §851.23)**

NWP complies with the following safety and health standards, which are applicable to the hazards at the WIPP site and the characterization activities host sites, per WP 12-IS.01 and the applicable Host Site Plan.

1. Title 10 CFR Part 850, "Chronic Beryllium Disease Prevention Program," (CBDPP) operations at WIPP, LANL, SRS, INL, and ANL are potentially within the scope of 10 CFR Part 850. Each host site maintains individual responsibility. There is some possibility that beryllium exposure might occur at WIPP. Accordingly, CBDPP programs are in place at WIPP and at the host sites (per the Host Site Plan) to address potential exposures. WIPP has

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developed and implemented a CBFO-reviewed and approved beryllium exposure prevention program in conformance with 10 CFR Part 850, WP 12-IH.02-9, *WIPP Industrial Hygiene Program - Beryllium Exposure Prevention Program*.

TRU waste containing beryllium is received at WIPP, but is packaged in containers meeting U.S. Department of Transportation specifications that are sealed, vented, and filtered per the WIPP Waste Acceptance Criteria. Personnel trained in hazardous waste, emergency response, and contamination control operations that may involve TRU waste receive periodic training on beryllium hazards and the requirements of the WIPP beryllium exposure prevention program.

NWP has personnel performing oversight duties at generator sites where there may be a potential for beryllium exposure. Those personnel are enrolled in and work under the requirements of the host site's beryllium exposure prevention program.

The possibility of beryllium exposure at WIPP during an event such as a drum breach is also addressed in WP 12-IH.02-9. WP 12-IH.02 provides requirements for compliance with the 10 CFR Part 850 worker protection and surveillance requirements for recovery from such an event. WIPP-007 includes further discussion of potential hazards. An updated survey for potential non-waste-related beryllium exposure is in process. Any changes or corrective actions to the beryllium program will be considered automatically part of the NWP 851 program as they are implemented.

2. Title 29 CFR §§1904.4-1904.11; 29 CFR §§1904.29-1904.33; 29 CFR §1904.44 and §1904.46 are applicable to NWP covered workplaces, and are covered under the WSHPD for NWP employees. Subcontractors at the WIPP site report through NWP, and subcontractors at host sites do dual reporting, although the host site is responsible for the total site reporting.
3. Title 29 CFR Part 1910, excluding 29 CFR §1910.1096, "Ionizing Radiation," is applicable at the WIPP site surface areas; it is not applicable to the mine, which is covered by Mine Safety and Health Administration (MSHA) standards. This responsibility falls to each host site as the cognizant operator of the facility and based on the interface agreements for safety responsibilities.
4. Title 29 CFR Part 1926, "Safety and Health Regulations for Construction," is applicable only to the WIPP site, as the characterization activities work scopes do not involve any construction activities. This requirement is implemented at the WIPP in the industrial safety program as referenced above in conjunction with WP 09-DC.01, *Construction Management Program*. Relevant subcontractor controls are contained in WP 12-IS.01-6.

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5. Title 30 CFR *Mine Safety and Health Administration*, including Parts 47, 48, 49, 57, and 62, "Safety and Health Standards-Underground Metal and Nonmetal Mines" is applied for worker protection and consistency throughout the WIPP site, for purposes of Part 851; however, it applies only to the WIPP site underground area and related surface structures, including all shaft collars and hoist houses, and the operation of all WIPP hoists, including the waste hoist operating station. This includes worker protection programs required by MSHA, such as diesel particulate personal air sampling and other occupational exposure assessments conducted per WP 12-IH.02-1.
6. American Conference of Governmental Industrial Hygienists (ACGIH), *Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices* (2005) is applied when the ACGIH Threshold Limit Values (TLVs) are lower (more protective) than permissible exposure limits in 29 CFR Part 1910. When the ACGIH TLVs are used as exposure limits, contractors must nonetheless comply with the other provisions of any applicable expanded health standard found in 29 CFR Part 1910. The WIPP Industrial Hygiene Program (WP 12-IH.02) is compliant with this requirement.
7. American National Standards Institute (ANSI) Z88.2, *American National Standard for Respiratory Protection* (2004) is fully implemented in WP 12-IH.02-6, *WIPP Industrial Hygiene Program – Respiratory Protection*. Characterization activities at the host site fall under the direction of the host site's respiratory protection program per its Host Site Plan. Note: This standard was cancelled due to the OSHA 29 CFR §1910.134 update to the OSHA Respiratory Protection Standard. NWP continued to meet this standard at the WIPP site, as well as the OSHA update; however, the host sites may or may not. Characterization activities at the host sites will continue to fall under the direction of the host site's respiratory protection program.
8. The ANSI Z136.1, *Safe Use of Lasers* (2000) standard is applicable; however, Class 3b or Class 4 laser or laser systems are not in use at WIPP nor are they in use in characterization activities at the host sites. WP 12-IH.02-7, *WIPP Industrial Hygiene Program – Lasers, Lighting, Pest Control, Sanitation, and Temperature* defines control mechanisms for introduction of new laser or laser systems to implement appropriate requirements if a Class 3b or Class 4 laser is purchased.
9. ANSI Z49.1, *Safety in Welding, Cutting and Allied Processes*, sections 4.3 and E4.3 (1999) is only applicable at the WIPP site because off-site characterization activities work scope does not include any welding, cutting, or allied processes. For WIPP, this portion of the standard on personal protective equipment is implemented through WP 12-IS.01-4, *Industrial Safety Program - Emergency and Personal Protective Equipment*.

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10. The standard NFPA 70, *National Electrical Code* (2005), is applicable to new facilities and modifications and repairs to existing facilities. As such, it incorporated at that time, based on WP 12-IS.03 and WP 09, *Conduct of Engineering*, requirements for the identification of applicable standards. This standard is applicable to NWP work scope for characterization activities at the host sites. However, NWP does not do any electrical work at the host sites as electrical services are provided by the host sites.
11. NFPA 70E, *Standard for Electrical Safety in the Workplace* (2009) is applicable. At the host sites, the electrical safety program, including lockout/tagout, is under the cognizance of the host site per its Host Site Plan. For WIPP and Carlsbad covered locations, this standard is implemented through WP 12-IS.03. For WIPP, it is applicable in accordance with the standard, which states that it is not applicable to underground mines. MSHA electrical requirements are implemented underground as required by the LWA and as it affords increased worker protection. For example, the MSHA requirements for electrical cables are specific in addressing corrosive atmospheres. Some requirements in NFPA 70E have been voluntarily implemented in the underground as defense-in-depth worker protection, but are not required and are not applicable under 10 CFR 851.
12. NFPA 122, *Fire Prevention and Control in Metal/Nonmetal Mining and Metal Mineral Processing Facilities*. This standard includes fire risk assessment and reduction, the detections and suppression equipment, fire protection for diesel powered equipment in underground mines, fire protection of surface mining equipment , and surface metal mineral processing plants.

Nothing in this section must be construed as relieving NWP from complying with any additional specific safety and health requirements that it determines to be necessary to protect the safety and health of workers.

The following standards, listed in §851.23, are not applicable to the WSHPD because they are not applicable to any work scopes currently being conducted at any of the covered workplaces.

- Title 29 CFR Part 1915, "Shipyard Employment"
- Title 29 CFR Part 1917, "Marine Terminals"
- Title 29 CFR Part 1918, "Safety and Health Regulations for Longshoring"
- Title 29 CFR Part 1928, "Occupational Safety and Health Standards for Agriculture"

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Additional standards in use at WIPP, though not applicable to the WSHPD, include International Commission on Radiological Protection (ICRP) 60, ICRP 68, and ICRP 74, which are incorporated by reference in the DOE/WIPP-95-2054, *WIPP Radiation Protection Program*.

**16.0 FUNCTIONAL AREAS (SUBPART C, §851.24)**

NWP has a structured approach to the worker safety and health program, which includes provisions for the following functional areas at applicable locations.

**1. Construction Safety (Appendix A.1)**

The construction safety functional area is only applicable at the WIPP site. NWP subcontracts construction work scope as needed. NWP subcontractors are required to comply with local, state, and federal safety, health, and environmental regulations. Each subcontract has a designated subcontractor technical representative (STR) to monitor the work practices of the subcontractor. The implementing procedures for construction safety are WP 15-PC3609; WP 15-PC3605, *Proposal, Competition, Identification, Selection, Evaluation, and Award*; WP 12-IS.01-6; and WP 09-DC.01. These documents include the following requirements:

A. For each definable construction activity:

1. Prepare and have approved by the construction manager an activity hazard analysis prior to commencement of affected work. Such analyses must:
  - (i) Identify foreseeable hazards and planned protective measures;
  - (ii) Address further hazards revealed by supplemental site information (e.g., site characterization data, as built drawings) provided by the construction manager;
  - (iii) Provide drawings and/or other documentation of protective measures for which applicable OSHA standards require preparation by a Professional Engineer or other qualified professional, and
  - (iv) Identify competent persons required for workplace inspections of the construction activity, where required by OSHA standards.

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2. Ensure workers are aware of foreseeable hazards and the protective measures described within the activity analysis prior to beginning work on the affected activity.
  3. Require that workers acknowledge being informed of the hazards and protective measures associated with assigned work activities. Those workers failing to use appropriate protective measures must be subject to the construction contractor's disciplinary process.
- B. During periods of active construction (i.e., excluding weekends, weather delays, or other periods of work inactivity), the construction contractor must have a designated representative on the construction worksite who is knowledgeable of the project's hazards and has full authority to act on behalf of the construction contractor. The contractor's designated representative must make frequent and regular inspections of the construction worksite to identify and correct any instances of noncompliance with project safety and health requirements.
- C. Workers are instructed to report hazards not previously identified or evaluated to the STR or Central Monitoring Room. If immediate corrective action is not possible or the hazard falls outside of project scope, the construction worker must immediately notify affected workers, post appropriate warning signs, implement needed interim control measures, and notify the construction manager of the action taken. The contractor or the designated representative must stop work in the affected area until appropriate protective measures are established.

The construction contractor must prepare a written construction project safety and health plan. The plan must reflect appropriate implementation of this section of the WSHPD construction requirements, and the specifics required in WP 12-IS.01-6. The safety and health plan must be approved by the NWP STR and NWP Environmental, Safety and Health prior to beginning work. In the contractor's safety and health plan, the contractor must designate the individual(s) responsible for on-site implementation of the WSHPD, specify qualifications for those individuals, and provide a list of those project activities for which subsequent hazard analyses are to be performed. The level of detail within the construction project safety and health plan should be commensurate with the size, the complexity, and risk level of the construction project.

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**2. Fire Protection (Appendix A.2)**

The fire protection functional area is applicable at the WIPP site and the host organization is responsible for the fire protection functions at the other NWP work sites, though some pieces of equipment used in characterization activities at the host sites include fire suppression related designs, which undergo WIPP reviews. The final equipment is signed off in accordance with the host site's fire protection program (FPP).

The WIPP FPP, as described in WP 12-FP.01, meets the requirements of DOE Order 420.1C, *Facility Safety*, and other DOE orders, directives, and guidance documents related to fire safety, for programmatic and design criteria. NWP implements a comprehensive fire safety and emergency response program to protect workers commensurate with the nature of the work that is performed. WP 12-FP.01 identifies the various activities, regulations, and personnel responsibilities necessary for assuring fire safety. WP 12-FP.01 incorporates other applicable NFPA codes, standards, and fire protection requirements. Those fire protection needs are addressed with related MSHA requirements implementation.

The FHAs (see WIPP-023, *Fire Hazards Analysis for the Waste Isolation Pilot Plant*) and building fire assessments periodically review the building fire protection infrastructure and procedures, and evaluate any risk to property and life. Deficiencies are noted and corrective action initiated.

NWP has implemented a comprehensive fire safety and emergency response program that minimizes the impact of emergency events on the health and safety of workers. The WIPP emergency response procedures include WP 12-9, *Emergency Management Program*; WP 12-ER4908, *Surface Fire Response*; and WP 12-ER4911, *Underground Fire Response*.

- A. NWP has implemented a comprehensive fire and emergency response program described in WP 12-9 to protect workers commensurate with the nature of the work that is performed. This includes appropriate facility and site-wide fire protection, fire alarm notification and egress features, and access to a fully staffed, trained, and equipped emergency response organization that is capable of responding in a timely and effective manner to site emergencies. Improvement initiatives are in progress to strengthen this commitment. Those actions include changes to the FHA, update to the Baseline Needs Assessment, and related changes focused on underground fire protection and response program components. Improvements will become part of this 851 Plan as completed and in accordance with schedules as agreed to by CBFO. Response capabilities and staffing are maintained in accordance with

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the Baseline Needs Assessment, assuring a fully staffed WIPP Fire Brigade 24-hours a day, seven days a week.

- B. NWP has implemented a comprehensive FPP in WP 12-FP.01. The FPP includes those fire protection criteria and procedures, analyses, hardware and systems, apparatus and equipment, and personnel which ensure that the objective in (A) of this section is met. The FPP includes meeting applicable building codes and NFPA codes and standards.

Improvements to these programs are currently in progress in response to the February events. They are anticipated to be implemented through the documents already described in this section.

**3. Explosives Safety – Not Applicable (Appendix A.3)**

NWP work scope does not involve the use of explosives. Therefore, this section of the rule is considered inapplicable.

**4. Pressure Safety (Appendix A.4)**

This section is not applicable to the characterization work scopes. Portions of the standards referenced are applicable at WIPP.

- A. Contractors must establish safety policies and procedures to ensure that pressure systems are designed, fabricated, tested, inspected, maintained, repaired, and operated by trained and qualified personnel in accordance with applicable and sound engineering principles. The implementing language of this requirement is in WP 09 and WP 13-1.
- B. Contractors must ensure that pressure vessels, boilers, air receivers, and supporting piping systems conform to:
  - 1. The applicable American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (2004), sections I through section XII including applicable Code Cases (incorporated by reference, see §851.27)

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2. The WIPP facility design was based on federal and state codes in effect at the time of the site's construction as documented in the System Design Description General Plant Design Description (SDD GPDD). However, modifications to the facility should be made using the current edition of the applicable codes and/or standards as determined by the approved engineering change. Use of the ASME B31 (Code for Pressure Piping) standards at WIPP is as indicated below per the pressure vessels section of the SDD GPDD, and or as indicated in paragraph (b)(3) of this section:
- (i) B31.1-2001, *Power Piping*, and B31.1a-2002, *Addenda to ASME B31.1-2001* (incorporated by reference, see § 851.27); is not applicable.
  - (ii) B31.2-1968, *Fuel Gas Piping* (incorporated by reference, see §851.27); is not applicable.
  - (iii) B31.3-2002, *Process Piping* (incorporated by reference, see §851.27); is applicable.
  - (iv) B31.4-2002, *Pipeline Transportation, Systems for Liquid Hydrocarbons and Other Liquids* (incorporated by reference, see §851.27); is not applicable.
  - (v) B31.5-2001, *Refrigeration Piping and Heat Transfer Components*, and B31.5a; is not applicable.
  - (vi) 2004, *Addenda to ASME B31.5-2001*(incorporated by reference, see §851.27); is not applicable.
  - (vii) B31.8-2003, *Gas Transmission and Distribution Piping Systems* (incorporated by reference, see §851.27); is not applicable.
  - (viii) B31.8S-2001, *Managing System Integrity of Gas Pipelines* (incorporated by reference, see §851.27); is not applicable.
  - (ix) B31.9-1996, *Building Services Piping* (incorporated by reference, see §851.27); is applicable.
  - (x) B31.11-2002, *Slurry Transportation Piping Systems* (incorporated by reference, see §851.27); is not applicable.

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- (xi) B31G-1991, *Manual for Determining Remaining Strength of Corroded Pipelines* (incorporated by reference, see §851.27); is not applicable.

3. The strictest applicable state and local codes.

When national consensus codes are not applicable (because of pressure range, vessel geometry, use of special materials, etc.), contractors must implement measures to provide equivalent protection and ensure a level of safety greater than or equal to the level of protection afforded by the ASME or applicable state or local code. Measures must include the following:

- (i) Design drawings, sketches, and calculations must be reviewed and approved materials, in process fabrications, nondestructive tests, and acceptance test.
- (ii) Qualified personnel must be used to perform examinations and inspections of materials, in process fabrications, nondestructive tests, and acceptance tests per WP 13-1.
- (iii) Documentation, traceability, and accountability must be maintained for each pressure vessel or system, including descriptions of design, pressure conditions, testing, inspection, operation, repair, and maintenance.

The requirements for this section are implemented through WP 09 and the SDD GPDD.

5. **Firearms Safety (Appendix A.5)**

This section is only applicable to the NWP WIPP as security services are not part of the NWP work scope at host sites. Security services at the Skeen-Whitlock Building do not fall under NWP 851 as they are a Department of Homeland Security direct contractor. The NWP security services at WIPP does involve the use of firearms. Therefore, firearms safety policies and procedures for security operations, and training to ensure proper accident prevention controls are in place. These are part of the WIPP Protective Force Procedures which address safety and storage of DOE weapons, firearms cleaning, armory operations, firearms safety, weapons qualification, live fire range administrative safety requirements, and other applicable areas. Written procedures address firearms safety, engineering, administrative controls, and personal protective equipment requirements.

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- A. Protective Force Orders are established for:
1. Storage, handling, cleaning, inventory, and maintenance of firearms and associated ammunition.
  2. Activities such as loading, unloading, and exchanging firearms.
  3. Use and storage of pyrotechnics, explosives, and/or explosive projectiles. This portion is not applicable. WIPP does not allow such devices on-site.
  4. Handling misfires, duds, and unauthorized discharges is addressed with specific instruction provided for each failure condition.
  5. Live fire training, qualification, and evaluation activities that are conducted.
  6. Training and exercises using engagement simulation systems at WIPP are conducted as force on force exercises. Each annual force on force exercise is based on an individual approved plan in compliance with DOE directives. Approval for implementation is given by signature approval from the CBFO, NWP, and Security prior to any implementation.
  7. Medical response at firearms training facilities.
  8. NWP, through mutual agreement, use the Eddy County Sheriff's range. No control or provisions are made to exercise control over the use of the firing range by personnel other than DOE or DOE contractor protective forces personnel. The range has been evaluated to ensure compliance with DOE requirements. A Hazard Analysis showing mitigation for areas not in compliance has been signed and approved by the CBFO. As added personnel protection, WIPP protective forces personnel will not co-occupy the range with anyone other than DOE WIPP personnel, unless a separate approval is received from CBFO, (such as the addition of personnel from the Safeguards and Security National Training Center or DOE Headquarters oversight personnel).
- B. Personnel responsible for the direction and operation of the firearms safety program are professionally qualified and have sufficient time and authority to implement the related procedures. This is demonstrated in the Live Fire Range Operations procedure contained in the PFO's, which

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defines minimum staffing along with qualification for both instructors and range safety officers for firearms range operations.

- C. Firearms instructors and armorers have been certified by the Safeguards and Security National Training Center to conduct the level of activity provided. Personnel are not allowed to conduct activities for which they have not been certified. The Site Security plan and Protective Force Orders define and ensure that qualified personnel are used and certifications are met.

Formal appraisals assessing implementation of procedures, personnel responsibilities, and duty assignments to ensure overall policy objectives and performance criteria are conducted by qualified personnel. These activities are ensured following guidance stated in WP 17-SS1006, *Safeguards and Security Security Evaluation Program*.

- D. Implement procedures related to firearms training, live fire range safety, qualification, and evaluation activities, including procedures requiring that:

Personnel must successfully complete initial firearms safety training before being issued any firearms. Authorization to remain in armed status will continue only if the employee demonstrates the technical and practical knowledge of firearms safety semiannually in accordance with *Protective Force Training Requirements* and in the limited scope performance testing section 7.0.

1. Authorized armed personnel must demonstrate through documented limited scope performance tests both technical and practical knowledge of firearms handling and safety on a semiannual basis per PFO.
2. Firearms training lesson plans must incorporate safety for all aspects of firearms training task performance standards. The lesson plans must follow the standards set forth by the Safeguards and Security Central Training Academy's standard training programs per PFO.
3. Firearms safety briefings must immediately precede training, qualifications, and evaluation activities involving live fire and/or engagement simulation systems per PFO.
4. A safety analysis was approved by the CBFO and developed for the facilities and operation of the live fire range prior to the re-arming of the guard initiative, meeting the 851 initial analysis

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requirement. In the future, it will be reviewed, updated, and approved before the implementation of any new training, qualification, or evaluation activity. Results of these analyses are incorporated into procedures, lesson plans, exercise plans, and limited scope performance tests per PFO.

5. Firing range safety procedures are conspicuously posted at all range facilities per PFO.
  6. Live fire ranges, approved by the Head of DOE Field Element, must be properly sited to protect personnel on the range, as well as personnel and property not associated with the range. NWP/Security Walls uses the Eddy County sheriff's range by agreement with the county. A hazards assessment was conducted to ensure compliance. The CBFO Security manager signed and approved the hazard analysis along with any mitigation activities prior to use of the range.
- E. NWP ensures that the transportation, handling, placarding, and storage of munitions conform to the applicable DOE requirements per PFO. This includes small arms ammunition storage in accordance with DOE O 473.3, *Protection Program Operations*, which requires that bulk ammunition be stored in accordance with DOE M 440.1-1B – Chg 1, Admin Chg 1, DOE *Worker Protection Program for DOE* (including the National Nuclear Security Administration) *Federal Employees*. NWP ensures the handling, storage, and placarding of small arms ammunition meets these fire protection requirements.

## 6. Industrial Hygiene (Appendix A.6)

Based on interface agreements, Industrial Hygiene at the host sites is under the Host Site Plans with the hosts providing the industrial hygiene program and services in support of the characterization activities at their site. NWP provides oversight of baseline surveys and other host-provided services in accordance with WP 15-GM1000, *Management Assessments*, to assure that NWP employees and subcontractors are appropriately protected. NWP has implemented a comprehensive industrial hygiene program for the WIPP site that includes at least the following elements:

- A. Initial or baseline surveys and periodic resurveys and/or exposure monitoring as appropriate of work areas or operations to identify and evaluate potential worker health risks:
  - WP 12-IH.02 addresses WIPP facility NWP employees and subcontracts.

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- Exposure monitoring for carbon tetrachloride is conducted per WP 12-IH1022.
- B. Coordination with planning and design personnel to anticipate and control health hazards that proposed facilities and operations would introduce:
- WP 09-CN3018, *Design Verification*, implements the process for this at the WIPP site.
  - For characterization activities, CCP-CM-001 ensures that the appropriate host support services are incorporated.
- C. Coordination with cognizant occupational medical, environmental, health physics, and work planning professionals is implemented at the WIPP in conjunction with the WP 12-IH series of procedures. Coordination at the host sites for characterization activities is defined in the interface agreements.
- D. The requirements for policies and procedures to mitigate the risk from identified and potential occupational carcinogens are implemented. WP 12-IH.02-1 addresses how chemical hazards are addressed for WIPP operations. The characterization activities are conducted under the host site's carcinogen program as part of its Host Site Plan.
- E. The requirement for professionally and technically qualified industrial hygienists to manage and implement the industrial hygiene program is implemented through WP 12-IH.02. This requirement for the host sites is implemented through their Host Site Plans whereby the hosts provide the industrial hygiene program, and the qualified industrial hygienists.
- F. The requirement related to use of respiratory protection equipment tested under the DOE Respirator Acceptance Program for Supplied Air Suits (DOE Technical Standard 1167-2003) is not applicable to any NWP work scope. National Institute for Occupational Safety and Health approved respiratory protection exists for the applicable DOE assigned, NWP related tasks. For security operations conducted by WIPP security or by other agencies based on MOUs, conducted in accordance with Presidential Decision Directive 39, *U.S. Policy on Counterterrorism*, use of Department of Defense military type masks for respiratory protection by security personnel is acceptable.

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**7. Biological Safety (Appendix A.7)**

NWP work scope does not include biological etiologic agents. Therefore this section of the rule is not considered applicable.

**8. Occupational Medicine (Appendix A.8)**

The occupational medicine program is implemented through WP 15-HS.02, *Occupational Health Program*, for NWP activities. Management of subcontractors in accordance with this requirement is done on a case-by-case basis as coordinated with NWP Occupational Health Services and may include direct participation by subcontractors in the NWP occupational medicine program, participation in the host sites' occupational medical program, or requirement for subcontractor companies to meet the occupational medical requirements in 10 CFR Part 851 as part of their contracts with NWP. Previously, subcontractors did not participate in the occupational medical program. With the changes in expectations related to 10 CFR Part 851, determinations of an effective path forward involved interpretation of potentially ambiguous requirements.

The occupational medical program includes oversight by a physician licensed in the State of New Mexico. Though NWP has employees and subcontractors in several states based on characterization activities, the primary medical director will be licensed in New Mexico where the primary facility is located. Lists of hazards, and expectations regarding pre-employment evaluations, will be given to subcontractors, and they may choose their own physician to provide those services. Exposure-related physicals (such as respiratory exposure) may be provided by the subcontractor's physician in accordance with the NWP occupational health program, or by the host facility. The NWP wellness program as shared with subcontractors will consist primarily of educational materials as the subcontractors are working multiple locations across the country. NWP interprets the requirements for a termination physical evaluation to be based on termination from the contract/DOE complex not from a specific facility. NWP characterization activities subcontractors frequently move from site to site throughout the DOE complex while operating under the same contracts. The occupational medical provider, as listed to meet the 10 CFR Part 851 requirements, may mean the physician subcontracted to provide services, or in the case of review of corporate-level Employee Assistance Programs (EAPs), may mean the NWP Occupational Health Services staff directing the NWP occupational health program.

- A. WP 15-HS.02 is the implementing document establishing how NWP provides or requires comprehensive occupational medical services to workers employed at a covered workplace who:

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1. Work on a DOE site for more than 30 days in a 12-month period; or
  2. Are enrolled for any length of time in a medical or exposure monitoring program required by 10 CFR Part 851 and/or any other applicable federal, state, or local regulation, or other obligation.
- B. NWP Occupational Medical Services are under the direction of a graduate of a school of medicine or osteopathy who is licensed for the practice of medicine in the State of New Mexico, which is the home office for NWP and where WIPP is located.
- C. Occupational medical physicians, occupational health nurses, physician's assistants, nurse practitioners, psychologists, employee assistance counselors, and other occupational health personnel providing occupational medical services are licensed, registered, or certified as required by federal or state law.
- D. NWP provides occupational medical providers access to hazard information by communication, coordination, and sharing among operating and environment, safety, and health protection organizations.
1. NWP and subcontractors provide occupational medical providers with access to information on the following:
    - (i) Current information about actual or potential work-related site hazards (chemical, radiological, physical, biological, or ergonomic).
    - (ii) Employee job task and hazard analysis information, including essential job functions.
    - (iii) Actual or potential work site exposures of each employee.
    - (iv) Personnel actions resulting in a change of job functions, hazards or exposures.
  2. NWP managers notify WIPP Occupational Health Services when an employee has been absent because of an injury or illness for more than five consecutive workdays (or an equivalent time period for those individuals on an alternative work schedule).

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3. NWP provides the occupational medical provider information on, and the opportunity to participate in, worker safety and health team meetings and committees.
  4. NWP provides occupational medical providers access to the workplace for evaluation of job conditions and issues relating to workers' health.
- E. NWP designates an occupational medical provider who is required in accordance with WP 15-HS.02 and 10 CFR Part 851 to:
1. Plan and implement occupation medical services.
  2. Participate in worker protection teams to build and maintain necessary partnerships among workers, their representatives, managers, and safety and health protection specialists in establishing and maintaining a safe and healthful workplace.
- F. A record, containing any medical, health history, exposure history, and demographic data collected for occupational medical purposes, is developed and maintained by NWP Occupational Health Services for each employee for whom medical services are provided. Occupational medical records are maintained in accordance with Executive Order 13335, *Incentives for the Use of Health Information Technology and Establishing the Position of the National Health Information Technology Coordinator*.
1. Employee medical, psychological, and EAP records are kept confidential, protected from unauthorized access, and stored under conditions that ensure their long term preservation. Psychological records are maintained separately from medical records and in the custody of the designated psychologist in accordance with 10 CFR §712.38(b)(2).
  2. Access to these records is provided in accordance with DOE regulations implementing the Privacy Act and the Energy Employees Occupational Illness Compensation Program Act.
- G. The occupational medical services provider determines the content of the worker health evaluations, which are conducted under the direction of a licensed physician, in accordance with current sound and acceptable medical practices and pertinent statutory and regulatory requirements, such as the Americans with Disabilities Act.

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1. Workers are informed of the purpose and nature of the medical evaluations and tests offered by the occupational medical provider.
  - (i) The purpose, nature and results of evaluations and tests are clearly communicated verbally and in writing to each worker provided testing.
  - (ii) The communication is documented in the worker's medical record.
  
2. The following health evaluations are conducted when determined necessary by the occupational medical services provider for the purpose of providing initial and continuing assessment of employee fitness for duty.
  - (i) At the time of hire or transfer to a job with new functions and hazards, a medical placement evaluation of an employee's general health and physical and psychological capacity to perform work, to establish a baseline record of physical condition and assure fitness for duty.
  - (ii) Periodic, hazard-based medical monitoring or qualification-based fitness for duty evaluations required by regulations and standards, or as recommended by the occupational medical services provider.
  - (iii) Diagnostic examinations to evaluate an employee's injuries and illnesses to determine work-relatedness, the applicability of medical restrictions, and referral for definitive care, as appropriate.
  - (iv) After a work-related injury or illness or an absence due to any injury or illness lasting five or more consecutive workdays (or equivalent time period for those on an alternative work schedule), a return to work evaluation to determine the individual's physical and psychological capacity to perform work and return to duty.
  - (v) At the time of separation from employment, individuals are offered an option to receive a general health evaluation to establish a record of physical condition.

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- H. The occupational medical services provider monitors ill and injured workers to facilitate their rehabilitation and safe return to work and to minimize lost time and its associated costs.
  - 1. In accordance with WP 12-HS.02 and the occupational medical provider's contract, the occupational medical provider is required to place an individual under medical restrictions when health evaluations indicate that the worker should not perform certain job tasks. The occupational medical services provider must notify the worker and contractor management when employee work restrictions are imposed or removed.
- I. The occupational medical services provider physician and medical staff promptly communicate the results of health evaluations to management and safety and health protection specialists to facilitate the mitigation of work site hazards.
- J. The occupational medical services provider includes measures to identify and manage the principal preventable causes of premature morbidity and mortality affecting worker health and productivity.
  - 1. NWP includes programs to prevent and manage these causes of morbidity when evaluations demonstrate their cost effectiveness.
  - 2. NWP makes available to the occupational medical provider appropriate access to information from health, disability, and other insurance plans (with individual personal information removed to protect employee privacy) in order to facilitate this process.
- K. The occupational medical services provider reviews and approves the medical and behavioral aspects of employee counseling and health promotional programs, including the following types:
  - 1. NWP-sponsored or supported EAPs.
  - 2. NWP-sponsored or supported alcohol and other substance abuse rehabilitation programs.
  - 3. NWP-sponsored or supported wellness programs.

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- L. The occupational medical services provider reviews the medical aspects of immunization programs, blood borne pathogens programs, and biohazardous waste programs to evaluate their conformance to applicable guidelines.
- M. The occupational medical services provider periodically reviews medical emergency response procedures included in site emergency and disaster preparedness plans. The medical emergency responses integrate with nearby community emergency and disaster plans.

**9. Motor Vehicle Safety (Appendix A.9)**

This section is applicable to the WIPP site and is implemented by WP 12-IS.01-8, *Industrial Safety Program – Vehicle Safety*. It is also applicable to subcontractors who drive WIPP-provided vehicles. For the characterization activities at the host facilities, the portions related to powered industrial equipment fall within the programmatic oversight of the host facility in providing programmatic aspects such as training requirements, road signs, and site speed limits. Safe driving awareness campaigns are conducted.

- A. NWP implements a motor vehicle safety program to protect the safety and health of drivers and passengers in Government-owned or -leased motor vehicles and powered industrial equipment (i.e., fork trucks, tractors, platform lift trucks, and other similar specialized equipment powered by an electric motor or an internal combustion engine, including electric carts).
- B. The NWP motor vehicle safety program is tailored to the individual DOE site or facility, based on an analysis of the needs of that particular site or facility.
- C. The motor vehicle safety program addresses the following as applicable to that portion of the NWP work scope or operations.
  - 1. Minimum licensing requirements (including appropriate testing and medical qualification) for personnel operating motor vehicles and powered industrial equipment.
  - 2. Qualifications for electric cart drivers will include the manufacturer's recommendations and ANSI B56.8-2006.
  - 3. Requirements for the use of seat belts and provision of other safety devices.
  - 4. Training for specialty vehicle operators.

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5. Requirements for motor vehicle maintenance and inspection for electric carts at the WIPP site. This includes preventive maintenance items performed according to the manufacturer's recommendations.
6. Uniform traffic and pedestrian control devices and road signs.
7. Site speed limits and other traffic rules including parking lot safety.
8. Awareness campaigns and incentive programs to encourage safe driving.
9. Enforcement provisions.

10. **Electrical Safety (Appendix A.10)**

This section is applicable only to the WIPP site, including NWP employees and subcontractors at the WIPP site. The characterization activities at other locations fall under the electrical safety programmatic direction of the host site. NWP implements a comprehensive electrical safety program initiated through WP 12-IS.03 at the WIPP site. The program meets the applicable electrical safety codes and standards referenced in §851.23.

11. **Nanotechnology Safety—Reserved (Appendix A.11)**

The DOE reserved this section in the 10 CFR Part 851 since policy and procedures for nanotechnology safety are currently being developed. Once these policies and procedures have been approved, the rule will be amended to include them through a rulemaking consistent with the Administrative Procedure Act. In the interim, any research conducted at the WIPP site related to nanotechnology will undergo thorough safety review with preplanned controls to ensure meeting the NWP commitment for defense-in-depth protection for workers.

12. **Workplace Violence Prevention— (Appendix A.12)**

The DOE reserved this section in the 10 CFR Part 851 since the policy and procedures for workplace violence prevention are currently being developed. Once these policies and procedures have been approved, the rule will be amended to include them through a rulemaking consistent with the Administrative Procedure Act. Once the rule is amended, the NWP implementing actions and documents will be included accordingly. However, NWP recognizes the need for workplace violence prevention and has provided

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training for personnel on actions to take if a workplace violence incident occurs, and encourages use of the NWP Employee Assistance Program when personal stress becomes overwhelming to individuals as a prevention measure.

**17.0 TRAINING AND INFORMATION (§851.25)**

The requirements in this section are applicable to NWP work scope, including joint responsibility related to characterization activities and subcontracts in accordance with WP 14-TR.01, *WIPP Training Program*, and CCP-QP-002. In addition, characterization personnel also meet the training requirements of the applicable host site based on its Host Site 851Plan.

1. NWP has developed and implemented a worker safety and health training and information program to ensure that workers exposed or potentially exposed to hazards are provided with training and information on that hazard in order to perform their duties in a safe and healthful manner.
2. NWP ensures that the following are provided:
  - (i) Training and information for new workers, before or at the time of initial assignment to a job involving exposure to a hazard, including information per the hazard communication program, as described in WP 12-IH.02-4.
  - (ii) Periodic training as often as necessary to ensure that workers are adequately trained and informed.
  - (iii) Additional training when safety and health information or a change in workplace conditions indicates that a new or increased hazard exists.
3. NWP provides training and information to workers who have worker safety and health program responsibilities as necessary for them to carry out those responsibilities.

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## **18.0 RECORDKEEPING AND REPORTING (§851.26)**

For characterization activities, recordkeeping and reporting responsibilities are shared with the host sites, as described below.

### **1. Recordkeeping**

- (i) NWP has established and maintains complete and accurate records of hazard inventory information, hazard assessments, exposure measurements, and exposure controls. For the WIPP site, records are maintained in accordance with the WP 12-IH series of procedures, and according to records management requirements in WP 13-1. For the characterization activities involving NWP and NWP subcontractors per the interface agreements, records are maintained in accordance with CCP-QP-008, *CCP Records Management*. The majority of hazard and exposure records (including IH and Radiological Program records) are maintained by the host site according to the requirements of their 851 Plan.
- (ii) NWP ensures that the work-related injuries and illnesses of its workers and subcontractor workers are recorded and reported accurately and consistent with DOE Order 231.1-1B, Change 1, *Environment, Safety and Health Reporting*. This is a joint function performed using systems such as the Computerized Accident/Incident Reporting System, Occurrence Reporting Processing System, and Noncompliance Tracking System. The host facility M&O has the primary responsibility for reporting for that facility. However, NWP maintains additional records for work scope at host facilities based on management commitment to ensure reporting is accurate and timely. Work-related injuries and illnesses of workers and subcontractor workers are recorded and reported in accordance with DOE Order 231.1-1B, Change 1, as implemented in WP 12-SA3131, *Occupational Injuries and Illnesses Recordkeeping*.
- (iii) Host sites shall comply with the applicable occupational injury and illness recordkeeping and reporting workplace safety and health standards in §851.23 at their sites, unless otherwise directed in DOE Order 231.1-1B, Change 1. As discussed in §851.23, these standards are applicable to NWP covered workplaces.
- (iv) Host sites shall not conceal nor destroy any information concerning noncompliance or potential noncompliance with the requirements of this part. This requirement is implemented through WP 13-1.

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2. Reporting and Investigation
- (i) NWP reports and investigates accidents, injuries and illnesses. This is a shared function, with the host site taking the lead for any investigations occurring at that site, in accordance with the interface agreements. For WIPP, this requirement is implemented through WP 12-SA3130, *Occupational Injuries and Illnesses*, and WP 15-MD3102, *Event Investigation*, which includes investigation, determining violations, root cause analysis, and determining corrective actions to prevent recurrence.
  - (ii) NWP analyzes data for trends and for lessons learned. At the WIPP site, safety and health experience information is reviewed in monthly site safety statistical reports, through WP 13-1 trending requirements, and as documented in WP 15-PA.01. Qualitative safety performance measures are monitored in accordance with WP 15-GM.03.
  - (iii) The DOE has established reporting thresholds for reporting worker safety and health noncompliance above a certain level of significance into the noncompliance tracking system. NWP uses an internal tracking system to track applicable noncompliances that do not meet the reporting threshold. Determinations as to whether a violation of a requirement has occurred, the nature and extent of any such violation, and for the imposition of an appropriate remedy is addressed through the WIPP Form process as defined by WP 15-GM1002 and WP 15-RA.01, *Nuclear Safety & Worker Safety and Health Compliance Program*.

## **19.0 VARIANCES (SUBPART D)**

Variations provide relief from safety and health standards for worker safety. Variations are submitted to the CBFO for review and, if the CBFO concurs, the variance is forwarded to the Cognizant Secretarial Officer for approval. Deviations from standards and codes applicable to property protection are reviewed and approved by the authority having jurisdiction process as provided in DOE O 420-1C, Facility Safety. One NFPA equivalency remains in effect for the Central Monitoring System.

## **20.0 PROGRAM REVIEW AND CONTINUOUS IMPROVEMENT**

The WSHPD will be reviewed annually as discussed in section 9. In addition, an evaluation of the effectiveness of the WSHPD will be conducted during the annual ISM assessment. This is in keeping with the NWP ISMS Description requirements for feedback and continuous improvement in safety.

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## **21.0 COMPLIANCE REFERENCE LIST**

This is the list of documents that effectively implement 10 CFR Part 851 as referenced throughout the plan.

- 10 CFR Part 850, "Chronic Beryllium Disease Prevention Program"
- 29 CFR Part 1904, "Recording and Reporting Occupational Injuries and Illnesses"
- 29 CFR Part 1910, "Occupational Safety and Health Standards"
- 29 CFR §1910.1096, "Ionizing Radiation"
- 30 CFR Part 47, "Hazard Communication"
- 30 CFR Part 48, "Training and Retraining of Miners"
- 30 CFR Part 49, "Mine Rescue Teams"
- 30 CFR Part 57, "Safety and Health Standards-Underground Metal and Nonmetal Mines"
- 30 CFR Part 62.150, "Hearing Conservation Program"
- DOE G 440.1-3, *Exposure Assessment*
- DOE O 151.1C, *Comprehensive Emergency Management System*
- DOE O 210.2A, *Corporate Operating Experience Program*
- DOE O 231.1B, Admin Chg 1, *Environmental Safety and Health Reporting*
- DOE O 420.1C, Chg 1, *Facility Safety*
- DOE STD-6005-2001, *Industrial Hygiene Practices*
- ANSI/ITSDF B56.1, *Safety Standard for Low Lift and High Lift Trucks*
- ANSI Z136.1, *Safe Use of Lasers*
- ANSI Z249.1, *Safety in Welding, Cutting, and Allied Processes*
- CWI, LLC 851 Plan

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- Executive Order 13335, *Incentives for the Use of Health Information Technology and Establishing the Position of the National Health Information Technology Coordinator*
- LANS 851 Plan
- UChicago Argonne, LLC 851 Plan
- PFO-Series, WIPP Protective Force Orders
- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-PO-004, *CCP/SRS Interface Document*
- CCP-PO-012, *CCP/LANL Interface Document*
- CCP-PO-024, *CCP/INL Interface Document*
- CCP-PO-027, *CCP/TRU Waste Processing Center/ORNL Interface Document*
- CCP-PO-500, *CCP/ANL RH TRU Waste Interface Document*
- CCP-PO-501, *CCP/INL RH TRU Waste Interface Document*
- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control*
- CCP-PO-510, *CCP/SNL Interface Document*
- CCP-QP-001, *CCP Graded Approach*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval, and Control*
- CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*
- MD 1.5, *Interim Underground Operational Restrictions and Requirements*
- MP 1.12, *Worker Protection Policy*

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- MP 1.2, *Stop-Work Policy*
- MP 1.29, *Mission, Goals, and Responsibilities*
- MP 1.7, *Employee Performance Appraisal and Development*
- MP 1.28, *Integrated Safety Management*
- MP 5.16, *Landlord Program*
- SDD GPDD, *System Design Description General Plant Design Description*
- WIPP-007, *Hazard Identification Summary Report for WIPP Operations*
- WIPP-023, *Fire Hazards Analysis for the Waste Isolation Pilot Plant*
- WP 02-EC.12, *Site Users and Tenants Guide for Organizations, Personnel, or Companies that Perform Work on U.S. Department of Energy Property or Rights of Way on or Around the Waste Isolation Pilot Plant*
- WP 09, *Conduct of Engineering*
- WP 09-CN3005, *Graded Approach to Application of QA Controls*
- WP 09-CN3018, *Design Verification*
- WP 09-DC.01, *Construction Management Program*
- WP 10-AD3007, *Use and Control of Rigging Components*
- WP 12-ER4911, *Underground Fire Response*
- WP 12-ER4925, *CMR Incident Recognition and Initial Response*
- WP 12-ES3918, *Reporting Occurrences in Accordance with DOE O 232.2*
- WP 12-FP.01, *WIPP Fire Protection Program*
- WP 12-IH.02, *WIPP Industrial Hygiene Program Manual*
- WP 12-IH.02-1, *WIPP Industrial Hygiene Program – Health Hazard Assessment*
- WP 12-IH.02-2, *WIPP Industrial Hygiene Program – Confined Spaces*

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- WP 12-IH.02-4, *WIPP Industrial Hygiene Program – Hazard Communication and Hazardous Materials Management Plan*
- WP 12-IH.02-6, *WIPP Industrial Hygiene Program – Respiratory Protection*
- WP 12-IH.02-7, *WIPP Industrial Hygiene Program – Lasers, Lighting, Pest Control, and Sanitation*
- WP 12-IH.02-9, *WIPP Industrial Hygiene Program – Beryllium Exposure Prevention Program*
- WP 12-IH.02-11, *WIPP Industrial Hygiene Program – Polychlorinated Biphenyls (PCBs)*
- WP 12-IH.02-12, *WIPP Industrial Hygiene Program – Cryogenics, Refrigerants, and Process Gases*
- WP 12-IH1022, *Sampling for Generated VOCs*
- WP 12-IS.01, *Industrial Safety Program – Structure and Management*
- WP 12-IS.01-3, *Industrial Safety Program – Power and Hand Tools*
- WP 12-IS.01-4, *Industrial Safety Program – Personal Protective Equipment*
- WP 12-IS.01-5, *Industrial Safety Program – Walking and Working Surfaces and Ladders*
- WP 12-IS.01-6, *Industrial Safety Program – Visitor, Vendor, User, Tenant, and Subcontractor Safety Controls*
- WP 12-IS.01-8, *Industrial Safety Program – Vehicle Safety*
- WP 12-IS.01-12, *Industrial Safety Program – Hoisting & Rigging*
- WP 12-IS.03, *Electrical Safety Program Manual*
- WP 12-IS0301, *Nationally Recognized Testing Laboratory Process*
- WP 12-IS3002, *Job Hazard Analysis Performance and Development*
- WP 12-SA3130, *Occupational Injuries and Illnesses*
- WP 12-SA3131, *Occupational Injuries and Illnesses Recordkeeping*

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- WP 12-9, *WIPP Emergency Management Plan*
- WP 13-1, *Nuclear Waste Partnership LLC Quality Assurance Program Description*
- WP 14-TR.01, *WIPP Training Program*
- WP 15-GM.03, *Integrated Safety Management System Description*
- WP 15-GM1000, *Management Assessments*
- WP 15-GM1002, *Issues Management Processing of WIPP Forms*
- WP 15-HS.02, *Occupational Health Program*
- WP 15-PA.01, *Operating Experience/Lessons Learned Program*
- WP 15-MD3102, *Event Investigation*
- WP 15-PC3605, *Proposal, Competition, Identification, Selection, Evaluation, and Award*
- WP 15-PC3609, *Preparation of Purchase Requisitions*
- WP 15-RA.01, *Nuclear Safety & Worker Safety and Health Compliance Program*