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OCCUPATIONAL SAFETY AND HEALTH TRAINING IN DOE

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HOT Topics

Occupational Safety and Health Training in DOE

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ABSTRACT

Occupational safety and health (OSH) policies, programs and activities within DOE are changing rapidly. In June, 1989, Secretary of Energy Watkins launched his "Ten Point Initiative" charting a new course for the Department of Energy (DOE) toward full accountability in the areas of environment, safety and health. Full compliance with Occupational Safety and Health Administration (OSHA) standards is now mandatory within the Department. Independent "Tiger Teams" are performing safety and health compliance assessments at DOE facilities to identify OSH deficiencies. A recent extensive OSHA audit of DOE OSH programs and related activities has resulted in additional changes in DOE OSH requirements. These changes coupled with those pending in the proposed OSHA Reform Act, have had, and will continue to have, a tremendous impact on the roles and responsibilities each of us has within DOE, particularly in the area of OSH training. This presentation focuses on the specific implications these changes have relating to OSH Training Requirements.

Proposed revisions to DOE Order 5483.1B, *Contractor Safety and Health Program*, are discussed along with the *Proposed OSH Training Requirements and Guidance*, drafted by a DOE Working Group in September, 1990.

Available technical support provided by EH-30 is described, and OSH Training managers are encouraged to take advantage of this assistance when upgrading the quality and quantity of OSH training to meet anticipated criteria.

KEY WORDS

OSH, OSHA, Safety, Training

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Occupational Safety and Health Training in DOE

INTRODUCTION

Occupational safety and health (OSH) policies, programs and activities within DOE are changing rapidly. In June, 1989, Secretary of Energy Watkins launched his "Ten Point Initiative",⁽¹⁾ charting a new course for the Department of Energy (DOE) toward full accountability in the areas of environment, safety and health. No longer in DOE, does production of defense nuclear materials take precedence over environment, safety and health. Full compliance with Occupational Safety and Health Administration (OSHA) standards is now mandatory within the Department. Independent "Tiger Teams" are performing safety and health compliance assessments at DOE facilities to identify OSH deficiencies. A recent extensive OSHA audit of DOE OSH programs⁽²⁾ and related activities has resulted in additional changes in DOE OSH requirements.

These changes coupled with those pending in the final version of the OSHA Reform Act,⁽³⁾ have had, and will continue to have, a tremendous impact on the roles and responsibilities each of us has within DOE, particularly in the area of OSH training. The focus of this presentation is to present the specific implications these changes have relating to OSH Training Requirements.

PROPOSED OSH TRAINING REQUIREMENTS AND GUIDANCE

On March 20, 1991, the Secretary of Energy issued a directive to the Assistant Secretary for Environment, Safety and Health (EH) and other DOE organizations to develop formal OSH training requirements for DOE and contractor employees, and an implementation plan and program to carry out required OSH training. Those requirements have been drafted and are now in review by the DOE Program Secretarial Officers (PSOs).⁽⁴⁾ Upon review and concurrence, the proposed OSH training requirements will be piloted at selected DOE sites, and incorporated into revised DOE Orders and Guidelines.

Proposed revisions to DOE Order 5483.1B, *Contractor Safety and Health Program*,⁽⁵⁾ provide for a Safety and Health Training Program structure that employs decentralized performance of OSH training by the GOCOs, with

centralized control and coordination through the DOE Office of Safety and Quality Assurance, EH-30. EH-30 would set standards and criteria, establish minimum OSH training requirements, coordinate training of contractor OSH personnel at OSHA and DOE OSH training courses, review contractor performance records, prepare pilot and model training programs, develop training aids and lesson plans and coordinate the exchange of technical information between DOE and contractor facilities. In the case of OSH Professional Personnel and Compliance Specialists, OSH training would be implemented centrally, from Headquarters (HQ).

Contractor responsibilities would include ensuring the implementation of effective OSH training programs encompassing all training required by DOE and OSHA regulations. As described in *Proposed OSH Training Requirements and Guidance*, the following are considered essential elements of GOCO OSH training programs:

1. **Personnel classification system which is consistent with that defined in 29CFR1960, Basic Program Elements for Federal Employee OSH Programs and Related Matters, ⁽⁶⁾ ie.,**
 - a. Management Officials
 - b. Supervisors
 - c. OSH Professional Personnel
 - d. OSH Compliance Specialists
 - e. Collateral Duty OSH personnel and OSH Committee Members
 - f. Employees
 - g. Employee Representatives

2. **Identification of OSH training requirements for each classification of personnel, per OSHA standards and DOE Orders**

A core of general requirements would be identified by DOE/HQ, for all employees, regardless of their classification. These core requirements include initial entry training, such as employee rights and responsibilities, employee concerns policies, emergency response procedures, etc. In addition to the general requirements, job specific training would be required for employees in each personnel classification. That training would be commensurate with the potential hazards that would be experienced in the employees' job duties, and the requirements and procedures to control those hazards. Special training requirements would also apply to Supervisors, Managers, OSH Professional Personnel, OSH Compliance Specialists, Collateral Duty OSH personnel, OSH Committee Members and Employee Representatives, based on the provisions of

29CFR1960, as well as an OSH training needs analysis performed by DOE/HQ.

3. Additional and refresher OSH training

In addition to the minimum OSH training requirements, per OSHA standards and DOE Orders, several additional areas of training would be required in GOCO OSH training programs. These areas include: job safety analysis, accident investigation, confined space entry, first aid and CPR, DOE recordkeeping, motor vehicle safety, voluntary prevention program, ergonomics, crane operations and non-ionizing radiation. Refresher training would be required for designated areas, based on the seriousness of hazards and frequency of exposures involved. For example refresher training would be required in the following areas: occupational noise exposure, asbestos, lead, hazardous waste and emergency response, portable fire extinguishers, and control of hazardous energy. It is emphasized that additional and refresher training requirements in these areas would be driven by employees' exposures to the hazards involved.

4. Analysis and implementation of OSH training priorities , based on OSH training deficiencies and other indicators such as accident and incident data

A number of OSH training deficiencies continue to be identified at many DOE facilities. The following are considered immediate training priorities to be addressed, as applicable in OSH training programs:

- a. Management of DOE and GOCO OSH programs, for top and middle level managers, including implementation of the DOE Voluntary Prevention Program (VPP).
- b. OSHA standards (29CFR1910, 1926 and 1960) course and specialized inspection/audit/evaluation and compliance courses (particularly in the areas of construction standards and electrical standards) for DOE and GOCO OSH Compliance Specialists.
- c. OSHA standards (29CFR1910, 1926 and 1960) course and specialized OSH courses (particularly in the areas of hazard communication, machine guarding, lock and tag, bloodborne diseases and hearing conservation) for DOE and GOCO OSH Professional personnel.
- d. OSH orientation program and standards (29CFR1910, 1926 and 1960) courses (particularly in the areas of accident assessment, hazard identification, hazard evaluation and hazard reduction) for DOE and GOCO Supervisors
- e. OSH program and standards (29CFR1910, 1926 and 1960) courses for GOCO Collateral Duty Personnel and OSH Committee Members

- f. Hazard communications, motor vehicle safety, electrical safety, lock and tag, construction safety, trenching and shoring, hazardous waste, noise control, hoisting and rigging safety and confined space training for GOCO employees
- g. Other, as identified in *Proposed OSH Training Requirements and Implementation Guidance*

RECOMMENDATIONS FOR GOCO OSH TRAINING PERSONNEL

DOE and GOCO OSH Training Managers must look ahead in the coming months to assessing their present OSH training programs, and preparing these programs to meet the forthcoming standards, per revised OSH training requirements and guidelines. Training Managers must assess their OSH training programs, giving immediate attention to ensuring adequate training of supervisors, managers, and OSH professionals. Topical areas requiring immediate attention include: construction safety, electrical safety, machine safeguarding, occupational injury and illness recordkeeping and confined space safety.

OSH Training managers are encouraged to draw on the technical support provided by EH-30 to aid them in upgrading the quality and quantity of OSH training provided to employees. Available support includes OSH courses that have been developed specifically for the DOE audience, and are being made available, to DOE and GOCO OSH organizations upon request. The courses were developed to address the Department's highest priority OSH training deficiencies. Some of the courses are briefly described below:

- S-101, *Supervisors Orientation to Occupational Safety in DOE*, is an introductory course for first line supervisors. This is a four day survey class, designed to teach first line supervisors the fundamental aspects of loss control, including hazard identification, hazard evaluation and hazard reduction/elimination.
- P-101, *Orientation to Occupational Safety Compliance in DOE*, is a detailed study of the interpretation and application of OSHA standards 1910 and 1926 and associated DOE Orders. This is a nine day course designed for OSH Professionals, OSH Compliance Specialists, and OSH Collateral Duty Personnel.
- M-101, *Managing Occupational Safety in DOE*, is a two day course designed for middle and upper level management officials at DOE facilities. This course examines the DOE Voluntary Prevention Program, and provides instruction on implementation of VPP in DOE.

Additional courses sponsored by EH include: Construction Safety, Machine

Guarding, Occupational Injury and Illness Recordkeeping, Excavating and Trenching, Electrical Safety and Confined Space Safety. These courses will be offered by EH-30 in the near term, with the intent of training GOCO OSH trainers to subsequently conduct the courses themselves, at their respective sites. Requests for these courses should be addressed to the DOE EH-31.2 Project Manager for OSH Training, Dr. Charles O'Dell, at the Germantown Office.

REFERENCES

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