

Management Plan

CPCC-MP-SH-32219

10 CFR 851 CPCCo Worker Safety and Health Program Description.

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Topic: Occupational Safety and Industrial Health

Technical Authority: Steelhammer, Jacob G

Functional Manager: Foster, Andrew L

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USQ Facility	USQ Review	Screeener
Solid Waste Operations Complex	GCX-2 (Editorial Changes)	Hoopes, Canyon
Canister Storage Building/Interim Storage Area	GCX-2 (Editorial Changes)	Hoopes, Canyon
Waste Encapsulation Storage Facility	GCX-2 (Editorial Changes)	Hoopes, Canyon
Transportation	GCX-2 (Editorial Changes)	Hoopes, Canyon
Capsule Storage Area	GCX-2 (Editorial Changes)	Hoopes, Canyon
105 KW Facility	GCX-2 (Editorial Changes)	Hoopes, Canyon
324 Building	GCX-2 (Editorial Changes)	Hoopes, Canyon
D4ES-Central Plateau	GCX-2 (Editorial Changes)	Hoopes, Canyon

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1.0 EXECUTIVE SUMMARY

The *10 CFR 851 CPCCo Worker Safety and Health Program Description* (this document) identifies the elements, methods, and processes by which Central Plateau Cleanup Company (CPCCo) meets the requirements in the Title 10, *Energy, Code of Federal Regulations* (CFR) Part 851, *Worker Safety and Health Program* (Rule) published in the Federal Register Volume 71, No 27, February 9, 2006, including the amended rule in Volume 82, No. 241, December 18, 2017. The Rule codifies worker protection program requirements and establishes the following:

- Requirements for a worker safety and health program that will reduce or prevent occupational injuries, illnesses, and accidental losses by requiring U.S. Department of Energy (DOE) contractors to provide their employees with safe and healthy workplaces at DOE sites; and
- Procedures for investigating whether a violation of a requirement of the Rule has occurred, for determining the nature and extent of any violation, and for imposing an appropriate remedy (851.1).

In accordance with Subpart C of the Rule, CPCCo is responsible for the safety and health of CPCCo workforce (851.20), including CPCCo employees and contractors, that meet the scope and definition of “*work at a DOE site in furtherance of the DOE mission,*” as defined in 10 CFR 851.3. CPCCo’s accountability to adhere to the Rule’s referenced requirements is based on the Rule’s Preamble, Federal Register Volume 71 No 27, February 9, 2006, page 6896 (Column 1), which states: “The standards included in this final rule are consistent with those mandated under DOE O 440.1A.”

CPCCo has adopted other best management practices, consensus standards, and health-based values not invoked by the Rule. CPCCo is contractually obligated to encourage employees to decline to perform a task that “poses an imminent risk of death or serious physical harm...” [(851.20(b)(8)]; however, CPCCo joined the rest of the Hanford Site contractors by using a graded approach that provides workers the right to Stop Work when they feel the hazard has not been fully addressed.

CPCCo had established several memoranda of agreement (MOA) with other Hanford Site contractors who have a key role in CPCCo’s ability to meet the Rule. This meets the 851.11(a)(2)(ii) requirement to coordinate to ensure there are clear roles, responsibilities, and procedures to ensure the safety and health of workers at multi-contractor workplaces.

CPCCo implements Integrated Safety Management System/Environmental Management System (ISMS/EMS) using CPCC-MP-MS-003, *Integrated Safety Management System/Environmental Management System Description (ISMSD)*, which describes how environment, safety, health, and quality integrate into the work planning and execution for CPCCo’s scope of work.

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2.0 ROLES AND RESPONSIBILITIES

2.1 General Description

The CPCCo Environmental, Safety, and Health (ES&H) support services organization is responsible for maintaining this CPCCo Worker Safety and Health Program Description (WSHPD). Within ES&H, Occupational Safety and Industrial Hygiene (OS&IH) is responsible for program development, implementation, and oversight. Price Anderson Amendments Act (PAAA) Event & Reporting is responsible for performing the actions associated with the PAAA program described in CPCC-PRO-NS-2243, *Identification, Reporting, and Tracking of Nuclear Safety and Worker Safety and Health Requirement Noncompliances & PAAA/Worker Safety and Health Enforcement Activities*. Appendix A, "Description of Functional Areas," provides a summary description of CPCCo organizations responsible for implementation of specific areas of the Rule. CPCCo Projects and organizations are responsible for implementing the overall worker safety and health program and appropriate integration into contracting and work planning activities.

The roles and responsibilities of organizations and personnel supporting CPCCo are described in CPCC-MP-MS-003. CPCCo establishes specific roles and responsibilities for implementation of worker safety and health requirements through the document format established in the CPCCo documents identified in Appendix B, "851 Implementation Matrix," which defines specific responsibilities for implementation of the scope of the individual document. Appendix C, "Contractor Safety and Health," provides a summary of the processes used to ensure CPCCo contracted work scope is performed in accordance with the WSHPD.

2.2 Integration of Site Activities

The Hanford Site consists of two DOE Field Offices and multiple contractors, requiring integration of some worker health and safety activities. CPCCo supports the Site Wide Standards Management Plan and provides qualified resources to represent CPCCo interests on a continuing basis. Occasionally, CPCCo meets with other site contractors to address sitewide issues in order to provide a consistent approach to resolutions.

Work performed by/for other contractors at the Hanford Site is controlled under a series of MOAs. Two MOAs are in place for the DOE-Prime Contractors who have a key role in CPCCo's ability to meet all the Rule's requirements.

- Hanford Mission Integrations Solutions, LLC, (HMIS)
- Occupational Medical Service Provider (OMSP)

In general, for work authorized under the MOAs, safety will be controlled by the contractor in control of the work location.

When obtaining products or services from other Hanford Site DOE Prime Contractors through the Work Authorization fund transfers, the expectation is that DOE has approved top-level programs in health, safety, and quality (ISMS, Worker Safety and Health Program [WSHP], and Quality Assurance Program), and that these programs and documents are found acceptable to DOE and no further verification is required.

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2.3 Worker Safety and Health Program Maintenance

The CPCCo ES&H Director is accountable for maintaining the WSHPD and shall approve all revisions. The WSHPD will be maintained in accordance with the Rule. An annual review will be conducted, at a minimum, to verify that the WSHP adequately reflects operations and controls. The annual review will include worker participation as defined in 851.11(d).

The WSHPD will be maintained under CPCCo configuration control and submitted for review and approval whenever a significant change or addition to the WSHP is made, when minor revisions are required, or annually.

Applicable labor organizations will be notified of any updates or changes to the program as defined in 851.11(d). This communication is initiated through Labor Relations to the Labor Organization President(s). Changes to the program are communicated to the workforce through a variety of methods (e.g., Take 5 for Safety and Safety Blitz bulletins, Required Readings, and the Plateau Remediation Contract Procedure System [PPS] notifications).

2.3.1 Minor Revisions

Editorial or minor process improvements that do not change context or concept will be reviewed, approved, and incorporated to the WSHPD without DOE-RL approval. Reference to these changes/revisions will be identified and communicated to the DOE-RL during the annual WSHPD review process.

2.3.2 Major Revisions

Significant operational changes and/or issues having an impact upon approved safety and health thresholds require written DOE-RL Contracting Officer approval prior to implementation, such as:

- New contractor awarded contract.
- Contractor accepts a new work scope for a new toxic, reactive, flammable, or explosive chemical which was not addressed in the approved WSHP.
- The toxicity or explosive hazard, such as chemical storage, has increased where there is a credible accident scenario that would have an impact upon the co-located workers or off-site public.
- A site not currently using explosives begins a project involving explosives.

2.3.3 Annual Review

In accordance with contractual requirements, submit an updated WSHPD for approval or letter stating that no changes are necessary to the currently approved plan.

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2.4 Submittals under 10 CFR 851

The CPCCo ES&H support services organization is responsible for maintaining the CPCCo WSHPD and submittals/notifications under the Rule. The following submittals/notifications are defined in the Rule and will be provided to DOE-RL.

2.4.1 Annual Worker Safety and Health Program Description

In accordance with contractual requirements, the WSHPD will be reviewed and submitted for DOE-RL Contracting Officer approval annually (12 months after the preceding revision date).

2.4.2 Closure Facility Hazards

In accordance with 851.21(b), CPCCo will submit to DOE-RL a list of closure facility hazards and the established controls within 90 days after identifying such hazards. Closure facility hazards are defined in 851.3 and are limited to hazards in which means of control involve deviations from the technical requirements of 851.23 and would require costly and extensive structural/ engineering modifications to be in compliance.

2.4.3 Requests for Interpretative Ruling

The DOE Office of General Counsel is the sole authority that can provide binding interpretations of the Rule. The DOE Office of Health, Safety & Security can provide technical information on implementation and enforcement guidance. CPCCo will provide courtesy notification to DOE-RL of any requests for interpretation.

2.4.4 Requests for Variance

The Rule's Subpart D defines the process for requesting a variance, and will be used when requesting temporary, permanent, and national defense variances. CPCCo will inform DOE-RL of the need for a variance and submit the request for variance to the Cognizant Secretarial Officer.

2.4.5 Self-Identification and Tracking System

CPCCo will use the DOE voluntary Noncompliance Tracking System (NTS) and the guidelines provided in the Enforcement Process Overview to report any noncompliance. CPCCo will use the existing Integrated Contractor Assurance System (iCAS) for non-NTS reportable 10 CFR 851 non-compliances.

3.0 PROGRAM DESCRIPTIONS

CPCCo has an established safety and health program based on CPCCo contract requirements and the Rule. The overall WSHP supports the functional areas established in the Rule and provides the environment for 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 (851.10(a)). CPCCo has separate, non-regulatory commitments to worker ownership and partnership in safety and health, as defined in the 47 *Federal Register* (FR) 29025, *Voluntary Protection Programs (VPP)*.

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4.0 IMPLEMENTING DOCUMENTS

Implementing documents are listed in Appendix B.

5.0 RECORD IDENTIFICATION

None

6.0 SOURCES

6.1 Requirements

10 CFR 851, *Worker Safety and Health Program*

6.2 References

47 FR 29025, *Voluntary Protection Programs*

CPCC-MP-MS-003, *Integrated Safety Management System/Environmental Management System Description (ISMED)*

CPCC-PRO-NS-2243, *Identification, Reporting, and Tracking of Nuclear Safety and Worker Safety and Health Requirement Noncompliances & PAAA/Worker Safety and Health Enforcement Activities*

DOE 851, *Frequently Asked Questions*

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Appendix A - Descriptions of “Worker Safety and Health Functional Areas”

(10 CFR 851 Appendix A)

The methods to ensure implementation of the functional areas are briefly summarized below.

1.0 CONSTRUCTION SAFETY

APPLICABLE. CPCCo complies with the 10 CFR 851.23 mandated construction safety laws, codes, standards, and regulations relating to construction safety, and ensures that all reasonable steps are taken to set and communicate expectations and enforce requirements for subcontractor safety performance.

- Construction means combination of erection, installation, assembly, demolition, or fabrication activities involved to create a new facility or to alter, add to, rehabilitate, dismantle, or remove an existing facility. It also includes the alteration and repair (including dredging, excavating, and painting) of buildings, structures, or other real property, as well as any construction, demolition, and excavation activities conducted as part of environmental restoration or remediation efforts (10 CFR 851.3(a) - Definitions).
- Construction contractor means the lowest tiered contractor with primary responsibility for the execution of all construction work described within a construction procurement or authorization document (e.g., construction contract, work order). (10 CFR 851.3(a) Definitions).
- Construction contractor is responsible for identifying a designated representative on the worksite during periods of active construction and assigning competent persons (where required by the Occupational Safety and Health Administration [OSHA]).
- Construction safety management and oversight ensures compliance with mandated codes and standards. Specific implementation methods are identified in Appendix B, “851 Implementation Matrix.”
- CPCCo work planning processes ensure that activities occurring in a non-construction environment trigger the appropriate construction standard requirements.

2.0 FIRE PROTECTION

LIMITED APPLICABILITY. A portion of this section does not apply to CPCCo, as the contract directs this government furnished service through another DOE-RL contracted organization. HMIS’s Hanford Fire Department (HFD) provides 10 CFR 851 related Fire Protection services. The HFD organization is broken into three divisions.

- **Operations Division** is responsible for fire suppression, hazardous materials response, emergency medical response, and special rescue support activities.
- **Fire Systems Testing and Maintenance Division** is responsible for the functional testing, inspection and preventive and repair maintenance activities for Hanford Site fire alarm and suppression systems to meet National Fire Protection Association (NFPA) and DOE standards and requirements. In addition, this element performs annual inspection of site fire extinguishers, provides emergency response backup for suppression, ambulance, and hazardous materials response support, and maintains all firefighter training certifications.

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- The **Fire Prevention Division** is managed by the Hanford Site Fire Marshal and is responsible for all fire prevention activities, including the building tour and inspection program.

CPCCo maintains a staff of Fire Protection Engineers to ensure the design and maintenance of fire protection systems meet the Rule's requirements. Specific implementation methods are identified in Appendix B, "851 Implementation Matrix."

3.0 EXPLOSIVES SAFETY

APPLICABLE. CPCCo complies with 851.23 mandated Explosives Safety laws, codes, standards, and regulations relating to explosives safety. CPCCo Projects activities infrequently use explosives as part of well decommissioning, demolition activities, and construction activities. All acquisition, storage, and use of explosives are in accordance with HMIS's HFD and Safeguard & Security processes. Specific implementation methods are identified in Appendix B, "851 Implementation Matrix."

4.0 PRESSURE SAFETY

APPLICABLE. CPCCo complies with 851.23 mandated safety and health laws, codes, standards, and regulations relating to maintenance and operation of pressure vessels. The DOE-RL is designated as the "jurisdictional authority" for Pressure Vessels. The Jurisdictional Authority interpretations are to be kept on file. Any variances or exemptions pursued in the future that are beyond the Jurisdictional Authority's scope and authority, as defined in American Society of Mechanical Engineers (ASME) Boiler Pressure Code series, will be pursued through CPCCo Prime Contracts and managed as exemptions or variances to DOE requirements. Specific implementation methods are identified in Appendix B, "851 Implementation Matrix."

5.0 FIREARMS SAFETY

NOT APPLICABLE. The CPCCo contracted work scope directs this government furnished service through another DOE-RL contracted organization. HMIS's Security related Protective Forces, and Animal Control, provides services that require firearms.

6.0 INDUSTRIAL HYGIENE

APPLICABLE. CPCCo complies with 851.23 contractually mandated safety and health laws, codes, and standards relating to industrial hygiene. Appendix B, "851 Implementation Matrix," identifies applicable requirements and implementation processes. CPCCo reviews for adoption more recent publications of the ACGIH TLVs when they are more protective.

7.0 BIOLOGICAL SAFETY

NOT APPLICABLE. CPCCo contracted work scope does not include hazards requiring the formation of an Institutional Biosafety Committee or equivalent as defined in 10 CFR 851 Appendix A, Section 7.

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8.0 OCCUPATIONAL MEDICINE

LIMITED APPLICABILITY. CPCCo obtains occupational medicine services as a government furnished service through another DOE-RL contracted organization and their subcontractors. At Hanford, the OMSP is responsible to establish an 851 Appendix A, subparagraph 8, compliant and comprehensive occupational medicine program for workers employed at CPCCo that work on a DOE site for more than 30 days in a 12-month period or are enrolled for any length of time in a required medical or exposure monitoring program.

All CPCCo employees, contractors and their lower tiered on-site subcontractors are to use the OMSP for medical services including medical examinations, first aid treatment, employee assistance program, and return to work evaluations. See Appendix C for further discussion. HFD provides ambulance service for urgent situations requiring care and transport.

CPCCo provides the OMSP access to hazard information by promoting adequate communication, coordination, and sharing among operating and safety organizations. CPCCo provides access to current information about actual or potential work-related hazards, employee job tasks, hazard analysis information, actual or potential worksite exposures, and employee essential job functions.

CPCCo provides the OMSP access to the workplace for evaluation of job conditions and issues relating to worker's health. CPCCo provides the opportunity and has established a forum for OMSP staff to participate in worker safety and health team meetings and committees. Workplace evaluations and meetings include the President's Zero Accident Council 2.0, case management meetings, emergency preparedness planning, and project-specific wellness and injury reduction activities.

Under the OMSP's management, employee medical, psychological, and Employee Assistance Program (EAP), records are kept confidential and protected. Access to medical records is provided in accordance with DOE regulations implementing the Privacy Act and the Energy Employees Occupational Illness Compensations Program Act.

9.0 MOTOR VEHICLE SAFETY

APPLICABLE. CPCCo complies with 10 CFR 851.23 mandated occupational safety laws, codes, standards, and regulations relating to motor vehicle safety. Appendix B, "851 Implementation Matrix," identifies applicable requirements and implementation processes.

10.0 ELECTRICAL SAFETY

APPLICABLE. CPCCo complies with 851.23 mandated safety laws, codes, standards, and regulations relating to maintenance and operation of an electrical safety program. CPCCo and DOE-RL have established a process within the CPCCo to identify an Authority Having Jurisdiction (AHJ) for the NFPA Electrical Standards, NFPA-70, *National Electric Code*, for design and installation; and an AHJ for NFPA-70E, *Standard for Electrical Safety in the Workplace*, electrical safe work practices. Both AHJ have authority for interpretations and equivalencies in regards to the NFPA-70 and the NFPA-70E. The AHJ is identified to DOE-RL outside of the WSHP under a separate letter. Interpretations for safe electrical design and installation are kept by the Hanford Electrical Codes Board. Board interpretations for safe electrical work practices are kept by the Hanford Workplace Electrical Safety Board.

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Any variances or exemptions pursued in the future that are beyond the AHJ's scope and authority, as defined in National Electrical Code (NEC) or other NFPA documents, will be pursued through CPCCo Prime Contracts and managed as exemptions or variances to DOE requirements. Specific implementation methods are identified in Appendix B, "851 Implementation Matrix."

11.0 NANOTECHNOLOGY SAFETY (RESERVED)

No information is provided as the Rule has "Reserved" this section for future use.

12.0 WORKPLACE VIOLENCE PREVENTION (RESERVED)

No information is provided as the Rule has "Reserved" this section for future use.

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Appendix B - 851 Implementation Matrix

Rule Section		CPCCo Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20	Management responsibilities and worker rights and responsibilities		
851.20(a)	Management responsibilities	CPCC-MP-QA-599	<i>Quality Assurance Program</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		CPCC-MP-TQ-011	<i>Central Plateau Cleanup Company Qualification and Training Plan</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		CPCC-PRO-AC-40471	<i>Contract Labor Resources</i>
		CPCC-PRO-AC-40493	<i>Contracting for Construction or Fabrication</i>
		CPCC-PRO-AC-40496	<i>Managed Task Services</i>
851.20(a)(1)	Establish policy, goals, and objectives	CPCC-POL-SH-5053	<i>CPCCo Safety, Health, Security, Quality, and Environmental Policy</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>

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Rule Section		CPCCo Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20(a)(2)	Use qualified staff	CPCC-PRO-HR-021	<i>Staffing</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-POL-TQ-11337	<i>Employee Training</i>
		Special Provisions, SP-5	<i>On Site Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		CPCC-MP-TQ-011	<i>Central Plateau Cleanup Company Qualification and Training Plan</i>
851.20(a)(3)	Hold personnel accountable	CPCC-PRO-HR-033	<i>Employee Discipline</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		CPCC-PRO-HR-050	<i>Managing Employee Performance</i>
851.20(a)(4)	Involve workers	CPCC-POL-SH-5053	<i>CPCCo Safety, Health, Security, Quality and Environmental Policy</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		CPCC-CHRT-SH-9982	<i>President's Zero Accident Council 2.0</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.20(a)(5)	Provide workers access to information	CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>

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Rule Section		CPCCo Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20(a)(6)	Establish procedures for worker reporting	DOE-0343	<i>Stop Work</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		DOE-0400	<i>Hanford Site-Wide Employee Concerns Program</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		CPCC-CHRT-SH-9982	<i>President's Zero Accident Council 2.0</i>
		CPCC-CHRT-SH-40512	<i>Employee Zero Accident Council</i>
851.20(a)(7)	Respond promptly to worker reports	DOE-0343	<i>Stop Work</i>
		DOE-0400	<i>Hanford Site-Wide Employee Concerns Program</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
851.20(a)(8)	Communicate regularly with workers	CPCC-PRO-SH-40461	<i>Safety Communications</i>
		CPCC-CHRT-SH-9982	<i>President's Zero Accident Council 2.0</i>
		CPCC-CHRT-SH-40512	<i>Employee Zero Accident Council</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		Special Provisions, SP-5	<i>On Site Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.20(a)(9)	Establish stop work procedures	DOE-0400	<i>Hanford Site-Wide Employee Concerns Program</i>
		DOE-0343	<i>Stop Work</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.20(a)(10)	Inform workers of their rights	CPCC-PRO-SH-40461	<i>Safety Communications</i>
		Course: 000006	<i>CPCCo - General Employee Training (CGET)</i>

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Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20(b)	Worker rights and responsibilities	CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		CPCC-POL-SH-5053	<i>CPCCo Safety, Health, Security, Quality, and Environmental Policy</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.20(b)(1)	Participate in activities on official time	CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		2022 Labor Agreement	<i>2022 Labor Agreement Between Central Plateau Cleanup Company (CPCCo) and Hanford Atomic Metal Trades Council (HAMTC) AFL-CIO</i>
851.20(b)(2)	Have access to safety and health documents	CPCCo Intranet Site Map	<i>Electronic Library/DOE RL Directives</i>
		www.energy.gov/ehss	<i>DOE-HQ Office of Health, Safety and Security</i>
		CPCCo Virtual Manual (OS&IH)	<i>Occupational Safety & Health Intranet Web Page</i>
		CPCC-PRO-SH-40461	<i>Safety Communications</i>
851.20(b)(3)	Be notified of overexposures	CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
851.20(b)(4)	Observe monitoring	CPCC-PRO-SH-40461	<i>Safety Communications</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
851.20(b)(5)	Accompany DOE officials on inspections	CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		2022 Labor Agreement	<i>2022 Labor Agreement Between Central Plateau Cleanup Company (CPCCo) and Hanford Atomic Metal Trades Council (HAMTC) AFL-CIO</i>
851.20(b)(6)	Request results of inspections and investigations	CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>

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Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20(b)(7)	Express concerns related to H&S	DOE-0400	<i>Hanford Site-Wide Employee Concerns Program</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.20(b)(8)	Decline tasks posing imminent danger	DOE-0343	<i>Stop Work</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
851.20(b)(9)	Stop imminently dangerous work	DOE-0343	<i>Stop Work</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>
		Special Provisions, SP-5	<i>On Site Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.21	Hazard identification and assessment		
851.21(a)	Establish procedures to identify hazards and assess risks	CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40410	<i>Hazard Communication Program</i>
		DOE-0342	<i>Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)</i>
		HMIS-RD-FP-8589	<i>Hanford Fire Marshal Permits</i>
		CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.21(a)(1)	Assess workers exposures	CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		CPCC-MP-QA-599	<i>Quality Assurance Program</i>

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851.21(a)(2)	Document hazard assessment	CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
		CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		HMIS-RD-FP-8589	<i>Hanford Fire Marshal Permits</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program (HSESP)</i>
851.21(a)(3)	Record results	CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
851.21(a)(4)	Analyze designs for potential hazards	CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-RD-EN-1819	<i>Engineering Requirements</i>
		CPCC-PRO-EN-40264	<i>Formal Design Review</i>
851.21(a)(5)	Evaluate operations, procedures, and facilities	CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-EN-2001	<i>Facility Modification Package Process</i>
		CPCC-CHRT-WKM-53060	<i>Hazard Review Board</i>
		CPCC-PRO-SH-40499	<i>Safety and Health Inspections</i>
851.21(a)(6)	Perform activity-level hazard analysis	CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program (HSESP)</i>

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851.21(a)(7)	Review safety and health experience	CPCC-PRO-MS-067	<i>Lessons Learned</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40461	<i>Safety Communications</i>
		CPCC-PRO-QA-052	<i>Issues Management</i>
		CPCC-CHRT-SH-9982	<i>President's Zero Accident Council 2.0</i>
		CPCC-CHRT-SH-40512	<i>Employee Zero Accident Council</i>
851.21(a)(8)	Consider interaction with other hazards, such as radiological hazards	CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
851.21(b)	Submit list of closure facility hazards to Head of DOE Field Element	Letter: CPCC-200055, "Central Plateau Closure Contract Transition Remaining Closure Facilities with Closure Facility Hazards List," Enclosure 1	<i>CPCC Closure Facilities with Closure Facility Hazards List</i>
		CPCC-PRO-SH-32621	<i>Closure Facility Hazard</i>
851.21(c)	Obtain baseline	CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		CPCC-PRO-SH-40499	<i>Safety and Health Inspections</i>

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851.22	Hazard prevention and abatement		
851.22(a)	Establish and implement a hazard prevention and abatement process	CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40516	<i>Chemical Management Program</i>
		CPCC-PRO-SH-40499	<i>Safety and Health Inspections</i>
		CPCC-PRO-FP-40421	<i>Hot Work</i>
		CPCC-CHRT-SH-9982	<i>President's Zero Accident Council 2.0</i>
		CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.22(a)(1)	Incorporate controls into facility designs and procedure	CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		CPCC-RD-EN-1819	<i>Engineering Requirements</i>
		CPCC-PRO-EN-2001	<i>Facility Modification Package Process</i>
		CPCC-PRO-EN-40264	<i>Formal Design Review</i>
		CPCC-PRO-MS-589	<i>Central Plateau Cleanup Company Procedures</i>
851.22(a)(2)	Prioritize abatement actions according to worker risks	CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-POL-SH-5053	<i>CPCCo Safety, Health, Security, Quality, and Environmental Policy</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.22(b)	Select hazard controls based on standard hierarchy of controls	CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-PRO-SH-40410	<i>Hazard Communication Program</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>

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851.22(b)(1)	Substitution of the hazard	CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40410	<i>Hazard Communication Program</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
851.22(b)(2)	Engineering controls	CPCC-RD-EN-1819	<i>Engineering Requirements</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
851.22(b)(3)	Work practices and administrative	CPCC-PRO-SH-40410	<i>Hazard Communication Program</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
851.22(b)(4)	Personal protective equipment	CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		DOE-0352	<i>Hanford Site Respiratory Protection Program (HSRPP)</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program (HSESP)</i>

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851.22(c)	Address hazards when selecting or purchasing equipment, products, or services	DOE-0352	<i>Hanford Site Respiratory Protection Program (HSRPP)</i>
		CPCC-PRO-AC-40478	<i>Procurement of Materials</i>
		CPCC-PRO-AC-40471	<i>Contract Labor Resources</i>
		CPCC-PRO-AC-40493	<i>Contracting for Construction or Fabrication</i>
		CPCC-PRO-AC-40496	<i>Managed Task Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.23	Workplace safety and health standards		
851.23(a) & (b)	Comply with standards applicable to hazards in their workplaces	CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		HMIS-PLN-SP-41080	<i>Hanford Integrated Site Wide Safety Standards Management Plan</i>
		CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program (HSESP)</i>
		CPCC-PRO-MN-19304	<i>Periodic Maintenance Process</i>
		CPCC-MP-MN-40443	<i>Nuclear Maintenance Management Program (NMMP) Description Document</i>
		DOE-0352	<i>Hanford Site Respiratory Protection Program (HSRPP)</i>
		CPCC-MP-TQ-011	<i>Central Plateau Cleanup Company Qualification and Training Plan</i>
		CPCC-PRO-SH-7085	<i>Safety Responsibilities</i>

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851.23(a) & (b) (cont.)	Comply with standards applicable to hazards in their workplaces	DOE-0342	<i>Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)</i>
		CPCC-PRO-SH-077	<i>Reporting, Investigating, and Managing Health and Safety Events</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.24	Functional areas		
851.24(a) & (b)	Have a structured approach to Safety and Health program that covers functional areas listed in App. A.	CPCC-PRO-WKM-12115	<i>Work Management</i>
		CPCC-MP-MS-003	<i>Integrated Safety Management System/Environmental Management System Description (ISMSD)</i>
		Plateau Procedure System (PPS)	<i>Virtual Manuals- Occupational Safety & Health, Fire Protection, Construction, Safeguards and Security, Training and Qualification, Work Management and Employee Concerns.</i>
		DOE-0336	<i>Hanford Site Lockout/Tagout Procedure</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program</i>
		DOE-RL-92-36	<i>Hanford Site Hoisting and Rigging Manual</i>

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851.25	Training and information		
851.25(a)	Ensure that all workers are trained on the hazards to which they are exposed	CPCC-POL-TQ-11337	<i>Employee Training</i>
		CPCC-MP-TQ-011	<i>Central Plateau Cleanup Company Qualification and Training Plan</i>
		CPCC-PRO-TQ-40164	<i>Personnel Training and Qualification</i>
		CPCC-PRO-TQ-164	<i>Integrated Training Electronic Matrix</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40498	<i>Toxic Metals Exposure Control</i>
		CPCC-PRO-SH-40479	<i>Occupational Noise Exposure and Hearing Conservation</i>
		DOE-0352	<i>Hanford Site Respiratory Protection Program</i>
		DOE-0342	<i>Hanford Site Chronic Beryllium Disease Prevention Program</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
851.25(b)(1)	Provide training for new workers before or at the time of initial assignment	CPCC-PRO-TQ-164	<i>Integrated Training Electronic Matrix</i>
		CPCC-PRO-TQ-40164	<i>Personnel Training and Qualification</i>
851.25(b)(2)	Provide periodic training as needed	CPCC-PRO-TQ-40164	<i>Personnel Training and Qualification</i>
851.25(b)(3)	Provide training about new hazards	SDD J3-18	<i>Site Training Services/HAMMER</i>
		CPCC-PRO-TQ-164	<i>Integrated Training Electronic Matrix</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
		CPCC-PRO-TQ-40164	<i>Personnel Training and Qualification</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>

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851.25(c)	Train workers who have safety & health program responsibilities	CPCC-PRO-TQ-40164	<i>Personnel Training and Qualification</i>
		CPCC-STD-TQ-40369	<i>Occupational Safety Training Program Description</i>
		CPCC-STD-TQ-54470	<i>Industrial Hygiene Training Program Description</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.26	Recordkeeping and reporting		
851.26(a)(1)	Establish and maintain complete safety and health records	SDD J3-67	<i>Federal Records Inventory and Schedule Mgmt.</i>
		CPCC-PRO-SH-40499	<i>Safety and Health Inspections</i>
		CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		CPCC-PRO-SH-40479	<i>Occupational Noise Exposure and Hearing Conservation</i>
		CPCC-PRO-IRM-10588	<i>Records Management Processes</i>
851.26(a)(2)	Record and report injuries and illnesses accurately	CPCC-PRO-SH-077	<i>Reporting, Investigating, and Managing Health and Safety Events</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		Special Provisions, SP-5	<i>On Site Services</i>
851.26(a)(3)	Comply with all applicable recordkeeping requirements	CPCC-PRO-SH-077	<i>Reporting, Investigating, and Managing Health and Safety Events</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
851.26(b)(1)	Report and investigate accidents, injuries and illness	CPCC-PRO-SH-077	<i>Reporting, Investigating, and Managing Health and Safety Events</i>
		CPCC-PRO-PMT-54845	<i>Vehicle Management</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>

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851.26(b)(2)	Analyze related data for trends and lessons learned	CPCC-PRO-QA-24741	<i>Performance Analysis Process</i>
		CPCC-PRO-QA-052	<i>Issues Management</i>
851.27	Materials incorporated by reference		
851.27(b) (1-10)	Reference Sources	CPCC-RD-EN-1819	<i>Engineering Requirements</i>
		CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		DOE-0359	<i>Hanford Site Electrical Safety Program (HSESP)</i>
		CPCC-PRO-EM-060	<i>Reporting Occurrences and Processing Operations Information</i>
		Special Provisions, SP-5	<i>On Site Services</i>
10 CFR 851 Appendix A	Worker Safety and Health Functional Areas		
1	Construction Safety	CPCC-PRO-CN-14990	<i>Construction Management</i>
		CPCC-PRO-WKM-079	<i>Job Hazard Analysis</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		CPCC-PRO-WKM-12115	<i>Work Management</i>
2	Fire Protection	SDD J3-19	<i>Fire and Emergency Response Services</i>
		SDD J3-20	<i>Fire & Emergency Response Services – System Maintenance</i>
		HMIS-RD-FP-8589	<i>Hanford Fire Marshal Permits</i>
		CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-STD-EM-54889	<i>Emergency Preparedness Program Requirements</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
3	Explosives Safety	CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-STD-FP-54136	<i>Control of Explosives</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>

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4	Pressure Safety	CPCC-STD-EN-52736	<i>Design, Inspection, Testing and Repair of ASME-Coded Pressure Systems and Safety Relief Devices</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
		DOE-0336	<i>Hanford Site Lockout/Tagout Procedure</i>
5	Firearms Safety	N/A	N/A
6	Industrial Hygiene	CPCC-MP-SH-54469	<i>Industrial Hygiene Program Management Plan</i>
		CPCC-PRO-SH-409	<i>Industrial Hygiene Monitoring, Reporting and Records Management</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		CPCC-PRO-SH-40479	<i>Occupational Noise Exposure and Hearing Conservation</i>
		CPCC-PRO-SH-17916	<i>Industrial Hygiene Exposure Assessments</i>
		DOE-0352	<i>Hanford Site Respiratory Protection Program</i>
		DOE-0342	<i>Hanford Site Chronic Beryllium Disease Prevention Program</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
7	Biological Safety	N/A	N/A
8	Occupational Medicine	DOE-0352	<i>Hanford Site Respiratory Protection Program</i>
		CPCC-MOA-HPMC-00002	<i>MOA between the HPMC OMS and CPCCo</i>
		CPCC-PRO-SH-52755	<i>Employee Job Task Analysis</i>
		CPCC-PRO-HR-021	<i>Staffing</i>

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8 (cont.)	Occupational Medicine	CPCC-PRO-HR-035	<i>Termination of Employment</i>
		DOE-0342	<i>Hanford Site Chronic Beryllium Disease Prevention Program</i>
		CPCC-PRO-HR-073	<i>Paid and Unpaid Absences</i>
		CPCC-PRO-SH-077	<i>Reporting, Investigating, and Managing Health and Safety Events</i>
		CPCC-PRO-HR-042	<i>Fitness for Duty</i>
		CPCC-STD-FP-40404	<i>Fire Protection Program</i>
		CPCC-PRO-SH-40479	<i>Occupational Noise Exposure and Hearing Conservation</i>
		CPCC-PRO-HR-693	<i>Return to Work after Personal Medical-Related Condition or Absence</i>
		CPCCo Prime Contract	<i>Interface Matrix - OMSP</i>
		Special Provisions, SP-5	<i>On Site Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
9	Motor Vehicle Safety	CPCC-POL-SH-54212	<i>Vehicle Safety Policy</i>
		HMIS-RD-TRANS-27562	<i>Commercial Driver License Holder's Drug & Alcohol Testing Requirements</i>
		HMIS-PRO-TRANS-37561	<i>Department of Transportation Federal Motor Carrier Safety Management Plan</i>
		CPCC-PRO-TP-166	<i>Transportation and Packaging Training</i>
		SDD J3-37	<i>Motor Carrier Services</i>
		SDD J3-39	<i>Railroad Services</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>

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10	Electrical Safety	DOE-0359	<i>Hanford Site Electrical Safety Program</i>
		CPCC-STD-SH-40518	<i>Personal Protection</i>
		DOE-0336	<i>Hanford Site Lockout/Tagout Procedure</i>
		SDD J3-41	<i>Electrical Transmission, Distribution, & Energy Mgmt</i>
		CPCC-PRO-SH-40078	<i>Contractor Safety Processes</i>
11	Nanotechnology Safety - Reserved	N/A	
12	Workplace Violence Prevention - Reserved	N/A	

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Appendix C - Contractor Safety and Health

The *10 CFR 851 CPCCo Worker Safety and Health Program Description*, covers CPCCo contracted work scope at any tier based upon the nature and duration of the work performed.

10 CFR 851, the Rule, applies to all construction work and services such as consultant, professional services, staff augmentation, etc. that is in the furtherance of the DOE mission.

10 CFR 851 does not apply to vendors or suppliers coming into CPCCo workspaces who do not have service contracts and who engage in no more than incidental work related to delivery, installation or repair of the products provided.

10 CFR 851 occupational medicine requirements apply to CPCCo contracted work scope at any tier if they are conducting CPCCo work scope on the Hanford Site.

CPCCo uses standard terms and conditions to flow down the applicable requirements of the CPCCo Worker Safety and Health Program. These requirements are specifically embedded in the *SP-5 On Site Services*. These terms and conditions reflect requirements consistent with the Rule, Subpart C. The standard terms and conditions are contractually binding and delineate corporate and personnel safety roles and responsibilities of CPCCo contractor at all tiers.

CPCCo has processes and procedures to screen contract Request for Proposal submittals to evaluate safety attributes (i.e., injury rates, Workers Compensation Experience Modification Rate, and OSHA Inspection history) and ensure the hazards associated with the contracted activity are properly addressed and meet the Rule's requirements. Depending on the scope of work and its complexity, offerors may be required to submit a safety plan for a specific hazard or activity, which will then be reviewed and approved as part of the contracting process.

CPCCo monitors the winning offeror's compliance with the worker safety and health program through routine safety inspections and reporting and tracking systems for non-compliance issues. These processes include contractor and contractor employee involvement. Safety and health non-compliance issues that cannot be immediately corrected are placed in a safe configuration until the issues can be resolved and corrective actions implemented.