

Administrative Procedure

CPCC-PRO-SH-52755

PRC-PRO-SH-52755

Employee Job Task Analysis

Revision 0, Change 0

Published: 05/12/2021

Effective: 05/12/2021

Program: Occupational Safety and Industrial Hygiene

Topic: Occupational Safety and Industrial Health

Technical Authority: Sellers, Theresa

Functional Manager: Edwards, David

Use Type: Administrative



- Solid Waste Operations Complex :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- Canister Storage Building/Interim Storage Area :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- Central Plateau Surveillance and Maintenance :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- Waste Encapsulation Storage Facility :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- 100 K Facility :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- Plutonium Finishing Plant :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- Transportation :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- 324 Facility :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie
- PFP Ancillary Structures :
Categorical Exclusion: GCX-2 (Editorial Changes)
Screener: Kraemer, Laurie

JHA: Administrative

Periodic Review Due Date:09/08/2025

Rev. 0, Chg. 0

Change Summary

Description of Change

Editorial change consists of updating company terminology (CHPRC to CPCCo) and referenced documents (PRC to CPCC), as well as an update to the current procedure templates, including spell check and updated table of contents.

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1.0 INTRODUCTION

1.1 Purpose

This procedure defines the requirements for utilizing the automated employee job task analysis (EJTA) to establish necessary employee medical qualifications and monitoring based on the job requirements, hazards, exposures, and overall risk associated with their assigned work scope.

An EJTA is developed as part of the hiring process so necessary medical qualifications are identified, applicable examinations are identified, applicable examinations are conducted, and medical clearances obtained before the employee reports to work.

The EJTA also:

- Satisfies specific Americans With Disabilities Act Amendment Act (ADAAA) and Fitness For Duty data needs
- Helps identify the need for additional employee exposure assessment and monitoring data
- Aids in determining the necessary health and safety training

Use of the EJTA facilitates compliance with U.S. Department of Energy (DOE) 10 CFR 851, *Worker Safety and Health Program*, which requires employee job task and hazard analysis information be provided to the Occupational Medical Service Provider (OMSP).

1.2 Scope

The requirements in this procedure are applicable to Central Plateau Cleanup Company (CPCCo) employees and subcontractor work activities performed under the CPCCo scope of work.

The requirements do not apply to Vendors. Vendors are defined as contractors that provide only “commercial items” as defined under the Federal Acquisition Regulations (FAR) and are not exposed to hazards on the Hanford Site (e.g., radiological, beryllium, hazardous waste) while providing their service.

This procedure does not apply to the OMSP (per contract with DOE) which is responsible for scheduling employees for medical qualification examinations and monitoring, for removing employees from medical program placement, for reporting results of medical examinations and monitoring, and for maintaining medical records.

The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical or physical exposures that may have been encountered. Workers may document past exposures on the [DOE Historic Health Exposure Questionnaire](#) and submit the form to the OMSP.

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1.3 Applicability

This procedure is applicable to CPCCo employees and subcontractors who perform work on site. An employee shall not be exposed to work-related hazards/exposures without a current signed EJTA. The process for completion of subcontractor EJTA's is contained in Appendix A.

1.4 Implementation

This procedure is effective upon publication.

2.0 RESPONSIBILITIES

All responsibilities associated with this procedure are identified in the process steps.

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3.0 PROCESS

3.1 Development and Revision of EJTA

Actionee	Step	Action
NOTE:	<ul style="list-style-type: none"> • Access to the automated EJTA can be obtained by contacting the CPCCo Occupational Safety and Industrial Hygiene Technical Authority. • Process for Contractor EJTAs is in Appendix A. 	
Managers or delegate		<ol style="list-style-type: none"> 1. COMPLETE an initial EJTA upon hire for each employee in accordance with the EJTA instructions that are part of the automated system or can be accessed at HPMC EJTA help. Every effort will be made to complete the EJTA as soon as the necessary information is available. 2. REVISE the EJTA when employees' essential job functions, physical job requirements, or the needed medical qualifications are altered as a result of job transfer or fundamental change in job requirements or hazards encountered. 3. UPDATE the employees' EJTAs annually. It is imperative that EJTAs are maintained current in order for the occupational surveillance examinations to be scheduled/performed and Medical clearances do not expire. EJTAs expire 365 days from the date last sent to Medical. When EJTAs are updated, the annual period will reset to the last date sent to Medical. 4. ENSURE the following statement is/has been added to the front page of the EJTA in the comment section during completion of the initial EJTA or when revising/updating the EJTA : "The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical of physical exposures that may have been encountered." 5. ENSURE a Safety and Health (S&H) Professional has reviewed and has concurred with the preparation of the EJTA.

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<i>Actioneer</i>	<i>Step</i>	<i>Action</i>
S&H Professional	6.	<p>REVIEW/COMPLETE the potential exposure hazards (PEH) section of the EJTA.</p> <ul style="list-style-type: none"> • During this review, applicable exposure information will be consulted to evaluate exposure levels using a graded approach. • Information to be considered includes previous EJTAs, baseline hazard assessments, previous monitoring data, and representative monitoring data. • If sufficient data exist to accurately assess exposures, the quantitative data (Qd) box should be checked for the agent. • A person can be administratively enrolled in a program if Qd box is not checked and the hazard ranking is 2 or 3.
Manager	7.	INVOLVE employees in the EJTA process.
	8.	PROVIDE employees the opportunity to discuss the EJTA with the S&H Professional when requested.
Employee	9.	<p>REVIEW EJTA <u>AND DISCUSS</u> any concerns with Manager and/or S&H Professional.</p>
Manager	10.	INCORPORATE appropriate employee and S&H Professional input into the EJTA.
	11.	INVALIDATE the EJTA if employee disagrees with the EJTA content <u>AND SELECT</u> the "Employee refused to sign" box on the EJTA.
	12.	FACILITATE a resolution meeting with the employee and S&H Professional when employee disagrees with the EJTA content and refuses to sign. Every employee on the Hanford Site has the right to participate in the dispute resolution process without fear of retaliation, reprisal, or penalty.
	13.	NOTIFY <u>AND INCLUDE</u> the HAMTC Health Advocate and the HAMTC Safety Representative (or equivalent union representative) in the resolution meeting for bargaining unit/building trade employees.
	14.	DO NOT SUBMIT EJTA to Medical until the employee, the Manager, and the S&H are all in agreement.

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<i>Actionee</i>	<i>Step</i>	<i>Action</i>
Manager	15.	<p>OBTAIN acknowledgment from both employee and OS&IH professional for their review of and concurrence through one of the following:</p> <ul style="list-style-type: none"> • Hard copy signature • Electronic signature • Documented telecom approval of signature (e.g., email, date/time of phone call) • Electronic approval through other mechanism (e.g., MS Outlook email voting) <p>16. MAINTAIN the signed EJTA and supporting concurrence documentation in the identified IDMS EJTA folder by sending the signed EJTA and correspondence electronically to ^CPCCo Records or hard copies to CPCCo Records at MSIN A5-05.</p> <p>17. PROVIDE a copy of the EJTA to the employee when requested.</p>
S&H Professional	18.	SUBMIT EJTA to OMSP.
Manager	19.	TERMINATE the EJTA when employee separates from the company or is on disability.

3.2 After-Completion of EJTA

<i>Actionee</i>	<i>Step</i>	<i>Action</i>
Manager	1.	ENSURE employee reports for medical qualification and monitoring examinations as scheduled by the OMSP.
	2.	COMPLETE employee training matrix based on the Occupational Safety and Health Administration (OSHA) training requirements and the results of the EJTA.
	3.	VERIFY medical qualifications and training before authorizing the employee to work in tasks that would present such exposures.
	4.	ENSURE the EJTA is revised so that the baseline audiogram is obtained prior to the employee's first exposure to noise at or above the allowable exposure of 85 dBA TWA. Employees whose work will change to expose them to 85 dBA TWA or higher must be sent to the OMSP to get a baseline audiogram before they are exposed to noise over 85 dBA TWA.

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<i>Actionee</i>	<i>Step</i>	<i>Action</i>
S&H Professional	5.	ASSIST managers <u>AND</u> INTERFACE with the OMSP in interpreting EJTA information to determine employee placement in medical qualification examinations and medical monitoring programs, and the need for additional workplace hazard controls.
	6.	DEVELOP a monitoring plan for any agents marked with a "2" or "3" on the PEH section of the EJTA that do not have the Qd box checked, <u>AND</u> UPDATE the EJTA once the monitoring has been completed.
	7.	ASSIST, as requested, line management in completing the employee training matrix based on the OSHA training requirements and the results of the EJTA.
Manager	8.	ENSURE employee receives the appropriate health and safety training as indicated by evaluation of the employee profile.
	9.	ENSURE the historical exposure information statement from step 3.1.4 has been added to the hardcopy of the signed EJTA before providing the EJTA to employees, third party administrators, or other authorized parties. <ul style="list-style-type: none"> EJTAs completed prior to the effective date of this procedure may need to have the statement added via typed statement on the form, computer form addition, stamp, or other permanent means.
Human Resources Department POC	10.	DETERMINE the necessary accommodations or actions if the OMSP determines an employee is not capable of performing the specified essential job functions and physical job requirements.
	11.	USE the EJTA as a resource for conducting ADAAA accommodation and Fitness for Duty reviews.

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4.0 FORMS[DOE Historic Health Exposure Questionnaire](#)

Site OMSP's New Hire Scheduling Form

5.0 RECORD IDENTIFICATION

All records are generated, processed, and maintained in accordance with CPCC-PRO-IRM-10588, *Records Management Processes*.

Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility
Approved Employee Job Task Analysis (EJTA)	Responsible Manager	IRM Service Provider

6.0 SOURCES**6.1 Requirements**10 CFR 851, *Worker Safety and Health Program***6.2 References**CPCC-PRO-IRM-10588, *Records Management Processes*

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Appendix A - Employee Job Task Analysis for Contractors

Subcontractors who do not have access to the EJTA automated system will initiate the EJTA manually as described in this appendix.

Request the Contractor company complete the Site OMSP's New Hire Scheduling Form and submit to OMSP for each worker the contractor proposes to work on site and who has not previously supported CPCCo. The OMSP forms are available through the CPCCo Safety Reference Documents external webpage at the following link:

<http://health.ri.gov/page.cfm/FormsGuides>

The subcontractor will work with the BTR or EJTA coordinator and the responsible project safety and health professional to perform a preliminary hazards assessment to identify anticipated chemical/physical hazardous exposure(s) likely to be encountered during performance of the subcontracted work. This assessment will be documented on a CPCCo draft EJTA, also available through the CPCCo Safety Reference Documents external webpage.

The safety and health professional will prepare an initial EJTA in the automated system and submit the completed EJTA to the Site OMSP.

The Site OMSP Scheduler processes the EJTA, schedules the exam, and contacts the subcontractor with the medical surveillance appointment date and time. The subcontractor ensures that workers report for medical qualification and monitoring examinations as scheduled by the OMSP.

The remaining expectations of the EJTA process in this procedure will be completed with the BTR or an assigned manager fulfilling the role of the EJTA manager. These expectations include:

- Revise the EJTA when employee functions or medical surveillance requirements change.
- Review/Update the EJTA annually.
- Ensure the following statement has been added to the EJTA: "The EJTA does not document historical exposures or represent potential exposures in case of an accident, incident, or abnormal event. It is not an exhaustive list of all chemical or physical exposures that may have been encountered."
- Involve and gain agreement from the employee and the responsible safety and health professional. Utilize the resolution process if there is disagreement.
- Hardcopy signatures and EJTA record retention.
- Verify the EJTA, medical qualifications, and necessary training are complete before the employee is exposed to hazards.
- Implement a monitoring plan as identified on the EJTA.

Terminate the EJTA when the subcontractor finishes work and leaves the site.