National Nuclear Security Administration

NNSA Policy Letter: NAP-6
Date: December 19, 2002

TITLE: **Federal Employee Occupational Safety and Health Program for National Nuclear Security Administration Headquarters Employees**

I. OBJECTIVE: Assure the safety of National Nuclear Security Administration (NNSA) Headquarters employees through the establishment, maintenance, and implementation of a Federal Employee Occupational Safety and Health (FEOSH) Program as required by Public Law 91-596, *Occupational Safety and Health Act of 1970.* Although this NNSA policy specifically addresses the safety of NNSA Headquarters employees, it is expected that the manager of each NNSA field office will establish a similar site-specific FEOSH program.

II. APPLICABILITY: The provisions of this Policy apply to all Headquarters NNSA Federal organizations with the exception of the Naval Reactors Program.

III. REQUIREMENTS: This policy defines NNSA expectations regarding protection of NNSA Headquarters employee occupational safety and health. It does not establish any new requirements that are not already established within Federal laws and regulations or the Department of Energy (DOE) directives system.

It is the policy of NNSA that NNSA operations must systematically integrate safety into management and work practices such that missions are accomplished while protecting the public, workers and environment. The NNSA FEOSH Program is established to comply with the Secretary's direction concerning Federal employee safety as stated in DOE Policy 450.4, *Safety Management Systems* and DOE Order 440.1A, *Worker Protection Management for DOE Federal and Contractor Workers.* In addition, this policy addresses how NNSA will comply with the applicable requirements of Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, 29 CFR 1960, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs*, 10 CFR 835, *Occupational Radiation Protection*, and 10 CFR 850, *Chronic Beryllium Disease Prevention Program.*

This NNSA Headquarters FEOSH Program serves as the baseline for management of NNSA Headquarters employees occupation safety and health issues and defines NNSA roles and responsibilities. The NNSA managers assigned safety management functions in the NNSA FEOSH Program shall develop implementing instructions for completion of

their safety management responsibilities. The NNSA FEOSH Program shall be maintained and updated as a living document for organizational and/or functional changes that influence NNSA Headquarters employee safety and health.

IV. RESPONSIBILITIES:

A. NNSA Administrator will monitor delegated responsibilities and the overall performance of safety management of NNSA Headquarters Federal employees.

B. NNSA Deputy/Associate Administrators are responsible for the day-to-day management of Headquarters FEOSH Program implementation. These responsibilities include: assuring employees receive appropriate safety and health training; completion of workplace inspections; assuring safety hazards are abated; maintaining exposure records; and assessing managers' and supervisors' performance in meeting FEOSH objectives.

C. NNSA Associate Administrator for Facilities and Operations is responsible for maintaining the NNSA FEOSH Program and providing technical assistance to other NNSA organizations.

V. POINT OF CONTACT FOR NNSA HEADQUARTERS FEOSH PROGRAM: Director, Office of Environment, Safety and Health Operations Support (NA-53) 202-586-8395.

Linton Brooks
Acting Administrator

Attachment:
Federal Employee Occupational Safety and Health Program
for National Nuclear Security Administration Employees

Federal Employee Occupational Safety and Health Program

for

National Nuclear Security Administration
Headquarters Employees

November 2002
National Nuclear Security Administration
U.S. Department of Energy
Washington, DC 20585

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FEOSH Program for National Nuclear Security Administration Employees

POLICY STATEMENT

The National Nuclear Security Administration (NNSA) is committed to providing safe and healthful working conditions for its employees. This commitment for Federal NNSA employees is implemented through an effective Federal Employee Occupational Safety and Health (FEOSH) Program as described in this document. Consistent with DOE P.450.4, *Safety Management System Policy* and DOE Order 440.1A, *Worker Protection Management for Department of Energy (DOE) Federal and Contractor Employees,* NNSA considers employee safety and health to be a primary responsibility of every manager and employee. To support this priority, NNSA develops, implements, and continually improves practices that assure optimal protection of its employees.

The FEOSH Program for NNSA employees is intended to be owned and implemented by all NNSA managers, supervisors, and employees. The program's success depends in great measure upon open and honest communication between employees and management. This team approach facilitates the recognition of existing and emerging safety and health concerns and the timely application of appropriate mitigative actions. It is critical that all NNSA personnel become involved in seeking and suggesting ways to improve the effectiveness of the NNSA FEOSH Program. Our shared goal in this program is for all of us to return home to our families at the end of each workday without work-related injury or illness.

Linton Brooks
Acting Administrator

NNSA Federal Employee Occupational Safety and Health Program

The purpose of this document is to describe the FEOSH Program for NNSA headquarters employees. The following program specifically addresses the safety of NNSA headquarters employees; however, it is expected that the manager of each NNSA field office will establish a similar site-specific FEOSH program. This document provides all NNSA personnel with the information, and references to additional information, needed to understand how to provide a safe and healthful work environment.

2.0 BACKGROUND

Section 19 of the *Occupational Safety and Health Act of 1970* requires each Federal agency to develop and implement a safety and health program that is designed to protect its Federal employees from workplace hazards, illnesses, and injuries.

The requirements for the FEOSH Program are:

- Section 19 of the *Occupational Safety and Health Act of 1970,* Public Law 91-596, 91st Congress, S. 2193, December 29, 1970;
- Executive Order 12196, Occupational Safety and Health Programs for Federal Employees;
- Title 29 CFR Part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs;
- Title 29 CFR Part 1926, Safety and Health Regulations for Construction;
- Title 10 CFR Part 835, Occupational Radiation Protection;
- Title 10 CFR Part 850, Chronic Beryllium Disease Prevention Program;
- Title 29 CFR Part 1910, Occupational Safety and Health Standards;
- DOE P 450.4, *Safety Management Systems Policy*;
- DOE Order 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*;
- DOE Order 442.1, *Department of Energy Employee Concerns Program*; and
- DOE Notice 450.7, *The Safe Handling, Transfer, and Receipt of Biological Etiologic Agents at Department of Energy Facilities.*

Pursuant to Department of Energy (DOE) Policy 450.4, NNSA line management is responsible and accountable for the safety and health of NNSA employees. Each DOE Headquarters organizational element, operations office, power marketing administration, or other field element is required to develop and implement their respective FEOSH programs.

Successful implementation of the NNSA FEOSH Program requires integration of all environment, safety and health activities with work planning and control processes so that employee safety and health and protection of the environment are integral to conducting all NNSA work.

Title 29 CFR 1960 also requires each agency to appoint a Designated Agency Safety and Health Official (DASHO) who is responsible for the effective management and implementation of the agency's FEOSH Program. The Assistant Secretary for Environment, Safety and Health is the appointed DASHO for DOE. The Office of Worker Health and Safety (EH-5) provides Departmental FEOSH programs with programmatic support and policy guidance.

3.0 APPLICABILITY

The policies and guidelines contained within this document apply to all NNSA personnel. All visitors, including contractors working within the NNSA domain, are expected to be familiar with this document and to abide by its policies.

4.0 PROGRAM STRUCTURE

Five key elements must exist to implement an effective FEOSH Program for NNSA employees. These five program elements, described in DOE O440.1A and consistent with Integrated Safety Management, are the cornerstone of an effective safety and health program. These elements are:

- Management commitment and employee involvement;
- Workplace hazard analysis;
- Hazard prevention and control;
- Safety and health training; and
- Program evaluation.

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

4.1 Management Commitment and Employee Involvement

National Nuclear Security Administration is committed to providing a workplace for its employees that is free from recognized hazards that are causing or are likely to cause death or serious physical harm and that are in compliance with Occupational Safety and Health Administration (OSHA) and DOE occupational safety and health and regulations.

National Nuclear Security Administration management commitment and employee involvement are critical to the successful implementation of the FEOSH Program for NNSA employees. In an effective program, management regards worker safety and health as a fundamental value to be pursued with as much vigor as other organizational goals.

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

4.1.1 NNSA Line Management Responsibilities

Consistent with Integrated Safety Management guiding principles, NNSA management is responsible for the overall integrity and implementation of the FEOSH Program for its employees. Field Office Managers are responsible for developing an effective FEOSH program for employees under their direction. Managers must assure that appropriate financial and other resources are available to effectively implement the FEOSH program. Managers are also responsible for assuring that information on the NNSA FEOSH program and its requirements are made available to employees and that the *Occupational Safety and Health Protection for DOE Employees* poster is displayed where it is accessible to all workers.

In order to implement an effective program, NNSA management supports FEOSH awareness activities, workplace inspections, investigation of safety and health concerns, hazard communication, abatement and control, employee training and other safety and health related initiatives. In addition, NNSA managers have certain responsibilities for maintaining records associated with FEOSH activities (see Section 4.1.4.).

Managers and supervisors are responsible for the safety and health practices of their employees in their respective work areas and in the pursuit of their work activities when away from their assigned office or on official travel. Furthermore, supervisors have the authority to remove an employee from their work area or to implement a stop-work mandate if they perceive a real or potential threat to health or safety.

4.1.2 NNSA FEOSH Coordinator Responsibilities

Each NNSA Deputy/Associate Administrator (NA-10, NA-20, NA-40, NA-50, NA-60) shall designate a FEOSH Coordinator at both Germantown and Forrestal for their respective NNSA organizational unit. The NNSA Senior Advisor for Environment, Safety and Health (NA-3.6) shall serve as the FEOSH Coordinator for the Administrator's staff. To ensure that all NNSA employees participate in FEOSH activities and are protected from unsafe or unhealthful working conditions, the NNSA FEOSH Coordinators shall be responsible for the following aspects of the FEOSH Program:

- Administer FEOSH Program activities for unit employees.
- Ensure that required NNSA unit workplace inspections are conducted.
- Target safety and health activities in high-risk or identified problem areas.
- Refer, as appropriate, or assist in any investigation of unit employee concerns and reports of unsafe/unhealthful working conditions.
- Facilitate prompt abatement of occupational safety and health hazards, and monitor progress of corrective actions in the unit's workplace.
- Encourage NNSA employee participation and involvement in FEOSH activity.
- Provide regular feedback to management concerning occupational safety and health

hazards.

4.1.3 NNSA Employee Rights and Responsibilities

All NNSA employees have rights as well as responsibilities in maintaining a safe and healthy workplace. Pursuant to Title 29 CFR 1960, NNSA employees have the right to:

- Have access to NNSA FEOSH program information;
- Know what identified occupational hazards exist, and corrective actions taken to eliminate or reduce their risk;
- Stop work IMMEDIATELY without fear of reprisal, should a situation arise that puts them or a co-worker in immediate danger;
- Report unsafe work conditions or practices to their supervisor or other appropriate authority without fear of reprisal;
- Request inspections of unsafe or unhealthful working conditions;
- Accompany safety and health inspectors on workplace inspections;
- Receive timely notification of resolution for reported issues;
- Observe workplace safety and health monitoring activities and be notified of monitoring results;
- Have access to workplace inspection and accident investigation reports; and participate in NNSA FEOSH activities on official time.

National Nuclear Security Administration employee responsibilities go hand-in-hand with employee rights. Commensurate with the right to work in a safe and healthful environment is the responsibility to act in ways that promote safety. Specifically, employees must:

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

Title 29 CFR Part 1960 and other related documents are available to all NNSA employees on the FEOSH web site at **http://tis.eh.doe.gov/feosh/**.

4.1.4 Reporting Employee Concerns and Hazards

Identification and reporting of potentially unsafe or unhealthful working conditions is the responsibility of all NNSA employees. Conditions reported may include environmental, safety and health, or facility related issues. National Nuclear Security Administration employees should use the following guidelines in reporting safety and health concerns. National Nuclear Security Administration employees should immediately report (either orally or in written form) all safety and health concerns or hazards to their supervisor.

NNSA Federal Employee Occupational Safety and Health Program

National Nuclear Security Administration employees should follow this sequential order in reporting safety and health concerns:

1. Immediate supervisor;
2. FEOSH point of contact for NNSA employees;
3. Upper management;
4. DASHO; and
5. OSHA.

If the concern or hazard is facility related, employees and/or their supervisor should report it to Engineering and Facility Management (ME-41) in a time frame consistent with the severity of the hazard. ME-41 is the point of contact for building maintenance issues for the Forrestal and Germantown Headquarters and General Services Administration (GSA) leased buildings. Use the following phone numbers to report facility-related safety and health concerns.

Washington, D.C. area or the Forrestal Building	202-586-6100
Germantown area or the Germantown campus	301-903-4005

If you need help in determining a course of action, notify the FEOSH point of contact for NNSA employees, Don Harvey, NNSA, Office of Environment, Safety and Health Operations Support (NA-53), at 301-903-7315. For NNSA Headquarters employees, all other non-safety or health concerns should be reported to Bill Lewis, Office of Employee Concerns (ED-5), at 202-586-4034.

4.1.5 Recordkeeping and Reporting Requirements

National Nuclear Security Administration managers also have certain responsibilities related to recordkeeping practices. NNSA Deputy Administrators must identify a Records Coordinator who, jointly with the NNSA FEOSH Coordinator, will establish and implement procedures for and identify where NNSA employee records will be maintained. In addition, NNSA managers must ensure that records of workplace inspections, hazard analyses and surveys, exposure monitoring and medical surveillance, worker process and procedure reviews, employee concern safety and health issues, or other FEOSH-related activities are maintained in accordance with DOE O 440.1A, DOE Order 1324.5B, "Records Management Program," and Federal confidentiality requirements. Records reflecting inspections, hazard analyses, employee concerns, and work practices must also be accessible to employees and their representatives upon request. National Nuclear Security Administration employees may access their personal health record by contacting June Robinson, Manager, Dependent and Health Care Services Program (ME-3) manager of the Germantown and Forrestal Federal Employee Health Units.

4.2 Analysis of Hazards in the Workplace

National Nuclear Security Administration managers and employees must analyze the hazards to NNSA employees at their normal duty station and while on official travel. Hazard analysis is a comprehensive process for identifying existing and potential workplace conditions that may cause employee injury or illness and identifying appropriate controls. Hazard analysis involving supervisors and workers working in conjunction with safety and health professionals helps to foster continuous improvement in hazard control and ensure compliance with safety and health requirements.

The following methods can be used to identify work-related hazards faced by NNSA employees in NNSA occupied space or while on official travel:

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

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

> *Note: National Nuclear Security Administration managers must assure that the required annual inspection of NNSA workspaces, as required by 29 CFR 1960, is performed. Engineering and Facility Management (ME-41) is responsible for building maintenance and correction of related hazards for the Forrestal and Germantown facilities, as well as being the point of contact for GSA leased space. National Nuclear Security Administration managers may elect to perform these inspection jointly with ME-41. National Nuclear Security Administration managers must also review any high-risk activities that take place away from NNSA occupied space. The NNSA FEOSH point of contact is also available to provide technical assistance in conducting these inspections.*

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

The second category includes hazards associated with site visits at DOE facilities. National Nuclear Security Administration employees performing site visits must follow all site-specific policies and procedures, (e.g., training requirements, use of personnel protective equipment, wearing of dosimeters, etc.) that have been established by the respective DOE field offices or their operating contractors. A unique hazard for NNSA employees traveling to DOE facilities is the potential for exposure to beryllium. National Nuclear Security Administration managers and employees must comply with the requirements of 10 CFR 850, *Chronic Beryllium Disease Prevention Program*, published December 8, 1999, when a NNSA employee travels to a DOE facility that presents the potential for exposure to airborne beryllium particles. Specifically, NNSA managers and employees must comply with NNSA's *Chronic Beryllium Disease Prevention Program (CBDPP) for NNSA Employees,* Appendix C of this document. Section 4 of Appendix C summarizes the Headquarters' CBDPP Medical Surveillance Program.

If an NNSA employee is the subject of exposure monitoring for beryllium or any other toxic material during DOE-related travel, the exposure monitoring data should be forwarded to the NNSA Records Coordinator or subject matter expert, as appropriate.

Another potential health hazard may occur if NNSA employees are assigned duties that entail travel outside the United States. Prior to their departure, all NNSA employees traveling outside the United States should consult with the medical personnel of the Federal Employee Health Unit regarding travel advisories, health precautions, and suggested immunizations to reduce the risk of travel-related illnesses or other health consequences.

4.3 Hazard Prevention and Control

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

The preferential order of achieving hazard prevention and control is show below:

- Engineering control;
- Work practice controls;
- Administrative controls;
- Personal protective equipment;
- Emergency preparedness; and
- Occupational medical programs.

Employee safety and health should be considered during the earliest stages of facility design, work or activity planning, and travel. However, employees may face new and previously unpredicted hazards that must be corrected or abated as they arise. For newly identified workplace or work activity hazards, corrective actions will be prioritized according to worker risk. If a hazard cannot

be corrected on the spot, then prompt interim protective measures will be taken prior to its final abatement. Personal protective equipment (e.g., hard hat, prescription safety glasses, safety shoes, etc.) required for the safety of NNSA employees is to be provided at no cost to the employee.

Proper planning by NNSA employees will help to prevent hazards. For example:

> Prior to travel, know the scope of work that is expected of you and the need for training, monitoring, personal protective equipment, and medical clearance. If travel is outside the United States, contact the Headquarters Federal Employee Health Unit about specific health precautions, travel advisories, and need for immunizations, that are recommended by the World Health Organization and the Centers for Disease Control. During DOE-related travel, if a NNSA employee has a medical/health examination in order to obtain a "clearance" so they can perform their assigned duties (e.g., respirator clearance), have a copy of the examination/clearance form forwarded to the Headquarters Federal Employee Health Unit to facilitate future clearance.

At any time, if a NNSA employee becomes aware of a previously unidentified hazard or perceives a risk of potential injury or exposure to chemical, ergonomic, or physical (including radiological) hazards, they should notify their supervisor immediately. If the risk of bodily harm is great, they should stop work until a safety or health specialist can evaluate the perceived hazard. If the hazard is facility related, regardless of whether the building is Headquarters or GSA leased, the supervisor or employee must notify Forrestal or Germantown Engineering and Facilities Management at 202-586-6100 (FORS) or 301-903-4005 (GTN), or the NNSA FEOSH point-of-contact, Don Harvey (NA-53) at 301-903-7315. Any work by an NNSA employee that requires respiratory protection must be conducted in accordance with Appendix E, Respiratory Protection Program, of this document.

Appendix A provides a listing of NNSA subject matter experts that can be contacted to provide additional information on specific hazards.

4.4 Safety and Health Training

All NNSA employees must have the needed skills to perform their tasks in a safe and healthful manner. Appropriate safety and health training is to be provided to senior managers, supervisors and employees. National Nuclear Security Administration employees should consult their immediate supervisor if at anytime they do not have the skills or knowledge to perform an assigned task in a healthy or safe manner.

Field FEOSH safety and health managers should be contacted regarding training that is specific to hazards that may be encountered while visiting a DOE facility.

4.5 FEOSH Program Evaluation

In accordance with 29 CFR 1960.11, performance evaluations for NNSA managers and supervisors shall measure that employee's performance in meeting requirements of the NNSA FEOSH program, consistent with the employee's assigned responsibilities and authorities for assuring employee safety and health.

Title 29 CFR 1960.79 requires that FEOSH program self-evaluations be developed and implemented. All NNSA components shall provide input to the DOE annual report to the Secretary of Labor on FEOSH activities as requested by EH-1, the DOE DASHO.

In addition, all NNSA components will track and report on their performance in achieving the goals and objectives of the Federal Worker 2000 Presidential Initiative.

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

NNSA Federal Employee Occupational Safety and Health Program

APPENDIX A

NNSA Subject Matter Experts

The National Nuclear Security Administration is fortunate to have an abundance of highly trained and specialized safety and health professionals. Below is a listing of the NNSA subject matter experts who can provide management, employees, and employee representatives with additional information on specific hazards.

Beryllium	Jim Slawski	301-903-5464
Chemical Safety	Rob Vrooman	301-903-9890
Construction Safety	Don Harvey	301-903-7315
Electrical Safety	John Fredlund	301-903-3059
Ergonomics	Don Harvey	301-903-7315
FEOSH	Don Harvey	301-903-7315
Fire Protection	Bill Froh	301-903-4093
Industrial Hygiene	Jim Slawski	301-903-5464
Nuclear Safety	Jim Winter	301-903-2874
Occupational Medicine	Jim Slawski	301-903-5464
Radiation Protection	Doug Minnema	301-903-7098
Respiratory Protection	Don Harvey	301-903-7315

For additional information on the DOE Employee Assistance Program, contact Bill Woods, Employee and Labor Relations Division (MA-353), at 202-586-4995.

The EH Portal is a valuable web site source for obtaining employee Environment, Safety and Health (ES&H) information across the complex. Employees can access this web site at http://tis.eh.doe.gov/portal/.

APPENDIX B

Common Workplace Hazards

As the majority of NNSA employees work in an office environment, the following is a listing of the most commonly occurring hazards found in an office setting. The intent of listing the most common workplace hazards is to raise awareness and to ultimately provide NNSA employees protection against injury. Remember that the listing is not designed to be all-inclusive.

When visiting DOE and DOE contractor facilities, NNSA employees must abide by site-specific safety and health programs. While on travel, if a NNSA employee has questions about worksite hazards, personal protective equipment, or safety and health protocols, contact the site safety and/or health personnel for guidance.

National Nuclear Security Administration employees should contact their supervisor and then the NNSA subject matter experts listed in Appendix A of this document, or the FEOSH point of contact for NNSA employees, Don Harvey, at 301-903-7315, should they need further direction or consultation concerning these or other work-related hazards.

➢ Electrical Hazards

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

➢ Fire Safety

Every NNSA employee is responsible for promoting fire safety. Reporting real or potential fire hazards and ensuring those hazards are corrected are necessary actions that help to eliminate the risk of a fire. If a perceived fire hazard cannot be corrected on-the-spot, report it to your supervisor and facility management immediately. Keep work areas, exits (internal and external), and hallways free of clutter. Know the correct evacuation route(s) from your work area.

➢ Ergonomics

Computer workstation and other office equipment should be configured to the comfort of the user. Position computer monitors so the top of the screen is at or below eye level. Chairs should

be adjustable and provide support to the lower back and upper extremities. When seated, feet should either rest on the floor or on a footrest. Further information on proper ergonomic practice may be found on the EH Portal. If in doubt of the correctness of your computer workstation design or if you are experiencing ill-health effects possibly because of it, report it to your supervisor and contact the FEOSH point of contact for NNSA employees to schedule an ergonomics evaluation. If health effects persist, consult the Federal Employee Health Unit.

➢ **Bloodborne Pathogens**

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

➢ **Violence in the Workplace**

Workplace violence or other types of unprofessional physical or verbal conduct will not be tolerated within NNSA. This type of behavior may result in disciplinary action, including termination of employment. As with any other type of workplace hazard, NNSA employees are responsible for reporting incidents of this nature to their supervisor. The occurrence of employee violence should also be reported to the FEOSH point of contact for NNSA employees, Don Harvey, at 301-903-7315, and the Office of Employee Concerns at 202-586-4034. At any time, if the threat of bodily harm is apparent, NNSA employees should immediately call building security or "911" to report the incident to local law enforcement authorities.

➢ **Housekeeping**

Clean, uncluttered, and organized work areas help minimize office-related accidents and employee injuries. Proper storage of paperwork, work materials, and equipment will also help the overall professional appearance of the work area. Discarding or archiving no longer needed documents/articles, regular cleaning and vacuuming, and avoiding fluid spills on carpeting and upholstered surfaces will support good indoor air quality and the overall safety and health of the work environment.

➢ Motor Vehicle Safety

NNSA employees may be required to operate motor vehicles during the course of their employment. NNSA supervisors should assure that employees are properly licensed to operate any assigned motor vehicles and/or powered industrial equipment. All NNSA employees are required to wear seat belts and observe posted speed limits and other traffic rules. NNSA supervisors should support awareness campaigns and incentive programs to encourage safe driving by NNSA employees both on and off the job.

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APPENDIX C

Chronic Beryllium Disease Prevention Program (CBDPP) for NNSA Employees

Title 10 CFR 850, *Chronic Beryllium Disease Prevention Program* (CBDPP), published December 8, 1999, requires that responsible DOE employers implement a program to manage and control workers' beryllium exposures in order to reduce the number of workers exposed and to ensure the early detection of chronic beryllium disease. National Nuclear Security Administration Headquarters employees may be involved in activities at DOE facilities that present the potential for exposure to airborne beryllium particles. Each NNSA Deputy/Associate Administrator is the responsible employer for these NNSA employees.

This appendix constitutes the NNSA's CBDPP, as required by 10 CFR 850.10, for NNSA Headquarters employees who perform duties at DOE facilities where the potential for exposure to airborne beryllium particles may be present. National Nuclear Security Administration Field Managers are responsible for developing and implementing a CBDPP for employees within their respective organizations.

General Requirements.

National Nuclear Security Administration managers and employees must comply with the NNSA FEOSH Program while visiting DOE facilities that may pose a risk of exposure to airborne beryllium particles. Each NNSA Deputy/Associate Administrator must designate a CBDPP point of contact to assist managers and employees in implementing the CBDPP for NNSA employees in their organization and in keeping track of CBDPP documentation and records.

To comply with the DOE CBDPP Rule, NNSA managers must, in giving assignments to NNSA employees, assure:

1. The employees' exposures will be at or below the action level;
2. The number of NNSA employees exposed and potentially exposed is minimized;
3. The opportunity for exposure to NNSA employees is minimized; and
4. That any NNSA employees' disability and lost work time due to beryllium disease, sensitization, and associated medical care is minimized.

To assure compliance with CBDPP requirements above, no NNSA employee shall enter a regulated area as defined by 10 CFR 850 without the knowledge and written consent of his immediate supervisor of record. Permission for entry may only be granted if entry into the regulated area is necessary to achieve the NNSA mission. Appropriate respiratory protection must be worn, and all work performed must be in accordance with the site CBDPP. Records of such potential exposure(s) shall be maintained and the potentially exposed NNSA employee enrolled in the beryllium medical surveillance program.

APPENDIX C (continued)

National Nuclear Security Administration managers must set goals for and maintain appropriate records of employee exposures and potential exposure and their beryllium-related medical status to further reduce exposures below the action level established by 10 CFR 850. By January 7, of each year, beginning with the year 2001, NNSA must submit to the EH Assistant Secretary an analysis of their NNSA employees' exposures and potential exposures, and beryllium-related medical status, and a proposal for exposure reduction and minimization goals for the ensuing year.

Program at Facility to be Visited.

National Nuclear Security Administration employees must comply with the CBDPP of the facility to be visited. National Nuclear Security Administration managers should assure that their employee(s) has reviewed the facility's CBDPP to ensure that the employee is aware of and will be in compliance when his/her activities involving beryllium begin.

Specific Program Requirements.

Many of the 10 CFR 850 specific program requirements do not apply to NNSA as a responsible employer. For example, the requirements to conduct a baseline beryllium inventory (10 CFR 850.26) and establish regulated areas (10 CFR 850.26) do not apply to NNSA at Headquarters. National Nuclear Security Administration managers and employees complying with the specific requirements of a DOE approved CBDPP for a facility being visited will be deemed to be in compliance with the requirements of 10 CFR 850, Subpart C. These requirements include, but are not limited to, 10 CFR 850.24 Exposure monitoring, 10 CFR 850.25 Exposure reduction and minimization, 10 CFR 850.26 Regulated areas, 10 CFR 850.27 Hygiene facilities and practices, 10 CFR 850.28 Respiratory protection, 10 CFR 850.29 Protective clothing and equipment, 10 CFR 850.34 Medical surveillance, 10 CFR 850.35 Medical removal, 10 CFR 850.36 Medical consent, 10 CFR 850.37 Training and counseling, 10 CFR 850.40 Performance feedback.

National Nuclear Security Administration managers must arrange with the visited facility, or make alternate arrangements, to assure that NNSA employees comply with the facility's requirements that involve scheduling and funding actions such as CBDPP training, respirator fit testing, and beryllium medical surveillance. Department of Energy facilities may include NNSA employees in their local program to provide required services.

National Nuclear Security Administration managers must arrange for exposure and medical surveillance results to be sent to the employee's Headquarters health unit for inclusion in the employee's medical surveillance record and to allow for aggregating the results since employees may visit and receive medical surveillance at different facilities.

Headquarters Medical Surveillance Program

The DOE HQ Occupational Health Program (ME-533) establishes medical surveillance protocols to ensure early detection of disease for workers. This program supplements and integrates the occupational health organization's comprehensive hazardous and toxic chemical exposure program as required by DOE Order 44.1, *Worker Protection Management for DOE Federal and Contractor Employees*. The Dependent and Health Care Services program has established standard operating procedures for a chronic beryllium disease prevention program (CBDPP) for DOE Headquarters personnel who are exposed to beryllium during the course of work. The program is designed to identify workers at higher risk of adverse health effects from beryllium, prevent beryllium induced disease by linking health outcomes to beryllium tasks, and make possible early treatment of beryllium induced disease.

The following objectives for HQ DOE CBDPP are directed toward achieving the goal of preventing cases of chronic beryllium disease resulting for DOE activities.

- Work in a coordinated effort with other DOE managers and organizations with health and safety responsibilities to identify and inventory potential toxic beryllium contact;
- Establish a roster of workers with potential exposure to beryllium. Medical surveillance will be provided to ensure early detection and beryllium sensitization prior to diagnosis; and
- Develop and implement occupational medicine program protocols specific to beryllium exposure.

For any reason, if NNSA employees are unable to perform their normally assigned duties for medical or health reasons, whether the cause is occupationally related or not, they should notify their supervisor immediately. It may also be advisable for the employee to contact the medical staff at the Federal Employee Health Unit, located at both Germantown and Forrestal facilities.

APPENDIX D

Radiation Protection for NNSA Employees

Because radioactive materials or radiation generating devices can be found at most DOE sites, a Federal employee visiting a DOE site, in many cases, may have to prepare for possible exposure to radiation or radioactive material. Under the system of radiation protection established by Title 10 Code of Federal Regulation, part 835 (10 CFR 835), a site performing an activity that could result in exposure of an individual or individuals to ionizing radiation is responsible for establishing a program to protect that individual from the effects of ionizing radiation. While the site is responsible for protecting all visitors to the site, it is prudent for Federal employees visiting the site to determine if there are any actions that should be taken in advance to meet site radiation protection requirements. In this way, time can be devoted most effectively to meeting the objectives of the visit. The following sections address aspects of radiation protection that should be considered before visiting a DOE site.

1. Training.

Training is required for unescorted access in the Controlled and Radiological Areas of DOE sites, before receiving occupational dose during Controlled Area access, and before performing an unescorted assignment as a Radiological Worker. Thus, a site visitor needs to determine what areas of a site will be entered and work assignments during the visit, and make arrangements for obtaining either training appropriate to the radiological hazard in those areas or work assignment and/or a qualified escort. Training on core or generally applicable aspects of radiation protection is periodically available to Federal employees at DOE Headquarters. Training that is specific to a DOE site must be obtained at that DOE site.

2. Radiation Dose Monitoring.

Depending upon which area of a site is to be visited, personnel visiting a site may either be monitored for internal or external exposure to radiation or both. In most cases, the visitor does not have to take any actions before the visit to be monitored for internal or external exposure to radiation. However, some sites may require a whole body count (a determination of internal radiation exposure by using detectors on the outside of the body) or submittal of a bioassay sample (typically a urine sample) before permitting a person to enter an area where internal radiation exposure monitoring is required. The whole body count should be scheduled before the visit. Depending on the site procedures, a whole body count may need to be performed or a bioassay sample provided upon termination of the site visit. Headquarters personnel need to adhere to these site requirements. In addition, it is a good practice for site visitors to know their current radiation dose for the year, particularly if they are going to receive any significant amount of radiation dose as a result of the site visit. Department of Energy Headquarters Federal employees are periodically provided records of their radiation dose from visits to DOE site where they have been monitored.

3. Protective Equipment.

For entry into areas of the site controlled because of the presence of contamination and airborne radioactive material, personal protective equipment such as anti-contamination clothing (anti-Cs) is always required and respiratory protection may be required. Typically, no advance preparations are needed for anti-Cs, however, it may be helpful to obtain training in putting on and taking off protective clothing if a full set of anti-Cs will be needed to visit a part of the site. This training is typically included in the training needed to gain access to areas that are controlled because of the presence of contamination or airborne radioactive material. If respiratory protection is needed as part of the site visit, refer to Appendix E for guidance on use of respiratory protection devices.

4. Records.

As can be seen above, it is a good practice to maintain current records of radiation dose monitoring, medical exams related to respirator use, and radiological training if a Federal employee plans routinely to visit DOE sites where exposure to ionizing radiation, contamination or airborne radioactive material is possible. The Records Coordinator of the NNSA employee's organization will identify where the records are maintained. Radiation dose monitoring results should be part of the Federal employee's occupational medical file. If provisions do not exist to have these records automatically incorporated into a Federal employee's medical file, the employees should personally forward copies of the monitoring records to their Headquarters health unit.

APPENDIX E

Respirator Program

These written guidelines reflect current regulations and respiratory protection technology at the time of writing. New developments in regulations and/or technology may supercede these guidelines. These guidelines apply only to NNSA Headquarters employees at this time. Check with the NNSA respiratory protection point-of-contact for specific applications.

Written program – This program shall be maintained by the designated NNSA Respiratory Protection Program Administrator in conjunction with the Federal Employee Occupational Safety and Health (FEOSH) Program. It will be made readily available to all who wear respirators.

Hazard assessment – Before wearing a respirator, a hazard assessment at the proposed workplace is required by OSHA regulations. It is assumed that if a Site requires a DOE-HQ Federal employee to wear a respirator, such an assessment has been done and documented, according to the OSHA Standard and the current ANSI Z88.2, American National Standard for Respiratory Protection.

Medical evaluation – When possible, medical evaluation for DOE-HQ employees can be done through the Headquarters Health Unit (following ANSI Z88.6). A written certificate shall be issued and should be acceptable at most field sites. When necessary, field sites may administer medical evaluations (following ANSI Z88.6), in lieu of the Headquarters Health Unit.

Training – All those wearing respirators must receive proper training according to the OSHA Standard and ANSI Z88.2. Most of the time, this training will be done at the Site. These training elements presently include:

1. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
2. What the limitations and capabilities of the respirator are;
3. How to effectively use the respirator in emergency situations, including situations in which the respirator malfunctions;
4. How to inspect, put on and remove, use, and check the respirator seals;
5. What the procedures are for maintenance and storage of the respirator;
6. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators;
7. Proper donning and doffing, and
8. When to change a cartridge.

APPENDIX E (continued)

Routine inspection, maintenance, storage, cleaning and disinfecting – Should be the responsibility of the issuer, usually the field Site. The wearer is responsible for inspecting his respiratory equipment prior to and after its use. Such inspection could include cleanliness of the respirator, torn or loose straps, holes in the filter, broken or loose fittings, cracked or scratched facepiece, missing parts, etc.

Selection – All respirators and air-supplied suits will be NIOSH-approved or approved under the DOE Respirator Acceptance Program. In most cases, the Site provides the needed respiratory equipment.

Fit testing – Should, preferably, be done at the Site, using the OSHA Standard protocol and the Site-preferred respirators. In exceptional circumstances, the Headquarters Respiratory Protection Program Administrator can arrange fit testing using a common respirator brand. Beards, low hairlines, glasses or goggles, and facial stubble may prevent proper user seal on a respirator. Quantitative fit testing is preferred. Fit testing must be done annually or more often as required by facial changes. Respirator pressure tests should always be done by the worker before entering a hazardous atmosphere.

Program evaluation of the NNSA Headquarters Respiratory Protection Program should be conducted once a year.