

**BECHTEL NATIONAL, INC.
URANIUM PROCESSING FACILITY
ENVIRONMENTAL, SAFETY AND
HEALTH PLAN**

PL-SH-801768-A007, REV. 3



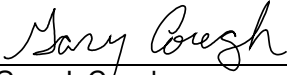



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**BECHTEL NATIONAL, INC.
URANIUM PROCESSING FACILITY
ENVIRONMENTAL, SAFETY AND HEALTH PLAN**

Prepared by the Uranium Processing Facility Project Team
of Consolidated Nuclear Security, LLC
Management & Operating Contractor
for the
Y-12 National Security Complex and Pantex Plant
under Contract No. DE NA0001942
with the U.S. Department of Energy
National Nuclear Security Administration

APPROVALS

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REVISION LOG

Revision 3	<input checked="" type="checkbox"/> Intent <input type="checkbox"/> Non-Intent
<ul style="list-style-type: none"> • This change is/These changes (include details regarding exact changes) are in response to Condition Report 25774-000-GCA-GAM-04038, <i>Failure to Sustain Corrective Actions Taken for Dropped Object Prevention at UPF [**CA]</i> <ul style="list-style-type: none"> ◦ Added Section 5.3.1, <i>Special Focus Program</i> ◦ Replaced STARRT Card with Field Level Hazard Assessment (FLHA) throughout document • This revision supersedes PRCN-PL-SH-801768-A007-R02-01 • No forms have been edited as part of this revision • An evaluation determination has been performed confirming this Plan that Implements Requirements does implement requirements tracked in the Programmatic Requirements Management System (PRMS) • Other changes include: <ul style="list-style-type: none"> ◦ Updated references ◦ Updated acronyms ◦ Editorial changes 	
Revision 2	<input checked="" type="checkbox"/> Intent <input type="checkbox"/> Non-Intent
<ul style="list-style-type: none"> • This revision incorporates the changes identified in and supersedes PRCN-PL-SH-801768-A007-R01-01. • No forms have been edited as part of this revision. • An evaluation determination has been performed confirming that this Command Media implements no quality requirements as tracked in the Programmatic Requirements Management System (PRMS). • A periodic review was completed on Revision 1 and has been documented on DPR-PL-SH-801768-A007-01, Rev 1. • This revision is a complete rewrite. Due to the extent of changes, revision bars are not shown. • Other changes include the following: <ul style="list-style-type: none"> ◦ Updated Section 4.0, <i>Integrated Safety Management</i> ◦ Updated Section 17.0, <i>Program Oversight and Monitoring</i> ◦ Added new Section 8.0, <i>Health and Industrial Hygiene</i>; Section 9.0, <i>Startup</i>; and Section 14.0, <i>ES&H Communications</i> ◦ Updated acronyms and references ◦ Formatted into new template 	
Previous revisions on record	

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ACRONYMS

BNI	Bechtel National, Inc.
CBL	Craft-Based Leadership
CNS	Consolidated Nuclear Security
ES&H	Environmental, Safety, and Health
FLHA	Field Level Hazard Assessment
IH	Industrial Hygiene
ISM	Integrated Safety Management
ISMS	Integrated Safety Management System
NS&E	Nuclear, Security, and Environmental
PSUM	Project Startup Manager
UPF	Uranium Processing Facility

DEFINITIONS

Command Media – UPF Project-specific or adopted documents that provide the systematic flowdown of governing requirements or management expectations.

1.0 INTRODUCTION

1.1 Purpose

The purpose of this Bechtel National, Inc. (BNI) UPF Environmental, Safety, and Health (ES&H) Plan is to define a consistent and uniform approach to implementing a site-specific ES&H program. This Plan summarizes the general program requirements from regulatory standards/laws, customer/owner requirements, and corporate expectations. This Plan also describes the ES&H organization, its roles, responsibilities, and practices, along with strategies for interface with UPF Project Management and the client, Consolidated Nuclear Security, LLC (CNS).

1.2 Scope

This Plan addresses ES&H program elements applicable to personnel supporting the UPF Project to ensure regulatory compliance and continuous ES&H improvement. Personnel includes on-site subcontractors and their lower tier subcontractor employees, visitors, on-site suppliers/vendors, and CNS employees (or their representatives).

It is the UPF Project's intent to meet the applicable requirements of the BNI UPF Subcontract 4300092953, applicable federal, state, and local regulatory standards, and Nuclear, Security, and Environmental (NS&E) requirements/standards, as applicable.

For CNS execution measures, refer to Y15-95-636PD, *UPF Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements*; and Attachment N of ICD-PM-801768-A011, *Interface Control Document for CNS Organizations and the UPF Project*.

2.0 ENVIRONMENT, SAFETY, AND HEALTH POLICY

The UPF Project ES&H policy is to provide and maintain a safe and healthy working environment, where hazards are identified, communicated, and mitigated to the fullest extent possible, for its employees, visitors, and the general public.

The UPF Project is dedicated to the concept that all incidents are preventable. Accordingly, the Project is committed to achieving and sustaining "Zero Incident Performance" through continuous improvement practices.

The objectives associated with this policy are as follows:

- Strive to eliminate all injuries and illnesses
- Promote environmental, safety, and health objectives as a constant value in designing, planning, training, and executing work
- Spread ownership for ES&H program effectiveness throughout the UPF Project
- Enhance employee awareness and involvement in our ES&H program implementation
- Increase employees' consistent utilization of safe practices in their daily work activities

- Optimize the use of continuous improvement practices as the basis for “Zero Incident Performance” initiatives
- Demonstrate to the client and to the public that UPF is “Dedicated to Safety Excellence”
- Select subcontractors that are committed to “Zero Incident Performance”

3.0 INTEGRATED SAFETY MANAGEMENT

Key elements of the Y-12 Integrated Safety Management System (ISMS) are flowed down to the UPF Project through PL-PJ-801768-A006, *Uranium Processing Facility Project Execution Plan*; referenced documents Y15-636, *Y-12 Integrated Safety Management*; and E-SD-2009, *Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements*.

The framework for the Integrated Safety Management (ISM) approach is organized around the five core functions:

1. Define the scope of work
2. Identify and analyze hazards associated with the work
3. Develop and implement hazard controls
4. Perform work within controls
5. Provide feedback on the adequacy of controls and continuous improvement in defining and planning work

The five core functions provide a distinct, phased approach in the continuing cycle of conducting safe work that has been incorporated in this Plan and associated Command Media and Guidance Documents (CMGD).

3.1 Integrated Safety Management System Guiding Principles

The guiding principles that are part of the UPF ISM approach are:

Line Management Responsibility for Safety – Line management is responsible for the safe and efficient conduct of work to ensure the protection of the public, the workers, and the environment.

Clear Roles and Responsibilities – Clear and unambiguous lines of authority and responsibility for ensuring safety are established and maintained at all organizational levels.

Competence Commensurate with Responsibilities – Personnel possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.

Balanced Priorities – The focus of the priorities will be to first focus on worker safety above all else. This will serve to also protect the public and the environment. Resources are effectively allocated to address safety, programmatic, and operational considerations.

Identification of Safety Standards and Requirements – Before work is performed, the associated hazards are evaluated, and standards and requirements are

established that, when properly implemented, provide adequate assurance the public, the workers, and the environment are protected from adverse consequences.

Hazard Controls Tailored to Work Scope. Hazard controls are developed according to the hierarchy of controls for a specific scope of work.

Zero Incidents and Environmental Releases. UPF is dedicated to the concept all incidents/events and environmental releases are preventable. Accordingly, the UPF Project is committed to achieving and sustaining “Zero Incident” performance through continuous improvement practices.

Worker Involvement. Execution of ISM is focused where work is executed, both at the company/site level and at the facility/activity level. Line management direction and ownership, worker input and support, and effective processes must be present to ensure success of the ISM approach.

4.0 LEADERSHIP AND COMMITMENT

The “Zero Incident Performance” philosophy is the basis for safety management on all Bechtel projects/facilities. To augment the philosophy of “Zero Incident Performance,” Project Management shall utilize all options available to maximize their own and others’ ES&H performance. 4SM-6BH-F0001, *NS&E ES&H Manual*, provides guidance to assist Project Management in the safe execution of the work to be performed.

The general roles and responsibilities of key personnel follow in the subsections below.

4.1 BNI Project Management

BNI Project Management is responsible and accountable for:

- Providing employees with a safe and healthful working environment
- Communicating the importance of ES&H to personnel under their jurisdiction and holding their direct reports accountable for ensuring the elements of the BNI UPF ES&H Plan are implemented
- Ensuring necessary resources, processes, and procedures are in place to provide appropriate levels of protection to site workers, visitors, vendors, the general public, and the environment
- Communicating ES&H performance expectations to the entire Project/facility team

4.2 Site Manager/Project Startup Manager

The Site Manager/Project Startup Manager (PSUM) has overall responsibility for:

- Providing the necessary resources to effectively implement the ES&H program
- Emphasizing to team members that cost, schedule, and quality will not override ES&H implementation
- Promoting open communication, cooperation, and trust between Bechtel and customers with a focus on optimizing ES&H performance

- Recognizing outstanding ES&H performance in order to increase commitment and participation
- Facilitating compliance with applicable ES&H regulations and requirements outlined in this Plan and associated procedures
- Supporting and encouraging employee-led ES&H efforts

4.3 Supervision

Supervision (i.e., Site Superintendents, Discipline Superintendents, Department Leads, General Foreman, and Foreman) is responsible for:

- Implementing BNI UPF ES&H procedures to ensure the safe, healthy, and environmentally sound execution of the work
- Setting an example for their peers, subcontractors, and customer/owner personnel in terms of commitment to the ES&H program by:
 - Being thoroughly familiar with UPF ES&H policies, plans, and procedures and with their individual responsibilities regarding implementation and enforcement
 - Being directly involved in and accountable for implementing the ES&H requirements applicable to their areas of responsibilities
 - Ensuring work tasks are conducted in an environmentally sound way in accordance with permits, plans, and the site environmental management system
 - Implementing immediate action to correct reported or observed unacceptable ES&H conditions and/or behaviors
 - Conducting safety meetings/briefings and communicating ES&H-related information to their subordinates
 - Assisting in the implementation of the Emergency Response Plan
 - Participating in project planning and risk analysis and the preparation of required documentation (i.e., Field Level Hazard Assessment [FLHA] Cards, Job Hazard Analysis [JHA])
 - Supporting event/incident investigations to determine causative factors and corrective actions and ensuring corrective actions are implemented in a timely manner
 - Supporting and recognizing employee “Pause/Stop Work” actions

5.0 ENVIRONMENT, SAFETY, AND HEALTH ORGANIZATION AND RESOURCES

The ES&H organization chart is regularly updated to reflect the current staffing and structure. For clarity regarding the composition and prime contractor-subcontractor demarcation in the ES&H organization, refer to PL-PM-801768-A033, *CNS Project Management Plan for the Uranium Processing Facility Project*.

5.1 Organization

The Project Manager has overall responsibility for ES&H. The ES&H department establishes a qualified group of ES&H professionals, under the direction of the BNI

UPF ES&H Manager, to provide technical and functional oversight of activities that occur on the UPF Project.

The ES&H positions include:

- **BNI UPF ES&H Manager** – The BNI UPF ES&H Manager, in conjunction with the Project Manager and Site Manager/PSUM, is responsible for developing, implementing, and administering ES&H procedures applicable to the UPF Project. The BNI UPF ES&H Manager serves as the resident expert in matters relating to ES&H.
- **BNI UPF ES&H Supervisor** – The BNI UPF ES&H Supervisor(s) serve as the cognizant experts in matters relating to Construction ES&H activities, and, like all employees, has the authority to pause/stop work activity in the event of imminent danger to the safety and health of workers, the public, or the environment. The BNI UPF ES&H Supervisors supports the Project-level implementation and enforcement of the requirements in this Plan.
- **BNI/Subcontractor ES&H Representatives** – ES&H representatives, or equivalent, provide day-to-day ES&H support to the Project during routine activities. These representatives assist Supervision with the inclusion of ES&H in planning activities, briefings, and work execution. They provide oversight of work activities to ensure ES&H hazards are properly identified, analyzed, and controlled/mitigated.
- **Industrial Hygienist** – Specialized ES&H Representative(s) in the field of Industrial Hygiene (IH) provide support for the identification and mitigation of industrial health hazards. IH representative(s) routinely monitor field activities for compliance with industrial hygiene requirements.
- **Environmental and Waste Management** – Specialized ES&H Representative(s) in the field of environmental control and/or waste management provide support to the Project and coordinating the implementation of requirements found in PL-SH-801768-A002, *Construction Waste Management Plan for the Uranium Processing Facility*; and PL-SH-801768-A009, *UPF Construction Environmental Control Plan*.

5.2 Interfaces

The Project interfaces primarily with CNS and with other oversight organizations at the direction of UPF Project Management.

5.2.1 Occupational Medicine (CNS)

The Occupational Medicine Program is implemented in accordance with Y78-001, *Occupational Medicine Program*, or the Subcontractor equivalent. BNI has supplemented the CNS Occupational Medical team with a BNI Subcontract of medical services.

5.2.2 Drug and Alcohol Policy (CNS/BNI)

All UPF personnel shall comply with the requirements outlined in CNS procedure Y11-411, *Drug Control Program-Illegal Drugs*.

Subcontractors shall comply with 10 Code of Federal Regulations (CFR), Part 707, *Workplace Substance Abuse Programs at DOE Sites*, as a condition of the Subcontract and submit a substance abuse plan to UPF for approval.

For BNI personnel, drug and alcohol policy requirements are implemented in accordance with APA-UPF-NSE-00011, *Bechtel National, Inc. (BNI) Workplace Substance Abuse Plan*.

5.2.3 Radiological Control Program (CNS)

The Radiological Control Program is implemented in accordance with Y75-100, *Y-12 Site Radiological Control Program*.

5.2.4 Environmental Control and Waste Management (CNS)

Project environmental control requirements are implemented in accordance with Y15-95-636PD.

Waste Management is implemented in accordance with PL-SH-801768-A002. Additional Environmental requirements are described and referenced in Y15-95-636PD.

5.3 Environmental, Safety, and Health Command Media

The NS&E ES&H Manual and associated Core Processes (CPs) are the foundation for UPF ES&H command media. Procedures and plans are developed and maintained in accordance with Y15-95-235, *UPF Command Media*, when such documents are necessary.

A list of applicable ES&H command media is located on the UPFweb (Procedures Web Page) and is inclusive of Y-12 ES&H plans and procedures that are applicable to UPF.

NOTE: *Additional ES&H-related Command Media can be found on the Construction command media tab (e.g., Lockout/Tagout, Scaffold)*

5.3.1 Special Focus Program

The site-specific UPF-CP-203, *Dropped Object Prevention Program*, is based on the scope of work and ES&H risk assessment UPF-CP-105, *Risk Assessment and Objectives*.

The following minimum requirements shall be covered in the program:

- Safe methods of construction that minimize dropped object potential and mitigate exposure in the event an object is dropped
- Training on dropped object prevention strategies
- A robust tool tethering process
- A dropped object pre-start inspection by supervision, such as use of a dropped object prevention checklist, that addresses elevation hazards, tethering of tools and equipment, and ground controls
- A process to track dropped object performance and analyze data to identify improvement opportunities

5.3.2 Request for Waiver or Deviation

Request for deviations from ES&H plans, ES&H standards, or ES&H implementing procedures shall be submitted to the BNI UPF ES&H Manager who will evaluate and coordinate with the appropriate Project Management and contractor representatives. Waivers shall only be granted in extreme circumstances, and with the concurrence of the Site Manager/PSUM, Project Management, and NS&E Manager of ES&H.

6.0 HAZARD/RISK ANALYSIS

Hazard control measures will be instituted according to the hierarchy of controls. These hazard control measures, in their preferred order of application are:

1. Elimination of the hazard or substitution of lower hazard practices, materials, or equipment
2. Engineering controls
3. Administrative controls (i.e., use of permits, authorizations, special procedure)
4. Personal Protective Equipment (PPE)

6.1 Work Control

Y17-95-64-800, *UPF Construction/Startup Work Control Program*, defines the process requirements for controlling construction-based work activities. This work control process is based on the functions and principles of the ISMS.

6.2 Job Hazard Analysis

The use of a job hazard analysis tool (or equivalent) in accordance with Y17-95-64-823, *FLHA/JHA Process*, is the primary method for hazard identification and control while planning a scope of work.

6.3 Pre-Task Analysis

A pre-task analysis process referred to as FLHA is utilized to evaluate and control hazards in the workplace. This process utilizes employees to identify and resolve ES&H hazards associated with a task, prior to the task being performed.

6.4 Risk Assessment

The Risk Management Program identifies, assesses, and manages technical and programmatic project risks through the life cycle of the UPF Project to minimize risk, minimize negative impact, and maximize positive outcomes, in accordance with UPF-CP-105.

7.0 HEALTH AND INDUSTRIAL HYGIENE

The UPF Project is committed to providing a work environment conducive to the health and well-being of all Project personnel. The focus of the UPF Industrial Hygiene Program is minimizing and eliminating acute and chronic exposures to chemical, physical, biological, and ergonomic hazards in the workplace.

Laws, regulations, and contractual requirements for the protection of worker health are outlined in ES&H command media including, but not limited to, the following:

- Hearing protection
- Hazard communication
- Hexavalent chromium exposure prevention
- Silica exposure prevention
- Heat/cold stress prevention

8.0 SUBCONTRACTOR SELECTION AND OVERSIGHT

ES&H participates in pro forma language development and approval, pre-procurement planning, pre-bid meetings, and award kick-off meetings, etc., as necessary, to evaluate, identify, and communicate ES&H concerns. Documents that provide further guidance and details concerning subcontractor selection and oversight include, but are not limited to, the following:

- Y17-95-64-876, *UPF Subcontract Management*
- DI-SH-801768-A002, *UPF ES&H Support for Subcontract Process*

8.1 Subcontractor Company Requirements

Subcontractors are required to follow this BNI UPF ES&H Plan and ES&H procedures, processes, laws, regulations, codes, standards, directives, and subcontract requirements applicable to the scope of work identified in the subcontract.

9.0 EMPLOYEE ENGAGEMENT

UPF recognizes the importance of establishing employee ownership of the ES&H program to ensure a strong ES&H culture and achieve “Zero Incident Performance.” BNI Project Management shall actively solicit and encourage employee participation and commitment to the ES&H process.

9.1 Craft-Based Leadership

The Craft-Based Leadership (CBL) Team is an important liaison between management and the Craft workforce that contributes to the development of a trusting work environment and positive safety culture by promoting active participation and safety awareness.

Through routine behavioral observations and weekly meetings, team members can: identify and eliminate at-risk behaviors through the following:

- Observing and coaching
- Recognizing human performance gaps and collaborate with other teams to develop solutions
- Analyzing observation data and provide feedback via reports to be shared site-wide

- Increasing individual safety awareness by providing positive reinforcement of safe behaviors

9.2 UPF Environmental, Health and Safety Council

The ES&H Council is responsible for promoting ES&H improvement throughout the site and serves as a collaborative effort between Site Management and employees. The ES&H Council members will actively seek to develop solutions for concerns and to review and apply recommendations as deemed necessary.

The Council's main functions include the following:

- Monitoring ES&H performance and programs
- Identifying positive practices and behaviors
- Evaluating and suggesting continuous improvement initiatives
- Reviewing upcoming risks and mitigation measures
- Resolving ES&H-related issues
- Providing reinforcement and recognition of positive behaviors

9.2.1 Zero Incident Performance Walkdown

The UPF ES&H Council is supported by a subcommittee with the directive to conduct a monthly walkdown of the site(s) prior to the regularly scheduled council meetings. The Zero Incident Performance Walkdown will be facilitated by ES&H and led by the Site Manager/PSUM, or delegate, and attended by members of Supervision (Area Superintendents), CBL Team representatives, and additional support personnel on an as-needed basis.

9.3 Ad Hoc Committees and Employee Teams

At the direction of the Site Manager/PSUM and BNI ES&H Manager, ad hoc committees or employee teams can be created to address emerging ES&H issues and develop solutions that are employee-owned. For example, an Electrical Safety Committee can be created if there are a high number of electrical incidents or a focus group can identify potential improvements for ES&H training.

9.4 Stop/Pause Work Authority

All Project personnel have the right to stop or pause a task they believe is unsafe. Project personnel have the duty to investigate the ES&H aspects of the jobs they perform and to require that satisfactory controls are in place prior to beginning work. Along with this authority is the responsibility to take an active role in the resolution of ES&H issues.

Further guidance for stop/pause work is outlined in DI-SH-801768-A005, *UPF Work Pause and Management Suspension of Work*.

9.5 Hazard Identification and Reporting

Project personnel are expected to immediately report hazards, unsafe conditions, near miss events, and poor/at-risk environmental practices. The early identification

and remediation of unsafe situations helps to minimize the potential for incident or injury.

The following avenues are available for hazard/ES&H issue reporting:

- **Chain-of-Command (Supervisors)** – should be the first individuals notified of an ES&H concern or hazard because of their proximity to the workforce
- **BNI UPF ES&H Department** – has responsibility to evaluate the risk associated with a reported hazard, elevate the issue for management attention, and ensure the issue is tracked to closure
- **Management** – ES&H concerns can be reported to any member of the Project Management team
- **Anonymous** – Those persons desiring to anonymously report an ES&H concern or hazard can do so by submitting the suggestion or concern through several available systems or mechanisms including the ActionWay system, Y-12 Employee Concerns program, and the Bechtel Ethics and Compliance Helpline (ethics@bechtel.com)

10.0 LIFE CRITICAL REQUIREMENTS

UPF-POLICY-CM-001, *UPF Life Critical Requirements*, applies to all personnel, including subcontractors and visitors. Any deviation or failure to comply with Life Critical Requirements has the potential to cause serious injury or death to the individual or fellow workers. Serious consequences for noncompliance by Project personnel will be enforced.

11.0 TRAINING AND DEVELOPMENT

Knowledge and personal accountability are essential to safe work behaviors, which reduce the occurrence of job-related injuries. ES&H training requirements are outlined in UPF-CP-102, *ES&H Orientation, Training, and Development*; and Y90-95-027, *UPF Training Program*.

12.0 ENVIRONMENT, SAFETY, AND HEALTH COMMUNICATIONS

Continuing ES&H education is accomplished by providing employees with constant reminders, ES&H information applicable to work activities, and other health/wellness information. The Project communicates ES&H information to project employees in a number of ways, including:

- Safety meetings
- ES&H metrics
- Bulletin board messages
- ES&H articles in newsletters
- E-mail messages
- ES&H orientation/training
- Pre-job/FLHA briefings

13.0 EVENT/INCIDENT INVESTIGATION AND REPORTING

Management is committed to investigating ES&H-related events and near events. This effort is intended to identify casual factors and provide guidance for corrective actions. Cases will be investigated in accordance with UPF-CP-108, *UPF Event Management and Investigation*. Reporting and notification criteria (e.g., Occurrence Reporting, customer notifications) is also outlined in UPF-CP-108.

Causal analysis will be conducted on incidents as defined in UPF-CP-108 and Y15 95-816, *UPF Issues Management Process*, as required.

Subcontractors are responsible for performing event/incident investigation for their scope of work.

13.1 Lessons Learned Program

Y15-95-331, *UPF Lessons Learned (LL) Program*, provides UPF-specific Lessons Learned Program requirements. The Lessons Learned Program collects information from the Project to share with other facilities.

14.0 EMERGENCY RESPONSE

The ability of the Project workforce and visitors to promptly take appropriate actions in the event of an emergency is essential to their safety, health, and well-being. The responses to emergencies will vary with the type of emergency, activities in progress, and site status. All emergency response actions must be thoroughly coordinated with the Project and local agencies.

Y40-507, *Emergency Management Emergency Facilities and Equipment Manual*, provides the requirements and guidance for personnel actions during an emergency. This Plan and its implementing procedures apply to personnel and visitors at the UPF Project.

15.0 PROGRAM OVERSIGHT AND MONITORING

ES&H performance and compliance is monitored formally and informally on a routine basis by the following entities on and off the Project:

1. **Customer/Owner** – ES&H performance and routine work execution is by on-site and off-site client representatives (i.e., CNS, National Nuclear Security Administration [NNSA], U.S. Department of Energy [DOE], and UPF Project Office [UPO]). Formal reviews, Awareness Activities and Management Assessments are conducted and communicated to BNI
2. **NS&E Functional** – NS&E ES&H conducts formal reviews of Project performance, including on-site assessments of work execution and routine review/analysis of project statistical performance (e.g., injury rates, near miss events)
3. **Field** – The ES&H Department along with Project/Line Supervision will conduct routine daily observations and monitor ongoing work activities for adherence to Project ES&H processes and procedures. Opportunities for improvement and noted deficiencies shall be communicated to the responsible supervisors for correction

Leadership Engagement Activities

Select work groups and functional departments are assigned a minimum number of engagement activities to be completed each month. Engagement activities will be recorded using a Bechtel electronic assessment, tracking, and data management tool (e.g., Chekhov). Engagement activity checklists are used to capture field walkdowns, focused observations, FLHA meeting attendance, and other leadership commitment activities.

Management Assessment

ES&H and other functional groups (e.g., Construction) will conduct formal surveillances/assessments of ES&H plans, procedures, and processes as outlined in Y15-95-817, *UPF Management Assessments (MA) Program*.

16.0 REFERENCES

16.1 Source References

DOE G 450.4-1C, *Integrated Safety Management System Guide*

PL-QA-801768-A001, *Bechtel National Incorporated (BNI) Uranium Processing Facility (UPF) Quality Assurance Plan (QAP)*

OT-SH-801768-A001, *Uranium Processing Facility Project Environment, Safety and Health Handbook*

16.2 Interfacing References

10 CFR 707, *Workplace Substance Abuse Programs at DOE Sites*

4SM-6BH-F0001, *NS&E ES&H Manual*

APA-UPF-NSE-00011, *Bechtel National, Inc. (BNI) Workplace Substance Abuse Plan*

DI-SH-801768-A002, *UPF ES&H Support for Subcontract Process*

DI-SH-801768-A005, *UPF Work Pause and Management Suspension of Work*

E-SD-2009, *Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements*

ICD-PM-801768-A011, *Interface Control Document for CNS Organizations and the UPF Project*

PL-PJ-801768-A006, *Uranium Processing Facility Project Execution Plan*

PL-PM-801768-A033, *CNS Project Management Plan for the Uranium Processing Facility Project*

PL-SH-801768-A002, *Construction Waste Management Plan for the Uranium Processing Facility*

PL-SH-801768-A009, *UPF Construction Environmental Control Plan*

UPF-POLICY-CM-001, *UPF Life Critical Requirements*

UPF-CP-102, *ES&H Orientation, Training, and Development*

UPF-CP-105, *Risk Assessment and Objectives*
UPF-CP-108, *UPF Event Management and Investigation*
UPF-CP-203, *Dropped Object Prevention*
Y11-411, *Drug Control Program-Illegal Drugs*
Y15-636, *Y-12 Integrated Safety Management*
Y15-95-235, *UPF Command Media*
Y15-95-331, *UPF Lessons Learned (LL) Program*
Y15-95-636PD, *UPF Integrated Safety Management Program Incorporating Worker Safety and Health Program Requirements*
Y15 95-816, *UPF Issues Management Process*
Y15-95-817, *UPF Management Assessments (MA) Program*
Y17-95-64-800, *UPF Construction/Startup Work Control Program*
Y17-95-64-823, *FLHA/JHA Process*
Y17-95-64-876, *UPF Subcontract Management*
Y40-507, *Emergency Management Emergency Facilities and Equipment Manual*
Y75-100, *Y-12 Site Radiological Control Program*
Y78-001, *Occupational Medicine Program*
Y90-95-027, *UPF Training Program*

16.3 Forms

None.

17.0 SUPPLEMENTAL INFORMATION

None.

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