

## UPF Life Critical Requirements



Preparer:

*Devon Engle*

12/17/19

Devon K. Engle  
UPF Construction Issues Management Coordinator

Date

*Sandy Reagan*

Approval:

**Name:** Sandy Reagan**For:** Jamie Horning

12/30/19

Jamie Horning  
CNS UPF ES&H Manager

Date

*David B. Harold*

12/16/19

David Harold  
UPF BNI ES&H Manager

Date

*Vanessa Holsomback*

12/31/19

Vanessa Holsomback  
UPF Human Resources Manager, BNI

Date

*Dave Ross*

12/17/19

Dave Ross  
UPF Site Manager

Date

*Catherine Flavin* Catherine Flavin for

12/31/19

John P. Howanitz  
Senior Vice President and UPF Project Director

Date

01/13/2020

Effective Date

## Implements Quality Requirements

☒ None☐ BNI☐ CNS☐ BNI and CNS

## UPF Life Critical Requirements

**REVISION LOG**

<b>Is this revision the result of a periodic review?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Periodic Review Due Date:</b>	<b>4/30/2022</b>
<b>Revision 3</b>	<input checked="" type="checkbox"/> Major intent <input type="checkbox"/> Minor intent <input type="checkbox"/> Non-intent
<ul style="list-style-type: none"> <li>• These changes are in response to Condition Report 25774-000-GCA-GAM-01877, <i>UPO-F1 - Significant Finding - Personnel Performing Steel Erection are Working Under Suspended Loads (ASRP-C&amp;ESH-5.29.2019-839058)</i></li> <li>• An evaluation determination has been performed confirming that this Command Media implements no quality requirements as tracked in the Programmatic Requirements Management System (PRMS).</li> <li>• Provided clarification in Section 3.0, Life Critical Requirements <ul style="list-style-type: none"> <li>◦ Revised Requirement #5 (Rigging, Lifting Operations, and Suspended Personnel Platforms) bullet 7, in accordance with 29 CFR 1926, Subpart CC</li> </ul> </li> <li>• Added reference to 29 CFR 1926, Subpart CC</li> </ul>	
<b>Revision 2</b>	<input checked="" type="checkbox"/> Major intent <input type="checkbox"/> Minor intent <input type="checkbox"/> Non-intent
<ul style="list-style-type: none"> <li>• This procedure is filed in response to CR 25774-000-GCA-GAM-00924, Trench Activities to Supply Temporary Electrical Power to a Subcontractor Trailer Resulted in Noncompliance with ACE.</li> <li>• Updates to procedure are as follows: <ul style="list-style-type: none"> <li>◦ Minor edits to 1.2 and 2.0 for clarity</li> <li>◦ Revisions to Section 5.0 (as noted) for alignment with BNI Functional Life Critical requirements; the previous revision aligned with BNI Corporate Life Critical Requirements only.</li> <li>◦ Section 7.0 updated for clarity</li> <li>◦ Updated to include use of form UCN-23363</li> </ul> </li> <li>• An evaluation determination has been performed confirming that this Command Media implements no quality requirements, as tracked in PRMS.</li> </ul>	
<b>Previous revisions on record</b>	

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## 1.0 INTRODUCTION

### 1.1 Purpose

The purpose of this policy is to communicate the Uranium Processing Facility (UPF) Life Critical Requirements.

### 1.2 Scope

This policy applies to all personnel performing work or visiting the UPF Project.

## 2.0 RESPONSIBILITIES

### 2.1 Site Management

Site Management will perform or delegate the following:

- Endorse Life Critical Requirements and answer employee questions prior to acknowledgement during Project Construction's Environment, Safety, and Health (ES&H) orientation
- Facilitate training to employees and subcontractors in the applicable UPF ES&H Core Processes (CPs), UPF Work Process Procedures (WPPs), and Job Site Work Rules
- Implement Life Critical Requirements
- Take appropriate action in response to identified non-compliance.

### 2.2 Site Supervision

Site Supervision will perform the following:

- Implement training for employees in the applicable UPF ES&H CPs, UPF WPPs, and Job Site Work Rules
- Plan properly for tasks associated with Life Critical Requirements to mitigate the risk of potential hazards
- Report violations observed when employees perform work contrary to the established standards.

### 2.3 Site Personnel

All persons performing work on the UPF Project site are required to comply with the following:

- Read, understand, and acknowledge acceptance of these Life Critical Requirements prior to performing any work on the UPF Project site and fully comply with them at all times (refer to **Appendix B, UPF Project Employee Acknowledgment Receipt and Understanding of Employee ES&H Safe Work Requirements**).
- Stop unsafe work without fear of reprisal.

**NOTE 1:** *If you believe that the work you are performing or observing presents a risk to people, property, or the environment, then exercise your Stop Work Authority immediately and report your concern to your supervisor.*

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- Exercise your Stop Work Authority and speak with your supervisor if you are uncertain of safe work requirements or you do not have the proper tools. Do not attempt any job that requires you to take on uncontrolled risk.
- Practice Courageous Leadership.

**NOTE 2:** UPF Training forwards the completed **Appendix B** forms to InfoWorks.

### 3.0 LIFE CRITICAL REQUIREMENTS

Violations to Life-Critical Requirements will be investigated using UCN-23363, *UPF Life Critical Violation Form*.

#	ES&H REQUIREMENT	RULE
1	Drug and Alcohol Policy	<p><u>Compliance with Drug and Alcohol Policy</u></p> <ul style="list-style-type: none"> <li>• Always report to work fit for duty.</li> <li>• Never use, possess, distribute, sell, be under the influence of illegal drugs, and/or abuse controlled substances (including prescription drugs not authorized by a physician).</li> <li>• Never consume or be under the influence of alcohol.</li> <li>• Employees using prescription or legal non-prescription drugs that might in any way impair their ability to perform assigned job duties shall immediately notify ES&amp;H and/or Medical Services or, in their absence, Human Resources/Labor Relations/Industrial Relations before using the drug at work.</li> <li>• Medications that can be detected under testing protocols must have a prescription indicating the employee's name and quantity.</li> </ul>
2	Fall Protection and Prevention	<p><u>Never work at unprotected heights or near openings without the use of required fall protection.</u></p> <ul style="list-style-type: none"> <li>• Never expose yourself or direct/allow others to be exposed to potential falls from unprotected heights of six feet (1.83 meters) or greater without the use of positive fall protection or fall arrest equipment. <i>(Exception: The use of personal fall protection is not required when climbing on fixed ladders less than 24 feet [7.3 meters] in length or on portable ladders)</i></li> <li>• Always install hard barricades or use 100% fall protection tie-off where a 6-foot (construction) fall hazard exists.</li> <li>• Never perform leading edge work during construction without an approved fall protection plan, job hazard analysis (JHA), or equivalent.</li> </ul> <p><b>NOTE:</b> <i>Leading edge work is clearly defined by Occupational Safety and Health Administration (OSHA) regulations.</i></p> <ul style="list-style-type: none"> <li>• Always secure at an approved anchorage point.</li> <li>• Never work around exposed edges and floor openings that are not securely covered and/or hard barricaded. Immediately report all unguarded open holes.</li> <li>• Always properly protect unguarded open holes.</li> </ul>

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#	ES&H REQUIREMENT	RULE
3	Confined Space Entry	<p><u>Never enter a permit-required confined space unless you are trained and authorized and an entry permit has been completed.</u></p> <ul style="list-style-type: none"> <li>• <b>Do not</b> enter any confined space without approved training.</li> <li>• Never enter a permit-required confined space unless atmospheric testing has been performed.</li> <li>• Never enter a permit-required confined space without an approved permit.</li> <li>• Never enter a permit-required confined space without an attendant at the entrance and an effective way to communicate with said attendant.</li> <li>• Always alert the attendant and/or supervisor of any hazard that would affect confined space safe entry.</li> <li>• Always evaluate, identify, and mitigate hazards prior to entry of any confined space.</li> </ul>
4	Lockout/Tagout (LO/TO)	<p><u>Never commence work until all energy sources have been identified and isolated in accordance with procedures.</u></p> <ul style="list-style-type: none"> <li>• Never remove and/or tamper with any tag and/or lock installed for the safety of personnel.</li> <li>• Prior to work, lock and tag machinery, systems, equipment, components, and/or systems that may contain any type of stored energy.</li> <li>• Identify and eliminate all residual/stored energy prior to any work activities.</li> <li>• Sign the authorized LO/TO permit, as required in accordance with procedures, prior to work activities.</li> <li>• Always obtain an LO/TO permit as required in accordance with procedures.</li> <li>• Do not perform work on any machinery, system, or equipment covered by LO/TO procedures without authorization or approved training.</li> <li>• Never manipulate any machinery, equipment, or system devices covered by any type of a LO/TO or restricted-use tagging permit without authorization and/or if not in accordance with procedures.</li> </ul>

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#	ES&H REQUIREMENT	RULE
5	Rigging, Lifting Operations, and Suspended Personnel Platforms	<p><u>Never conduct lifting operations unless authorized and verified as competent.</u>  <u>Never work under a suspended load.</u></p> <ul style="list-style-type: none"> <li>• <b>Do not</b> perform lifts during construction without authorization, training, and verification of competency in accordance with UPF Construction Hoisting and Rigging procedures.</li> <li>• Operate all equipment in accordance with the manufacturer's instructions/guidelines and/or the UPF Crane and Rigging Operations Work Process Procedures.</li> <li>• Always conduct and/or direct any lifts during construction operations in accordance with UPF Construction Hoisting and Rigging procedures.</li> <li>• Never hoist loads over people.</li> <li>• Never perform work within the work zone where the load could potentially fall, such as in load-upending activities, except as allowed below by OSHA regulation.</li> <li>• Always use taglines during construction lifts.</li> <li>• Only authorized personnel shall be allowed to work within suspended load fall zones, in accordance with OSHA standards (e.g., 29 CFR 1926, Subpart CC, <i>Cranes and Derricks in Construction</i>, Section 1425).</li> <li>• Never cross a barricade that controls an area with a suspended load unless you are authorized (i.e., part of the lift team).</li> <li>• Never operate cranes, lifting equipment, suspended personnel platforms, and/or rigging devices unless authorized and verified as competent.</li> </ul>
6	Defeating Safety Devices	<p><u>Never disable, bypass, modify, or remove any safety protection device without authorization.</u></p> <ul style="list-style-type: none"> <li>• This includes but is not limited to the following: <ul style="list-style-type: none"> <li>○ Disconnecting load indicators</li> <li>○ Removing rotating equipment guards</li> <li>○ Fixing triggers/power switches in the "on" position</li> <li>○ Removing equipment/tool handles</li> <li>○ Hardwiring electrical wires into outlets</li> <li>○ Using damaged equipment and/or tools that have been tagged out of service</li> <li>○ Failure to use outrigger pads.</li> </ul> </li> </ul>
7	Barricades (Hard and Soft)	<p><u>Never disregard or bypass signage and barricading.</u></p> <ul style="list-style-type: none"> <li>• Only authorized personnel may work within "Danger" designated barricades.</li> <li>• Never disregard or bypass signage and barricading.</li> <li>• Always isolate imminent danger areas with proper barricades and information tags.</li> </ul>
8	Elevated Work Platforms (Aerial Lifts)	<p><u>Never operate any mechanical elevated work platform without documented training.</u></p> <ul style="list-style-type: none"> <li>• Never stand on the toe-board, mid-rail, or top-rail of the basket.</li> <li>• Never enter a basket without being tied-off to the manufacturer's designated anchor point, even during ground positioning, without documented approval for the deviation.</li> <li>• Never exit the basket at height unless prior documented approval for the deviation has been obtained from Project ES&amp;H personnel.</li> </ul>

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#	ES&H REQUIREMENT	RULE
9	Scaffolding	<p><u>Never access any scaffold without documented evidence of inspection by a designated competent person before each work shift.</u></p> <ul style="list-style-type: none"> <li>• Obey the scaffold rules at all times.</li> <li>• Never access any scaffold without a documented and tagged daily inspection. Construction scaffold rules include strict adherence to the color-coded tagging system of red, yellow, and green tags as appropriate.</li> <li>• Scaffold builders must never access any scaffold while not wearing required fall protection and maintaining 100% tie-off above 6 feet while building, dismantling, or modifying any scaffold.</li> <li>• Never access a red-tagged scaffold. Only authorized scaffold builders are permitted, and they must wear required fall protection.</li> <li>• Never access a yellow-tagged scaffold without 100% tie-off or fall protection.</li> <li>• Never access scaffolds that are not tagged; they are assumed to be red-tagged.</li> <li>• Never alter or modify a scaffold unless you are competent, qualified, and authorized to do so.</li> <li>• Always erect a scaffold in accordance with manufacturer's instructions and/or OSHA regulations.</li> </ul>
10	Excavation & Trenching	<p><u>Never access an excavation deeper than 4 feet (1.2 meters) that has not been sloped, benched, or shored and does not have a completed excavation permit.</u></p> <ul style="list-style-type: none"> <li>• Never enter an excavation or trench or direct others to enter prior to obtaining an approved and documented excavation/trenching permit and ensuring that a daily/shift inspection assessment has been performed by a competent person.</li> <li>• Always obtain an excavation/trenching permit before operating equipment to remove soil and/or dig.</li> <li>• Never perform excavations without a competent person present.</li> <li>• Do not enter an excavation without adequate ingress/egress, such as stairs and ladders, which are required within 25 feet (7.6 meters) of each worker in all trenches greater than four feet (1.2 meters) in depth.</li> </ul>

## 4.0 CONSEQUENCES FOR FAILURE TO COMPLY WITH LIFE CRITICAL REQUIREMENTS

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 shall be enforced for UPF employee and subcontractor personnel non-compliances.

### 4.1 UPF Project Personnel

Failure to comply with any of these Life Critical Requirements may result in disciplinary actions enforced by the employee's parent company, up to and including termination and site access removal. Rehire eligibility, at the UPF Project's sole discretion, will not be considered until a minimum of six months.

Disciplinary action up to termination and site access removal may be imposed on any Project personnel who are aware of Life Critical noncompliance and do not exercise



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Courageous Leadership. The disciplinary action imposed will be determined by the Site Manager in conjunction with the Project ES&H Manager.

**4.2 Subcontractor Personnel**

Subcontractor personnel who fail to comply with any of these Life Critical Requirements will be removed from the job site by the employer and denied Project site access by Site Management. Access will be reinstated at the UPF Project's sole discretion and will not be considered until a minimum of six months.

Subcontractor personnel who are aware of noncompliance with the Life Critical Requirements and do not exercise Courageous Leadership may be removed from the site and denied Project site access.

**5.0 RECORDS**

Records generated by this procedure shall be maintained in accordance with Y15-95-800, *UPF Document Management*. Record types for documents submitted to the UPF DMC are identified in ML-PS-801768-A001, *Uranium Processing Facility Project Master Document Type List*. Quality Type is listed as Quality-Lifetime (QA-L), Quality-Nonpermanent (QA-NP), or Non-Quality (Non-QA).

Records generated during the performance of this procedure include:

Record or Form Number	Record Title	Record Holder	System/ Location	Quality Type
UCN-23363	<i>Life Critical Violation Policy Form</i>	UPF DMC	InfoWorks	NON-QA

**6.0 REFERENCES****6.1 Source References**

BNI NS&E ES&H MI-405, *NS&E Life Critical Violation Policy - Rules of Engagement*

**6.2 Interfacing References**

29 CFR 1926, *Safety and Health Regulations for Construction - Subpart CC, Cranes and Derricks in Construction*

ML-PS-801768-A001, *Uranium Processing Facility Project Master Document Type List*

Y15-95-800, *UPF Document Management*

**7.0 SUPPLEMENTAL INFORMATION**

Appendix A, *Acronyms and Definitions*

Appendix B, *UPF Project Employee Acknowledgement Receipt and Understanding of Employee ES&H Requirements*

## **APPENDIX A**

### **Acronyms and Definitions**

#### **Acronyms**

<b>CP</b>	Core Process
<b>ES&amp;H</b>	Environmental, Safety & Health
<b>JHA</b>	Job Hazard Analysis
<b>LO/TO</b>	Lockout/Tagout
<b>OSHA</b>	Occupational Safety and Health Administration
<b>UPF</b>	Uranium Processing Facility
<b>WPP</b>	Work Process Procedure

#### **Definitions**

<b>Courageous Leadership</b>	The practice of addressing hazardous conditions or at-risk behaviors in a constructive and effective manner immediately to correct the behavior and/or mitigate the hazard
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## **APPENDIX B**

### **UPF Project Employee Acknowledgment Receipt and Understanding of Employee ES&H Safe Work Requirements**

**EMPLOYEE NAME: (printed)** \_\_\_\_\_

As a condition of my employment, I have received, read, and understand the **UPF Life Critical Requirements** Policy, and agree to comply with it.

I understand that any violation of a Life Critical Requirement will result in immediate disciplinary action, up to and including denial of site access and/or termination. The Life Critical Requirements are:

- Compliance with Drug and Alcohol Policy
- Fall Protection and Prevention
- Confined Space Entry
- Lockout/Tagout (LO/TO)
- Rigging, Lifting Operations and Suspended Personnel Platforms
- Defeating Safety Devices
- Barricades
- Elevated Work Platforms
- Scaffolding
- Excavation & Trenching

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**Employee Signature**

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**Date (DD/MM/YY)**