THE NATION'S URANIUM PROCESSING FACILITY

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06/08/26
Effective Date

REVISION LOG

Revision 5	
☒ Intent ☐ Non-Intent	Implements PRMS Requirements: ☐ Yes ☒ No
• This revision is in response to corporate policy update for Life Criticals (See Note Under 4.0 Identification of Violation)	

Revision 4
☒ Intent ☐ Non-Intent
• This revision is a total rewrite; due to the extent of changes, revision bars are not shown • Created Section 9.0, *Records* • Created Section 10.3, Forms, and included use of UCN-23564, *Life Critical Requirements: Investigation Review Board Report,* and UCN-23565, *Life Critical Requirements: Investigation Report*
Previous revisions on record

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1.0 INTRODUCTION

1.1 Purpose

The Life Critical Requirements (LCRs) affirm key aspects of personnel safety and wellbeing and must be followed by all Project personnel and subcontractor employees. The intent of the LCRs is to help protect employees and their colleagues from serious injuries and fatalities. The LCRs help establish safety and health expectations and assure accountability.

The LCRs include:

- work at height
- dropped objects
- confined space
- energy isolation
- barricades and signs
- excavation
- lifting operations
- safety controls
- permit to work, and
- mobile equipment/personnel interface

Refer to **Appendix B, Life Critical Requirements**.

Each LCR is comprised of three components: (1) the element, defined as the life-critical category (e.g., work at height); (2) a corresponding life-critical statement (e.g., never work at height outside a protected area without fall protection equipment); and (3) lifesaving rules that describe how to comply with a life-critical statement (Figure 1).

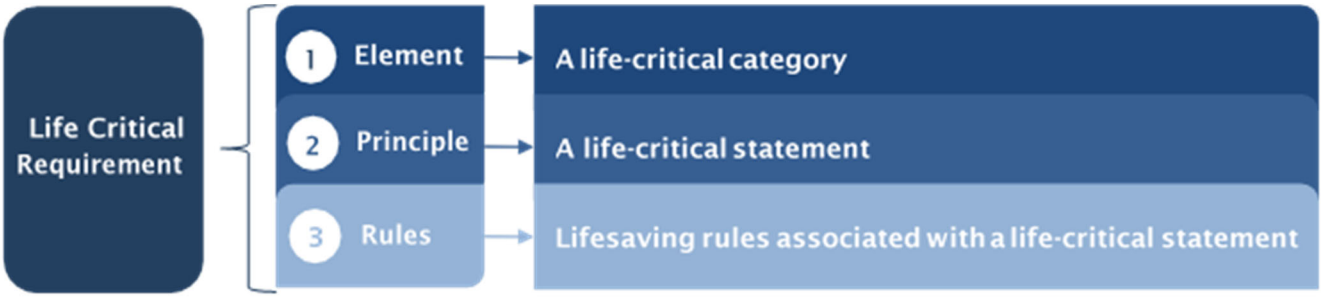


Figure 1 The Three Components of a Life Critical Requirement

The LCRs are not intended to address all risks and hazards on a worksite that are identified through Environmental Safety and Health (ES&H) planning. Rather, they are meant to draw attention to activities most likely to lead to a serious incident, and the life-critical actions and behavior over which an individual has control.

1.2 Scope

This Policy applies to all personnel performing work or visiting the Uranium Processing Facility (UPF) Project. The LCRs apply equally to non-manual professionals and support personnel, direct-hire craft professionals, and subcontractors and suppliers (all tiers).

2.0 RESPONSIBILITIES

2.1 Senior Management

The Project Manager or designee (e.g., Site Manager or Project Startup Manager [PSUM]) will oversee implementation of the Life Critical Requirements Program. This includes confirming and endorsing the LCRs and assuring that employees and subcontractors receive training in applicable programs, procedures and Project Work Rules. Project Management will take appropriate action in response to identified non-compliance and provide consistent leadership regarding consequence management.

2.2 Site Supervision

Supervision will provide frequent coaching to help sustain employee awareness of programs, procedures and Project Work Rules. They will plan tasks to mitigate risks and control hazards using Job Hazard Analysis (JHA) and Field Level Hazard Assessment (FLHA) and conduct inspections to monitor work methods and employee behavior for ES&H compliance and risk management. Supervision will also provide feedback to employees on safe work practices, use of Stop Work Authority where an LCR violation is observed or imminent, and report LCR incidents to ES&H.

2.3 BNI Environmental, Safety and Health Manager

The Bechtel National, Inc. (BNI) ES&H Manager will affirm the LCRs at project start with the leadership team (i.e., Project Manager, Site Manager, Labor Relations/Workforce Services Manager, and Human Resources Manager).

ES&H Manager will ensure that UCN Form 23564 & UCN Form 23565 are completed

ES&H is responsible for incorporating the LCR Program into New Hire Orientation and field supervisor training. ES&H ensures that employee acknowledgement of the LCR Program is documented and retained (**Appendix D, *Life Critical Requirements Acknowledgment Form***). ES&H also will promote awareness of the LCR Program among employees, identify and investigate alleged LCR violations, and make recommendations to the Life Critical Incident Review Board.

2.4 Site Personnel

Personnel performing work on the UPF project are required to read, understand, and acknowledge acceptance of the LCRs prior to performing any work and always comply with the LCRs.

Personnel shall use Stop Work Authority immediately and report the concern to supervision without fear of reprisal when they believe that work being performed presents risk to people, property, or the environment.

Personnel shall also exercise Stop Work Authority and speak with supervision if uncertain of safe work practices or when proper tools and equipment are unavailable. Personnel are asked to never attempt a task that involves an uncontrolled risk.

Personnel are encouraged to practice Courageous Leadership, 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. This means openly communicating and addressing hazardous conditions and at-risk behaviors in a constructive and effective manner when observed.

NOTE: *UPF Training forwards the completed Life Critical Requirements Acknowledgment Form (**Appendix D**) to InfoWorks®.*

3.0 TRAINING

Training is provided on the LCRs, key behaviors expected to meet those requirements, and the consequences of non-compliance. Training of an employee must occur as soon as practicable, typically within New Hire Orientation, as consequences under the program cannot be administered until personnel have been trained.

Following instruction on the LCRs, each person is required to acknowledge via signature that they received, read, and understand the LCRs and agree to comply with them as a condition of employment or site access. This acknowledgment can be made using a standalone document (**Appendix D**) that will be submitted to Training and to the Document Management Center (DMC) for Record Retention.

Continuing education on the LCRs will be communicated through multiple means such as topic-specific courses (e.g., confined space, work at height, lockout/tagout), toolbox talks, daily ES&H briefings, stand-downs, posters, bulletin boards, badge cards, electronic messaging, and other communication methods as appropriate.

4.0 IDENTIFICATION OF VIOLATION

NOTE: *To encourage Craft Professionals to perform Peer to Peer coaching, Peer to Peer coaching by craft professionals shall not be considered a Life Critical Violation if the coaching is received in a professional manner. Peer to Peer coaching for Life Critical Violations are exempt from reporting.*

All personnel have the responsibility and authority to Stop Work without fear of reprisal when safety concerns exist. This responsibility includes situations in which a co-worker places themselves in danger or at risk of injury.

Where an LCR violation is suspected, the related work activity must be stopped immediately, and the area made safe. Responsible Supervision and ES&H personnel shall be notified.

A member of supervision (e.g., Foreman, General Foreman, Supervisor, Superintendent, or Manager), receiving notification of an alleged LCR violation must immediately stand-down the affected employee(s) and notify the relevant Construction Manager/Supervisor and ES&H representative who will further make the appropriate notifications.

- For alleged violations involving direct-hire Craft Professionals, Labor Relations (Union) must be notified
- For alleged violations involving non-manual Staff Professionals, Human Resources (HR) must be notified
- For alleged violations involving subcontractors and suppliers, the Project Subcontracts Manager or designee must be notified

Upon notification of an alleged LCR violation, an ES&H representative and the employee's supervisor, or other supervisory personnel within the affected employee's chain of command, will conduct a cursory review to determine if the allegation merits formal investigation. The BNI ES&H Manager will make the final decision regarding the need for formal investigation.

In a situation where an employee self-reports their own LCR violation, prior to it being reported by others, the BNI ES&H Manager must still initiate a cursory or formal investigation as warranted, assure corrective actions are taken, and that additional training is implemented. In this situation, the Incident Review Board has the authority to waive disciplinary action following a complete investigation that explains the rationale for the waiver to be considered.

Craft Professionals trained to conduct peer-to-peer observation and feedback as part of Craft-Based Leadership (CBL) program must not divulge the name of the individual suspected of violating an LCR; however, the CBL observer is still required to promptly stop work and intervene when a violation is observed, engaging with the involved team member by providing education and coaching on how to comply with the LCRs. While the employee's name must be protected in this situation, the observed LCR violation should be recorded as part of the CBL engagement process for data trending, analysis, and continual improvement.

Consequences may be imposed on any person who is aware of an LCR non-compliance and does not address or report the violation. Reprisal against an observer or reporter of an LCR violation will not be tolerated and disciplinary action will be enforced against any person involved in retaliatory actions. In either of these situations, disciplinary action may include termination or removal of site access.

Individuals involved in Life Critical Violation allegations may be subject to Drug and Alcohol Testing pursuant to project procedures.

5.0 INVESTIGATION

The following process will occur when a decision is made by the BNI ES&H Manager to initiate a formal LCR investigation.

- An assigned ES&H representative will notify the relevant Construction Manager/Supervisor and Labor Relations or HR representative of the decision

- The BNI ES&H Manager or designee will lead the investigation team, which may include other relevant personnel from Construction, ES&H, Labor Relations, Human Resources, or Subcontracts Management (for subcontractor violations), as appropriate
- The investigation team will interview the parties involved, gather facts, and document findings. The resulting written report should include witness statements, training records, employee acknowledgement of the LCRs, photographs, Project ES&H requirements, causal analysis, and any other relevant data
- The investigation team will organize, analyze, and summarize the facts and findings in an investigation report UCN-23565, *Life Critical Requirements: Investigation Report,* for delivery and presentation to the Life Critical Incident Review Board.

To encourage swift confirmation and resolution of an alleged violation, the Incident Investigation Team should deliver their report to the Life Critical Incident Review Board within two full working days following the date of the LCR allegation

6.0 LIFE CRITICAL INCIDENT REVIEW BOARD

The Life Critical Incident Review Board (LCIRB) will be used to evaluate Life Critical violations. The Board will be chaired by the Site Manager or PSUM and may be comprised of the BNI ES&H Manager, Site Superintendent, Labor Relations or Human Resources representative, LCR investigation team representative, and a subcontractor representative as appropriate.

LCIRB participants will determine if the allegation is valid and, if so, the level of disciplinary action to be applied. Disciplinary action must be based on investigation findings and may range from a documented warning to termination of employment or removal, depending on the circumstances and must be documented on UCN-23564, *Life Critical Requirements: Investigation Review Board Report*.

The LCIRB must confirm that ES&H training, written acknowledgement of LCRs by the employee, and direction given by supervision was appropriate and adequate and that events were not the result of behavior or actions by others. Importantly, the LCIRB must confirm that the incident and circumstances do qualify as an LCR violation.

The resulting disciplinary action will be communicated to the employee by the responsible supervisor, Labor Relations, or Human Resources (as appropriate) and documented in the employee's file. In the case of a subcontractor’s employee, the project’s Subcontracts Manager will issue written notice to the subcontractor informing them of the LCIRB decision.

7.0 DISCIPLINARY ACTION

Failure to comply with an LCR may have the potential to cause serious injury or death to an individual or the workers nearby. Consequences for noncompliance by non-manual, craft and subcontractor personnel shall be consistently enforced by project management.

Discipline should be tied to the behavior of individuals and the potential risks associated with their behavior, more than the actual outcome of their actions. As such, disciplinary actions can apply to anyone, whether a worker, supervisor, or manager.

A supervisor or manager who does not enforce an LCR, or who contributes to a LCR violation because of inappropriate direction or lack of guidance, may be subject to disciplinary action as relevant to their influence on the observed LCR violation.

Disciplinary action may also be imposed on employees who are aware of LCR noncompliance by others and do not take action to stop it or seek intervention by supervision or ES&H.

A disciplinary scale must be applied when an LCR violation is affirmed (**Appendix C, *Life Critical Violation Process***). That process must consider risk exposure, severity of the incident, employee intent, and extenuating circumstances, as applicable. Disciplinary action can range from termination, suspension, final written warning, to written warning. In limited situations, a documented verbal warning could be considered based on circumstances identified during the LCR investigation.

Mitigating circumstances identified during the incident investigation may lower the level of disciplinary action. Alternatively, repeat safety offenses by an individual or reckless behavior may increase the level of disciplinary action.

7.1 Termination/Removal

Termination is recommended when an employee has exposed themselves to a recognized hazard posing a risk of serious injury or fatality. Termination also is recommended when an LCR violation involves reckless or negligent behavior or willful intent to violate an LCR. Repetitive violation of safety rules, inclusive of a previous LCR violation, can also trigger termination.

- Project personnel who are terminated because of a confirmed LCR violation may be eligible for rehire, at Project's sole discretion, after a six-month separation from the company
- Subcontractor personnel who are removed from the worksite because of a confirmed LCR violation may be eligible to have their site access reinstated, at Project's sole discretion, after a six-month separation from the project

Prior to taking any adverse employment action involving termination of employment or removal from the project, the applicable representative from Human Resources or Labor Relations must contact Bechtel Legal, such as the Bechtel Manager of Labor & Employment, to review the findings from the investigation and disciplinary decision by the LCIRB.

8.0 CORRECTIVE ACTION

The BNI ES&H Manager, or designee, will ensure that corrective actions or lessons learned from the investigation are implemented and communicated to the project workforce, as appropriate. For employees receiving warnings or suspensions, their supervisor must engage with them when they return to the worksite and confirm their

understanding of LCRs, safety expectations, and Stop Work Authority. Coaching and mentoring are expected.

9.0 RECORDS

Records generated by this Document shall be maintained in accordance with Y15-95-800, *UPF Document Management.*

The following records are generated:

Record or Form Number	Record Title	Record Holder	System/ Location	Doc. Type
UCN-23564	*Life Critical Requirements: Investigation Review Board Report*	UPF DMC	InfoWorks	LCV
UCN-23565	*Life Critical Requirements: Investigation Report*	UPF DMC	InfoWorks	LCV

10.0 REFERENCES

10.1 Source References

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

2HO-E0A0-00002, *Life Critical Requirements Program*

10.2 Interfacing References

Y15-95-800, *UPF Document Management*

10.3 Forms

UCN-23564, *Life Critical Requirements: Investigation Review Board Report*

UCN-23565, *Life Critical Requirements: Investigation Report*

11.0 SUPPLEMENTAL INFORMATION

Appendix A, *Acronyms and Definitions*

Appendix B, *Life Critical Requirements*

Appendix C, *Life Critical Violation Process*

Appendix D, *Life Critical Requirement Program Acknowledgment*

APPENDIX A
Acronyms and Definitions

BNI - Bechtel National, Inc. 5
CBL - Craft Based Leadership 7
DMC - Document Management Center 6
ES&H - Environmental Safety and Health 4
FLHA - Field Level Hazard Analysis 5
HR - Human Resources 7
JHA - Job Hazard Analysis 5
LCIRB - Life Critical Incident Review Board 8
LCR - Life Critical Requirement 4
MEWP - Mobile Elevating Work Platform 12
PSUM - Project Startup Manager 5
UPF - Uranium Processing Facility 5

APPENDIX B
Life Critical Requirements

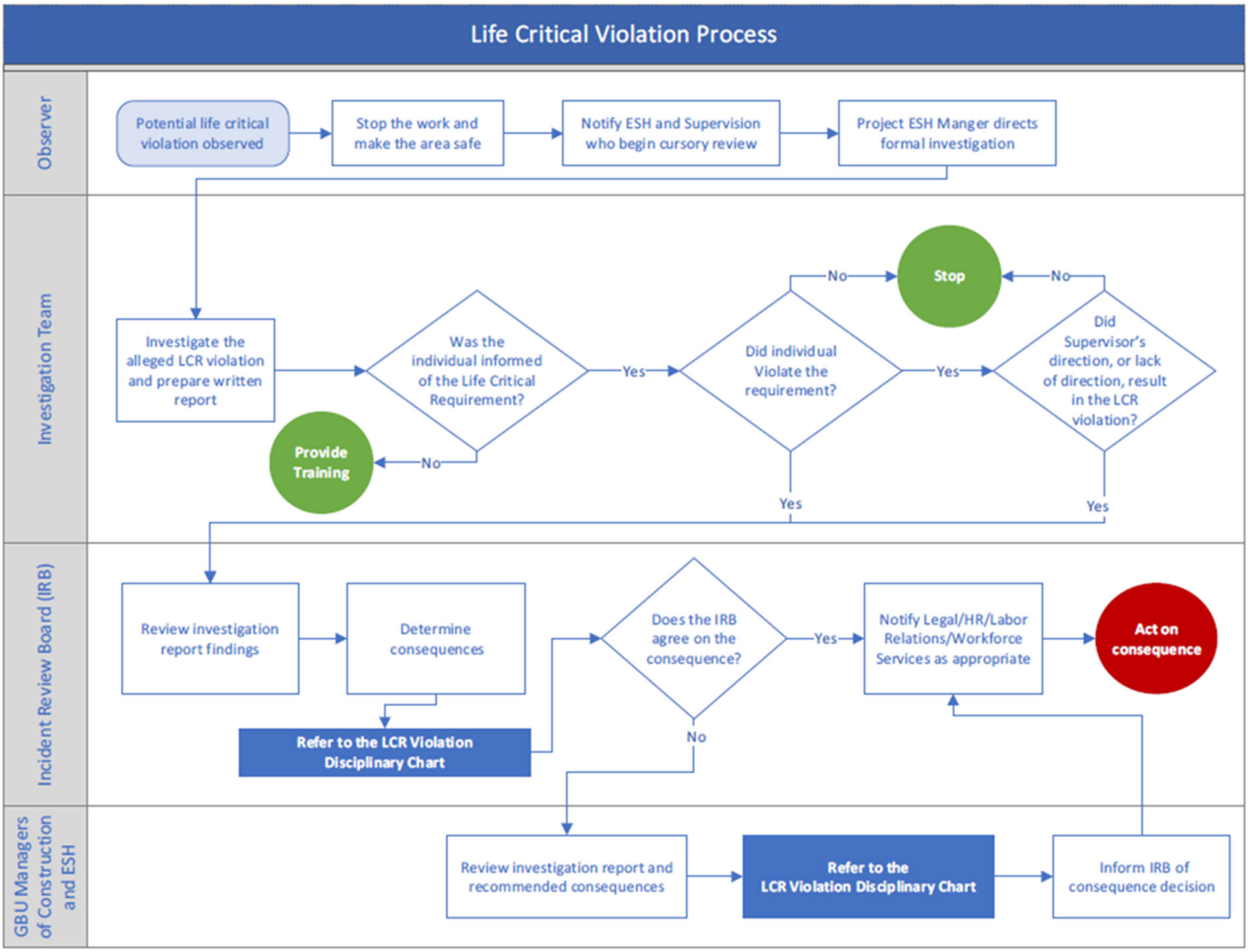
Element	Principle	Rules
1. Work at Height	Never work at height, outside of a protected area, without fall protection equipment.	1. Do not work at heights of 6 feet (1.8m) or greater without fall prevention (e.g., guardrails, fall restraint, floor/wall covers) or fall protection equipment. 2. Do not work from yellow-tagged scaffolds, with a recognized fall potential of 6 feet (1.8m) or greater, unless 100% use of fall protection equipment can be achieved. 3. Do not erect, dismantle, or modify a scaffold or temporary work platform unless trained and authorized. 4. Do not access a red tagged scaffold or temporary work platform unless authorized. 5. Do not remove floor or wall covers, where a 6-foot (1.8m) or greater fall hazard exists, unless a permit is in place and a fall prevention or protection system is used. 6. Do not use a mobile elevating work platform (MEWP) unless trained and authorized and fall protection equipment is attached to the manufacturer's designated anchorage point. 7. Do not stand on the guardrails of an MEWP.
2. Dropped Objects	Never bring tools, equipment, or materials to height without dropped object controls.	1. Do not use tools at height unless they are equipped with a tether system that is rated for the tool, installed by trained personnel, and secured to an appropriate anchor point. 2. Do not use or store materials near a leading edge or opening unless dropped object controls are in place. 3. Do not work at height unless restricted access zones or exclusion zones are erected to protect personnel below.
3. Confined Space	Never enter a permit- required confined space unless trained and a permit is in place.	1. Do not enter a permit-required confined space unless trained and signed onto an approved confined space entry permit. 2. Do not enter a permit-required confined space unless all hazardous energy sources have been identified, isolated, and verified as safe. 3. Do not enter a permit-required confined space unless atmospheric testing has confirmed that acceptable entry conditions exist. 4. Do not enter a permit-required confined space unless an attendant is present, a method of communication is established, and a rescue plan is in place.

Element	Principle	Rules
4. Energy Isolation	Never commence work on equipment or systems until all energy sources have been identified, isolated, and verified at zero-energy.	1. Do not work on equipment or systems involving energy sources including, but not limited to, electrical, mechanical, and pressure unless all hazardous energy sources are identified, isolated, and any stored energy discharged as verified through a zero-energy check. 2. Do not work on energized equipment or systems unless authorized and signed onto the energy isolation permit or Energized Electrical Work Permit, as applicable. 3. Do not remove energy-isolating devices, locks, or tags installed by other authorized personnel.
5. Barricades and Signs	Never disregard or bypass danger or exclusion zone barricading or signage.	1. Do not enter a danger barricaded area unless part of the work crew responsible for the activity, or the hazard has been controlled and barricade made incomplete (e.g., by lowering or removing one side) by a team member responsible for the barricaded work. 2. Do not enter an exclusion zone (i.e., a barricaded area that no one shall enter). 3. Do not perform imminent danger work unless others are protected from the hazard by use of a danger barricade, exclusion zone barricade, or perimeter control is achieved through use of a spotter.
6. Excavation	Never access an excavation unless a permit, protective system, and daily safety inspection is in place.	Do not access an excavation deeper than 4 feet (1.2m) unless: • The work is authorized by a valid permit available at the excavation • A current excavation safety report, by a competent person, has been completed and made available at the excavation • Ground movement is controlled, and collapse is prevented by a protective system (slope, bench, shore, or shield) as stated in the excavation permit • Overhead and underground services and hazards, including pipelines and electric cables, have been identified, located, and where necessary, removed, or isolated • Unauthorized entry is prevented by barricades and warning signs; and • A stairway, ladder, ramp, or other safe means of egress is available within 25 feet (7.6m) of lateral travel in trench excavations

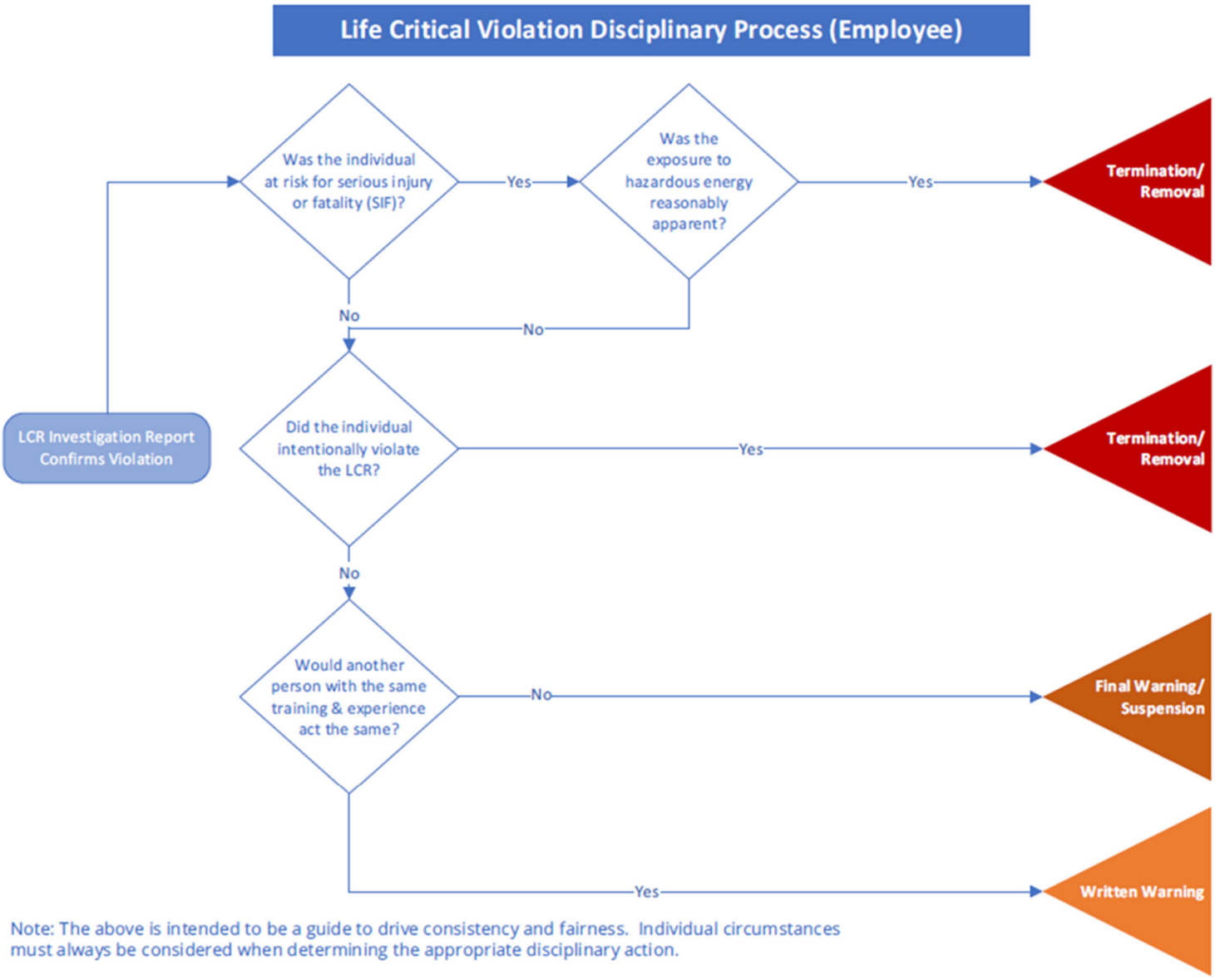
Element	Principle	Rules
7. Lifting Operations	Never conduct lifting operations unless authorized and verified as competent; never work under a suspended load.	1. Do not conduct lifting operations unless the lift is properly planned and documented with all risks assessed and controlled. 2. Do not conduct lifting operations in a manner contrary to the equipment manufacturer's instructions or Bechtel Standard Work Process Procedures. 3. Do not perform rigging hardware inspections, act as a signal person of a crane lifting suspended loads, or act as the person in charge of lifting operations unless authorized and verified as competent. 4. Do not use lifting equipment unless it is certified for use, current with periodic inspection, and visually inspected prior to use. 5. Do not use lifting equipment unless all safety devices are in place and functioning correctly. 6. Do not conduct lifting operations unless all personnel are kept clear of the fall zone by suitable means (e.g., barricades, taglines, warning signs, audible alarms, public address announcements, or banksman). 7. Do not ride the load or hook of a crane.
8. Safety Controls	Never override, disable, bypass, modify, or remove safety controls without authorization.	1. Do not defeat safety controls, such as: • Tool, machine, and equipment guards • Power tool auxiliary/side handles • Constant pressure triggers/switches • Relief valves and fire and gas detection controls • Electrical and control system interlocks, light curtains, pressure mats • In vehicle monitoring systems, reverse operation alarms 2. Do not use damaged tools or equipment that have been tagged out of service.

Element	Principle	Rules
9. Permit to Work	Never commence work until you have determined if a permit is required.	1. Do not participate in permit-controlled work unless a valid permit to work is in place. 2. Do not engage in work activities which are outside of the scope of the work permit. 3. Stop work when conditions change until the changes are assessed, control measures updated, and the work permit is updated.
10. Mobile Equipment & Personnel Interface (MEPI)	Never put yourself in the path of vehicles or operating equipment.	1. Do not disregard or bypass designated pedestrian walkways, where there is a risk of serious injury due to moving vehicles or mobile equipment. 2. Do not place yourself within 10 feet (3m) of vehicles and mobile equipment until positive communication with the operator has been achieved and vehicle or mobile equipment is stationary. 3. Do not enter vehicle or mobile equipment operating areas on foot when the area is designated “no boots on ground.” 4. Do not access, or commence work on public or private roads or railways, unless an approved traffic management plan and traffic controls are in place. 5. Do not leave work areas, protected by a traffic management plan and associated traffic controls, unless authorized and a safe path of travel has been established. 6. Do not operate vehicles and mobile equipment unless authorized, verified as competent, and seatbelts are worn by the operator and all occupants. 7. Do not operate vehicles or mobile equipment unless they are in a safe working condition. 8. Do not use a mobile phone or other communication device while operating vehicles or mobile equipment.

APPENDIX C
Life Critical Violation Process
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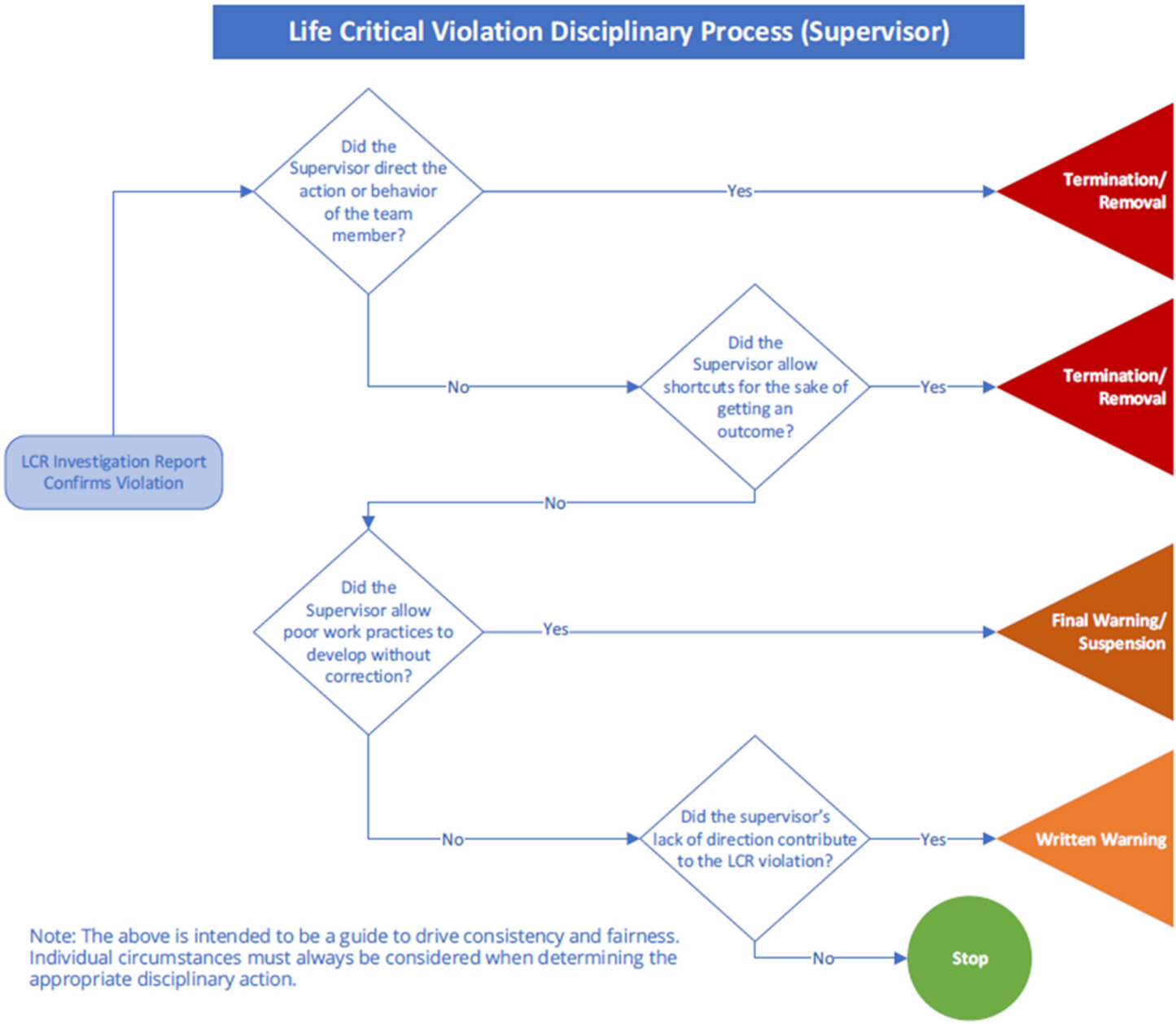


APPENDIX C
Life Critical Violation Process
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Note: The above is intended to be a guide to drive consistency and fairness. Individual circumstances must always be considered when determining the appropriate disciplinary action.

APPENDIX C
Life Critical Violation Process
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APPENDIX D
Life Critical Requirement Program Acknowledgment
Page 1 of 1

THE NATION'S URANIUM PROCESSING FACILITY

LIFE CRITICAL REQUIREMENT PROGRAM ACKNOWLEDGEMENT

DMC Document Number:
D-51185907 Q-51185908

I. Background

Project's Life Critical Requirements (LCRs) affirm key aspects of personnel safety and wellbeing and must be followed by all CNS, Bechtel and subcontractor employees who perform work on the UPF Project. The intent of the LCRs is to help protect employees and their coworkers from serious injuries and fatalities. The LCRs help establish safety and health expectations and assure accountability. The goal is to foster a positive safety culture and reduce the likelihood of serious incidents.
Compliance with the LCRs is a condition of employment on the UPF Project. This training serves as a revision to the UPF Work Rules Section III, Disciplinary Process for Category I violations involving non-compliance with the Project's Life Critical Requirements.

II. Receipt and Understanding of Life Critical Requirements

I have been trained on the Project's Life Critical Requirements and confirm my understanding of them. I acknowledge that adhering to these requirements is mandatory for employment on the Project.
I have received a printed version of the Project's Life Critical Requirements and will adhere to them as part of the terms of my employment on the Project.
I acknowledge that violating a Life Critical Requirement will result in disciplinary action, potentially termination of my employment or removal from the Project.

The Life Critical Requirements are:	
Work at Height	Excavation
Dropped Objects	Lifting Operations
Confined Space	Safety Controls
Energy Isolation	Permit to Work
Barricades and Signs	Mobile Equipment & Personnel Interface (MEPI)

I understand, that should I have questions regarding the Life Critical Requirements, I will consult my direct supervisor or the Project's Environmental, Safety and Health (ES&H) team. I recognize that the LCR requirements may be revised by the Project if necessary, and that employees will be notified accordingly.

III. Employee Acknowledgement

Through my signature below, I agree to comply with the Life Critical Requirements mandated by the Project.

No.	Badge	Printed Name	Attendee Signature
1			
2			
3			
4			
5			