

WP 12-IS3002

Revision 14

Job Hazard Analysis Performance and Development

Management Control Procedure

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APPROVED FOR USE

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CHANGE HISTORY SUMMARY

REVISION NUMBER	DATE ISSUED	DESCRIPTION OF CHANGES
12	09/29/14	<ul style="list-style-type: none"> • Introduce a new form, JHA checklist (EA12IS3002-3-0) as a replacement for the HIS. • Revise methods for implementation and removed Pre-Job Briefing, WCD, Training, and GHA as methods. • Revised process steps to require FWS and IS concurrence on GHA and Standing AJHA reference. • Revised process steps and new JHA checklist to required IH, FPE, and Rad concurrence when certain hazards are identified. • Revised process steps to require inclusion of supplemental information that shows evidence of the analysis performed that support the conclusions of the JHA review (e.g., IH, Rad). • Revised Figure 1 to align with process revisions. Added reference to the Senior Management Review Board criteria screening and procedure. • Changed “Work Planner” to “Work Planner (Procedure Writer)” as the procedure writer assumes responsibilities defined in this process for technical procedures.
13	06/08/15	<ul style="list-style-type: none"> • Removed content relating to the use of the Automated Job Hazard Analysis system. • Added clarification wording throughout the procedure. • Removed requirement to record mitigation method (numbers 1-5) for Standing JHAs, or task specific JHAs generated for Type 3 and Type 4 work as outlined by the Work Control process. • Removed reference to the Work Order Summary Sheet as a tool for documenting JHAs.
14	03/31/16	<p>Deleted Figure 1 Updated JHA walk down requirements. Removed Work Control Manager from step 7.2.2.</p>

INTRODUCTION

This procedure provides direction for the performance and administration of the Job Hazard Analysis (JHA) process implemented by Nuclear Waste Partnership LLC (NWP) at the Waste Isolation Pilot Project (WIPP).

Every WIPP employee is expected to work safely and to maintain a safe work environment. All WIPP activities are evaluated for potential hazards and a detailed general hazard analysis (GHA) has been performed to address routine industrial safety hazards and associated controls at WIPP facilities. Visitors should be briefed on the general hazards they may be exposed to and controls expected of them as part of their orientation.

When hazards are present beyond those evaluated within the GHA, the JHA process is followed to identify, evaluate, control, and communicate potential hazards associated with performing WIPP activities covered by Title 10 *Code of Federal Regulations* (CFR) 851 and over which NWP has contractual responsibility. This work includes but is not limited to facility maintenance, building maintenance, construction activities, facility operations, waste operations, subcontractor activities, and service organization support. This does not apply to activities such as commuting to and from work, administrative/office work and associated administrative vendor services such as food vending machine services that do not directly affect or potentially impact the facilities, equipment or surrounding work environment. These activities are covered under the GHA.

Science and testing groups operating under WP 02-EC.12 also will provide their own JHAs and any other documentation making up their work control package to the Test Coordination Office (TCO) and the NWP Experiment Support Liaison to be reviewed for consistency and to ensure the work scope is approved, that it has adequate budget and all required training is complete. Once the package has been reviewed by the TCO/Experimental Support Liaison (WP 15-SE.01) and comments resolved (if any) with the experimental group, then the package can be presented to ES&H for review and approval.

Emergency Response Procedures (ERPs) are exempted from having hazards analysis (JHA) performed. ERPs are performed by trained and qualified emergency responders under the Emergency Management System (EMS). Hazards and controls associated with emergency actions are evaluated and implemented as part of the EMS process.

Performance of this procedure generates the following record. That record is handled in accordance with departmental Records Inventory and Disposition Schedule (RIDS) for the department that generated the JHA.

- EA12IS3002-3-0, Job Hazard Analysis Checklist

IMPLEMENTATION

Standing JHAs developed using the Automated Job Hazard Analysis and those developed as Hazard Identification Summary (e.g. PMs) will be considered valid until expired or a revision is required. Upon expiration or when revision is required, the Standing AJHA will be required to be developed using the JHA Checklist. Updates will be made as outlined in section 10.0.

TRAINING

On-site personnel receive a GHA awareness overview as part of General Employee Training. Personnel (excluding vendors and Science & Testing groups) performing the JHA shall have completed Advanced Hazard Analysis training (SAF-116).

Technical Training will maintain records of personnel trained on performance of the JHA process and provide resources for Job Hazard Analysis training.

DEFINITIONS

Field Readiness Walkdown: (Also referred to a Work Area Inspection) A process of reviewing field conditions and related hazards (e.g., co-located work, weather, changes to facility conditions, etc.) prior to performance of work to ensure adequate controls are in place.

Field Work Supervisor: For purposes of this procedure, Field Work Supervisor is defined as the individual responsible for oversight and control of field work.

General Hazard Analysis: The identification, analysis, and specification of mitigation for those industrial safety and industrial hygiene hazards routinely encountered by personnel when entering, passing through or inhabiting the WIPP Site. General hazards and controls are limited to those mitigated by 1) worker's site/facility safety orientation and training and by 2) general personal protection equipment (PPE) (such as gloves, hearing protection, sturdy footwear for foot protection, eye protection such as safety glasses/goggles/face shield, etc.).

Job Hazard Analysis Output Document: Resulting document that identifies the task specific hazards and controls associated with the specified scope of work to include the AJHA Hazard Report or Job Hazard Analysis Checklist (EA12IS3002-3-0).

Standing Job Hazard Analysis (Standing JHA): A JHA Checklist or AJHA Hazard Report developed allowing repetitive performance of a specific scope of work. Standing JHAs are appropriate for repetitive work performed where hazards remain consistent (static) (e.g., warehouse operations, bolting, office cubicle set up).

Subject Matter Expert: For the purposes of this procedure, subject matter expert (SME) is defined as the organizational representative responsible for ensuring organization specific programmatic and regulatory requirements are implemented. SME for the purposes of this procedure is not to be confused with SMEs assigned for the qualification program.

Work Control Document (WCD): Work packages and technical procedures used to perform activity level tasks that include various support documents or permits needed during work execution.

Work Planning Team: A multi-disciplined team responsible for performance of the job hazard analysis and development of WCDs.

REFERENCES			
DOCUMENT NUMBER AND TITLE	BASELINE DOCUMENT	REFERENCED DOCUMENT	KEY STEP
10 CFR 851, "Worker Safety and Health Program"	✓	✓	
10 CFR 851.21, "Hazard Identification and Assessment"	✓		
10 CFR 851.22, "Hazard Prevention and Abatement"	✓		
URS Global Management & Operations Services Work Planning and Control Program Standard	✓		
MP 1.12, <i>Worker Protection Policy</i>	✓		
WP 02-EC.12, <i>Site Users and Tenants Guide for Organizations, Personnel, or Companies That Perform Work on U.S. Department of Energy Property or Rights-of-Way on or Around the Waste Isolation Pilot Plant Site</i>		✓	
WP 04-AD3030, <i>Pre-Job And Post-Job Reviews</i>		✓	
WP 04-AD3032, <i>Senior Management Review Board</i>		✓	
WP 10-WC3010, <i>Periodic Maintenance Administration and Controlled Document Processing</i>		✓	
WP 10-WC3011, <i>Work Control Process</i>		✓	
WP 10-WC3012, <i>Work Control Document Writer's Guide</i>		✓	
WP 12-IH.02 series, <i>WIPP Industrial Hygiene Program</i>	✓		
WP 12-IS.01 series, <i>WIPP Industrial Safety Program</i>	✓		
WP 12-IS.01-1, <i>Industrial Safety Program – Barricades and Barriers</i>	✓		
WP 15-GM.02, <i>Worker Safety and Health Program</i>	✓		
WP 15-GM.03, <i>Integrated Safety Management System Description</i>	✓		
WP 15-PS3002, <i>Controlled Document Processing</i>		✓	
WP 15-PS.2, <i>Procedure Writer's Guide</i>		✓	
WP 15-SE.01, <i>Science Experiment Support Plan</i>		✓	

REFERENCES			
EA04AD3032-1-0, <i>Senior Management Review Board (SMRB) Screening Criteria</i>		✓	
EA10WC3011-28-0, <i>Work Order Summary Sheet</i>		✓	
EA12IS3002-3-0, <i>Job Hazard Analysis Checklist</i>		✓	
PROD-439, <i>General Hazard Analysis</i>	✓	✓	

PERFORMANCE

1.0 JOB HAZARD ANALYSIS OVERVIEW

The safety policies established at WIPP are intended to ensure a safe working environment for employees, visitors, subcontractors/vendors and the public. It is every person's responsibility to maintain a safe work environment, be aware of hazards in the workplace, and ensure appropriate controls are implemented. A critical aspect in all cases is the individual's responsibility and expectation to remain aware of job conditions and to call a **TIME OUT/STOP WORK** if a hazard emerges or is encountered that was not appropriately addressed.

With the exception of ERPs, a hazard analysis is performed for all WIPP activities.

The following sections describe:

- The expectations relating to work covered by the GHA.
- Define the hazard analysis process to be taken when hazards beyond those covered by the GHA are present.
- Program requirements and administration for WIPP WCDs.

2.0 SUBCONTRACTOR/VENDOR JOB HAZARD ANALYSIS

The subcontractor technical representative (STR) has the responsibility to include the identification of hazards specific to the WIPP site as part of the statement of work.

Subcontractor/vendors, whose activities are managed through the Approval Request/Verification Request process, will provide their own JHAs as part of the submittal process. The subcontractor/vendor supplied JHA will be reviewed and approved by the Subcontractor Technical Representative and Environmental Safety & Health. Additional approval is required by Fire Protection Engineer if work involves flammable, explosive, fire, or heat generating equipment and Radiological Control representative for all radiological work.

Depending on the completeness of the subcontractor/vendor provided JHA, a supplemental JHA may be provided using the JHA Checklist (EA12IS3002-3-0).

3.0 GENERAL HAZARDS ANALYSIS (applicable to all personnel)

The GHA evaluates standard industrial and workplace hazards to ensure that employees have the proper skills and knowledge to safely perform routine work activities. If the hazard evaluation for a work activity determines that all hazards are covered by the GHA and none of those hazards are introduced by the specific job, then no additional job specific hazard analysis is required.

Often, postings such as signs or warning barriers/barricades will identify hazards to alert workers to the need for applying general/non-specialized PPE. Some examples are hearing protection for a high noise hazard in an emergency diesel generator room (when the generator is running), eye protection when using shop equipment, or use of hard hats in congested work areas with overhead bumping hazards. General hazards and controls need not be specified in WCDs since workers are trained to the identification of these types of hazards and controls needed to mitigate the hazards. Specifying general hazards and controls in WCDs could result in diluting the importance of addressing the controls for hazards associated with accomplishment of specific tasks and the work environment detailed in the WCD. Exception to this is when general hazards are introduced by the task performed.

Based on evaluation of employee experience, training, and knowledge, the GHA identifies routine work place hazards where controls are skill based and can be implemented by the individuals performing the work. The GHA and associated controls are always in effect and are applicable to all WIPP activities. The GHA is available on the Safety web site.

Information contained in the GHA is used when appropriate by workers, supervisors, and managers to discuss and identify applicable hazards and controls within the work area.

If the hazard evaluation for an activity identifies that all hazards are bounded by the GHA, this decision is documented within the WCD and no further hazards analysis is required.

4.0 JOB HAZARD ANALYSIS WALK DOWN & TABLE TOP REVIEW REQUIREMENTS

A JHA is performed to evaluate all aspects of task performance. This includes an analysis of the hazards associated with performing the task, and also an evaluation of hazards associated with the work area where the activity will be performed (confined space, elevated work, radiological areas, etc.).

JHAs will vary in complexity depending on the hazards and necessary controls to protect the worker. The input of the Work Planning Team is critical in the JHA process. The JHA walk down is the first major component of the JHA process.

4.1 Job Hazard Analysis Walk Down

The walk down provides the Work Planning team an opportunity to fully recognize hazards associated with the work scope in the context with the space and environment where the work will be performed. Because the management ownership of safety is essential, it is imperative that the Field Work Supervisor (FWS) and worker perform a joint walk down to ensure all safety hazards are identified. Safety and the work planner are invited to the walk down.

- 4.2 Key personnel are required to be invited to the walk down to ensure understanding and consensus on the hazard mitigation strategy for hazards identified. The safety representative and work planner may choose not to participate based on familiarity with the hazards and/or previous walk downs. Documentation on the JHA Checklist will occur. The FWS and worker(s) are required to participate.

Required walk down participants include:

- Field Work Supervisor (FWS)
- Work Planner (Procedure Writer) (planning walk down acceptable)*
- Worker(s)
- Safety Representative(current or previous walk down acknowledged)

Other SME Representative as determined by the work scope. Attachment 4 of WP 10-WC3011 may be used to assist in identifying appropriate SME involvement, including the following:

- Work Planner (Procedure Writer)*
- Safety Representative
- Subcontract Technical Representative (STR)
- Industrial Hygiene
- Environmental Representative
- Radiological Safety
- Operations
- Fire Protection Engineer

* Work Planner walk down may be performed concurrently with the scoping walk down.

4.3 Job Hazard Analysis Tabletop Review

Typically after completion of a walk down, the Work Planning Team reconvenes to assist in the development of the final JHA output documents. For simple tasks (e.g., Type 3 and non-complex Type 1 WCDs), the JHA walk down and review may be combined.

During the tabletop review the Work Planning Team will perform the following:

- Review relevant Lessons Learned and feedback.
- Review previous radiological and industrial hygiene surveys where applicable.
- Ensure that any unique, activity-specific controls required by the Documented Safety Analysis (DSA)/Technical Safety Requirements (TSR), As Low As Reasonably Achievable (ALARA) Job Review, Industrial Hygiene Exposure Assessment, Shock and Arc Flash Hazard Analysis, Safety Data Sheet (SDS), and other hazard assessment/analysis documents are discussed.
- Review drawings, notes, video, photographs and conduct discussions with team members familiar with the work site.
- Validate/update the work scope.
- Review/validate the basic job steps/tasks and modify any draft instructions.
- Discuss and identify the hazards associated with each job step or activity including potential undesirable events (e.g., the potential consequences of improperly performing and/or not performing the step, etc.).
- Analyze the identified hazards collectively to arrive at the optimum set of controls for the work being performed, and to ensure that the selected controls do not conflict with each other or introduce additional hazards (e.g., heat stress due to prescribed PPE for multiple hazards such as electrical, radiological, and chemical).

- Prescribe specific controls necessary for the protection of workers, the public, and the environment:
 - Include consideration of potential transients or accidents (i.e., "what if" scenarios such as spills, fires, exposures, failures, changing conditions, interference, alarms, unexpected equipment actuations, errors, etc.) and their consequences;
 - Review work tasks from a human performance perspective to identify and either eliminate or develop contingencies for error likely situations.
- Select controls that seek to prevent or mitigate the hazards using the hierarchy listed below. Preference should be given to passive controls over active controls.
 - Elimination or substitution.
 - Control the hazards through engineered controls/barriers.
 - Control the hazards through administrative controls.
 - Control the hazards through the use of PPE to protect the worker from the hazard as a final resort.

5.0 METHODS FOR IMPLEMENTATION OF CONTROLS

Methods of implementation are used to identify how the required hazard controls are to be implemented. Controls for the hazards are identified and incorporated into the WCD when determined to not be within the training and qualification of the workers. Because the hazard controls associated with the activity are incorporated into the WCD (work instruction, permits), the JHA output document (AJHA Hazard Report or JHA Checklist) is not required in the field. For tasks not governed by a WCD (e.g., warehouse operations, janitorial duties, Standing JHAs, and work classified as Type 3 or Type 4 through the Work Control Process), methods of control are not required to be documented on the JHA Checklist. The JHA is used as the source of controls required to perform the task.

In order to effectively communicate the necessary controls to mitigate or eliminate hazards to the workers, the following additional guidelines should be used to select the methods of implementation:

Methods of controls are specified for each identified hazard on the JHA output document and may include the following:

- **Precaution/Limitation/Prerequisite** – Control incorporated into the Precaution/Limitation/Prerequisite sections of the work document.
 - Hazard information is incorporated into the Precaution/Limitation sections of the work instructions when the hazard applies to the entire scope of work or occurs at more than one point in the WCD.
 - Prerequisite actions may be captured when the control must be in place and verified as complete **PRIOR** to start of work.
- **WARNING/CAUTION** – Specified through a statement in a work document.
 - Used when a hazardous condition applies to a specific step in the body of a work instruction.
- **Work Procedure Instruction** – Directions provided through incorporating specific steps and step sequencing within a work document. For supplemental information on development of WCD work instructions/technical procedures, refer to WP 10-WC3012 and WP 15-PS.2.
 - Used when the control is established through performance of a sequence of steps.
 - **Critical Step** – Steps placed in a work instruction that require sign off, initial, check off for which an error in performance could result in an unnecessary risk.
- **Permit/Plan/Evaluation** – Detailed controls, requirements, or actions are specified in a permit or plan and contained in the WCD.

Hazard controls are contained in supporting permits or plans required to be generated by another controlling procedure/program (e.g. Confined space, Hot Work).

Required Permits/Plans/Evaluations should be identified in the WCD as a Prerequisite or as a specific step as appropriate.

Example: Step number XXX Ensure the Hot Work Permit is completed and included in the WCD.

6.0 DOCUMENTING THE RESULTS OF THE JHA

The JHA Checklist or Hazard Report do not authorize work; they must be used in conjunction with a WCD that has been approved for release and use or used to communicate required controls for routine/repetitive work not governed by a WCD.

In cases where a technical procedure or work activity can be performed in multiple locations where work area and/or location specific hazards exist (e.g., calibration procedure used on the same instrument installed at several locations), a Standing JHA may be developed to identify and implement the additional specific controls for that location which is used to supplement the task specific JHA controls that were incorporated into the WCDs. Use of Standing JHAs is also appropriate for repetitive work not governed by a WCD, such as warehouse operations, janitorial duties, etc.

JHAs for WCDs capture hazards and controls identified at the time a WCD was developed. Normal WCD change controls and processes provided in WP 10-WC3010, WP 10-WC3011, and WP 15-PS3002 ensure new or additional task specific hazards identified are mitigated and necessary controls implemented within the WCD.

The following sources of new hazards may drive changes to a WCD:

- Updates/revisions of the JHA Checklist
- Hazards introduced through equipment modifications/upgrades, permanent changes to field conditions which introduce new hazards.

Workplace hazards that may be introduced in the work area following development of the JHA (co-located work activities, radiological conditions, weather conditions, etc.) are evaluated prior to work execution, and appropriate controls implemented per section 9.0.

The general hazards and controls covered by the GHA may be specified on the JHA output documents. When this is done it is important to highlight those hazards introduced through performance of the task to differentiate against general hazards that may be confronted on a daily basis. Specifying general hazard controls in work documents could result in diluting the importance of controls implemented for analyzed hazards specific to the work task or environment so special emphasis is needed on those hazards introduced by the task.

7.0 JOB HAZARD ANALYSIS DEVELOPMENT

NOTE

Performance of a pre-job briefing or post-job review is not to be considered a job step when performing a JHA. The JHA process is hazard driven, not driven by the job steps in a WCD. Although the word "task" is used in the JHA process, it is intended to mean a major segment of a job, not a job step. This deviation from past practice is intended to discourage and eliminate the use of a JHA as a procedure and makes the JHA more efficient.

7.1 Work Planner (Procedure Writer)

- 7.1.1 Prepare a list of work activities or a draft/outline of the work document containing tasks to be accomplished.

NOTE

Depending on the complexity of the job, or the number of work groups involved, it may be necessary to conduct initial scoping meeting(s) with representatives of the various work groups to obtain a clear understanding of the work scope.

7.2 FWS/Worker/Work Planning Team

- 7.2.1 Obtain input on the approach or activities to be completed.
- 7.2.2 Evaluate the work activity, work location, and identified hazards to determine if the activity falls within the GHA, or a current Standing JHA.

[A] **IF** work activity falls within the GHA, or a current Standing JHA, **GO TO** step 7.10.

[B] **IF** not covered, **GO TO** step 7.3.

NOTE

A walk down may be augmented by the use of technology and/or information gained by examination of pictures, drawings, specifications or other technical data. However, technology and data reviews shall not be used to circumvent the need for a walk down.

7.3 FWS/Worker/Work Planning Team

7.3.1 If additional JHA development is required, perform field walk down to identify potential hazards relating to work activities and the work area/environment using the JHA Checklist.

7.3.2 If a field walk down cannot be conducted (e.g., equipment is not set up when job is planned, room is sealed, or the risk is unacceptable or outweighs the benefits), obtain the responsible manager approval (e.g., Mining Manager, Operations Manager, Maintenance Manager) for a table top only review.

7.4 Responsible Manager

7.4.1 Review basis for not performing a walk down. If the reason is acceptable, record justification on the JHA Checklist and approve.

[A] If approval is received to allow a table top discussion (versus a walk down):

7.5 Work Planner (Procedure Writer)

7.5.1 If responsible manager approval is received, steps may need to be added to the WCD to ensure conditions assumed during development of the JHA and WCD are aligned with actual field conditions and controls are adequate. Noting, if conditions are not as planned, work shall be **STOPPED** and the change control process shall be applied.

7.6 FWS/Worker/Work Planning Team

7.6.1 Facilitate a tabletop review if a JHA walk down cannot be accomplished.

7.7 For any JHA review (walk down or table top)**7.7.1 FWS/Worker/Work Planning Team**

[A] Record participation in the JHA development on the form/checklist being used.

- [B] Evaluate the activities to be performed, and quantify the hazards such as those listed below:
- Airborne dusts/particulates, including asbestos
 - Noise dB levels
 - Radiation dose rates
 - Chemical volumes
 - Temperature limits or extremes
 - Fluid or gas pressures
 - Electrical voltage and amperage
 - Weight of lifted or suspended components, etc.
- [C] Determine if the work activity can affect personnel or facility safety, can pose challenges to facility equipment, processes, or operations (e.g., result in shut-downs, delays, significant costs or losses), or can result in other unacceptable/undesirable consequences.
- [D] Look beyond the scope of the work at the surrounding area and/or work being scheduled for the same time/place. Ask yourself:
- Will this lessen the safety of the individuals involved in the work scope being planned for?
 - Is there a hazard which is not contained within the work package's scope?
 - Will extrinsic issues negatively impact the safety of the personnel and/or equipment operability?
- [E] Conduct a "what if" analysis of specific tasks and hazards using the following hierarchy of controls for mitigating the hazard.
- Can hazard be eliminated/reduced or substituted (e.g., different chemical cleaning agent)?
 - Can Engineering Controls be utilized (e.g., ventilation)?
 - Can Administrative Controls be utilized (e.g., dose monitoring)?
 - Can Personal Protective Equipment (PPE) be used (e.g., Self-Contained Breathing Apparatus)?
 - Can a less hazardous way to do the job be found?

- Can the physical conditions that created the hazard be changed?
- Can the sequence or way the procedure is written be modified to a safer alternative?
- Can the need for doing the job or the frequency of doing the job be reduced?

7.7.2 Review to ensure additional hazards are not created or made worse due to controls which are selected (e.g., excessive PPE causing heat exhaustion or heat stress) and conflicts do not exist between the controls established for hazards identified (i.e., PPE requirements for radiological hazards don't conflict with PPE requirements for Industrial Hygiene hazards).

7.7.3 Ensure recognized hazards not found on the JHA support documents/checklists and mitigation related strategies are inserted as user-added hazards.

7.8 Work Planning Team (SME Representatives)

7.8.1 Ensure that control of hazards identified during performance of the JHA take into account the requirements of associated safety and health standards, safety data sheets, and WIPP-specific regulations and programmatic requirements, without violating radiological control, the DSA/TSR or other Safety Basis documents. If conflicts arise, SME to ensure resolution before the JHA output document is approved.

NOTE

When work is to be performed by a subcontractor, additional review and concurrence may be required by the subcontractor safety representative and/or STR.

7.9 FWS/Worker/Work Planning Team (Industrial Hygiene, Fire Protection, Radiological, as required) as described in Section 4.2

7.9.1 Finalize the JHA by documenting the results of the hazard identification, hazard analysis, selection of controls, and method of control implementation on the JHA output document (or equivalent for Subcontractors).

7.9.2 Ensure inclusion of information documenting the analysis performed (e.g., IH, IS, Fire Engineering) that provides the basis for the conclusions recorded in the JHA output document. Information on analysis performed shall be included as a reference in the JHA checklist comments section and included in with the WCD or procedure history file.

7.9.3 If analysis information is referenced, include as an attachment to the JHA output document.

NOTE

The JHA output document is used as input to development of the WCD.

7.10 FWS/Safety Representative/Other SME representatives, as required)

7.10.1 IF determined to be covered by the GHA or a Standing JHA, FWS and IS/IH representative REVIEW and document concurrence.

7.11 Work Planner (Procedure Writer)/FWS

7.11.1 If the activity requires a permit, form, plan, or PPE determination (e.g., Confined Space Entry Permit, Hot Work Permit, , etc.), ensure the appropriate SME organizations review and approve the document for inclusion in the WCD and the permit, form, plan, etc. is called out appropriately as a prerequisite, specific work step, etc.

7.12 Work Planner (Procedure Writer)

7.12.1 Attain the approved JHA output document for the WCD or in the Technical Procedure History File. If a JHA output document is to be used as a Standing JHA, retain a copy and follow steps outlined in section 11.0.

8.0 PRE-JOB BRIEFING

Some level of pre-job briefing (PJB) is performed for all work. The PJB could be formal and documented or informal and verbal. The FWS conducts the PJB as outlined in WP 04-AD3030, Pre-Job Briefings and Post Job Reviews, to ensure understanding of the controls incorporated into the WCD.

9.0 FIELD READINESS WALK DOWN

After completion of the Pre-job Briefing, verification that field conditions are consistent with conditions identified during the work planning is necessary to ensure proper controls for hazards. Review of field conditions also allows for supplemental controls to be established when co-located work, weather, or other issues are identified relating to the environment or work location.

9.1 FWS

- 9.1.1 If controls are not incorporated into the WCD, ensure availability of a legible, current, copy of the JHA output document is available to the workers before the job starts.

9.2 Worker/FWS

- 9.2.1 Prior to starting work activities, evaluate the job site and determine if hazards associated with the task and the work location are consistent with those identified in the WCD and the pre-job briefing (e.g., hazards introduced by co-located work, changes to work area conditions, etc.) and current environmental conditions (e.g., rain, snow, high/low temperature).
- 9.2.2 Identify workplace or environmental hazards and determine and implement appropriate controls (e.g., work rest regimen, hard hats, barricades or barriers, heat stress mitigation, ice removal, supplemental lighting, etc.).
- 9.2.3 When required controls and appropriate personal protective equipment have been established, work may be performed.
- 9.2.4 **STOP** work and notify management whenever the conditions have changed or the JHA output document appears to be inadequate.

9.3 FWS

- 9.3.1 Take action to disposition/resolve the STOP work condition.

9.4 Worker/FWS

- 9.4.1 Ensure controls remain in place while the hazard(s) exists.

10.0 HAZARD/CONTROL CHANGES TO APPROVED JOB HAZARD ANALYSIS OUTPUT DOCUMENTS

Changes to the JHA output documents are not required for hazards and controls related to field conditions (e.g., weather, co-located work, etc.) or if additional identified hazards fall within the GHA.

- Changes to a JHA Checklist may be performed by marking up the original JHA Checklist with the required change, or preparing a new JHA Checklist describing the additional hazards and controls. The method selected is determined by the number and significance of changes that are required, and the ability for the change to be made in a legible manner.
- Changes to AJHA Hazard Reports – If changes are required to an AJHA Hazard Report, the changes must be documented on a JHA Checklist and the AJHA Hazard Report discontinued.

WCDs/technical procedures must be reviewed to determine if changes are required based on the change to the JHA output document. If change is required, change is processed in accordance with the applicable program procedure.

10.1 FWS/Work Planner (Procedure Writer)/Safety Representative/Other SMEs

10.1.1 Prepare the change by marking up the original JHA Checklist or prepare a new JHA Checklist identifying the new/changed hazards and relating controls.

10.2 Worker/FWS/Safety Representative/Applicable SMEs

10.2.1 Review the change, ensuring conflicts do not exist.

10.3 FWS/Safety Representative/SME

10.3.1 If acceptable, the FWS, Safety Representative, and any appropriate SMEs must approve the change as documented by initialing by the change(s) and explanation entry in the comments sections or, as appropriate.

10.4 FWS/Work Planner (Procedure Writer)

10.4.1 Review the other documents (e.g., work document, permit, plan) to determine the need for revision and revise in accordance with the applicable procedure.

11.0 STANDING JOB HAZARD ANALYSIS

As Standing JHA controls are not routinely incorporated into the procedure or work document, they are considered a supplemental work document for that activity and must be reviewed. When Standing JHAs are used, field conditions must be reviewed each time the work is performed, and approved controls established if additional hazards are identified.

Standing JHAs developed under the AJHA system are only valid until the assigned expiration date or until revisions are required due to new or changed hazards or hazard controls. The revised Standing JHA will be required to be developed using the JHA Checklist.

11.1 Work Planner (Procedure Writer)/FWS/Safety Representative

11.1.1 Evaluate the work activity, work location, and identified hazards to determine if there is a current Standing JHA available for use, or if the activity requires development of a new Standing JHA.

11.2 Work Planner (Procedure Writer)/FWS/Work Planning Team

11.2.1 If Standing JHA development is required, perform the JHA as outlined in section 7.0.

11.3 Work Planner (Procedure Writer)/FWS/Safety Representative/Applicable SMEs

11.3.1 Finalize the Standing JHA by documenting the results of the hazard identification, hazard analysis, selection of controls, and method of control implementation.

11.4 FWS/Safety Representative/Applicable SMEs

11.4.1 Review and approve the Standing JHA ensuring completeness, technical accuracy, and controls identified for activities are appropriate.

11.4.2 Assign a review date at or near the scheduled review date of the procedure or two years from the point of approval for Standing JHAs not tied to procedures.

11.5 Environmental, Safety & Health Representative

11.5.1 Ensure that a review and update of Standing JHAs is performed and documented by the appropriate Work Group Manager (WGM) and SMEs based on the assigned review date.

11.5.2 Update the web site with the approved Standing JHA.

11.6 WGM

- 11.6.1 Upon notification, initiate actions to review and update, if necessary, the Standing JHA ensuring SME review and approval of changes made.