

**Office of Enterprise Assessments  
Assessment of Occupational Injury and Illness  
Recordkeeping and Reporting at the Moab  
Uranium Mill Tailings Remedial Action Project**



**July 2018**

**Office of Worker Safety and Health Assessments  
Office of Environment, Safety and Health Assessments  
Office of Enterprise Assessments  
U.S. Department of Energy**

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## ACRONYMS

CAIRS	Computerized Accident/Incident Reporting System
CFR	Code of Federal Regulations
CRAD	Criteria and Review Approach Document
CY	Calendar Year
DART	Days Away, Restricted or on Job Transfer
DAW	Days Away from Work
DOE	U.S. Department of Energy
EA	Office of Enterprise Assessments
GJO	Grand Junction Office
NWP	North Wind Portage
OFI	Opportunity for Improvement
OII	Occupational Injury and Illness
OSHA	Occupational Safety and Health Administration
RAC	Remedial Action Contractor
RWD	Restricted Work Days
TAC	Technical Assistance Contractor
UMTRA	Uranium Mill Tailings Remedial Action

**Office of Enterprise Assessments**  
**Assessment of Occupational Injury and Illness Recordkeeping and Reporting**  
**at the Moab Uranium Mill Tailings Remedial Action Project**

**EXECUTIVE SUMMARY**

The U.S. Department of Energy (DOE) Office of Worker Safety and Health Assessments, within the Office of Enterprise Assessments (EA), conducted an independent assessment of occupational injury and illness (OII) recording and reporting by North Wind Portage and S&K Logistics Services, LLC, at the Moab Uranium Mill Tailings Remedial Action Project, and DOE oversight of the program by the Office of Environmental Management's Grand Junction Office. The assessment included an onsite data collection visit from March 12-15, 2018. The objective of this assessment was to ensure the quality and accuracy of safety performance metric data available to DOE and DOE contractor management for feedback and improvement analysis and decision-making purposes. This assessment is part of EA's targeted assessment of DOE OII recording and reporting activities.

EA reviewed the remedial action contractor (RAC) and technical assistance contractor (TAC), North Wind Portage and S&K Logistics Services, LLC, respectively, OII case records for calendar years 2015–2017, including OII case and medical files, Occupational Safety and Health Administration (OSHA) 300 Log and Annual Summary, and recordable cases reported in DOE's Computerized Accident/Incident Reporting System (CAIRS).

EA interviewed RAC and TAC management and administrative personnel who are integral to OII recordkeeping and reporting processes, and eight contractor employees regarding their previously reported injuries.

Overall, the RAC and TAC have satisfactory mechanisms in place for reporting contractor worker injuries at the Moab Uranium Mill Tailings Remedial Action Project. Contractor personnel with OII recordkeeping responsibilities are knowledgeable and experienced in recordkeeping requirements. Workers interviewed by EA understood their responsibilities for reporting injuries and illnesses. Initial worker training communicates the injury reporting requirements, which are also reinforced to workers during annual refresher training. Interviewed workers stated that they felt comfortable reporting injuries and illnesses, without fear of reprisal. They also reported that they were satisfied with management's response to reported injuries and post-injury medical evaluations.

EA identified three issues warranting RAC management attention. The RAC and its subcontractors did not appropriately complete and keep separate OSHA 300 Logs and Form 300A Annual Summaries for each project site/establishment. The RAC submitted its recordable OII cases late into CAIRS by greater than 100 days. RAC quality checks were not effective in identifying discrepancies between local OII case records and CAIRS. EA did not identify any issues for the TAC.

EA's evaluation of Federal oversight determined that the DOE Grand Junction Office has not conducted oversight of OII recordkeeping and reporting procedures or resulting records to verify that contractor's quarterly self-assessments are effective.

**Office of Enterprise Assessments**  
**Assessment of Occupational Injury and Illness Recordkeeping and Reporting**  
**at the Moab Uranium Mill Tailings Remedial Action Project**

**1.0 PURPOSE**

The U.S. Department of Energy (DOE) Office of Worker Safety and Health Assessments, within the independent Office of Enterprise Assessments (EA), conducted an assessment of occupational injury and illness (OII) recording and reporting at the Moab Uranium Mill Tailings Remedial Action (UMTRA) Project. The objective of this assessment was to ensure the quality and accuracy of safety performance metric data available to DOE and DOE contractor management for feedback and improvement analysis and decision-making purposes. This assessment included an onsite data collection visit from March 12-15, 2018.

**2.0 SCOPE**

EA assessed the effectiveness of OII recordkeeping and reporting in accordance with the *Plan for the Office of Enterprise Assessments Assessment of Injury and Illness Recordkeeping and Reporting at the Moab Uranium Mill Tailings Remedial Action Project – March 2018*. The scope included evaluation of the OII recordkeeping and reporting activities of North Wind Portage (NWP), which is the DOE prime remedial action contractor (RAC) for the Moab UMTRA Project, and two of its subcontractors, AMEC Foster Wheeler and Nielson Construction Company. The scope also included evaluation of S&K Logistics Services, LLC, which is the DOE prime technical assistance contractor (TAC), and its teaming partner Professional Project Services, Inc. DOE line oversight of the contractor OII programs was also evaluated.

**3.0 BACKGROUND**

The Moab UMTRA Project administrative office is located in Grand Junction, Colorado, while the remediation and technical site work occurs at Moab and Crescent Junction, Utah. The project's primary mission is to relocate mill tailings and other contaminated materials from a former uranium ore processing mill site in Moab, Utah to an engineered disposal cell near Crescent Junction, Utah. The project includes remediation of ground water at the Moab mill site. Currently there is a total of 118 contractor and subcontractor employees working on site at the Moab UMTRA Project.

The Office of Environmental Management's Grand Junction Office (GJO) provides Federal oversight of the Moab UMTRA Project.

**4.0 METHODOLOGY**

The DOE independent oversight program is described in and governed by DOE Order 227.1A, *Independent Oversight Program*. EA implements the independent oversight program through a comprehensive set of internal protocols, operating practices, assessment guides, and process guides. Organizations and programs within DOE use varying terms to document specific assessment results. In this report, EA uses the terms "deficiencies, findings, and opportunities for improvement (OFIs)" as defined in DOE Order 227.1A. In accordance with DOE Order 227.1A, DOE line management and/or contractor organizations must develop and implement corrective action plans for the deficiencies

identified as findings. Other important deficiencies not meeting the criteria for a finding are also highlighted in the report and summarized in Appendix C. These deficiencies should be addressed consistent with site-specific issues management procedures.

As identified in the assessment plan, this assessment considered requirements related to 10 CFR Part 851, *Worker Safety and Health Program*. Specifically, the RAC and TAC must use the requirements and criteria in 29 CFR Part 1904, *Recording and Reporting Occupational Injuries and Illnesses*, and DOE Order 231.1B, *Environment, Safety and Health Reporting*, to accurately record local OII case records and report recordable cases into the DOE Computerized Accident/Incident Reporting System (CAIRS) database within a prescribed timeframe.

EA used specific criteria from objectives OII.1, OII.2, and OII.4 of EA Criteria and Review Approach Document (CRAD) EA-32-07, *Occupational Injury/Illness Recordkeeping*, for this assessment, which was primarily a review of a sample of OII case records from calendar years (CYs) 2015 through 2017. The assessment was not intended to be a full programmatic review; however, the records review was supplemented by other activities, such as interviews with managers who have OII recordkeeping responsibilities, to assess the effectiveness of some elements of Moab contractor OII recordkeeping procedures.

EA evaluated available RAC, TAC, and DOE records associated with identifying, investigating, classifying, recording, and reporting OII cases, including OII cases in the DOE CAIRS case records. EA requested 15 interviews with the workers associated with the injury cases for additional information, but 7 of the requested interviewees were no longer with the Moab UMTRA Project. EA also examined key documents, such as procedures, analyses, and training records, and interviewed key personnel responsible for developing and executing the associated programs.

The members of the EA assessment team, the Quality Review Board, and EA management responsible for this assessment are listed in Appendix A. A detailed list of the documents reviewed, personnel interviewed, and observations made during this assessment, relevant to the findings and conclusions of this report, is provided in Appendix B. Appendix C lists identified deficiencies, and Appendix D summarizes the results of EA's case file reviews.

EA has not conducted a previous assessment of OII recordkeeping and reporting at the Moab UMTRA Project. Therefore, there were no items for follow-up during this assessment.

## **5.0 RESULTS**

### *Objectives:*

*A procedure is in place to ensure that OII cases to DOE contractor employees are identified, properly classified, and accurately recorded. (CRAD EA-32-07, Objective OII.1, Criteria 1 through 4)*

*DOE contractor and subcontractor OII cases are accurately classified, and recordable OII cases, as well as work exposure hours, are reflected in CAIRS in a timely manner. (CRAD EA-32-07, Objective OII.2, Criteria 1 through 9)*

### *Criterion:*

*The organization maintains a formal injury and illness recordkeeping program that outlines the responsibilities and procedures for identifying, reporting, classifying, and documenting OII cases. (10*

*CFR § 851.11(a)(3)(i), 851.20(a)(3) and (6), 851.23(a)(2), and 851.26(a)(2)-(4))*

Moab UMTRA Project documents for investigating, documenting, classifying, and reporting OIIs include:

- DOE-EM/GJ3002, *Moab UMTRA Project 10 CFR 851 Worker Safety and Health Program Description* (Applicable to the RAC and TAC jointly.)
- DOE-EM/GJ2136, *Moab UMTRA Project Incident Reporting Procedure* (Applicable to RAC and TAC jointly.)
- DOE-EM/GJ1038, *Moab UMTRA Project Health and Safety Plan* (Applicable to the RAC and TAC jointly.)
- DOE-EM/GJTAC1570, *Moab UMTRA Project Technical Assistance Contractor Occupational Medical Program Procedure* (Applicable to the TAC only.)
- NWP Contract with Occupational Medical Provider (Applicable to the RAC only.)

These RAC and TAC procedures established a satisfactory OII recordkeeping program for reporting injuries and investigating and classifying OII cases. However, as noted below, these procedures have not been fully effective in identifying, documenting, and reporting DOE contractor injuries.

*Criterion:*

*Personnel with OII recordkeeping responsibilities are properly trained. (10 CFR 851.25(c) and DOE Order 231.1B, Attachment 3, Section 1.i)*

Both the RAC and TAC personnel with OII recordkeeping responsibilities are knowledgeable and experienced in recordkeeping requirements. In addition, three RAC and one TAC safety and quality assurance personnel had received recordkeeping and CAIRS reporting procedures training during an onsite course presented by the DOE CAIRS manager in 2010. The primary RAC safety representative responsible for entering new recordable cases indicated having limited experience with CAIRS data management due to the limited number of cases at the site and the time between recordable cases (i.e., only two recordable OII cases in the last three years). (See **OII-RAC-OII-1**.)

*Criteria:*

*Workers are trained to report all injuries and illnesses promptly per the organizational procedure. (10 CFR 851.25(a))*

*Workers report occupational injuries and illnesses without reprisal. (10 CFR 851.20(a)(6))*

Moab UMTRA Project joint RAC and TAC procedures require contractors working on site to report injuries and illnesses to their supervisors and/or safety and health managers. Initial worker training communicates this injury reporting requirement to workers. This requirement is also reinforced to workers during annual hazardous waste operations and emergency response refresher training. Each worker who was interviewed by EA understood the requirement to report all injuries and illnesses occurring on site and stated that employees felt comfortable reporting injuries and illnesses without fear

of reprisal. Overall, workers reported that they were satisfied with management's response to reported injuries and post-injury medical evaluations.

*Criterion*

*OII cases are investigated and classified per 29 CFR 1904 criteria, with cases found to be recordable documented on the CAIRS form and on the local OSHA 300 Log within seven days. (29 CFR 1904.29(b)(3))*

Based on EA's review of OII case records and interviews with workers associated with the cases, all OII cases have been appropriately recorded except a case that was not updated to accurately reflect actual days away, restricted or on job transferred (DART) (see Appendix D for specific review results) and another where actual days were not accurately identified in CAIRS. **(Deficiency)**

*Criteria:*

*OSHA Forms 300A, Summary of Work-Related Injuries and Illnesses, reflect recordable OII cases (29 CFR 1904.32)*

*The OII reporting requirements flow to appropriate subordinate organizations, and sub-tier contractor records are reported to the DOE CAIRS and recorded on OSHA 300 Logs. (10 CFR 851.11 and DOE Order 231.1B, Attachment 1, Contractor Requirements Document, Section 2.a.(1))*

*Changes in CAIRS organization code are required to reflect current reporting organizations, including separate organization codes for contractors and their subcontractors. (DOE Order 231.1B, Attachment 1, Contractor Requirements Document, Section 2.a.(3))*

The Moab UMTRA Project CAIRS Log shows that of the 28 injury-related incidents between CY 2015 and CY 2017, the project contractors determined that two were OSHA recordable. EA selected eight of the 28 OII cases for a detailed review and interviewed the associated injured workers. Although EA found that these cases were classified properly as work related, there were quality-related discrepancies in some of the cases.

EA's review of the TAC's OSHA 300 Logs and Form 300A annual summaries for CY 2015–2017 identified that the OII case experience (i.e., no recordable OSHA cases) was properly documented and that the local records were accurately reflected in DOE CAIRS organization code 3260644, *S&K Aerospace (Moab) – EM*. The TAC's OSHA recordkeeping practices and reporting to DOE CAIRS into a single CAIRS organization code is appropriate. However, the name of its reporting CAIRS organization code does not reflect its current contractor name.

EA's review of the RAC's OSHA 300 Logs and Form 300A annual summaries for CY 2015–2017 found that the RAC did not properly report OII information for employees of its two major subcontractors who are supervised on a day-to-day basis by the RAC and did not use separate OSHA forms for the individual sites/establishments as required by 29 CFR 1904.30 and 1904.31. **(Deficiency)** For example, EA reviewed two OSHA 300 Logs and Forms 300A for CY 2016. The original forms, dated January 2017, reflected all NWP and its subcontractor employee work exposures at both project sites/establishments and included one recordable OII case for an NWP employee and one for a subcontractor (AMEC Foster Wheeler) employee. An amended Form 300A, dated December 2017, included only the NWP work exposure and one NWP employee recordable OII case. NWP's two subcontractors did not prepare separate CY 2016 OSHA 300 Logs and Forms 300A for their work and OII experience at each project site/establishment. For CY 2015, the RAC's OSHA forms consolidated contractor and subcontractor data, similar to the RAC's original CY 2016 OSHA forms. For CY 2017, the RAC incorrectly created



two sets of OSHA 300 Logs and certified OSHA Forms 300A, one set that included all of NWP's own and subcontractor employees and one set that included only NWP employees.

There are various inadequacies regarding RAC recordkeeping practices (See **OFI-RAC-OII-2a**):

1. OSHA OII recordkeeping forms are not maintained as required in relationship to how subcontractor employees are supervised on a day-to basis, i.e., injuries that occur to subcontractor employees that are supervised on a day-to-day basis by NWP are to be included on NWP's OSHA 300 and 300A forms, and injuries to employees not supervised on a day-to-day basis by NWP are to be maintained on the subcontractor's OSHA 300 and 300A forms.
2. The incident reporting procedure and subcontract contract documents only require subcontractors to report their OII cases to the RAC and do not require subcontractors to maintain OSHA recordkeeping forms as required.
3. NWP corporate management's misconception that they needed to include its Moab UMTRA Project's recordable OII cases in into its overall corporate OII recordable data when reporting to OSHA. Because the Moab UMTRA Project is under DOE regulatory jurisdiction, there is no requirement to report recordable OII cases occurring on the Moab UMTRA Project electronically to OSHA. DOE uses CAIRS for the electronic submission of OII data when required.

RAC currently uses organization code 3260645, *Moab RAC (Portage) – EM*, to report OII case data and work hour exposures in CAIRS. Separate CAIRS organization codes for reporting RAC subcontractor OII data are not used for RAC subcontractors that provide day-to-day supervision of their own employees as required by DOE O 231.1B, Attachment 1, Section 2.a.(3). (See **OFI-RAC-OII-3**)

*Criterion:*

*Personnel with assigned CAIRS/OII recordkeeping responsibility are informed of all contractor and subcontractor injuries and illnesses through established accident/occurrence reporting mechanisms and review of other documentation. (CRAD EA-32-07, Objective OII.2, Criterion 2)*

Procedures for informing the RAC and TAC personnel assigned OII recordkeeping responsibilities of injuries and illness incidents are in place and have been effective, with one exception. Follow-up medical information regarding an AMEC Foster Wheeler recordable case (CAIRS Case No. 2016001) was not sufficiently communicated by AMEC Foster Wheeler to the RAC OII recordkeeper, so the case was not updated in CAIRS to reflect actual DART for the case (see Appendix D for specific case file review results). (See **OFI-RAC-OII-2b**.)

*Criterion:*

*Verifiable case files are established for each OII containing information supporting classification decisions. (10 CFR 851.26(a)(1) and DOE Order 414.1D, Quality Assurance, Attachment 2, Quality Assurance Criteria, Criterion 4, Management/Documents and Records)*

RAC and TAC information necessary to properly classify, record, and report OII cases into CAIRS was available for assessment purposes. RAC's medical documentation for evaluation and treatment of OII cases did not include essential information required to evaluate the OII cases against OSHA recordable case criteria related to restricted work activities. The occupational medical service used by the RAC to provide initial medical evaluation and coordination services for OII cases, by company policy, does not provide any work restrictions beyond the first day of each injury occurrence. In addition to promoting healing and ensuring that work-related injuries are not aggravated, work restrictions are an OSHA

criterion for determining whether an OII case is recordable. However, the RAC does not always ensure that work restrictions are properly identified by a physician or other licensed health care professional or by RAC supervisors/managers for each OII case and maintained as part of OII verifiable case file. (See **OII-RAC-OII-4.**)

*Criterion:*

*Work exposure hours for each assigned reporting organization code are properly accounted for and electronically reported into CAIRS on or before the due date (10<sup>th</sup> of the month following each calendar quarter). (DOE Order 231.1B, Attachment 3, Section 1.e)*

The RAC and TAC have established methods for determining actual work exposure hours from cost control data and work hour submittals from subcontractors. The work hours are consistent with OSHA Forms 300A and generally match employee information documented in organization charts. CAIRS work hour submittal documentation indicates timely submittals.

*Criterion:*

*The organization electronically submits initial case reports to the CAIRS database on or before the 15<sup>th</sup> and the last workday of the month and updated by the 10<sup>th</sup> of the month that follows each quarter until closed. (DOE Order 231.1B, Attachment 3, Section 1.d)*

The TAC had no recordable OII cases in CY 2015–2017.

The RAC had two OII cases in CY 2015–2017, both of which were known by RAC to be OSHA recordable on the date of each injury. These two recordable OII cases (CAIRS Case No. 2016001 and 2016002, both in CY 2016) were submitted late into CAIRS by 122 and 103 days, respectively, based on the RAC CAIRS Log. **(Deficiency)** The DOE CAIRS online training module states in bold “REMINDER: The case is not ‘reported to DOE’ as required by DOE Directives until you click the Submit to Production button.” EA determined that RAC recordkeeping personnel were entering recordable case information as draft submittals into the CAIRS “workspace,” but not formally reporting them into CAIRS “Production” within the required timeframe.

The limited number of RAC and TAC recordable OII cases provide RAC and/or TAC personnel entering CAIRS data with little or no practice or experience in making CAIRS case entries. In addition, RAC reported technical difficulties connecting to the CAIRS database due to a poor broadband connection and possible CAIRS software issues. The RAC has worked with the DOE CAIRS technical support personnel on resolving access to CAIRS.

*Criterion:*

*Quarterly quality checks of local OII data and associated CAIRS records to ensure information are thorough, accurate, and consistent. (DOE Order 231.1B, Attachment 3, Section 1.f)*

The RAC scheduled, conducted, and documented quarterly quality checks of OII records for CY2015–2017. However, these quality checks were not effective in identifying instances of late, formal reporting into CAIRS, or data quality errors between OSHA recordkeeping forms and CAIRS, and did not evaluate appropriate sources needed to determine OII case classifications, such as medical and workers’ compensation records.

*Criteria:*

*DOE line management evaluates contractor and DOE programs, and management systems, including site assurance systems, for effectiveness of performance (including compliance with requirements). (DOE Order 226.1B, Section 4.b.(1))*

*DOE line management has written plans and schedules for planned assessments, focus areas for operational oversight, and reviews of the contractor's self-assessment of processes and systems. (DOE Order 226.1B, Section 4.b.(2))*

GJO has relied solely on reviewing contractor-performed quarterly OII recordkeeping quality check reports; however, these reviews did not identify that the contractor-performed quality checks were not effective as noted above. Based on review of the CY2016–2017 Integrated Oversight Schedule and interviews with the GJO safety and health manager and facility representative, GJO has not scheduled or conducted oversight of OII recordkeeping and reporting procedures or resulting records.

## **6.0 FINDINGS**

EA did not identify any findings during this assessment. Deficiencies that did not meet the criteria for a finding are listed in Appendix C of this report, with the expectation from DOE Order 227.1A for site managers to apply their local issues management processes for resolution.

## **7.0 OPPORTUNITIES FOR IMPROVEMENT**

EA identified OFIs to assist cognizant managers in improving programs and operations. While OFIs may identify potential solutions to findings and deficiencies identified in appraisal reports, they may also address other conditions observed during the appraisal process. EA offers these OFIs only as recommendations for line management consideration; they do not require formal resolution by management through a corrective action process and are not intended to be prescriptive or mandatory. Rather, they are suggestions that may assist site management in implementing best practices or provide potential solutions to issues identified during the assessment.

**OFI-RAC-OII-1:** Consider providing additional training for personnel with recordkeeping and CAIRS entry responsibilities using a recognized DOE and OSHA recordkeeping training resources. AU-23 provides online CAIRS training resources. In addition, OSHA provides online training and recordkeeping advisor resources at <https://www.osha.gov/recordkeeping/>.

**OFI-RAC-OII-2:** Consider revising recordkeeping procedures to include additional information for:

- a. Detailing how OSHA 300 Logs and Forms 300A should be maintained between prime contractors and subcontractors and for the Moab UMTRA Project sites/establishments.
- b. Monitoring OII case file information for changes which would make cases recordable or require CAIRS updates for previously recorded OII cases.

**OFI-RAC-OII-3:** The RAC should consider, with GJO input, establishing one or more additional CAIRS organization codes for reporting RAC subcontractor OII data. The determination for the need for separate CAIRS organization codes for subcontractors should also consider how the RAC and its subcontractors provide day-to-day supervision of their employees working at the Moab UMTRA Project.

**OII-RAC-OII-4:** The RAC should consider a process for identifying work restrictions for injured workers by a physician or other licensed health care professional or RAC supervisor(s) and documenting the work restrictions in the OII case files; implementing them in the workplace; and using them to determine OII case classification decisions.

## **Appendix A Supplemental Information**

### **Dates of Assessment**

Onsite Assessment: March 12-15, 2018

### **Office of Enterprise Assessments (EA) Management**

William A. Eckroade, Acting Director, Office of Enterprise Assessments  
Thomas R. Staker, Director, Office of Environment, Safety and Health Assessments  
William E. Miller, Deputy Director, Office of Environment, Safety and Health Assessments  
C.E. (Gene) Carpenter, Jr., Director, Office of Nuclear Safety and Environmental Assessments  
Kevin G. Kilp, Director, Office of Worker Safety and Health Assessments  
Gerald M. McAteer, Director, Office of Emergency Management Assessments

### **Quality Review Board**

Steven C. Simonson  
John S. Boulden III  
Kevin L. Dressman  
Thomas R. Staker  
William E. Miller  
Michael A. Kilpatrick  
Kevin L. Nowak

### **EA Assessors**

Nimalan Mahimaidoss – Team Lead  
Kevin G. Kilp  
Terry E. Krietz

**Appendix B**  
**Key Documents Reviewed, Interviews, and Observations**

**Documents Reviewed**

- DOE-EM/GJ3002, *Moab UMTRA Project 10 CFR 851 Worker Safety and Health Program Description*, Rev. 4, October 2016
- DOE-EM/GJ2136, *Moab UMTRA Project Incident Reporting Procedure*, Rev. 1, May 2015
- DOE-EM/GJ1038, *Moab UMTRA Project Health and Safety Plan*, Rev. 6, April 2017
- DOE-EM/GJTAC1570, *Moab UMTRA Project Technical Assistance Contractor Occupational Medical Program Procedure*, Rev. 3, 2010
- CAIRS Log for RAC and TAC for CY 2015–2017
- RAC CAIRS Report No. 001 (2016)
- RAC CAIRS Report No. 002 (2016)
- ORPS Cases Reported Under Occupational Injury Reporting Criteria, CY 2015–2017
- RAC and TAC Organization Charts
- S&K Logistics Services Subcontract No. L301500SM1 with St. Mary’s Hospital and Medical Center
- NWP Services Agreement with WorkCare, Inc./WorkCare Medical Group, Inc.
- EM-20 *Assessment of Occupational Injury and Illness Recordkeeping and Reporting, Moab UMTRA Project*, May 2010
- OSHA 300 Logs and 300A Annual Summary Forms, CY 2015–2017 for TAC
- OSHA 300 Logs and 300A Annual Summary Forms, CY 2015–2017 for RAC
- OSHA 300A Annual Summary Form, CY2016, Amended 12/2016
- RAC Incident Log, CY 2015 – 2017
- Medical Records Associated with OII Cases

**Interviews**

**Grand Junction Office**

- Federal Cleanup Director
- Environment, Safety, Health and Quality Assurance Manager
- Acting Facility Representative
- Contracting Officer Representative

### **Remedial Action Contractor**

- Project Manager
- Moab Operations/Site Manager
- Crescent Junction Operations Site Manager
- ESH&Q Manager (AMEC Foster Wheeler)
- Health and Safety Representatives (2)
- QA Manager
- Tailings Pile General Foreman (Nielson Construction Company)
- Workers Associated with OII Cases (6)

### **Technical Assistance Contractor**

- Senior Program Manager
- Health, Safety and Training Manager
- Quality Assurance and Environmental Compliance Manager (Pro2Serve)
- Workers Associated with OII Cases (2)

### **Observations**

- End-of-Day Meetings

## **Appendix C Deficiencies**

Deficiencies that do not meet the criteria for a finding are listed below, with the expectation from DOE Order 227.1A that site managers will apply their local issues management processes for resolution.

### **Remedial Action Contractor (NWP)**

- The RAC did not accurately record DART for a recordable case on its OSHA 300 and 300A forms or CAIRS case record and did not accurately reflect DART on another case between the OSHA 300 Log and CAIRS case record CAIRS 851.26(a)(2), 29 CFR 1904.7 and DOE Order 231.1B, Attachment 3, Section 1.b. and d.
- The RAC did not properly report OII data on the OSHA 300 Logs and Form 300A annual summaries for itself and its two major subcontractor for employees supervised on a day-to-day basis and between sites/establishments as required by 10 CFR 851.23(a)(2) and 29 CFR 1904.30 and 1904.31.
- The RAC did not report recordable OII cases into DOE CAIRS within the required time period and did not make CAIRS case revisions as required by 10 CFR 851.26(a)(2); DOE Order 231.1B, Attachment 3, Section 1.d.



**Appendix D  
Results of Case File Reviews**

<b>OII Case Not Properly Classified</b>		
<b>Case File and Injury Date</b>	<b>Moab Classification</b>	<b>Case Summary and Required Classification</b>
<p>CAIRS Case No. 2016001 (RAC/AMEC Foster Wheeler)</p> <p>Date of Injury: January 4, 2016</p>	<p>Injury, DART Case with 12 days away from work (DAW)</p>	<p>Radiation control instrumentation specialist slipped on ice and fractured knee cap. Specialist’s routine duties included 25% field work, radiation control activities, and hillside movement monitoring. These duties entail walking, climbing, taking radiological smears, and carrying instrumentation.</p> <p>Specialist had surgery on the day of the injury, followed by 12 DAW (recorded on CAIRS case). Upon returning to duty, specialist was on crutches, “sat at desk,” and did not perform a number of routine functions (primarily field work) due to medical work restrictions. A second surgery occurred on April 12, 2016, followed by 14 DAW. Medical restrictions included no lifting greater than 25 pounds above waist level, preventing the performance of routine field duties until October 10, 2016.</p> <p><u>Required Classification:</u></p> <p>DART Case with 26 DAWs and 253 restricted work days (RWD) (capped at 180 DART)</p>
<b>Quality Check Results</b>		
<p>CAIRS Case No. 2016002 (RAC)</p> <p>Date of Injury: August 29, 2016</p>	<p>Injury, Medical Treatment with 87 DAW and 87 RWD</p>	<p>CAIRS case recorded 87 DAW and 87 restricted work days; however, OSHA 300 Log entry only indicated 87 DAW.</p> <p>CAIRS case and/or OSHA 300 Log need to be revised to reflect the appropriate number of DART.</p>