

**Implementation of 10 CFR 851,
“Worker Safety and Health Program”,
Occupational Medicine Criteria
at the
Nevada Site Office**

Charles E. White, NNSA/NSO
Occupational Medicine Program Manager
Suzanne M. Lee, NSTec
Manager of Medical Operations

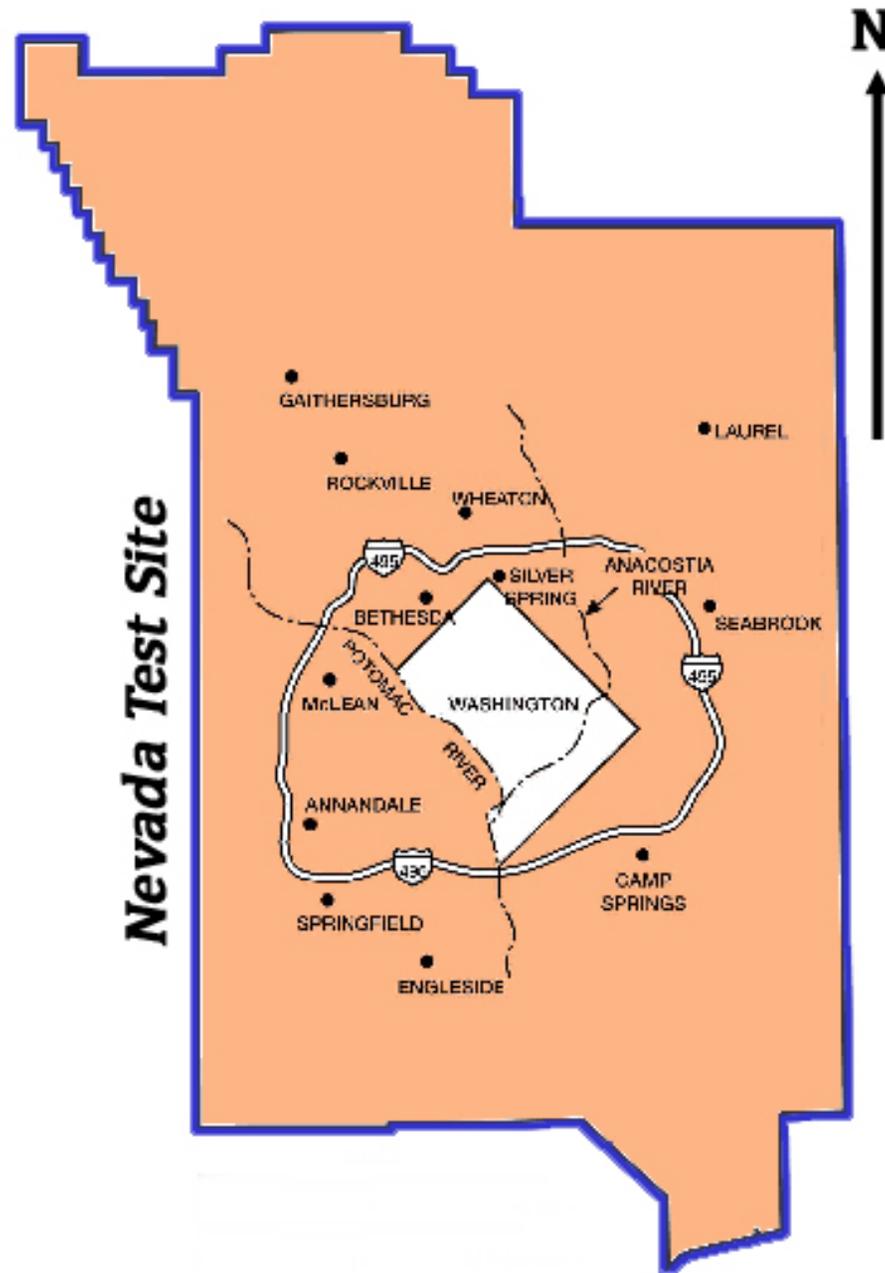
Presented to:
HSS 10 CFR 851 Implementation Tele-Video Conference
October 3, 2007

Background of the Nevada Test Site

- Established December, 1950
- Primary missions:
 - Provides a unique and indispensable extension of the national laboratories' experimental capabilities in support of the Stockpile Stewardship Program.
 - Operational site for environmental restoration, low-level radioactive waste management, and groundwater characterization activities.
 - Non-defense research and development activities are conducted in cooperation with universities, industries, and other federal agencies.
- National Nuclear Security Administration (NNSA) site
 - Numerous contractors and subcontractors
 - DOE Environmental Management component as well

Background of the Nevada Test Site (continued)

- Located ~ 65 miles northwest of Las Vegas
- ~ 1375 square miles in size
- Mountainous rugged terrain
- Seasonal temperatures range from 0°-110°



NSTec Occupational Medicine Program Background

- Two clinics
 - Nevada Site Office, North Las Vegas, NV
 - Nevada Test Site, Mercury, NV
 - Geographically separated by 65 miles
- Patient population = ~5000
 - Approximately 12 contractors, including Stoller-Navarro Joint Venture, Wackenhut Security, PAI, etc.
 - Three (3) DOE National Laboratories
- Composition of Occupational Medicine Organization
 - 21 staff
 - 1 Site Occupational Medical Director (SOMD), 4 providers, 2 nurses, 4 medical assistants, 2 lab technicians
 - 2 medical records staff, 1 administrative staff, 1 operations staff, 1 manager
 - 2 employee assistance staff, 1 ergonomist

NSTec Occupational Medicine Program Services

- Medical surveillance and qualification programs
 - OSHA HAZWOPER, Asbestos, Beryllium, Silica, HRP, etc.
- Occupational injury/illness
- One time non-occupational injury/illness
- Fitness for duty
- Return-to-work evaluations
- Immunizations
- Wellness
- Ergonomics
- Employee Assistance Program (EAP)
- Human Reliability Program (HRP)

ASTec Human Reliability Program (HRP) Overview

- All physical components completed by internal Occupational Medicine staff
 - Two phase annual physical
 - Phase I: All testing conducted and reviewed by clinical staff
 - Phase II: History and physical and testing results are reviewed by provider
- Psychological requirements completed by community psychologist (designated by DOE)
- SOMD reviews all components of the psychological and medical examination and makes final recommendation to management officials
- Accessibility
 - Random drug screens
 - Meeting required 2-hour timeframe
 - Ready accessibility to maintain HRP certification
- ~ 550 HRP personnel currently in program; increasing to ~ 600

NSTec Strategy to Implement 10 CFR 851 Occupational Medicine Criteria

- Based upon existing program that was compliant with DOE Order 440.1A, “Worker Protection Management for DOE Federal and Contractor Employees”
- Two phase physical
 - Labs, x-rays and GXTs are completed by community providers
 - Phase I: All testing (except above) conducted and reviewed by clinical staff
 - Phase II: History and physical and testing results are reviewed by provider
- Average cost of physical ~ \$150.00
- Implementation impacts
 - Increased administrative requirements, (e.g., written vs. verbal notification)
 - Morbidity & mortality statistics
- Development of “Physical Examination Purpose/Results,” FRM-2025
 - Purpose of physicals and testing – Page 1
 - Results of physical/provider review – Page 2

Implementation of 10 CFR 851 by NSTec Subcontractors

- Procurement process addresses evaluations by Environmental Safety Health & Quality (ESH&Q) representatives
 - Originally established to address DOE O 440.1A
 - Occupational safety, industrial hygiene, radiological, environmental
- Screening of Subcontractors providing commercial items/services
 - FedEx, Vendor Deliveries, Trash pickup, etc.
 - Preamble of Rule
 - 48 CFR, Chapter 1, Part 2.101
- Development of “Subcontractor Medical Release,” FRM-2062
 - Demographic considerations
 - Project schedule/date(s)
 - Potential hazards & medical surveillance requirements
- NSTec 10 CFR 851 Program Description provides governing implementation basis for NSTec Subcontractors
 - Reduced administrative burden for subcontractors
 - Separate NNSA/NSO review and evaluation not required

Benefits of NSTec Consolidated Medical Program to Address 10 CFR 851 Occupational Medicine Criteria

- Cost Effective
 - Negotiated rates
 - Minimize time away from job
 - Single point of contact
- Process Efficiencies
 - Standardized forms
 - Preset criteria for physicals
 - Consistent contacts
- Skill Set
 - Capability to meet DOE Occupational Medicine criteria
 - Appropriate training
 - Avoids reliance on community services with potentially less rigor
- Personnel Processing
 - Timely coordination
 - Onsite physicals
 - Knowledge of workplace hazards
- Logistical Considerations
 - Addresses multiple craft/projects
 - Avoids need to search for local providers
- Records Retention
 - Single resource for record requests
 - Immediate reference
- Hospital Support
 - MOU agreements
 - Knowledge of work performed
 - Interface with hospital personnel

NSTec Strategy to Implement 10 CFR 851 Occupational Medicine Criteria

Conclusions

- Successful implementation of DOE O 440.1A provided solid foundation to address 10 CFR 851 criteria
- Collaboration between Occupational Medicine, ESH&Q, Procurement, and General Counsel is essential for consistency of implementation
- “Subcontractor Medical Release,” FRM-2062 assists with evaluating job related hazards & associated medical surveillance
- Program flexibility to address craft assignments, changes in labor pool, incorporation of subcontractors
- Reduces administrative burden for Site Office personnel
- Single occupational medicine provider has proven to be a cost effective method for NSTec to address implementation of 10 CFR 851 occupational medicine criteria