

E-4. Work Site Safety Evaluations

I. Scope

This applies to all facilities owned, leased, or regularly comprising NCI-Frederick operations/staff including but not limited to laboratories, animal facilities, production facilities, shops, offices, and construction sites. It also applies to resident non-NCI-Frederick operations in NCI-Frederick facilities (i.e., NIAID, etc.). Work performed by OTS Contractor employees at NIH facilities in Bethesda and satellite facilities is not included because these services are provided by National Institute of Health (NIH) Division of Occupational Health & Safety (DOHS).

II. Purpose

To provide mandatory I safety inspections (evaluations), as required, of NCI-Frederick work areas. Specific objectives are to:

- A. Identify areas of noncompliance, provide recommendations for corrective action, and establish timetables for correcting areas of noncompliance;
- B. Identify alternative operating practices that will provide opportunities to reduce exposure to employees, and/or provide greater environmental protection;
- C. Identify opportunities for pollution prevention programs, including source reduction and recycling activities;
- D. Serve as an educational tool for personnel.

III. Definitions

Hazard Abatement - Action taken to correct safety infractions that may include engineering controls, administrative action, or the use of personal protective equipment (PPE). When immediate action is judged necessary by the Environment, Health and Safety Program (EHS) to abate serious hazards, abatement may include terminating operation and evacuation of affected area(s).

Safety Evaluation - Periodic, routine, or unannounced inspections of NCI-Frederick facilities and properties to identify areas of non-compliance, deviations or discrepancies in safety and environmental regulations.

IV. Responsibilities

A. Supervisors have the following responsibilities.

1. Assist the evaluation team in performance of the work site safety evaluation by accompanying and participating in the evaluation.
2. Communicate the findings contained in the work site safety evaluation report with those working in the area.
3. Initiate timely action to abate all issues brought to the supervisor's attention, be it by the work site safety team, employees, or oneself. Actions include but are not limited to the preparation of work orders, employee safety training, and requiring subordinates to follow safety rules.

B. Employees have the following responsibilities.

1. Communicate deficiencies/safety concerns to the supervisor or the work site safety evaluation team.
2. Abate hazards through safe work practices as instructed by supervisor.

C. Senior Management

1. Principal Investigator/Director
 - a. Allocate sufficient resources for hazard abatement.
 - b. Hold subordinates accountable for hazard abatement.
2. NCI-Frederick Management
 - a. Hold Principal Investigator/Director accountable for hazard abatement.

D. EHS have the following responsibilities:

1. Conduct formal, work site safety inspections (evaluations), as required, of areas/facilities at the NCI-Frederick and local, off-site facilities.
2. Prepare formal work site safety evaluation reports to document safety infractions and recommend appropriate corrective action(s) to appropriate management.
3. Notify the appropriate senior management including the NCI-Frederick Contracting Officer and NCI-Frederick Project Officer of lower management's failure to perform hazard abatement in accordance with the terms of the OTS contract.

E. FME has the following responsibilities:

1. FME COTRs are responsible for safety oversight of sub-contractors performing construction, renovation, or repair work. at all areas/facilities at the NCI-Frederick and local, off-site facilities.
2. FME will assign overall safety responsibility for each in-house construction, renovation, or repair project. Typically this will be the FME Lead Shop Supervisor or an FME COTR.

F. VPP has the following responsibilities:

1. VPP Facility Manager and VPP Associate Safety Officer are responsible for safety oversight of sub-contractors performing construction, renovation, or repair work at the VPP.
2. VPP Facility Manager and VPP FME Group Leader will assign overall responsibility for each in-house construction, renovation, or repair project.

V. General

Worksite safety evaluations are formal in nature and are conducted by EHS, supervisors, and employees.

- A. Work site safety evaluations incorporate the following elements:
1. Each work site will be evaluated at least annually.
 2. Evaluations will be conducted using a team approach that varies to meet the requirements of the area; in most cases it will involve the supervisor of the area being evaluated and elements of the EHS staff. Scheduling the time of the evaluation will be coordinated by EHS staff.
 3. Criteria of area-specific evaluations:
 - a. *Laboratories* are evaluated annually by EHS staff, preferably accompanied by the facility manager and lab supervisor.
 - b. BSL-2* *labs* are evaluated on an annual basis by biosafety staff; not necessarily at time of regular lab evaluation.
 - c. Authorized radiation use areas are evaluated at least monthly by the radiation safety staff, or as required by the radioactive materials license. These evaluations are in addition to the annual lab safety evaluations.
 - d. *Animal facilities* are evaluated semi-annually for safe conditions by at least one EHS staff member. This safety evaluation is concurrent with IACUC semiannual inspections whenever possible.
 - e. *FME Shops* annual safety evaluations are jointly performed by at least one EHS staff member, preferably accompanied by the relevant FME supervisor.
 - f. *Office* safety evaluations are jointly performed annually by at least one EHS staff member, preferably accompanied by the facility manager. Where appropriate, these evaluations may be concurrent with lab evaluations.
 - g. *Production Facility* annual safety inspections are jointly performed by at least one EHS staff member, preferably accompanied by the facility manager and/or facility safety specialist.

- h. *Construction site* safety evaluations are to be performed as described in IV E and F above. Assistance from EHS is available as needed or requested.
4. For items V.A. 3.a-g, work site safety evaluations will be documented in a written report to the Principal Investigator/Director/Manager, as appropriate.
5. When an infraction has not been corrected (or inadequately corrected) in accordance with the completion dates specified in the written inspection report, EHS will notify appropriate senior management to include the NCI-Frederick Contracting Officer.