10 CFR 851 Technical Amendment: Standards Incorporated by Reference

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Introductions

HQ Participants:
Background

• On February 9, 2006, 10 CFR part 851, *Worker Safety and Health Program*, was published.

• It adopted several industry standards to establish the baseline technical safety and health requirements for DOE workplace operations.

• These standards were already required by DOE Order 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*
Background

• Standards bodies update regularly, as we all know
• Response to questions about updates submitted to AU:

• DOE Response Line D16-05-002:

Implementing the updated versions of standards would provide an appropriate level of worker protection.
Background

• AU discussed the upcoming technical amendment:
  – Outreach and Awareness Initiative
  – Web conferences,
  – DOE and EFCOG meetings,
  – informal conversations.

• Many in the DOE asked us to update the standards.
Current Practices

Variety of contractor practices:

• “…has adopted other best management practices, consensus standards and health-based values not invoked by the Rule.”

• “Additional specific safety and health requirements may be implemented …”
Current Practices

Variety of contractor practices:

- Performed “Code Standards Evaluation:”
- Adopted NFPA 70
Current Practices

Variety of contractor practices:

• Not adopted in 10 CFR 851 Worker Safety and Health Program, but
• Adopted work practices
Current Practices

Variety of contractor practices:

- Not adopted in 10 CFR 851 Worker Safety and Health or work practices
Implementation Support

• Gather information on challenges
• Consult with:
  – Programs
  – EFCOG
  – Health and safety SMEs
  – Others
Implementation Support

• Work to identify mechanisms to facilitate implementation with:
  – OGC
  – Office of Enterprise Assessment
  – Programs
  – EFCOG
  – Health and safety SMEs
  – Others
Continue to Communicate

- Inform us about your implementation challenges
- Provide your best practices for already implementing updated consensus standards
- Give us your suggestions for supporting implementation