

DRI WORKPLACE SAFETY PLAN (WSP)

A. INTRODUCTION

A written Workplace Safety Plan (WSP) is required by Nevada Revised Statutes 618.383 and Nevada Administrative Code 618.538-618.540. The written plan is required to identify employees' responsibilities for safety and must include information on how DRI will

- Identify, analyze and control workplace hazards,
- Provide employee health and safety training and education
- Investigate occupational accidents and illnesses and institute a corrective action program
- Ensure employee compliance with safety rules and work practices

Employers with more than 25 employees are also required to establish a safety committee with details on how the committee functions included in the written plan.

B. PURPOSE

The Desert Research Institute's Workplace Safety Plan specifies requirements, procedures and practices that are aimed at minimizing the occurrence of potentially harmful situations in employee work assignments and/or in the workplace. The Plan reflects DRI administration's concerns for health and safety in the workplace and specifies the prompt correction of any condition or practices during employment that may result in a possible death or serious physical or environmental harm.

C. SCOPE

THE WSP applies to all DRI work locations, including field research sites. It is important to understand that WSP does not alleviate the requirement to develop and implement other applicable EH&S policies, programs and procedures or to implement best EH&S management practices at DRI. Instead the WSP serves as the umbrella safety plan supported by other EH&S plans, programs, procedures and guidelines, which are found on the [DRI EH&S website](#).

D. RESPONSIBILITIES FOR WORKPLACE SAFETY

a. President

DRI's President is ultimately responsible for Institute health and safety, although it must be emphasized that in order to have an effective program, the support of the entire employee population is required.

b. Vice President of Research and Chief Science Officer (VPR)

The Desert Research Institute's VPR shall oversee the office of Environmental Health and Safety (EH&S) and other research compliance areas covered by the Director of Sponsored Research/Compliance. The VPR is responsible for research compliance performance of the Institute. S/he provides the link between the broad strategic aims of the Institute, the Research Advisory Committee (RAC) and the implementation of the various compliance programs. These responsibilities include:

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- Ensuring that DRI successfully manages environmental health and safety and other research-compliance areas, including Export Controls;
- Within the resources provided, ensuring that there are adequate staff, funds and materials to support the environmental health and safety plan;
- Ensuring that Division and Center Directors fulfill their specific responsibilities for implementing the DRI environmental safety and health program.

c. **DRI Administration.**

All vice-presidents, assistant vice presidents, and directors are responsible for:

- Providing facilities and equipment required for a safe work environment.
- Ensuring individuals under their management have the authority and support to implement health and safety policies, practices and programs.
- Ensuring areas under their management are in compliance with DRI health and safety policies, practices and programs.
- Establishing priorities and committing resources for correction of safety deficiencies.
- Establishing procedures for dissemination of policies and other safety-related information.
- Establishing procedures for implementation of policies.
- Establishing a system for assessing safety performance.

d. **Supervisors, Faculty, Principal Investigators, First-line Supervisors, Supervising Technologists** and all other employees who have supervisory authority shall ensure that their project/program elements comply with the DRI Workplace Safety Plan and other applicable EH&S plans, programs and procedures, and are in compliance with applicable health and safety laws, regulations and guidance documents.

Additional responsibilities include:

- Providing safe and healthy environments for those areas and personnel for whom they have supervisory or administrative responsibility
- Developing job/task specific safety procedures to ensure compliance
- Initiating and enforcing necessary preventative measures to control hazards
- Developing and maintaining written procedures and research protocols that conform to all applicable DRI guidelines, including Division, Center, Laboratory, and other DRI-unit guidelines
- Ensuring necessary support, such as personal protective equipment, occupational medical exams, local exhaust ventilation, etc., are in place
- Instructing employees in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks
- Ensuring that each employee follows applicable EH&S procedures and that each employee is trained as appropriate before beginning new tasks
- Reporting and investigating injuries

e. **DRI Health and Safety Committees** are responsible for:

- Formulating, reviewing and/or recommending the adoption of environmental health and safety policies, programs, procedures and guidelines
- Monitoring the effectiveness of environmental health and safety policies programs, procedures and guidelines.
- Recommending actions to correct safety deficiencies.
- Advising the VPR on the status of these policies and recommendations and achievement of goals established on an annual basis.

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Safety-related ad hoc committees may be established by individual organizational units and/or by the Standing Safety Committees as required to achieve the objectives of the EH&S program.

f. EH&S Personnel

The Desert Research Institute's EH&S personnel are responsible for overseeing the planning and administration of the DRI EH&S program and coordinating the contents of the program. Those responsibilities include:

- Ensuring that the EH&S Program is managed in compliance with applicable health and safety laws, regulations and guidance documents.
- Advising the VPR on issues related to EH&S
- Monitoring the effectiveness of the DRI EH&S program
- Providing staff support to safety committees
- Providing safety and health-related technical services.
- Providing hazardous waste disposal services.
- Developing and assisting operating units in implementation of safety programs.
- Providing training materials, assistance, and programs in safe and healthy work practices
- Consulting with employees and supervisors about safety and health concerns
- Reviewing local, state and federal legislation, recommending policies, and monitoring compliance with environmental, health and safety statutes and regulations and DRI EH&S policies and programs.
- Working with the scientists and technologists to identify, evaluate and control hazards and reduce potential losses in the workplace.

g. Employees and Volunteers

DRI employee/volunteer involvement is the key for ensuring that the DRI EH&S program achieves its intended goals of protecting the health and welfare of Institute employees and the environment. DRI employees are responsible for

- Complying with the requirements outlined in the Institute's Workplace Safety Plan and other applicable EH&S policies, programs, procedures and guidelines, work-area-specific procedures and instructions by the supervisor.
- Promptly reporting all safety and health hazards, environmental deficiencies and all accidents and injuries and hazardous situations to their supervisor or EH&S Office, no matter how minor they appear.
- Attending required EH&S training programs provided by supervisors and other instructors.
- Performing activities as trained.

E. WSP PROGRAM ELEMENTS

1. HAZARD IDENTIFICATION, ANALYSIS and CONTROL

- a. Identification. The methods used for identifying hazards include preliminary project/task hazard/safety review, inspections (annual, periodic, as needed) conducted by EH&S personnel and/or supervisors, incident investigations, lessons learned and outside agency reports.
- b. Analysis. The tools used to analyze hazards depend on the nature and location of the work and include, but are not limited to job hazard analysis, environmental sampling, accident/incident summaries, and inspection reports.

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- i. At DRI the basic program element that shall be implemented for the purpose of controlling and preventing workplace accidents/injuries is project-specific safety planning. This may take the form of developing a site-specific health and safety plan (SSHASP), as commonly used on DOE-funded projects, a Hazard Assessment and Mitigation Plan (HAMP) used for other DRI field projects, lab-specific standard operating procedures (LSSOP) developed to augment the DRI Chemical Hygiene Plan, or a job safety/hazard analysis (JS/HA).
- ii. DRI faculty, principal investigators, first-line supervisors, and supervising technologists are responsible for evaluating the work activities that are performed within the project for the purpose of identifying specific hazards that workers may be exposed to and to identify control measures for each hazard. The Division Director is responsible for ensuring that the PI/project manager conducts a hazard review with involved employees prior to the initiation of the project. EH&S may be contacted for assistance with the hazard analysis and subsequent development of a SSHASP, HAMP, LSSOP or JS/HA for the project, which will undergo EH&S review before implementation
- iii. In addition to project specific safety planning, DRI faculty, principal investigators, first-line supervisors, and supervising technologists shall perform a hazard analysis whenever
 - employees must perform new job tasks in which they are not fully aware of the hazards that may be involved in the work activity;
 - tasks are not performed on a routine basis such that employees cannot maintain a level of proficiency; and
 - there are "one time" tasks that involve a high risk for accidents/injury.
- c. **Control.** Once hazards have been identified and analyzed, the appropriate engineering controls, administrative controls and personal protective equipment (PPE) needed in order to eliminate hazards or reduce them to as low as reasonably achievable (ALARA) will be identified and implemented. PPE should never be used in lieu of implementing appropriate engineering or administrative controls, but is often times required before engineered controls are fully implemented and must be used to provide protection when engineering and administrative controls cannot fully control the hazard. DRI EH&S is available to assist in the hazard analysis and control selection process.

2. SAFETY AND HEALTH TRAINING AND INFORMATION

The EH&S Office is responsible for developing and presenting or arranging for applicable DRI employees safety training. This includes ensuring that lesson plan objectives comply with the requirements and performance objectives of the various EH&S Standards.

a. NEW EMPLOYEE ORIENTATION, ENVIRONMENTAL, HEALTH AND SAFETY TRAINING

In compliance with Nevada Revised Statute 618.175, all new employees, including graduate students, hourly staff, and unpaid volunteers, will be provided with a New Employee Orientation EH&S Training when they report to Human Resources for work. The training will include a safety orientation video and booklet entitled "Quick Guide to Safety", which serves to introduce new employees to the general policies and concepts of the DRI EH&S

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Program. New employee/volunteers who will work in labs or on field projects will receive additional safety orientation training for those types of work assignments.

The new employee's supervisor is also provided with a New Employee Safety Orientation Checklist, which s/he is to complete and return within one week of the hire date. The checklist has a section where the supervisor can indicate job specific training that is required.

b. REFRESHER TRAINING

EH&S is responsible for determining which employee groups are required to participate in refresher trainings and at what frequency the training is required and to provide or make arrangements for those classes. Refresher training may be conducted on-line, in person in a classroom setting or in smaller group meetings. Examples of courses that are provided by EH&S annually include the lab safety refresher, annual hazardous waste generator training, and bloodborne pathogens review.

c. JOB SPECIFIC ENVIRONMENTAL, HEALTH AND SAFETY TRAINING

DRI faculty, principal investigators, first-line supervisors, technologists are responsible for identifying work-specific safety training requirements for their employees and shall instruct their employees in the policies and procedures to avoid accident/illness associated with the identified hazards of the work. This training must be documented.

3. ACCIDENT INVESTIGATION

a. Reporting

- i. All occupational injuries and illnesses that occur to DRI employees shall be reported immediately (no longer than 24 hours post incident) to the employee's supervisor and to the DRI Environmental Health and Safety Office. The filing of applicable Worker's Compensation paperwork resulting from the report of an injury will follow the process outlined in on the [BCN Worker's Compensation web site](#).
- ii. For motor vehicle accidents, an accident form and instructions should be located in the vehicle's glove box. Injured employees will also need to complete applicable Worker's Compensation paperwork as noted above. For additional requirements on reporting accidents involving NSHE/DRI owned vehicles, see the Facilities Department section of the DRI Administrative Manual.
- iii. Occupational injuries, vehicular accidents and other emergency incidents that occur on DOE-funded projects may require additional reporting as outlined in the DRI Occurrence Report Form. This includes immediate voice reporting to the appropriate personnel noted on the form as well as expeditious completion and delivery of the occurrence report form to the DRI (DOE) Program Manager or Facility Security Officer.

b. Investigation

- i. BCN Risk Management, in conjunction with the appropriate supervisor(s), is responsible for conducting occupational illness/injury investigations. DRI EH&S is available to assist when requested. The BCN Occupational Injury or Illness Investigation Form includes corrective action to be taken with time line for completion.

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- ii. For occupational illnesses or injuries that occur on DOE-sponsored projects, the incident investigation will follow the procedures outlined in Section F of the project's site-specific Health and Safety Plan (SSHASP). The site supervisor completes the actions listed on the initial accident/injury/near-miss checklist and forwards a copy to the NNSA/NFO Environmental Health and Safety Manager and the DRI Environmental Health and Safety and DOE Program Security Offices. DRI EH&S and DOE Facility Security Officer Security will follow up as appropriate.
- iii. For incidents involving radiation-producing equipment or radioactive materials licensed under the DRI radioactive materials license, the UNR Radiation Safety and Laser Officer (RSLO) or his/her designee will take the lead role in the investigation process. The UNR RSLO will be responsible for filing any required reports with the Nevada Radiological Health Section as well as arranging for additional monitoring, reviewing (and revising as necessary) work practices, etc.
- iv. For reported radiological material exposures that occur while a DRI employee or contractor is performing activities associated with a DOE project, the Radiological Safety Prime Contractor (RSPC), with assistance from the DRI Rad Con Manager and the site safety officer, will conduct the investigation. The UNR RSLO will participate in the investigation process if it involves alleged exposures from UNR or DRI licensed radioactive materials or radiation-producing equipment used on DOE-funded projects. The RSPC will file any required occurrence reports on behalf of the DRI.

c. Accident/Injury Record-Keeping

- i. The Risk Management Department, Business Center North, University of Nevada, Reno manages the processing of claims and is responsible for the maintenance of occupational injuries and illness records and documentation. They provide DRI with a copy of an updated OSHA 300 log at least quarterly.
- ii. At the beginning of each calendar year a completed OSHA 300 log (or equivalent) for the previous year is forwarded to DRI for posting at the SNSC, Las Vegas and the NNSC, Reno. The required posting period is February 1 until April 30. Logs must be maintained for a minimum of five (5) years.
- iii. Lessons learned will be communicated through safety committee minutes, which are posted on the web.
- iv. Occurrence Reports will be maintained by the DRI DOE Program Security Office

4. ENFORCEMENT

The employee's division/department will take action, when deemed appropriate, for any employee violating safety rules and/or standards. Employees shall be subject to disciplinary action up to and including dismissal per the Nevada Administrative Code (NAC).

5. SAFETY COMMITTEES

Lab & Field Safety Committees shall be established for the Institute. The committees are comprised of technical and professional staff representing the DRI divisions and administration. The committees operate separately, sharing minutes and meeting jointly for presentation of information common to both.

Safety committees will meet at least quarterly. The committee meetings are open to attendance by any DRI employee. Meeting announcements and agendas will be communicated at least one week prior to the meeting date via e-mail or posting to the internal EH&S web site.

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Committee minutes will include attendance records. Minutes will be posted on the DRI committee website for a minimum of one year. Hard copies will be maintained in the EH&S Office for a period of no less than three years.

In addition to these two formal safety committees, DRI faculty, principal investigators, first-line supervisors, and supervising technologists shall conduct safety meetings with members of their work unit at timely intervals. Topics to be discussed during these sessions will be related directly to the safety aspects of the work activities of the project. These safety meetings should be used to emphasize measures necessary for eliminating or controlling the hazards associated with the work activities and should use the project-specific EH&S Plan (HASP, HAMP or lab-specific SOPs) as a guideline.

6. OTHER REQUIREMENTS

EH&S will develop policies, programs, and procedures as required by applicable federal, state and local EH&S regulations. Once developed, divisions/departments will implement them and the day-to-day responsibility of complying with them rests with those who supervise employees and the employees themselves.