

Subcontractor and Vendor Oversight

Program Heads and supervisors (including Principal Investigators) take responsibility for the safety of non-construction work requested from subcontractors or vendors by:

1. Working with Procurement to assure that qualified service suppliers are selected;
2. Ensuring hazards are identified through a **Subcontractor Job Hazards Analysis and Work Authorization (SJHAWA)** and controlled;
3. Ensuring that a pre-job safety meeting is conducted, which includes a review and signing of the SJHAWA, an **ES&H Orientation for Non-Construction Subcontractors, Vendors, and Affiliates**, and verification that the workers have completed EHS0470 General Employee Radiation Training;
4. Verifying that the work is authorized as described in **ES&H Manual Chapter 31**; and
5. Providing sufficient oversight to ensure that on-site work is performed safely in compliance with LBNL EHS requirements. Records of the signed Subcontractor Job Hazards Analyses and related work authorization documents are maintained on the **Subcontractor Job Hazards Analysis and Work Authorization database**.

Subcontractor / Vendor Job Hazards Analysis

Before Hands-On Work (See **ES&H Manual Chapter 31, Section 31.6** for examples) can be performed by Subcontractors or Vendors at LBNL facilities, the work must be authorized. If the subcontractor / vendor has performed similar work at LBNL and has an existing work authorization, the ATAP Line Manager requesting the work must review the existing authorization and verify that it covers the requested work. If a new or modified work authorization is needed, following activities must be completed:

- A draft **Subcontractor Job Hazards Analysis (SJHA)** and any additional draft formal work authorizations required (such as a temporary laser work authorization, electrical work authorization, hot work permit, etc.) describing the work, hazards, and controls must be completed.
- The subcontractor or vendor must be provided with the **LBNL ES&H Orientation for Non-Construction Subcontractors, Vendors, and Affiliates** for review.
- A pre-job meeting between the ATAP Line Manager requesting the work, the ATAP ES&H Coordinator or EHS Liaison, and the subcontractor or vendor must occur at which the SJHA, other formal work authorizations, and the Non-Construction Safety Orientation are discussed and the hazard level for the work is determined. Completion of EHS0470 General Employee Radiation Training (GERT) is verified. **If a subcontractor or vendor will be performing work with Class 3B or 4 lasers, a laser safety orientation by the Laser Safety Officer or Division Safety Coordinator is required.**
- The review will include consideration of whether there will be circumstances when hazards remaining after controls could incapacitate a person so that he/she could not self-rescue or activate emergency services, which would require documented restrictions against **working alone**.

- The work authorizations are completed and signed by the ATAP Line Manager requesting the work and the subcontractor or vendor and are posted or available on-line at or near the work location.

During the conduct of the hands-on work performed by the subcontractor or vendor, the ATAP Line Manager who requested the work must provide oversight and keep records of visits to the work site and observations. Low-level hazard work (not requiring formal authorization) oversight is comparable to the oversight of similar activities performed by LBNL employees. High-level hazard work (requiring formal authorization) must be checked at a minimum frequency of once per workday, or more frequently if required by work authorizations. Work that is not performed in conformance with the authorization should be corrected on the spot. Significant or multiple non-conformances may be cause for dismissal of the contractor/vendor and should be brought to the attention of the EHS Non-Construction Safety Assurance Program Manager and appropriate Procurement personnel.

Construction work must be authorized by LBNL Facilities Division. The safety and health of construction subcontractor employees is the responsibility of the construction subcontractor (**ES&H Manual Chapter 10**). ATAP personnel who notice imminent hazards on construction projects in ATAP areas should exercise Stop Work authority. Other safety concerns at construction sites should be brought to the attention of the Facilities Project or Construction Manager, or an EHS Construction Safety subject matter expert.