

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 service suppliers are qualified and with **Export Control** to ensure service providers are authorized to do business with LBNL.
2. Ensuring hazards are identified through a **Subcontractor Job Hazards Analysis and Work Authorization (SJHA)** and controlled.
3. Ensuring that a pre-job safety meeting is conducted, which includes a review and signing of the SJHA, 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**.
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, 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. The ATAP ES&H Coordinator or EHS Liaison will assist with this orientation as needed. 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 may be required.** The Requestor of the work (Activity Lead, supervisor, or laser owner) is responsible for ensuring that subcontractor controls and authorizations are in place before work starts and that subcontractors follow all specified requirements.

The Activity Lead or Requestor must provide an orientation to the service and repair providers on the hazards in the Laser Controlled Area and brief them on the WPC controls.

- **If a subcontractor or vendor will be performing electrical work, the Subcontractor Qualified Electrical Workers must be accepted by the LBNL Electrical Safety Officer.** The Subcontractor must provide documentation of their QEWs' qualifications and training. For details, see **ES&H Manual Chapter 8, Electrical Safety, Work Process G** AHJ Acceptance of Non-Construction Subcontractor QEWs.
- The pre-job 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.

Visitors and Users

The SJHA process may also be used to evaluate and authorize the work of short-term visitors or users of ATAP facilities who do not have an LBNL employee ID. Screening by **Export Control** may be required to verify that the visitors/users are authorized to have access to the LBNL equipment and information.

Construction work must be authorized by LBNL **Projects and Infrastructure Modernization 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 Projects and Infrastructure Modernization Division Project or Construction Manager, or an EHS Construction Safety subject matter expert.

During the COVID-19 pandemic, the SJHA has been modified to include documentation of COVID-19 requirements. See the SJHA database at: <https://sjha.lbl.gov/start.aspx>.

Per LBNL's COVID-19 Exposure Prevention Policy (ES&H Manual, Chapter 46), SJHA requesters must determine the risk-based hazard level and controls for their affiliates, users, vendors and non-construction subcontractors (AUVNs) prior to traveling to any of the Lab's sites. Chapter 46 outlines the methodology for determining if the AUVN's travel risk level is considered low, medium or high.

Low-, medium-, and high risk-level travel requires various levels of controls:

- All travel risk levels require following general COVID prevention controls. The [SJHA COVID Briefing Handout](#) should be provided to AUVN personnel to follow.
- Medium risk level travel requires Division Director or designee approval from the division hosting the traveler.
- High risk-level travel requires a 14 day quarantine period **or** the initiation of a quarantine equivalency document, along with EHS liaison review and approval, and Division Director approval. If a quarantine equivalency document is chosen, it must be uploaded to SJHAs under Tab 4, supporting documentation section.

For more detailed policy information, visit the ESH Manual, Chapter 46 ([46.6 COVID-19-related Requirements for Affiliates, Users, Vendors, and Non-construction Subcontractors Coming to LBNL](#)). You can also contact your Division Safety Coordinator or EHS liaison for additional support.

Subcontractors performing work at LBNL, or offsite leased locations, are expected to follow current COVID-19 health and safety requirements prescribed by the CDC, County of Alameda, City of Berkeley, OSHA and LBNL which includes wearing face covers, self-symptom checks for COVID-19 symptoms, frequent hand washing with soap and water, use of hand sanitizer (provided by the subcontractor), practicing social distancing, staying home if ill, covering coughs and sneezes, and avoiding touching your eyes, nose and mouth. Additionally, subcontractors are expected to follow their employer's COVID-19 Site-Specific Protection Plan (SPP) or they can agree to follow LBNL's SPP. More detail on this is provided below under the SPP section.

LBNL SJHA requesters are expected to ensure subcontractor workers are following these requirements. Tab 5 on SJHAs, or another method, must be used to document safety and COVID-19 observations. See additional information below under the heading, "COVID-19 & GENERAL SAFETY OBSERVATIONS".