sJHA Process – Subcontractor Job Hazards Analysis

Brief

<table>
<thead>
<tr>
<th>Title</th>
<th>sJHA Process – Subcontractor Job Hazards Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Publication date</td>
<td>6/18/2013</td>
</tr>
<tr>
<td>Effective date</td>
<td>10/25/2010</td>
</tr>
</tbody>
</table>

BRIEF

Policy Summary

The Subcontractor Job Hazards Analysis (sJHA) program at Berkeley Lab ensures that all nonconstruction subcontractor work is performed safely and in accordance with regulations by:

- Completing the Subcontractor Job Hazards Analysis (sJHA) form
- Reviewing the sJHA, and validating findings with the subcontractor
- Providing work oversight to ensure the subcontractor is performing the work as authorized

Who Should Read This Policy

This policy applies to Berkeley Lab subcontractors, vendors, and affiliates who perform nonconstruction-related hands-on work and are not under direct supervisory control of Laboratory personnel.

To Read the Full Policy, Go To:

The POLICY tab on this wiki page

To Read the ES&H Program Details, Go To:

http://www.lbl.gov/ehs/pub3000/CH31.html

Contact Information

Subcontractor Safety Assurance Program Manager
Technical Support Services
Environment, Health, Safety, and Security (EHSS) Division

Policy

<table>
<thead>
<tr>
<th>Title</th>
<th>sJHA Process – Subcontractor Job Hazards Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Publication date</td>
<td>6/18/2013</td>
</tr>
<tr>
<td>Effective date</td>
<td>10/25/2010</td>
</tr>
</tbody>
</table>

POLICY
A. Purpose

The Subcontractor Job Hazards Analysis (sJHA) program at Lawrence Berkeley National Laboratory (Berkeley Lab) ensures that all nonconstruction subcontractor work is performed safely and in accordance with regulations by:

- Completing the Subcontractor Job Hazards Analysis (sJHA) form
- Reviewing the sJHA, and validating findings with the subcontractor
- Providing work oversight to ensure subcontractor is performing the work as authorized

The sJHA program is implemented through the password-protected online sJHA Work Authorization database.

B. Persons Affected

This policy applies to Berkeley Lab subcontractors, vendors, and affiliates who perform nonconstruction-related hands-on work at facilities owned or leased by Berkeley Lab and are not under direct supervisory control of Laboratory personnel.

C. Exceptions

This policy does not apply to:

- Most consultants
- Personal services agreements
- Contract labor
- Intra-university transactions
- Advanced Light Source and other user-facility affiliates addressed by another work authorization mechanism
- Other university agreements
- Subcontractors, vendors, or affiliates who have completed a Berkeley Lab Job Hazards Analysis and work authorization per the ES&H Manual Job Hazards Analysis program.

D. Policy Statement

1. Berkeley Lab ensures that all subcontractors, vendors, and affiliates performing hands-on work at facilities owned or leased by Berkeley Lab do so in a safe manner that complies with applicable regulations. (Work Process A)
2. Before hands-on work (see Section F, Definitions/Acronyms) can be performed by subcontractors, vendors, or affiliates at Laboratory facilities, the following activities must be completed:
   a. A Subcontractor Job Hazards Analysis (sJHA) form must be created. (Work Process B)
   b. A pre-job meeting must take place between the requester and the subcontractor, vendor, or affiliate.
3. Nonconstruction subcontractors must review the ES&H Orientation for Non-Construction Subcontractors, Vendors & Affiliates at the pre-job meeting prior to working on site. (Work Process C)
4. The sJHA work authorization process may also be used for simple facility modifications or repairs conducted by subcontractors. These simple “construction” activities are generally accomplished by a single craft on a single day. See the ES&H Manual Construction on Health & Safety program for the work authorization process for typical construction projects.

E. Roles and Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managers, supervisors, and employees</td>
<td>• Adhere to the provisions of this policy by ensuring that subcontractors performing hands-on work at their request have completed the sJHA process before work begins.</td>
</tr>
</tbody>
</table>
| Division Safety Coordinator | • Provides his/her division with Environment, Safety & Health (ES&H) support for implementing the safety-assurance process defined in the ES&H Manual sJHA Process – Subcontractor Job Hazards Analysis program.  
  • Requests support from the EHSS Division Non-Construction Safety Assurance Program Manager and EHSS subject matter experts, when necessary |
| EHSS Division Non-Construction Safety Assurance Program Manager | • Provides the requesting division with guidance, leadership, and direct consultative services in sJHA policy and program implementation  
• Monitors the Laboratory’s performance in sJHA policy and program implementation, and enters that information into a database  
• Maintains the sJHA program |
| --- | --- |
| Procurement Department | • Communicates the sJHA policy and program requirements to subcontract bidders and awardees  
• Requests that each subcontractor and vendor complete an sJHA and review the Berkeley Lab *ES&H Orientation for Non-Construction Subcontractors, Vendors & Affiliates* pamphlet before performing hands-on work at a Laboratory facility  
• Monitors subcontractor and vendor performance, including ES&H compliance |
| Requester | • Ensures that an sJHA is prepared for the subcontractor, vendor, or affiliate who will perform hands-on work at a Laboratory facility, and that a pre-job meeting is held between the requester and the subcontractor, vendor, or affiliate before work is performed  
• Signs the sJHA and thereby authorizes the work to be performed  
• Obtains safe work authorizations for the scope of work to be performed by the subcontractor, vendor, or affiliate, when required  
• Provides and records oversight of the subcontractors using the risk-based graded approach described in the ES&H Manual *sJHA Process – Subcontractor Job Hazards Analysis* program. |
| Subcontractor, vendor, and affiliate | • Provide input on the sJHA and submit it to the requester  
• Review the Berkeley Lab *ES&H Orientation for Non-Construction Subcontractors, Vendors & Affiliates* pamphlet  
• Attend the pre-job meeting and discuss the steps of the work scope and associated hazards and controls  
• Sign the sJHA and any required safe work authorizations  
• Agree to work in conformance with the authorized conditions  
• Perform the scope of work as authorized. |

### F. Definitions/Acronyms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affiliates</td>
<td>Non-Laboratory employees engaged in on-site Laboratory activities. Affiliates are subject to training in safety and other subjects. They are also issued a Berkeley Lab identification badge. Affiliates may receive system accounts, research access to facilities, and a per diem allowance for housing and living expenses. Examples: facility users, scientific collaborators, students</td>
</tr>
</tbody>
</table>
| Hands-on work | Includes all activities except administrative office work and other similar activities. The following activities are examples of hands-on work:

- Use of hand or power tools
- Repair or service of a device, apparatus, machine, or mechanism
- Material handling
- Handling or disposing of a chemical; a compressed gas; or a hazardous, radioactive, or biohazardous material

The following activities are not defined as hands-on work, unless they also include an activity associated with hands-on work (see above):

- Office and administrative duties
- Computer programming
- Attending or making a presentation
- Supervision of a worker(s) who is not performing hands-on work
- Document archiving
- Financial auditing
- Photography
- Language translation |
| High-level hazard work | Any activity that requires a safe work authorization document (e.g., laser Activity Hazard Document, Radiological Work Authorization) as described in the ES&H Manual Safe Work Authorizations and Radiation Safety programs |
| Low-level hazard work | An activity that does not require an additional safe work authorization document |
| Nonconstruction work | Activities that do not create a new facility, or alter, add to, rehabilitate, dismantle, or remove an existing facility, including any combination of engineering, procurement, erection, installation, assembly, demolition, or fabrication.

Nonconstruction work also excludes the alteration and repair (including dredging, excavating, and painting) of buildings, structures, or other real property, as well as any construction and excavation activities conducted as part of environmental remediation efforts (See the ES&H Manual Construction Health & Safety program). |
| Non-Construction Safety Assurance Program | An EHSS Division program that provides guidance, leadership, and direct consultative services to divisions for the implementation of the policy and requirements in this chapter |
| Requester/division | An individual in a Berkeley Lab division who requests and oversees the conduct of subcontractor, vendor, or affiliate services |
| Requisition preparer | A Berkeley Lab worker who is trained and authorized to use procurement software programs for initiating requisitions and purchase orders |
### Risk-Based Graded Approach

- A process to ensure that work activities are efficiently managed through systems that are adequate to, and commensurate with, the risk involved in the activity
- Risks include potential impact to worker or public health and safety, threats to the environment, consequences of noncompliance, and cost impacts
- The risk-based approach considers whether or not work is hands-on, and includes low or high hazards in order to determine if a written authorization (beyond the sJHA) is required and what level of oversight is necessary

### Subcontractor

A firm that has sole contractual responsibility for execution of defined work related to a project, and for compliance with all safety, health, and environmental codes, standards, and regulations

### Subcontractor Job Hazards Analysis (sJHA)

An sJHA:

- Describes the scope of work to be performed
- Identifies work hazards and controls
- Is the work authorization document for subcontractors, vendors, and affiliates

When required, other safe work or electrical work authorizations are obtained and appended to the sJHA. Maximum duration of an sJHA is one year, but they may be renewed indefinitely.

Authorizations and restrictions stipulated by any required safe work or electrical work authorizations supersede those in the sJHA.

### Vendor

An entity that sells a product for which installation or warranty service may be provided

### G. Recordkeeping Requirements

Completed sJHAs and related documents (i.e., safe work authorizations, evidence of training) must be maintained in the sJHA database by the requester.

### H. Implementing Documents

<table>
<thead>
<tr>
<th>Document number</th>
<th>Title</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>07.02.004.001</td>
<td>sJHA – Subcontractor Job Hazards Analysis</td>
<td>Program</td>
</tr>
<tr>
<td>07.02.004.003</td>
<td>Work Process B, <em>Creating an sJHA</em></td>
<td>Work Process</td>
</tr>
<tr>
<td>07.02.004.004</td>
<td>Work Process C, <em>Training and Orientation</em></td>
<td>Work Process</td>
</tr>
<tr>
<td></td>
<td>ES&amp;H Orientation for Non-Construction Subcontractors, Vendors &amp; Affiliates</td>
<td>Orientation pamphlet</td>
</tr>
<tr>
<td>07.02.003.001</td>
<td>Safe Work Authorizations</td>
<td>Program</td>
</tr>
<tr>
<td>07.07.011.001</td>
<td>Electrical Safety</td>
<td>Program</td>
</tr>
<tr>
<td>07.07.007.001</td>
<td>Construction Health &amp; Safety</td>
<td>Program</td>
</tr>
</tbody>
</table>
I. Contact Information

Subcontractor Safety Assurance Program Manager
Technical Support Services
Environment, Health, Safety, and Security (EHSS) Division

J. Revision History

<table>
<thead>
<tr>
<th>Date</th>
<th>Revision</th>
<th>By Whom</th>
<th>Revision Description</th>
<th>Section(s) Affected</th>
<th>Change Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/2/2012</td>
<td>0</td>
<td>M. Ruggieri</td>
<td>Re-write for wiki (brief)</td>
<td>All</td>
<td>Minor</td>
</tr>
<tr>
<td>6/18/2013</td>
<td>1</td>
<td>M. Ruggieri</td>
<td>Re-write for wiki (policy)</td>
<td>All</td>
<td>Minor</td>
</tr>
</tbody>
</table>

Document Information

DOCUMENT INFORMATION

Title: sJHA Process – Subcontractor Job Hazards Analysis

Document number: 07.02.004.000

Revision number: 1

Publication date: 6/18/2013

Effective date: 10/25/2010

Next review date: 6/18/2016

Policy Area: Safe Work Authorization

RPM Section (home): ESH

RPM Section (cross-reference): none

Functional Division: EHSS

Prior reference information (optional): PUB-3000 Chapter 31

Source Requirements Documents

- 10 CFR 851, Worker Health and Safety Program
- PUB-3581, Work Health and Safety Program, Section 1.6, Flow Down of 851 Requirements to Subcontractor

Related Berkeley Lab Policies

- Safe Work Authorizations and Activity Hazard Document Policy

Implementing Documents
<table>
<thead>
<tr>
<th>Document number</th>
<th>Title</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>07.02.004.001</td>
<td>sJHA – Subcontractor Job Hazards Analysis</td>
<td>Program</td>
</tr>
<tr>
<td>07.02.004.003</td>
<td>Work Process B, <em>Creating an sJHA</em></td>
<td>Work Process</td>
</tr>
<tr>
<td>07.02.004.004</td>
<td>Work Process C, <em>Training and Orientation</em></td>
<td>Work Process</td>
</tr>
<tr>
<td></td>
<td>ES&amp;H Orientation for Non-Construction Subcontractors, Vendors &amp; Affiliates</td>
<td>Orientation pamphlet</td>
</tr>
<tr>
<td>07.02.003.001</td>
<td>Safe Work Authorizations</td>
<td>Program</td>
</tr>
<tr>
<td>07.07.011.001</td>
<td>Electrical Safety</td>
<td>Program</td>
</tr>
<tr>
<td>07.07.007.001</td>
<td>Construction Health &amp; Safety</td>
<td>Program</td>
</tr>
<tr>
<td>07.02.001.001</td>
<td>Job Hazards Analysis</td>
<td>Program</td>
</tr>
</tbody>
</table>