

Subject: INTEGRATION OF ES&H REQUIREMENTS INTO SUBCONTRACTED WORK	Effective Date: July 2, 2004	Initiated by: Head, ES&H and Infrastructure Support
	Supersedes: Rev. 2, dated December 11, 1998	Approved: Director

The Princeton Plasma Physics Laboratory relies upon subcontractors to perform specific scopes of work at the Laboratory. It is important to recognize that while subcontractors bring needed skills and resources to perform work at the Laboratory, they also bring along different principles and approaches related to worker safety. A primary responsibility of PPPL is to ensure that the subcontracted work scope is completed in accordance with PPPL (and DOE) expectations with regard to technical performance, quality, safety, cost, and schedule. To do so, line managers must rely upon, and apply PPPL policies, procedures, and manuals that define processes for defining work scope as well as the identification, analysis and control of work place hazards.

The nature of work that can be subcontracted means that a wide variety of PPPL Procedures and policies can be invoked to control the subcontracted work. These controls pertain specifically to Work Planning, Job Hazard Analysis, Training, and Subcontract Administration. The PPPL Work Planning process is particularly important because it has become a focal point for work planning and work control across the Laboratory and it provides key cross references to PPPL procedures.

Furthermore, ES&H training for subcontractors is an integral component of the work control process. Subcontractors who perform work at the Princeton Plasma Physics Laboratory site are required to have the appropriate training necessary to perform their jobs competently, efficiently, and safely with due regard for health concerns, the environment and quality. This is necessary to assure that the Laboratory meets the requirements specified by the U.S. Department of Energy. The type, and amount, of training depends on the type of subcontract, as well as the defined scope of work. The cognizant PPPL person requesting the subcontractor is responsible to assure that subcontracted personnel meet the training requirements outlined in this policy and in PPPL procedures prior to performing work.

If a subcontractor works under direct PPPL management, then training requirements are the same as they would be for a PPPL employee performing comparable work. As a minimum, the subcontractor will receive training in the following areas commensurate with assigned duties:

1. Environment, safety and health (ES&H) and quality issues
2. Job specific tasks, including required certification of qualification

In those cases where the subcontract personnel arrive at PPPL to perform a specific scope of work on-site (for greater than 40 hours per calendar year), the standard contract requires that the subcontractor employee be given either a subcontractor-specific version of General Employee Training (GET) or the regular employee version of GET. The standard contract also requires that the subcontractor comply with Occupational Safety and Health Administration (OSHA) requirements in 29CFR1910 and 29CRF1929. Each subcontractor supervisor shall complete the standard PPPL GET course. Each subcontractor supervisor shall be responsible to assure that the individual workers employed by the subcontractor organization meet all applicable Laboratory ES&H and OSHA standards. The subcontractor organization shall be held accountable that this assurance is met. Attachment VII of PPPL procedure GEN-008, "Specific Minimum Access Training and Escort Requirements" shall be used to determine minimum training requirements for short-term and long-term access to PPPL by subcontract personnel.

The cognizant PPPL person shall specify in the requisition, statement of work, specification, or other appropriate subcontract document any training requirements that will become part of the contract. Additional training requirements may be necessary to comply with specific OSHA or PPPL ES&H or permitting requirements. In addition, medical evaluations required by OSHA are the responsibility of the subcontractor organization unless the Head of ES&H specifically requests additional medical evaluation.