

Non-Construction Safety Assurance For Subcontractors, Vendors and Guests

Frequently Asked Questions

1. When is a Non-Construction Subcontractor Job Hazards Analysis and Work Authorization (SJHAWA) required?

Subcontractors, Vendors and Guests who perform non-construction hands-on work at LBNL facilities are required to have a work authorization based on a job hazards analysis (See PUB-3000 Chapter 31). For short-term work (less than 30 days), the SJHAWA is normally completed. For longer-term work (30 days or more) the institutional JHA may be an option. Note that authorization for construction work performed by subcontractors and vendors uses a separate, work authorization process tailored for construction type activities (See PUB-3000 Chapter 10).

2. What are some examples of Hands-on Work?

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 bio-hazardous material.**

The following activities are not considered 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.**

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3. What are the main elements of the Non-Construction Safety Assurance Process?

- **An SJHAWA is prepared.**
- **A Pre-job meeting is held and the SJHAWA (and any other required documents) is reviewed and signed by all parties.**
- **Oversight of work is performed using the risk-based graded-approach defined in PUB-3000 Chapter 31.**

4. Can a non-construction pre-job meeting be held by telephone?

No. Pre-job meetings must occur in person. However, information can be exchanged and questions resolved in advance by e-mail or telephone in order to simplify the pre-job meeting.

5. How long are SJHAWAs valid?

SJHAWAs are valid for one year if the scope of work, hazards and controls do not change.

6. Who is responsible for keeping the Division's SJHAWA records?

In the past, each Division has been required to designate a person to maintain their SJHAWA records. Usually that person is the Division Safety Coordinator.

With the online SJHAWA system, the database is the repository for the SJHAWA records.

7. Can I use another Requester's SJHAWA if the scope of work and subcontractor are the same?

An SJHAWA authorizes a scope of work to be performed with defined hazards and controls by the identified staff at the locations listed. If any one of those parameters change, the original SJHAWA must be revised or a separate SJHAWA must be developed. For example, a new location could be added to the original SJHAWA. Using the Online SJHAWA system, an existing SJHAWA can be cloned and revised appropriately for your requirements.

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8. What are the qualifications for an individual to perform the role of Requester for SJHAWAs?

In order to be qualified to be a Requester, the individual must understand the scope of work, the hazards and the controls, and be available to perform the delegated duties.

9. Do all Subcontractors, Vendors and Guests need to take GERT?

All Subcontractors, Vendors and Guests who visit the LBNL site or obtain access to visit the LBNL site, are required to complete GERT every two years or to be continuously escorted (e.g., line-of-sight supervision).

10. What is the technical basis for the Non-Construction Safety Assurance Process?

LBNL is required by Federal Law to ensure that all Subcontractors, Vendors, and Guests who perform work at LBNL facilities do so in a safe manner in compliance with applicable regulations. The DOE Worker Safety and Health Program rule, 10CFR851, requires LBNL to assure that subcontractors are performing work safely. LBNL's general requirements are documented in LBNL/PUB-3140, *Integrated Environment, Health, and Safety Management Plan: Integrated Safety Management (ISM) System*, and in LBNL/PUB-3851, *Worker Safety and Health Program*. Each Division is responsible for ensuring that their Subcontractors, Vendors, and Guests perform work on-site in compliance with LBNL EH&S requirements. The EH&S Division helps LBNL divisions carry out their responsibilities through the Non-Construction Safety Assurance Program that is documented in PUB-3000 Chapter 31.

11. What do I do if a subcontractor comes to LBNL to perform work and their SJHAWA has not been completed?

Non-construction hands-on work cannot be performed at an LBNL facility without a signed SJHAWA. When necessary, an SJHAWA for a low-hazard scope of work can usually be completed at the pre-job meeting. High hazard scopes of work, by definition, require additional work authorizations, which usually require several days or more to obtain and complete.

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12. Do we need to respond to the e-mail Safety Reminders that are sent out regarding requisitions for non-construction services?

No response is required if you understand your safety assurance duties. The purposes of the Safety Reminders are to inform or remind Requesters of the SJHAWA process and to notify Division Safety Coordinators that a subcontract for on-site hands-on work has been submitted to Procurement from their Division.

13. When should the non-construction pre-job meeting occur?

The pre-job meeting usually occurs on the same day that the scope of work starts. The meeting can be held earlier, if necessary.

14. Who approves the SJHAWA?

SJHAWAs are approved by the Requester when the form is signed. Some Division Safety Coordinators provide close oversight of their Division's SJHAWA completion process, including signing the form. Lab-wide SJHAWAs are approved by the Program Manager for Non-construction Safety Assurance.

15. Can I delegate my responsibilities as a Requester of non-construction services?

Yes. You can delegate your responsibilities as a Requester of non-construction services to a qualified LBNL employee. In order to be qualified to be a Requester, the LBNL employee must understand the scope of work, the hazards and the controls, and be available to perform the delegated duties.

16. What should be addressed during oversight of subcontractor work?

During oversight of the work, the Requester confirms and records on the SJHAWA form that the scope of work is being performed and hazards present are the same as documented in the SJHAWA and that the listed required controls are being used.

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17. How do I record my oversight of the subcontractor's work?

If you are using the MS Word version of the SJHAWA form, the last page of the SJHAWA is a table in which you can record who performed the oversight, date of the oversight and any observations.

If you are using the Online SJHAWA form, go to Section 5 Observations to record your oversight notes directly into the form.

18. What are the Requester's duties when using a Lab-Wide SJHAWA?

- 1. Go to the Program web site or the Online SJHAWA database to obtain a copy of the Lab-Wide SJHAWA,**
- 2. Confirm that the scope of work that you are requesting matches the scope of work on the Lab-Wide SJHAWA. If additional work authorizations are required, obtain those before the work begins.**
- 3. Carry out a brief pre-job meeting and make sure that the subcontractor signs the form if he/she has not already done so. Lab-Wide SJHAWAs with new signatures should be sent to the Program Manager for Non-construction Safety Assurance.**
- 4. Provide oversight commensurate with the hazard level of the scope of work.**