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ENVIRONMENTAL, NOISE, AND OCCUPATIONAL HEALTH CONSULTANTS

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INTERIM STATUS REPORT

OCCUPATIONAL SAFETY AND HEALTH TRAINING
PROGRAM AT ETCs

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INTERIM STATUS REPORT

OCCUPATIONAL SAFETY AND HEALTH TRAINING
PROGRAM AT ETCs

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INTERIM STATUS REPORT

OSH TRAINING AT ETCs

ABSTRACT

Preliminary studies reveal that serious deficiencies exist in occupational safety and health training programs within ASFE. The basic requirements of Executive Order 12196, 29 CFR 1960 (both earlier and current versions) and Chapter III, ASFE 5480.1 are not being addressed in an adequate fashion.

The principal deficiencies are a lack of sufficient funding for both employee and safety and health staff training, and inadequate or non-existent documentation of training for top management, intermediate levels of management, and supervisors. Similar deficiencies exist in varying degrees for other employees. It is apparent that the full extent of the training requirements in OSHA 29 CFR 1910 standards has not been recognized and implemented within the ETCs.

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INTRODUCTION

Overview of Requirements

Prior to February 1980, the basic requirements for occupational safety and health training for federal employees were contained in Executive Order 11807 and DOL/OSHA regulations in 29 CFR 1960. The new Executive Order 12196 (February 26, 1980) made no substantial changes in those requirements.¹ However, the revised 29 CFR 1960 carried forward all prior requirements and added more specific direction on "Training of Collateral Duty Safety Officers."² In brief, DOE must provide occupational safety and health training appropriate to the level of function and responsibility for:

- Top Management Officials
- Supervisors
- Safety and Health Specialists
- Safety and Health Inspectors
- Collateral Duty Safety and Health Personnel and Committee Members
- Employees and Employee Representatives

ASFE Order 5480.1 (August 1979), Chapter VI, contains guidance for use by the ETCs in developing programs to meet these requirements. That Order is currently being revised to meet the requirement of the new Executive Order, 29 CFR 1960, and the recently issued (November 1980) DOE 3790.1, "Occupational Safety and Health Program for Federal Employees." This latter explicitly requires (paragraph 7b(6)) that ASFE and the Directors of the ETCs provide the required OSH training.

Problems associated with meeting these training requirements have been identified by the Office of Planning and Technology Assessment's Environmental Safety and Health Division (OPTA-ESH) of the Assistant Secretary for Fossil Energy (ASFE).

¹U.S. Department of Energy Topical Report, DOE/ET/135557-13, Comparison of Executive Order 11807 and 12196, March 10, 1980, p. 3.

²29 CFR 1960, Subpart H, 1980.

Field studies by contractors³ and site visits by OPTA-ESH staff have noted deficiencies. Additionally, the problems of funding travel for training of OSH staff have been repeatedly cited at the several OSH Budget and Program Plan meetings held by OPTA-ESH. (The latest of these meetings were in March 1980 at Brooks AFB, Texas, and at Washington, D.C., November 1980.)

Budgetary Problems

In accordance with the requirements of Chapter XV of DOE 5480.1, "Program and Budget Planning," the ETCs developed and submitted to OPTA-ESH, OS&H Program and Budget Plans in October 1979, for the five year period FY 80-85. A review by A. F. Meyer and Associates, Inc. (AFMA) under DOE Contract DE-AC02-79ET13557 found that while the training need was recognized, the funding projected in most cases was unrealistically low.⁴

In 1980, the ETCs submitted information for the budget process through the ASFE "PPTA System" (no information as to proposed changes to the 1979 estimate have yet been made available to AFMA). Site visits to LETC and GFETC have, however, provided information as to the actual training situation. It is unfortunately true that less resource commitments are in fact being made than those "unrealistically low" projections made in the 1979 estimates.

Although budget projections for OSH upgrade and professional improvement have been fairly adequately estimated, a major deficiency appears to be the lack of travel funds. In fact, the budget planning documents reviewed by AFMA did not cover travel; seemingly, there are no provisions in the present ASFE procedures to identify such requirements on a specific basis.⁵ Our final report will address this issue further.

³U.S. Department of Energy Topical Report, DOE/ET/13557, ETC Assistance Study, Bartlesville, OK, March 1980.

⁴A. F. Meyer and Associates, Inc. Memorandum, "Review of OSH Implementation Plans," October 29, 1979.

⁵The revised 29 CFR 1960 (1960.7(c)(1)) requires appropriate resources be provided by DOE for training (including travel money).

PRINCIPAL FINDINGS TO DATE

In addition to reviewing results of two recently conducted site visit inspections (LETC and GFETC), other data has been considered. These include prior site visits, the budget and program plans, and information in other reviews of DOE's overall OSH training programs.⁶ The specifics of the findings at LETC and GFETC will be discussed in the industrial reports of those inspections.

The generic findings to date, as reported below, will be reevaluated in light of the further investigations and studies now underway.

Overall Studies of Management and Employee Training

Varying degrees of OSH training for employees in hazardous occupations are being conducted. At least a minimal effort to provide general hazardous material and exposure training is conducted. Heavy reliance is being given to a commercially available Hazardous Chemical Safety course (offered by J. T. Baker Co.). However, only minimal job specific training as called for by OSHA 29 CFR 1910 and 29 CFR 1960.59 has been observed. Additionally, generally adequate training is being provided in first aid, CPR (Cardiac Pulmonary Resuscitation), and in respiratory protection.

The required top management, mid-management, and supervisory training requirement is not being met. There has not been any documented formal training for management within the last twelve months. Informal meetings and discussions do not meet the requirement.

Safety and Health Staff Training

Lack of travel funds precludes OSH staff from attending non-DOE sponsored seminars and training programs. DOE/ASFE sponsors periodic OSH planning meetings and workshops, and DOE/ASEV conducts workshops and meetings on DOE problems. If funds permit, these are attended by ETC staff. However, these do not provide the detailed, formal educational opportunities for professional improvement which are required by 29 CFR 1960.56. The AFMA final report will discuss alternatives to achieve that end.

⁶U.S. Department of Energy, "A Review of Occupational Safety and Health Training for Federal Employees," March 1980.

Documentation of Training

From our preliminary studies, it would appear that in most instances, adequate training records are not being maintained. Failure to record training activities could result in failure to train properly. Further, the failure to identify, train, and record training could result in DOE management receiving a civil action from an injured employee.⁷

⁷U.S. Department of Energy, "Summary of Employee Penalties for Failure to Notify Employees Regarding Potential Hazards," ASFE-557-2-79-2, December 1979.

RELATED STUDIES IN PROGRESS

AFMA, in accordance with the requirements of the Work Order, is continuing to investigate OSH training resources available within the Federal government. Evaluations are also being made of commercially available sources of training, with particular reference to extension and self-study courses for professional advancement and short formal courses. These will be discussed in the final report.