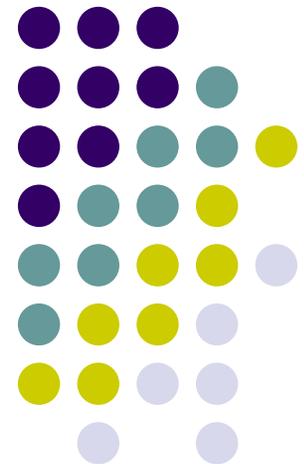


DOE Contractors' Implementation Approaches for 10 CFR 851 Rights and Responsibilities Training



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What is Required?

- 10CFR851.20(b) “Worker Rights and Responsibilities”
 - Workers must comply with the requirements of this part . . .
- 10CFR851.25(c), “Training and information” supports 20(b) by requiring that contractors,
 - “must provide training and information to workers who have worker safety and health program responsibilities that is necessary for them to carry out those responsibilities.”



How to Meet this Requirement?

- Contacted the following DOE contractors to determine their method of compliance
 - Lawrence Berkeley National Laboratory
 - Argonne National Laboratory
 - Pacific Northwest National Laboratory
 - Y-12 National Security Complex
 - Los Alamos National Laboratory
 - Oak Ridge National Laboratory
 - Savannah River Nuclear Solutions
 - MOAB UMTRA Project

How We Train Employees in 10CFR851 Rights and Resp.



- New employees receive training on 10CFR851 rights and responsibilities in new employee training/orientation
- The 10CFR851 poster is displayed in the workplace
- Contractors have 10CFR851 in their contracts
- Contractor employees receive training on 10CFR851 rights and responsibilities in their contractor safety orientation



Issues

- Most employees/contractors can correctly answer the question, “what are your employee rights and responsibilities” – GREAT
 - Stop work authority is well understood
 - The right to observe monitoring and safety inspections is less well known
- Many employees/contractors cannot link these rights and responsibilities to 10CFR851 – is that an issue?