



Department of Energy  
Washington, DC 20585

JM Chronology  
JM RECEIVED 12-6-13  
OUT FOR REVIEW 12-9-13  
DRB DISCUSSION 12-19-13

MEMORANDUM FOR: INGRID KOLB  
DIRECTOR, OFFICE OF MANAGEMENT

THROUGH: KEVIN T. HAGERTY  
DIRECTOR, OFFICE OF INFORMATION RESOURCES

FROM: GLENN S. POBONSKY  
CHIEF HEALTH, SAFETY AND SECURITY OFFICE  
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT: Notice of Intent to Develop DOE Policy ~~XXX.X~~ <sup>364.1</sup> *Health and Safety Training Reciprocity*

**PURPOSE:**

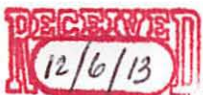
This memorandum provides justification for the development of Department of Energy (DOE) Policy (P) XXX.X, *Health and Safety Training Reciprocity*. This directive provides the Department's expectations for the acceptance of equivalent worker safety and health training across the DOE complex. Equivalence will be determined by the Office of Health Safety and Security's National Training Center (NTC) through a certification program which assures that basic training elements meet and comply with the requirements established by Federal regulations, national consensus standard, and Department of Energy Directives.

**JUSTIFICATION:**

**Background:** The Department has committed to providing the necessary resources to ensure every Federal and contractor employee understands the importance of health and safety in their day to day work activities. This commitment requires every employee to receive training that identifies hazards, controls, and roles and responsibilities necessary to mitigate injury and illness relevant to the activities the employee will be conducting.

Currently, DOE Federal and contractor employees are required to complete various health and safety training courses prior to conducting work at DOE owned and/or operated sites and facilities. In some instances, employees who conduct work at multiple DOE facilities and sites managed by different contractors repeat similar if not exactly the same type of health and safety training programs at each facility/site regardless of where they completed their previous training. This situation results in an inefficient use of Departmental resources and reduces the time employees spend in support of accomplishing Departmental missions.

The Office of Health Safety and Security through its National Training Center (NTC) has developed a process that can be used to certify certain health and safety training programs as meeting



requirements established by Federal regulations, national consensus standard, and DOE directives thus allowing for the reciprocity of these training programs across the DOE complex.

This NTC process was developed through a collaborative effort among DOE federal, M&O contractor and labor organizations including the DOE Volpentest HAMMER Training Facility at Hanford, the Energy Facility Contractors Group (EFCOG), the National Institute of Environmental Health Sciences (NIEHS), and the national labor organizations.

Examples of courses which are currently available in the reciprocity program include; Radiological Worker (Radworker) Training, Hazardous Waste Operations and Emergency Response (HAZWOPER) Training, and General Employee Training.

**Summary of Development Process:** Based on a request by the Secretary of Energy to expand this program to increase its benefit across DOE, the Office of Health, Safety and Security will develop a draft policy that will be presented to the Directives Review Board for further coordination.

**Applicability:** All required safety and health training which has been certified by NTC

**Major Changes:** Training certified by NTC will be accepted at any DOE site with the understanding that additional contractor, site, or facility specific training components may be added to the training requirements and be completed by employees prior to working at locations requiring specialized training. The policy will not prohibit the requirement for additional training in those circumstances

**IMPACT:**

Training reciprocity will improve productivity and make better use of existing resources by reducing the resources currently used to provide redundant safety and health training.

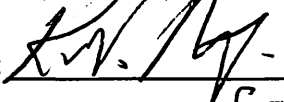
**WRITER:**

Bill R. McArthur, HS-10, 3-6061

**OPI:**

Patricia R. Worthington, HS-10, 3-5926

Ingrid Kolb, Director, Office of Management (MA-1):

Concur:  Nonconcur: \_\_\_\_\_ Date: 12/19/2013  
For Ingrid Kolb.

## Risk Identification and Assessment

---

### *Revision of DOE P XXX.X, Training Reciprocity*

<b>Risk</b>	<b>Probability</b>	<b>Impact</b>	<b>Risk Level</b>
<b>People</b>			
1. Require redundant training	Likely	Medium	Significant
<b>Mission</b>			
2. Increase utilization of resources	Likely	Medium	Significant
<b>Assets</b>			
<b>Financial</b>			
3. Cost of redundant training	Likely	Medium	Significant
<b>Customer and Public Trust</b>			
4. Increased cost of training and loss of employee time	Likely	Medium	Significant

### Gap Analysis of Existing Risks and Controls

<b>Laws</b>	<ul style="list-style-type: none"> <li>None</li> </ul>
<b>External Regulation</b>	<ul style="list-style-type: none"> <li>None</li> </ul>
<b>DOE Regulation</b>	<ul style="list-style-type: none"> <li>10 CFR 851, Worker Safety and Health Program</li> <li>10 CFR 835, Occupational Radiation Protection</li> </ul>
<b>DOE Orders</b>	<ul style="list-style-type: none"> <li>DOE O 440.1B, Worker Protection Program for DOE (Including the National Nuclear Security Administration) Federal Employees</li> </ul>
<b>Contract Controls</b>	<ul style="list-style-type: none"> <li>48 CFR 970.5223-1, Integration of ESH into work planning and execution</li> </ul>
<b>External Assessments</b>	<ul style="list-style-type: none"> <li>None</li> </ul>

## Risk Mitigation Techniques

Risk Assessment for DOE P 434.1, "Conduct and Approval of Select Agent and Toxin Work at Department of Energy Sites"					
Risk/Opportunity	Risk Level	Potential Cost/Benefit	External Control(s)	Proposed Mitigation Technique	Internal Control (if needed)
Require redundant training	Significant	Utilization of training resources and employee time for redundant training		Develop P XXX.X, <i>Training Reciprocity</i>	
Increase utilization of resources	Significant			Develop P XXX.X, <i>Training Reciprocity</i>	
Cost of redundant training	Significant			Develop P XXX.X, <i>Training Reciprocity</i>	
Increased cost of training and loss of employee time	Significant			Develop P XXX.X, <i>Training Reciprocity</i>	