

# H-0123 Contractor Safety Program

SUBJECT: Contractor Safety	H-0123	REVISION NO: 4	
REFERENCES: 29 CFR190 29CFR1926 CP-04-201 Contract Labor CP-04-215 Contract Services CP-28-111 Badging P&P 40-19 CP-04-107 Order Placement			
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## 1. Purpose

To ensure that contractors and subcontractors performing work at the GE Wilmington Site have the ability to perform work maintaining the high standards of the Site with regards to Environment, Health and Safety. Ensure that Contractors performing work at the GE Wilmington site maintain responsibility for the safety of their employees, host employees and the community.

## 2. Definitions (H-01)

**2.1. Contract Company** – A company hired to perform a task for the GE Wilmington site. Subcontractor companies are covered under the contractor company (The contracted company is responsible to ensure sub-contractors comply with all GE Wilmington site EHS policies and procedures).

**2.2. Contractor Employee (Contractor):** Individual employed by Contract Company (or subcontract employee)

**2.3. Contractor Leadership** – A leader for the a Contract Company, may include owner, foreman, shift supervisor, lead craftsman (or subcontract leadership)

**2.4. Project Manager** - A GE Wilmington employee responsible for work direction of the contractor (or through a Contract Company of a subcontractor.)

**2.5. Delivery Personnel** – Drivers of vehicles who bring or remove products or other materials to or from the site.

**2.6. Resident Contractor:** Primary construction and service Contract Company that maintains a full time presence on site; examples include maintenance, janitorial, food service preparation, engineering and security contract companies.

**2.7. Resident Contractor Employee:** Individual employed by Resident Contract Company

**2.8. Site Employee:** Employee of GE or GNF whose primary work location is Wilmington. Also includes temporary (contract) employees such as Granite.

**2.9. Temporary Labor Service. Temporary (contract) employees:** People hired through a service such as GRANITE, ADDECO or interns/co-ops from an educational institution.

**2.10. Visitor:** Personnel not under contract with GE or GNF directly or subcontracted. Examples include customers, government regulators, guests, sales representatives and others as specified by EHS. Visitors are the responsibility of the representative (GE or contract personnel) that they are visiting and are to remain under their supervision while on site. Visitors must be escorted at all times while on-site.

**2.11. Low Hazard Work Activities** – Non Industrial or Construction Work which is considered “low hazard”; typical examples include clerical or administrative activities, medical support, engineering design and food preparation activities.

**2.12. Industrial Work Activities** – work considered “medium risk”; typical examples may include equipment servicing, electrical troubleshooting, elevated work (>4 feet), use of respiratory equipment, machining, equipment installation, hot work or entry into airborne controlled radiological areas and small-scale office relocations, routine maintenance and/or repair of buildings/facilities.

**2.13. Construction Work Activities** – work considered “high risk”; typical examples may include excavations, building demolition, steel erection, concrete/masonry work and framing and/or include work activities identified in section 2.13. Equipment installation and are large-scale projects involving significant renovation, new construction or demolition (lasting more than one week) requires the contractor to submit a site-specific project Construction Safety Plan detailing the rules, regulations and procedures to be followed on the project.

### **3. Responsibilities / Applicability**

#### **3.1. Responsibilities**

**3.1.1. EHS Group** - Inform GE Project Manager of the contractor safety requirements, approve and maintain an accurate list of qualified Contract Companies (based on review of EHS information provided for working at the site, including review of past on-site issues or concerns raised during performance of previous site work), screen and approved chemicals for use by Contract Companies and conduct periodic audits of contractor safety performance on site. Provide guidance to GE Project Manager on contractor accountability.

#### **3.1.2. Sourcing –**

**3.1.2.1.** Provide assistance to the GE Project Manager and monitor the hiring of Contract Companies.

**3.1.2.2.** Provides potential vendors and current approved vendors’ access to applicable Contracted Services & Labor portals where EHS Contractor Safety Program and EHS Questionnaire are available to review and complete for bid purposes.

#### **3.1.3. GE Project Manager:**

**3.1.3.1.** Identify the type of Work Activities as defined in Section 2.11, 2.12 and 2.13 above.

**3.1.3.2.** Provide contract companies with a bid package that includes a copy of the applicable sections of the site Safety Manual and a copy of the Contractor EHS Questionnaire. If subcontractors are to be used to complete the contract work, the contract company shall ensure their subcontractors adhere to the site EHS policies and procedures.

**3.1.3.3.** Ensure chemicals to be used on site by the contract company have been approved by EHS using the appropriate site tracking system (See section 4.2)

**3.1.3.4.** Provide Site EHS with a completed copy of the Contractor EHS Questionnaire for review prior to awarding work to the Contract Company.

**3.1.3.5.** Identify tasks such as lockout/tagout and permit-required confined space entry that may require copies of the contract company's procedures prior to the start-up of work.

**3.1.3.6.** Inform contractors of job specific safety procedures including the requirements of task specific Job Hazard Analysis (JHA's) or NSRR's or RWPs (as applicable per job contracted to perform).

**3.1.3.7.** Ensure contract company personnel are familiar with job specific hazards such as the presence of underground utility lines, etc.

**3.1.3.8.** Ensure contract company personnel are familiar with locations of emergency equipment (eye wash, safety shower, pull box, etc.).

**3.1.3.9.** Assist the Contractor Leadership with obtaining site permits.

**3.1.3.10.** Ensure contractor compliance with site EHS policies through routine inspections.

**3.1.3.11.** Upon notification of a contractor injury, accident or non-compliance shall contact their EHS lead.

**3.1.3.13.** Ensure that contractors have attended applicable training as administered by the Mid Atlantic Safety Council (MASC) or a reciprocal council prior to the beginning of work.

**3.1.3.14.** Perform initial work scope meeting with the contract company and coordinate with the EHS Group any additional requirements (ex: routine review meeting frequencies with contract companies during large construction activities), as applicable.

**3.1.3.15.** Provide potentially affected GE employees notice of work to be performed (this is typically performed during Production/Daily meetings or site communication for site wide projects which could impact personnel)

#### **3.1.4. Contract Company:**

**3.1.4.1.** Provide the GE Project Manager with requested job-related procedures.

**3.1.4.2.** Notify the GE Project Manager of chemical usage associated with the contracted task.

**3.1.4.3.** Complete the Contractor EHS Questionnaire and return to Project Manager or EHS.

**3.1.4.4.** Ensure Contractor Employees and subcontractors comply with State, Local and Federal regulations as well as site Wilmington Site EHS policies.

**3.1.4.5.** Provide "qualified" personnel as described in 29 CFR 1910 and 29 CFR 1926.

**3.1.4.6.** Obtain required site permits.

**3.1.4.7.** Provide medical treatment and applicable medical evaluations to contract employees.

**3.1.4.8.** Ensure contract employees are provided with, and use, applicable personal protective equipment when working at the site.

**3.1.4.9.** Notify the GE Project Manager if any previously unidentified workplace hazards are identified, report any injuries and near misses.

**3.1.4.10.** Take appropriate actions to correct contractor related deficiencies identified by the GE Project Manager and/or EHS.

**3.1.4.11.** Provide job-specific training related to the contract task.

**3.1.4.12.** Provide the GE Project Manager with an accurate list of contractor and subcontractor employees who will be on the GE Wilmington site to complete the contracted task.

**3.1.1.4.** Ensure that contractors have received the Wilmington site-specific EHS Awareness Training administered by Site Security.

**3.1.5. Radiation Safety** - Ensure contract employees are monitored for and minimize radiological exposure and issue Radiation Work Permits as required.

**3.1.2. Security:** Verifies or conducts training, issues appropriate badges, additional instructions in the applicable post order.

**3.1.3. Project Manager/Site Employee/Resident Contractor Employee:** Ensures that Contractor Employees follow the access restrictions assigned to them, act as escort for Contractor Employees as needed.

**3.1.5. Contractor Employee:** Follow requirements communicated in training.

**3.1.6. Site EHS Contractor Coordinator:** Review and approve, from EHS standpoint, contractors for work on site; including identifying review meeting timelines with contractor company management, EHS Group and GE Project managers, as applicable. Perform overall contractor company health and safety performance is reviewed annually on Resident Contractors that perform Industrial or Construction Work activities.

### ***3.2. Applicability***

**3.2.1.** This procedure applies to Contractors as defined above.

## **4. Procedure**

### ***4.1. Contract Qualification & Selection*** (Final step required for exceptions.)

**4.1.1.** The Project Manager / Sourcing identify the work needs and requests bids or start PO process with contract companies. A copy of the Contractor EHS Questionnaire should be

provided to each bidding company, as part of the bidding process, unless already on file with EHS.

**4.1.2.** A completed Contractor EHS Questionnaire is returned to EHS for approval for EACH Contract Company associated with the contracted work should be done PRIOR to awarding contract work, with supporting information provided as indicated by responses on the questionnaire.

**4.1.3.** At this time, based upon initial review of the EHS Questionnaire, additional contractor information (training records, written procedures, etc.) may be requested by EHS prior to approval, based upon type of work to be performed on-site.

**4.1.4.** The questionnaire and additional submittals are reviewed as part of the selection process to evaluate the safety qualifications of the contractor. Contractors with a poor safety record or program may be disqualified from bidding on the contract or requested to update their programs to qualify. Contractors with acceptable health and safety submittals are designated as approved contractors for bidding. Criteria for approval include the following:

4.1.4.1. Injury and Illness rates (as compared to industry average). 4.1.4.2. Current documentation of past safety performance (including Experience Modification Rate).

4.1.4.3. Written safety policies and procedures are comprehensive.

4.1.4.4. Health & Safety Training

4.1.4.5. Enforcement of safety procedures

4.1.4.6. Pre-work review of potential hazards (ex, confined space, LOTO, Hot Work, Electrical Work, Elevated Work Lead or Asbestos abatement)

4.1.4.7. Verification that the contractor has not been removed from the site Approved Contractor List for violation(s) of the Contractor Safety program.

4.1.4.8. Other criteria, as identified.

**NOTE:** Based on information provided, Contractors with a poor safety record or program may be disqualified from bidding on the contract **OR** requested to update their programs to qualify.

**4.1.5.** EHS updates the site approved contractor list with the vendor and applicable information (Type of work (low, industrial or construction), GE Project Manager/Contact, Resident or non-resident contractor, high risk operations potential to be performed and any other additional requirements.

**ADDITIONAL REQUIREMENTS:** identified for contractors to perform work on the facility, will be listed in the Notes section of the site approved contractor list and provided to the GE Project Manager.

**4.1.6.** Site Workflow for contract activities, contractor badge approvals, includes an EHS Vendor Validation step (ref CP-04-201 Labor and CP-04-215 Services).

**4.1.6.** Exceptions to this procedure must be approved by EHS.

## **4.2. Chemical Usage**

**4.2.1.** The Contract Company must provide the GE Project Manager, or designee, with a complete list of chemicals required to complete the contract task. The contract company shall also provide a current Material Safety Data Sheet (MSDS) for these chemicals.

**4.2.2.** The GE Project Manager searches the approved chemical database (SDS System).

**4.2.3.** If exact match is not found, a Purchasing Approval Request (CPAR) is initiated to request approval for the chemical.

**4.2.4.** The EHS Group reviews the CPAR and MSDS and either approves or rejects the chemical's site use.

**4.2.5.** The GE Wilmington EHS Group must be contacted for waste chemical disposal.

**4.2.6.** Chemicals used by non-resident contractors must be approved by EHS to use but do not need to follow steps 4.2.2 thru 4.2.4 of this procedure.

**4.2.7.** Non-resident contractors must have copies of all MSDS available at their job site.

**4.2.8.** Exceptions to the chemical usage section of this procedure must be approved by EHS.

### **4.3. Contractor Site Admittance**

**4.3.1.** See Procedure CP-28-111 for site badging/access procedure.

### **4.4. Commencement of Contract Work**

<p><b>NOTE:</b> Prior to commencement of contract work affected GE employees are informed of any hazards related to the work.</p>
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**4.4.1.** Contractors must comply with State, Local and Federal regulations as well as site Wilmington Site EHS and other policies.

**4.4.2.** Typical Controls for work in the Controlled Access Area: (See Radiation Protection Office for Current Requirements)

**4.4.2.1.** Prior to entering an Airborne Controlled Area, contractors may be required to provide one urine sample (Reference P&P 40-19) and complete a Cumulative Occupational External Radiation Exposure History

**4.4.2.2.** Contractors entering the Airborne Controlled Area will be required to log their hours spent in the area.

**4.4.2.3.** Contractors working in a Radiation Area may be required to wear a Thermo Luminescent Dosimeter (TLD) Badge under protective clothing between their neck and waist while working in the area.

**4.4.3.** Contractors conducting work requiring control of energized sources or entry to confined spaces must provide the Project Manager with a copy of their lockout/tagout procedures and these procedures must be equal to or more stringent than GE procedures.

**4.4.4.** Contractors will not use GE Wilmington equipment (e.g. machines, fork trucks, and tooling) without proper training and GE authorization.

**4.4.5.** Contractors will maintain housekeeping in the areas they are working.

**4.4.6.** Contractors will provide proper barricading around work areas.

**4.5. Work monitoring:** The Project Manager and the EHS personnel will conduct routine inspections of the contract work activities (these routine inspections may be included in normal housekeeping area inspections or others, as appropriate). Failure to comply with site EHS policies may result in removal of offending personnel from the site and termination of the contract.

#### **4.6. Contractor Oversight**

##### **4.6.1. Reporting of Injuries**

**4.6.1.1.** Contractors have the responsibility to report injuries or accidents to the Project Manager (regardless of severity) immediately. Injuries or accidents in the Airborne Controlled Area must also be reported to Radiation Protection immediately. Injuries that are an emergency may be treated by the GE on-site medical clinic or GE EMTs. Non-emergency injuries should be referred to the contractor's internal treatment process. Injuries that impact the contractor's ability to be in the Airborne Controlled Areas must be evaluated by GE Medical before return. Additionally, contractors are responsible for and must also conduct accident investigations of any injuries that occur on site and provide to the GE Project Manager.

##### **4.6.2. Non Compliance**

**4.6.2.1** Contractor compliance issues are documented on the Contractor Health and Safety Infraction Notice. The Contractor Health and Safety Infraction Notice is presented as Attachment B. The GE Project Manager issues safety infraction notice to the contract company for completion.

**4.6.2.2.** Upon receipt of the completed "Contractor Health and Safety Infraction Notice", the GE Project Manager and EHS will evaluate, based on the incident, and identify, as appropriate, any additional corrective and/or preventive actions (as identified by the contract company's investigation or other) for completion. Actions may include, based on the evaluation, removal of the contract company and/or contract personnel, to ensure the site maintains a safe work environment.

##### **4.6.3 Contractor Dismissal**

**4.6.3.1.** GE maintains the right to terminate the contract and/or dismiss contractor personnel for safety problems without penalty to GE.

**4.6.3.2.** Site Security will be notified and remove access rights for the applicable individual(s).

4.6.3.3. If a contract company is evaluated as unable to maintain presence on-site, the Site Contractor Approved List information will be highlighted in Red; requirements to be re-established as a site contractor will be provided to the contract company and not allowed to bid on projects until corrective actions have been completed (tracked in the \*restrictions section of the Site Approved Contractor List)

#### **4.6.4. Construction Projects**

**4.6.4.1.** Large Scale involving significant renovation, new construction or demolition (scheduled to last more than one week) require a site-specific project construction safety plan detailing the rules, regulations and procedures to be followed on the project. Small-scale office relocations, routine maintenance and repair of building/facilities are not subject to this requirement. Contractor Safety Work plan (Typical) for use provided as Appendix C.

**4.6.4.1.1.** Initial work scope review meeting should be performed with the GE Project Manager, contract management and EHS Group.

**4.6.4.1.2.** Routine reviews/meetings by the Construction Company management, GE Project Manager and EHS Group on status of the project, including a review of any improvements, corrective and/or preventive actions and project schedule, including a post project review with any identified improvements to be provided to EHS for review.

**4.6.4.1.3.** Large scale construction projects require the construction company to perform daily worksite inspections, with results reviewed with the GE Project Manager and EHS group during construction project scheduled review meetings (as identified in section 4.6.4.1.1 and 4.6.4.1.2 above),

### **5. Training / Documentation**

**5.1.** Documentation of the approved qualification will be maintained by Sourcing and EHS.

**5.2.** For employee badges, site workflow record data base is maintained.

**5.3.** This procedure, and any changes to it, is communicated to potential GE Project Managers as applicable.

**5.4.** EHS maintains site documentation of inspections using forms typical for other EHS inspections. Records of contractor inspections are to be made available to site EHS upon request.

#### **5.5. Low Hazard Work Activities performed – Annual Basis:**

**5.5.1. EHS Awareness:** Basic level of training highlighting basic OSHA safety topics

**5.5.2. Blue Dot:** Introduction to the site layout and key features of the emergency response plan

**NOTE:** training provided by Security upon initial site assignment and annually thereafter

Exceptions as noted in section 5.8 of this procedure



## **5.6. Industrial or Construction Work Activities performed – Annual Basis:**

### **5.6.1. EHS Awareness and Blue Dot training (See section 5.5 above)**

**5.6.2.** Mid Atlantic Safety Council (MASC) Basic “+” Safety Training or the reciprocal level with other Safety Councils, to be completed prior to initial assignment to site. GNF or GE Industrial Safety or Security leaders may accept non-reciprocal training on a case by case basis, approved by EHS.

**NOTE:** training provided by Security upon initial site assignment and annually thereafter

Exceptions as noted in section 5.9 of this procedure

## **5.7. Qualified or Certified Training:**

**5.7.1.** Contract Company will ensure that Contractor Employees are trained appropriately for their work tasking. The minimum requirements are found in Federal and State Regulations. Examples of this training are (but not limited to)

**5.7.1.1.** Lockout Tagout

**5.7.1.2.** Fall Protection

**5.7.1.3.** Electrical Safety

**5.7.1.4.** Confined Space Entry

**5.7.1.5.** Hot Work

**5.7.1.6.** Specific Chemical Hazards

**5.7.2.** Contract Companies will provide certification of training upon request by the GE Project Manager or EHS.

## **5.8. GE Project Manager (or designated representative):**

**5.8.1.** My Learning Courses - *GE-EHS-261/GE-EHS-261R, GE-EHS-525A and, GE-EHS-545***OR** *equivalent.*

**5.8.1.** For supervising construction projects, My Learning Courses (identified in 5.8.1.1.) **AND** GE-EHS-440 (OSHA 10 Hour Construction or equivalent) **OR** experience in applicable construction type activities (as verified by the EHS).

**5.9. Exceptions:** Exceptions, in emergency situations, may be approved by EHS.

## **6. Documentation:**

### **6.1. Contractor Training Records:**

- 6.1.1.** Training Security documents initial/refresher contractor training in appropriate tracking database. Hardcopy records are filed in security office at the South Gate.
- 6.1.2.** Resident contract Company will provide training to Resident Contract Employees as established by agreement with Site EHS. Initial training for Resident Contract Employees prior to badge issue will meet the requirements for Level II above.

### **6.2. Contractor Oversight Documentation:**

- 6.2.1.** Reports of injuries, accidents or non-compliance with site policies may be communicated via e-mail notifications to the GE Project Manager.
- 6.2.1.** Upon notification of any non-compliance with site policies, the GE Project Manager shall contact EHS who will review with the Project Manager, complete the GE section of the Contractor Infraction Notice and provide the Notice to the contractor management to complete and returned to EHS as soon as possible.
- 6.2.2.** Corrective actions completed may be communicated via e-mail notifications, as evaluated by the GE Project Manager and EHS, between GE and the contract company.
- 6.2.3.** EHS shall review with the GE Project Manager status of the investigation and evaluate additional requirements to continue or resume work on-site.

## **7. Evaluation:**

### **7.1. Annual Program Evaluation:**

- 7.1.1.** EHS shall evaluate the Contractor Safety Program against the GE Corporate Health & Safety Framework, EHS Scorecards, Inspection results, and Contractor Infraction Notices received from the past year and EHS Power Audits. This evaluation will be tracked (ex: Gensuite Compliance Calendar). Contract companies may be required to meet additional requirements to maintain status as a site approved contractor or be removed from the site approved contractor list.
- 7.1.2.** Identified improvements to the site Contractor program will be tracked to closure (ex: Gensuite Condition Reporting tool).
- 7.1.3.** Annually, as part of the Carolina Star program evaluation, site approved contractors who work >500 hours per quarter on-site will complete the Contractor EHS Questionnaire on an annual basis to provide previous years EHS metrics for inclusion in the annual Carolina Star Program Evaluation (as applicable).

**7.1.4.** Perform overall contractor company health and safety performance is reviewed annually on Resident Contractors that perform Industrial or Construction Work activities.

## **8. Appendix:**

**A.** [Contractor EHS Questionnaire](#) (Typical)

**B.** [Contractor Infraction Notice](#) (Typical)

**C.** [Contractor Safety Work plan](#) (Typical)