

American DND Corporate Health and Safety Plan

1.0 Introduction

This Health and Safety Plan (HASP) is the written embodiment of the American Demolition & Nuclear Decommissioning, Inc. (American DND) Corporate Health and Safety Program and its constituent standard processes and procedures for preventing accidents and injuries on American DND jobsites. The health and safety protocol established by this program is based on representative site conditions known and anticipated to be present on jobsites and at our corporate locations. These processes and procedures, combined with any site-specific health and safety plans (SSHASP), will constitute the overall environmental, safety, and health (ES&H) plan for any American DND project.

All operations and equipment used by American DND shall comply with:

- Applicable Occupational Safety and Health Administration (OSHA) Laws and Regulation
 - Section 29 Code of Federal Regulations (CFR) Part 1926, Safety and Health Regulations for Construction
 - 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- U.S. Department of Energy (DOE) 10 CFR 851, Worker Safety and Health Program
- National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos regulations and applicable state and local rules governing asbestos abatement operations
- National Demolition Association (NDA) Demolition Safety Manual

Before site operations begin, all employees shall have:

- (1) Read or reviewed the contents of this HASP and any SSHASPs
- (2) Acknowledged their understanding of this HASP and all revisions made to it by signing the “Declaration of Understanding” statement in the “New Employee Orientation/Safety Awareness Training and Acknowledgement” form (**Section 9.6.1**)

This HASP is subject to ongoing review and revision by American DND pending approval by the quality assurance/quality control (QA/QC) team.

1.1 Safety Program Synopsis

American DND utilizes assigned hardcopy HASP manuals issued by job number to each supervisor/foreperson and/or environmental, safety, and health representative (ES&HR) who operates a project-specific jobsite.

The entire manual is a living document which is to be used to create the SSHASP for a given jobsite. The manual becomes active and effective when proactively and consciously utilized by the project team, supervisor/foreperson, and/or ES&HR to create a safe worksite.

To support full implementation of **Integrated Safety Management (ISM)** guiding principles into work planning and execution, the Health and Safety Program incorporates the following core Integrated Safety Management System (ISMS) functions/elements, as illustrated in the feedback loop in **Figure 1-1**:



- Line management responsibility for safety
- Clear roles and responsibilities
- Competence commensurate with responsibility
- Balanced priorities
- Identification of safety standards and requirements
- Hazard control tailored to work being performed
- Operations authorization



Figure 1-1. ISMS Flowchart

Every employee on an American DND jobsite, including the project manager (PM), supervisor/foreperson, and ES&HR, is considered a “competent person.” All persons possess the necessary training and experience to recognize and anticipate hazards and the knowledge and capacity to implement site procedures and controls to avoid accidents and create a safe workplace. Everyone has the authority to stop work in the event of unsafe conditions and immediately implement corrective actions.

This manual contains copies of American DND safety policies and general safety rules that apply to all jobsites. The manual also contains hazard assessments and site-specific policies that set forth the basis of the anticipated hazards of the specific job and the work practices that will be implemented to avoid these hazards.

The manual also contains **safety awareness** programs and provides orientation forms, training forms, and toolbox safety forms on which all safety meetings and training are documented. It also provides a staged disciplinary procedure for the supervisor to use to upgrade overall safety awareness. Employees/subcontractors who do not embrace and wholeheartedly practice safe work ethics and procedures are removed from the jobsite.

SSHASPs for each jobsite are audited monthly by the Corporate Health and Safety Director and QA/QC team to ensure their use and quality of implementation/maintenance. The efforts are audited on an annual basis to evaluate ranking of the supervisors and employees’ safety record. The manuals are updated semiannually or as needed to include updates in regulations and to communicate notifications to the field workforce.

In addition to the manual, American DND completes weekly and monthly facility and jobsite inspection and audit forms that are used by the Corporate Safety Department, supervisor/foreperson, and administrative supervisors to quantitatively measure safety performance on each jobsite. The management safety audit checklist is provided in **Section 10.5.5**.

It is American DND management's opinion that the combination of all these efforts and the constant hands-on management of our safety personnel and general supervisors that keep our safety awareness at the highest-possible level. It is the cooperative team effort and daily practice of safe work procedures that enables American DND to succeed in continuing to achieve our **zero-accident performance philosophy**.

1.2 Corporate Safety Statement

To: All Fellow Employees

From: Bill Sundeen, President/CEO, American DND

American DND places top priority on the safety and wellbeing of all personnel. Nothing takes a higher priority for American DND management than:

- Accident/injury prevention
- Worker safety
- Visitor safety
- Public safety and health
- Environmental responsibility

For American DND's safety program to be effective, American DND management expects every person to participate in all aspects of safety, with the belief and understanding that **all accidents and injuries are preventable**. American DND creates a safe attitude in a cooperative effort to continuously maintain an excellent safety record. American DND expects everyone, including officers, management, supervisors, forepersons, stewards, operators, laborers, and drivers to participate and contribute, proactively, in the implementation and enforcement of the American DND safe work ethic. No unsafe acts are acceptable, nor will they be tolerated on any American DND jobsite.

American DND's goal is zero-accident, zero-injury safety performance.

American DND's management accepts the responsibility for implementing the Williams-Steiger Occupational Safety and Health Act of 1970 and will enforce compliance with all applicable safety laws and regulations.

American DND embraces the core Integrated Safety Management (ISM) functions/elements to successfully implement ISM guiding principles:

- Line management responsibility for safety
- Clear roles and responsibilities
- Competence commensurate with responsibility
- Balanced priorities
- Identification of safety standards and requirements
- Hazard control tailored to work being performed
- Operations authorization

Project managers and site supervisors/forepersons fulfill the definition of "competent person" as defined by the U.S. Occupational Safety and Health Administration (OSHA), and are responsible to plan out all activities, prior to execution, and are required to ensure that all adequate resources, including safety supplies, are on the job prior to the start of work.

Supervisors/forepersons will conduct site-specific safety orientations for newly hired employees and newly transferred employees, as well as subcontractors for awareness purposes. Superintendents and forepersons will assign tasks to employees/subcontractors commensurate with their level of experience and training.

Every individual on an American DND jobsite maintains the right to stop work on the project if any unsafe conditions or presence is suspected. The supervisor/foreperson or project manager shall be informed immediately of any suspected unsafe conditions/situations so corrective actions can be implemented immediately.

To monitor compliance with our zero-accident performance philosophy, American DND requires all accidents, injuries, and mishaps, no matter how small, incidental, or minor in severity, be reported immediately to the supervisor/foreperson, project manager, and Corporate Health and Safety Director. Compliance with specific safety protocol is further reviewed as part of the American DND quality assurance/quality control review process.

American DND further reinforces our commitment to safe work attitudes and zero-accident performance philosophy through a safety engagement program administered on a site-by-site basis by the president/CEO and senior vice president. American DND firmly believes there is profit in safety, and those profits should be shared with all those who contribute to a safe workplace.



William C. Sundeen
American DND President/CEO