

Project Justification Statement
Proposed Standard for the Department of Energy
Voluntary Protection Program:
Department of Energy Voluntary Protection Program Standard

1. Organization Name/Code.

Office of Worker Safety and Health Assistance, AU-12

2. Author's Name (Contact Information: Phone, E-mail).

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18-25-16
date

3. Senior Line Manager (First SES-level manager above the author).

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18/25/16
date

4. How will this new or proposed revision to the DOE Technical Standard support DOE?

The Department of Energy (DOE) initiated its Voluntary Protection Program (VPP) in January 1994 to promote improved safety and health performance through public recognition of outstanding programs. DOE-VPP also includes coverage of radiation protection/nuclear safety and emergency management because of the type and complexity of DOE facilities. Similar to the Occupational Safety and Health Administration's (OSHA) VPP program, DOE-VPP provides several proven benefits to participating sites, including improved labor/management relations, reduced workplace injuries and illnesses, increased employee involvement, improved morale, reduced absenteeism, and public recognition.

Since 1994, the Office of Worker Safety and Health Assistance and its predecessor offices have maintained four program documents that define the VPP program requirements and procedures for participants to apply for and achieve recognition for exceeding regulatory requirements in a quest for a safer work environment. The proposed new standard will combine the current program documents into a single standard to provide the application and maintenance of DOE VPP Standards.

5. After conducting a search for Voluntary Consensus Standards what possible standards were considered for use in lieu of developing or revising the subject DOE Technical Standard?

No other consensus standard is available that describes the DOE VPP process and procedures unique to DOE.

6. Provide reasoning for not using potentially applicable Voluntary Consensus Standards.

There are no applicable voluntary consensus standards for DOE VPP.

7. Will this new or proposed revision to the DOE Technical Standard have an impact on any DOE Directives or a Rule? If so, please list the impacted Directive(s) or Rule(s).

This new technical standard will not impact current DOE safety directives or be incorporated by reference in any DOE Directive or Rule.

8. Provide reasoning for selecting document type (DOE Standard, DOE Handbook, DOE Specification). Please refer to DOE O 252.1A, *Technical Standards Program*, Appendix A, Technical Standard Document Types. Note: DOE Handbooks must not include requirements statements (“shall” statements).

A standard was chosen as the basis for the *Department of Energy Voluntary Protection Program Standard* based on DOE O 252.1A, Appendix A, paragraphs 1.a. and 1.b., which state “DOE standards:

- a. Provide specific standardized approaches, methodologies, technical criteria, or other information on accomplishing a task, developing a plan, and/or performing a calculation or assessment to implement a DOE requirement.
- b. Provide a common shared approach or methodology for implementing a DOE requirement such that its implementation is consistent across DOE programs and operations.

The current program documents contain many “shall” or “must” statements that only apply when an applicant voluntarily adopts the approach. Those statements then become bases for evaluating the applicant’s safety and health program, and determining if the applicant meets the requirements for recognition under VPP. The program standards have been in use for 22 years, with modification.

9. Provide target development milestones:
 - a. Planned Start (September/2016) – Start developing draft
 - b. Planned Coordination (January/2017) – Submit for TSP RevCom Review
 - c. Planned Completion (June/2017) – Approval and Issuance