Table of Contents

1 Purpose

The purpose of this procedure is to describe ITER requirements to ensure safe conditions for contractors and their subcontractors working on the IO premises in compliance with the French regulation (notably Decree 92-158).

2 Scope

This procedure applies to all contractors and their subcontractors involved in the ITER project and carrying out tasks and services within IO premises and buildings.

In compliance with Decree 92-158, the instruction does not apply to the ITER construction worksite that is under the requirements of a specific set of Health and Safety rules.

The document is belonging to Occupational health and safety process and is level 2 document in the MQP hierarchy.

3 Definitions and acronyms

Contractors: all external entities / staff carrying out work for ITER within ITER premises. This might include but is not limited to:

- External experts
- Interim workers
- DA staff and support staff permanently working in ITER premises
- Interns
- Project associates
- Cleaning service provider
- Permanent contracted maintenance personnel
- External technical staff carrying out periodical checks on equipment
- Companies working on assembling of new installations or equipment.
- Providers of yearly or periodical maintenance according to legal requirements.

Subcontractors: contractors having no direct contract with IO, but with another contractor on site.

4 References

- **Labour code** Art L 4511-1 and Art R4511-1 to 12, R4512-1 to 16, R4513-1 to 13, R4514-1 to 10, R4515-1 to 11
- **ITER General Emergency Procedure (T24NPG)**
- **Internal Regulations (27WDZW)**
- **Working conditions on the ITER Organization site (2EQ9JM)**
- **Protocol for Deliveries at ITER (SGEN74)**
- **Safety induction - D92** *(TVUL52)*

5 Responsibilities

IO SHS division:

- Takes part to pre-work meetings;
- Delivers safety instructions;
- Participates to prevention plan elaboration;
- Keeps a record of all prevention plans for at least 3 years;
- Takes part in contractors' audits and work inspections.

- IO department/division/section (that engages external party on a contract within the IO premises and buildings):

- Inform SHS division about new contractor's activities 15 days prior start of works;
- Holds the pre-work meeting in which all safety requirements are presented and a prevention plan is completed;
- Sign the Prevention Plan;
- Manages pre-work and periodical coordination meetings.

- Committee for Health and Safety (CHS):
  - Might request further inspections if deemed necessary due to the nature of risks.

- External company representatives:
  - Provide IO with written information about:
    - Date of arrival on site and duration of the intervention
    - Name and references of all subcontractors, identification of subcontracted tasks
  - Provide accreditation of employees' competence as well as equipment inspection when requested by IO;
  - Take part in meetings and inspections;
  - Make sure the prevention plan, safety training and all other necessary safety instructions are shared with the workforce involved in the work (including subcontractors);
  - Get aware of their obligations through this instruction and the Prevention Plan Note for contractors;
  - Designate an Occupational Doctor for medical screenings and check-ups.

6 Basic principles

6.1 Prevention Plan

A prevention plan must be established:
- when the operation includes more than 400 working man hours (in 12 months);
- when it involves hazardous work (according to the list in the Order dated 19th March 1993 – see annex 1).

As part of the process of developing the prevention plan a meeting must take place between the contractor and the IO before any work starts. The prevention plan will be filled in together during the pre-work inspection (common preliminary inspection) to review hazards that exist in the workplace and hazards that may be created by performing the work, or by being in the vicinity of the work. During this meeting, attendees will discuss about the different hazards involved by the operations to determine the mitigation measures to implement.

a. Pre-work Inspection (or Common Preliminary Inspection)

The pre-work inspection must include these elements:
- Identify the work area;
- Identify car park area and traffic paths, both pedestrian and vehicle ;
- Identify workplace hazards or possible hazardous conditions, including those due to coactivity;
- Identify the means of mitigating identified hazards;
- State the rules to work safely within the IO site.

Participants in the work place inspection should be at a minimum:
- The person responsible from the contract company;
- The IO Responsible Officer for the contract (or his representative);
- The member of IO SHS Division designated;

- A representative of any subcontractor involved in the intervention.

b. Prevention Plan elaboration

All subcontractors must be mentioned on the prevention plan and must sign it individually.
Every stakeholder shall have a copy of a complete prevention plan.
The information required to be supplied in the prevention plans as follows:

Administrative Information

- The start date of the work and duration,
- The name and qualifications of the person in charge of the contract, both from the IO and contracting company,
- The number of employees, names and qualifications (if necessary for performing the work),
- Information about eventual subcontractors (name, number of person, subcontracted phases of work).

HS information:

- Results of the workplace inspection (Phase's definition of hazardous activities, coactivity and adequate prevention means),
- The adaptation of materials, equipment and devices to the nature of operations performed and the definition of service's conditions,
- The organization set up for emergency situation and the description of the system put in place for this purpose by the IO (ITER General Emergency Procedure),
- Identification of subcontractors and subcontracted work.

Follow up and Update

It is important to note that the prevention plan should be updated during the operation if conditions change. No deviations shall be allowed on the scope of work. In this case a new pre-work inspection may be necessary.
Follow up meetings and audits (for extended work duration) may be carried out on contractors Health and Safety performance. Corrective actions will be assigned to fix identified deficiencies. In the event of serious issue, work can be suspended upon IO Building Health and Safety Technical Officer.

6.2 Training Requirements

Specific accreditation required for the work will be provided along with the prevention plan if requested from IO. This shall be requested before work is commenced.

At the arrival of every new comer, a safety leaflet is provided. They shall be kept available at any time by every contractor's employee.

Contractors have the responsibility to train their personnel working on ITER site. Upon receiving the approved Prevention Plan, the person in charge of the contracting company shall share the Prevention Plan with the entire workforce under the contract. It is the responsibility of the contractor reference person to make sure the information is correctly understood before workers start their activities.
Access to IO procedures / instructions and emergency plans is given during the prevention plan development.

Contractors and Sub-contractors are also required to:

- Participate in fire / emergency drills exercises;
- Participate in emergency drills involving local responders or CEA;
- Contractors are encouraged to make their staff available in the IO Safety Training;

- Be familiar with information provided in the ITER safety leaflet/Safety induction brochure - D92 *(ITER_D_TVUL52 v1.0)*

6.3 Reporting of Incidents and Hazardous Situations

Safety tickets
Contractors can alert any dangerous situations even if they are not involved. A simple way to inform SHS division of a hazardous situation is the safety ticket system. It consists in a simple form to fill in.

Incident Report
It is mandatory to inform SHS division of any incident occurring on site without any delay. Contractors are required to report immediately to IO the number of accidents of contract and subcontract personnel working for the IO thanks to the incident report form.

In the case of a work injury, the reporting requirement is within 24 hours of the incident and an IO SHS representative shall review the report to help determine corrective actions to be carried out if needed.

6.4 Occupational Doctor

Obligations relating to occupational health are the responsibility of the contractor.
The occupational doctor from IO provides the occupational doctor of the contract company, at his request, any information on specific hazards of work (berrylium).

Medical Exam
Pre-employment screening, and then visits every 2 years (every year in case of increased medical surveillance) are under the responsibility of the contractor.

7 Disciplinary actions

In case of deviations, unsafe acts, unacceptable behaviour or any event that might impair the contractors' or IO staff health and safety, disciplinary actions shall be considered upon completion of a thorough investigation: this shall involve the contractors' workers, the contractors' reference person and the IO staff involved in the contract.
In case of serious misconduct, contractors might be denied the access to site according to article 4.2 of the Internal Regulations.

8 Forms and templates and checklists

- **Incident report form (3QNA5F)**
- **Reporting Accidents & Near-Misses (32BNUE)**
- **Prevention plan template (T76WJE)**

9 Records

Prevention plans shall be kept for three years in view of potential inspections, and remain at the disposal of the CHS and occupational doctors concerned.

Location of the procedure: / IDM Root / Project Integration, Administration & Services / 8.0 Safety / Security and Health & Safety (SHS) / Occupational Health and Safety (OHS) / 04-Contractors Management

Location of the template: / IDM Root / Project Integration, Administration & Services / 8.0 Safety / Security and Health & Safety (SHS) / Occupational Health and Safety (OHS) / 04-Contractors Management / Prevention plans / Procedures

- IDM document type (if required)	
- Location of folder (in IDM)	
- Instructions for identification of the records (naming convention of the documents)	
- The responsible team (for managing the records)	
- The retention period (the retention period may be governed by external standards and regulations. The responsible team in charge of records shall consult Legal, Safety and Quality division to ensure proper definition of retention periods)	

ANNEXE 1

Hazardous Work

For contractors whose stay is shorter than 2 weeks, a prevention plan is not needed except in case their activity is one among the following (according to the list in the Order dated 19th March 1993 – see annex 1):

1. Work involving exposure to ionizing radiation.
2. Work involving exposure to explosive, combustibles, extremely flammable, easily flammable, very toxic, toxic, noxious, CMR substances.
3. Work involving exposure to Biological risks.
4. Working on installations classified for environmental protection (ICPE).
5. Maintenance on machines and work equipment, other than lifting gears needing periodical technical evaluation.
6. Work on lifts, cargo lifts
7. Work on high / low temperature installations.
8. Work involving lifting equipment (hoist, cranes),
9. Work involving hand driven lifting equipment above working or traffic areas
10. Work exposing to contact risk with live parts (voltage above T.B.T (legal very low voltage)
11. Work involving use of work equipment where article R. 4323-17 of the Labor code applies.
12. Construction work with potential fall from height at 3 meters.
13. Work involving exposure to noise levels exceeding 90 dB (A) (140 dB(C)).
14. Work with exposure to drowning risk.
15. Work with exposure to burying risk
16. Assembling, disassembling of heavy pre- fabricated elements.
17. Demolitions.
18. Confined space work
19. Work in hyperbaric environment
20. Work with laser (greater than class 3A).

Oxy-acetylene welding requiring the use of a fire permit.