



The National Science Foundation Division of Polar Programs United States Antarctic Program

PESH-POL_2000.05 USAP Safety and Risk Management Policy

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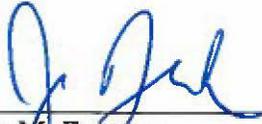
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Consult the USAP Master List for the most current version.

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Signature Approval

Approved by:



21 Jul 2016

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Date

Table of Contents

1.	Purpose	1
2.	Scope	1
3.	Applicability and Compliance	1
4.	Responsibilities	1
5.	Policy	2
5.1.	Objective	2
5.2.	Safety Program Principles.....	2
5.3.	Risk Management	3
5.4.	Compliance with Regulations and Standards.....	3
5.5.	Hazard Reporting	3
5.6.	Mishap Reporting and Analysis.....	4
5.7.	Authority of the ASC EHS Organization	4
5.8.	Participant Rights	4
6.	Points of Contact	5
7.	Policy Review	5

1. Purpose

The purpose of this document is to establish and promulgate the Safety Risk Management Policy of the U.S. Antarctic Program (USAP).

2. Scope

The USAP Safety Risk Management Policy applies to all participants under the auspices of the USAP. While participants are deployed to Antarctica, en route to and from the Antarctic continent, or aboard USAP chartered vessels and aircraft, they shall be considered under the auspices of the USAP. For the purposes of this policy, “participants” include but are not limited to:

- National Science Foundation (NSF) employees
- Persons affiliated with or employed by other U.S. Government Agencies, except Department of Defense (DoD) military personnel when subject to equivalent or more stringent DoD or component safety policy and risk management systems.
- Persons affiliated with or employed by an NSF grantee institution engaged in science activities as a consequence of an NSF grant, or other persons who work or visit Antarctica or USAP facilities under NSF sponsorship.
- Contractors, subcontractors, and consultants engaged in supporting USAP activities.

3. Applicability and Compliance

This policy applies at all times to all participants while in Antarctica and working at or visiting USAP stations and camps, or aboard USAP vessels, aircraft, and vehicles.

This policy also applies to the extent practicable to all participants while working at or visiting USAP operating locations in the U.S. or in gateway cities, except that host countries may impose more stringent requirements that must be followed.

4. Responsibilities

All participants and all organizations associated with the USAP have responsibilities as follows:

- The Director, National Science Foundation, has delegated to the Director, Division of Polar Programs, the authority to develop and implement policies for managing the USAP. This Safety Risk Management Policy governs associated safety and risk management systems to ensure reasonable protection from injury for all USAP participants and visitors and to promote effective stewardship of resources through the prevention of property damage and lost time.
- The Polar Environment, Safety, and Health (PESH) section is responsible for developing safety policy and overseeing its implementation.
- All USAP participants shall take responsibility for their safety and health, actively participate in creating a safe and healthful environment, and comply with the requirements in this policy. Participants also have the responsibility for bringing

this policy to the attention of visitors, as appropriate. Supervisors and science project leaders shall also be responsible for maintaining a safe and healthful environment for those they supervise.

- Grantee institutions and organizations are responsible for the safe conduct of their affiliates and employees while working at USAP operating locations and shall require them to comply with this policy.
- Contractors, subcontractors, and consultants shall require their employees to comply with this policy. Contractors and subcontractors having five or more employees engaged in USAP work shall, at a minimum, maintain a safety program consistent with this policy.
- The Antarctic Support Contractor is also responsible for:
 - Providing support to all USAP participants, as required, to correct safety issues and reduce safety risks. Safety support to participants shall include but is not limited to inspections, mishap analysis, provision of necessary safety and personal protective equipment, testing and monitoring, specialized training, safety advice and consultation, maintenance and support of participant safety committees, seasonal visits to major field camps, and maintenance of a full-time safety presence at McMurdo, South Pole, and Palmer stations.
 - Maintaining a comprehensive USAP-wide system for reporting and analyzing injuries, property damage mishaps, and close calls or near-misses, and for compiling and reporting data on such occurrences regularly and consistently.
 - Performing risk analyses of science, construction, and support projects identified by PESH, and implementing or recommending to Polar Programs appropriate risk controls where needed.
 - In the event that ASC safety personnel order an act or operation of a participant not employed by ASC or its subcontractors to be stopped, other than briefly, at remote sites, a report of the stoppage and its circumstances shall be made as soon as practicable and always within 24 hours to the NSF Polar Programs Safety and Health Officer and the NSF Representative or NSF Station Manager. This report can be made by email, phone, or in person.

5. Policy

5.1. Objective

The primary objectives of the USAP Safety Program are to provide all participants with safe and healthful places to work and live while performing the USAP mission and to preserve USAP property and mission capability.

5.2. Safety Program Principles

The fundamental principles of the USAP Safety Program are:

- Safety is a paramount concern. Safety is not subordinate to the accomplishment of research and operations, and management of safety risks shall be integrated into all operations.

- Participants shall be aware of and manage all safety risks to USAP personnel while engaged in the USAP mission.
- All safety risks shall be maintained at acceptable levels consistent with the benefit to the operation or mission.
- No unnecessary safety risks shall be taken or accepted.
- All USAP participants are responsible for their own safety and for controlling recognizable risks to those with whom they work and live. Supervisors and managers are responsible for the safety of their subordinates in the workplace.

5.3. Risk Management

Risk management is the process of identifying hazards, assessing and characterizing the risks associated with the hazards, and controlling the risks to an acceptable level consistent with the benefit to the program and its participants. Documented risk analyses appropriate for the scope and complexity of the project plan shall be completed for all deliberately planned projects, structured risk analyses shall be performed for unplanned or emerging projects and activities, and operational risk management shall be practiced throughout all activities at the point of operation. Risk management processes will be described in a separate procedure document.

5.4. Compliance with Regulations and Standards

Regulations and standards are usually the result of attempts to reduce risks based on prior experiences. Therefore, compliance with standards and risk management are mutually supporting safety management strategies. For Antarctic operations, where most U.S. regulations and standards do not as a matter of course apply, the USAP will incorporate, as guidelines, applicable national consensus standards and codes. However, the use of such standards or codes as guidelines shall not be construed as voluntary acceptance of or a decision to at all times comply with such standards and codes. In foreign operating locations, USAP operations shall comply with applicable regulations and standards of the host country.

In those cases where a code amendment or waiver is deemed necessary by the support contractor, the support contractor shall complete and submit the *Engineering Code Amendment or Safety Requirement Waiver Form* (PESH-FRM_2000.05-1) as indicated in the USAP procedure *Requesting a Waiver or Code Amendment* (PD-SOP-0004). The PESH safety and health officer, acting as the authority having jurisdiction (AHJ), will approve or deny each request based on discussions with the appropriate activity based manager (ABM) and/or the ASC point of contact for the request.

5.5. Hazard Reporting

All participants must report safety hazards that cannot be immediately corrected. Hazards may be reported to a participant's supervisor, to the ASC's Environment, Safety, and Health (ESH) organization, or directly to the NSF Polar Program's

Safety and Health staff. Anonymity shall be maintained if requested. Posters shall be displayed at all stations and major field camps specifying the processes for reporting hazards. Participants have both the right and responsibility to stop work where hazards present an imminent danger to safety and health.

5.6. Mishap Reporting and Analysis

All incidences involving death, injury, unplanned property damage, or situations that might have led to the aforementioned consequences but for good fortune or last minute intervention, often called “near misses” or “close calls,” shall be reported and analyzed using the ASC’s mishap reporting system. The Division of Polar Programs may direct additional analysis of serious mishaps. The prime objective of mishap analysis is to determine root causes so existing risks can be controlled and similar mishaps can be prevented in the future. USAP mishap reporting procedures will be described in a separate procedure document.

5.7. Authority of the ASC EHS Organization

In the absence of the NSF Representative, NSF Station Manager, Polar Programs Safety and Health Officer, or other Polar Programs safety staff, the ASC EHS organization shall be responsible for all matters of safety, health, and risk management, except those directly related to military operations. In this capacity, ASC EHS is authorized to stop unsafe operations, direct compliance with appropriate safety and health policies, including ASC policies applicable to the situation, and take other actions that may be necessary to reduce risks to acceptable levels and maintain an appropriate level of safety.

5.8. Participant Rights

All participants have:

- The right to report unsafe or unhealthful working conditions or operations to the ASC EHS office.
- The right to report unsafe or unhealthful working conditions or operations to NSF/Division of Polar Programs, and to have their name kept confidential, if requested.
- The right to request the inspection of any worksite alleged to possess unsafe or unhealthful conditions. Requests may be made to either the ASC EHS office or NSF/Division of Polar Programs. If desired, the names of those making requests to NSF/Division of Polar Programs will be kept confidential.
- The right to stop work, refuse a task, or cease an operation they believe, in good faith, to be an imminent danger to safety or health, if all the following conditions are met:
 - Where possible, the employer or program has been asked to eliminate the danger and refused to do so;
 - A reasonable person would agree there is a real danger of death or serious injury; and

- There is not enough time, due to the urgency of the hazard, to get it corrected through regular channels.
- The right to appeal the disposition of any report or inspection of an alleged unsafe or unhealthful condition to NSF/Division of Polar Programs.
- The right to be protected from discrimination, restraint, interference, coercion, or reprisal as a result of reasonable and good faith participation in safety and risk management processes.

6. Points of Contact

Posters with phone numbers and email addresses for reporting safety hazards to ASC and NSF are posted at each site. Questions about this policy may be forwarded to the Safety and Health Officer, Division of Polar Programs, Directorate for Geosciences, National Science Foundation, 4201 Wilson Boulevard, Arlington, Virginia 22230, at (703) 292-8030.

7. Policy Review

This policy is valid until rescinded. It will be reviewed as needed.