
Supporting Statement for Contractor Safety

Part A: Justification

OMB No. 1910-New

BPA F 5480.28e, Excavation/Trenching Permit

BPA F 6410.15e, Contractor's Report of Injury or Illness

BPA F 6410.18e, Contractor's Report of Incident/Near-Hit

BPA F 6410.42e, Contract Energized Electrical Work Permit

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

The purpose of the Information Collection Request is to collect information from BPA contractors at Bonneville Power Administration (BPA) sites pertaining to health and safety to include information on injuries, illnesses, accidents, and events that could adversely affect the health and safety of the public and/or workers. BPA has submitted to the Office of Management and Budget (OMB) for clearance a proposal for collection of information pursuant to the Paperwork Reduction Act of 1995. The proposed collection will allow BPA to gather information from contracting entities to ensure that safety requirements are being met.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on August 30, 2022, volume 87, number 167, and page 52945. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on November 14, 2022, volume 87, number 218, and page 68146. One comment was received and responded to. Comment was immaterial to the collection.

These collections require OMB approval under the Paperwork Reduction Act because the forms gather information from employees, contract employees, and members of the public. This new collection contains four collection instruments. The relevant instruments for these collections are the following forms:

BPA F 5480.28e, Excavation/Trenching Permit: **Form used to ensure adequate work planning by contract workers for trenching and excavation work.**

BPA F 6410.15e, Contractor's Report of Injury or Illness: **Form used by contractors to report contractor injuries to BPA on BPA contracts.**

BPA F 6410.18e, Contractor's Report of Incident/Near-Hit: **Form used by contractors to report non-injury incidents and near hits to BPA on BPA contracts.**

BPA F 6410.42e, Contract Energized Electrical Work Permit: **Form used to validate equipment cannot be de-energized by BPA engineers or substation operators before a contractor is allowed to work on energized equipment.**

Gathering this information is necessary to comply with Occupational Safety and Health Administration (OSHA) safety regulations for BPA's contracted workforce.

A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

BPA is a power marketing administration, a federal nonprofit agency based in the Pacific Northwest. Although BPA is part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services. BPA markets wholesale electrical power from 31 federal hydro-electric dams in the Columbia River Basin, one non-federal nuclear plant and several other small non-federal power plants. The U.S. Army Corps of Engineers and the Bureau of Reclamation own and operate the federal dams. BPA is responsible for marketing about one-third of the electric power used in the Northwest.

BPA also operates and maintains about three-fourths of the high-voltage transmission in its service territory. BPA's service territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

As part of its responsibilities, BPA promotes energy efficiency, renewable resources, and new technologies. The agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydroelectric power development in the Columbia River Basin.

The authorities for this collection are:

- The Bonneville Project Act of 1937, 16 U.S.C § 832a
- [Department of Energy Standardization Act of 1997](#), 42 USC Chapter 84, Section 7101
- Occupational Safety and Health Administration, Safety and Health Regulations for Construction 29 CFR Part 1926
- 29 USC, Chapter 15, sections 657

As a Federal Agency, BPA employees and contractors are required to adhere to a number of Federal regulations, executive orders, DOE Orders, policies and procedures. BPA's Safety Program seeks to comply with these requirements and also provide a safe and secure working environment for all employees and contractors. The purpose of the program is to provide measures to safeguard personnel in order to prevent death, injuries, or damage to equipment.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

The information being collected in BPA Forms **5480.28e, Excavation/Trenching Permit** and **6410.42e, Contract Energized Electrical Work Permit** primarily consists of the name and work contact information of the contractor in order to ensure the safe performance of the work.

The information being collected in BPA Forms **6410.15e, Contractor's Report of Injury or Illness** and **6410.18e, Contractor's Report of Incident/Near-Hit** contains the contract worker's name and work

contact info, but goes on to request specific information regarding the work taking place and actions prior to the incident. This information helps to determine root causes and allows for Safety personnel to follow-up with reporting parties for more detailed information required by the root cause analysis.

The information collected in BPA Form **6410.15e, Contractor's Report of Injury or Illness** also includes the injury or illness that the contractor is reporting as well as requests that witness reports be added to the documentation. This information is important for reporting purposes and to help determine root causes of accidents for future mitigation.

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

BPA F 5480.28e, Excavation/Trenching Permit: this form is posted at the job site and a physical copy is retained. The form can be filled and signed electronically and routed via e-mail.

BPA F 6410.15e, Contractor's Report of Injury or Illness: this form is submitted via e-mail to the Contracting Office Representative.

BPA F 6410.18e, Contractor's Report of Incident/Near-Hit: this form is submitted via e-mail to the Natural Resource Specialist for the project or the Contracting Office Representative.

BPA F 6410.42e, Contract Energized Electrical Work Permit: the form is posted at the job site and a physical copy is retained. The form can be filled and signed electronically and routed via e-mail.

The instruments are fillable electronic PDF forms, where they require submittal they are delivered via email. 100% of responses can be submitted electronically. Within existing budget and resource constraints, Department program managers and contractors continually work to apply the latest appropriate-level information technology (hardware and software) to reduce the contractor's information collection burden and improve the timeliness and usefulness of the management of the information being collected. The cost of additional automation significantly outweighs the potential reduction in burden on respondents.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

This is a new collection, existing collection sources were reviewed, but none met the information requirements.

A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The collection applies to businesses that contract to provide construction services to BPA; this collection will not have a significant impact on small entities. All questions asked on the four forms were reviewed and deemed necessary to ensure safe operations by BPA.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the collections are not conducted BPA would be out of compliance with OSHA mandated safety program requirements.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- (c) requiring respondents to submit more than an original and two copies of any document;
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;
- (e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- (g) that includes a pledge of confidentiality that is not supported by authority established in statute of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The information collection is conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and

recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on August 30, 2022, volume 87, number 167, and page 52945. No comments were received.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on November 14, 2022, volume 87, number 218, and page 68146. One comment was received and responded to. Comment was immaterial to the collection.

Due to the regulatory nature of the collection instruments in this package no other efforts were made to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or on the data elements to be recorded, disclosed or reported.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Respondents will not receive any payment or gift.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Where applicable, BPA provides notice that the proposed collection of information in this program will be part of a system of records covered by the Privacy Act and the routine disclosures that may occur. For BPA F 6410.15 the System of Record is DOE-38 Occupational and Industrial Accident Records. None of the other forms require a Privacy Act Statement.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Only BPA F 6410.15e, Contractor's Report of Injury or Illness has the potential to contain sensitive information since there is the potential for some medical information regarding an on-the-job injury or illness. Information is provided in the Privacy Act Statement regarding how the information will be used and disclosed as well as the reason for collecting the information.

None of the other forms request information that is of a sensitive nature.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

The totals in the table below are based on averages calculated by Safety staff. Burden hours were estimated based upon staff timing while reviewing instructions and filling out the collection instruments. Burden hours are rounded.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
BPA F 5480.28e Excavation/Trenching Permit	contractors	30	30	.3	9	1
BPA F 6410.15e Contractor's Report of Injury or Illness	contractors	30	30	.25	8	1
BPA F 6410.18e Contractor's Report of Incident/Near Hit	contractors	30	30	.25	8	1
BPA F 6410.42e Contract Energized Electrical Work Permit	contractors	100	100	.25	25	1
			0		0	
TOTAL		190	190		50	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
contractors	50	40.35	\$2,018
			0
TOTAL	50		\$2,018

Annual cost to the public is estimated to be \$2,018 based on an average of \$40.35/hour (fully burdened) using BLS data from: <http://www.bls.gov/news.release/ecec.nr0.htm> using civilian worker average compensation and 50 burden hours.

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Other than those described above, BPA does not anticipate any additional annual cost burden to respondents. There will be no ongoing operation or maintenance costs for respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated budget for the Safety office that processes this information collection is \$7,881 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, average full time equivalent (FTE) is approximately \$54.96/hour (based on the Bureau of Labor and Statistics Employer Costs for Employee Compensation Summary <http://www.bls.gov/news.release/ecec.nr0.htm>). BPA approximates .74 hours to review each form

- 190 reports/year x .74 hour/report x \$54.96/hour = \$7,727
- Those costs for the Safety Office budget that are not personnel-related and for office and equipment are \$154.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This is a new collection, therefore there are no changes or adjustments reported.

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

This information collection will not be published.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

BPA will display the OMB Control Number and expiration date on all collection vehicles.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement.