



Memorandum from the Office of the Inspector General

November 5, 2025

Jason T. Regg

**REQUEST FOR FINAL ACTION – EVALUATION 2025-17547 – OVERSIGHT OF
CONTRACTOR SAFETY**

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Lindsay J. Denny, Director, Evaluations – Operations, at (865) 633-7349. We appreciate the courtesy and cooperation received from your staff during the evaluation.

Greg Stinson
Assistant Inspector General
(Audits and Evaluations)

JAJ:FAJ

Attachment

cc (Attachment):

TVA Board of Directors
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OIG File No. 2025-17547



Office of the Inspector General

Evaluation Report

To the Vice
President, Safety and
Shared Services

OVERSIGHT OF CONTRACTOR SAFETY

Evaluation Team

John Anthony H. Jacosalem
Samantha N. Moore

Evaluation 2025-17547

November 5, 2025

ABBREVIATIONS

COR	Contractor Oversight Representative
OSHA	Occupational Safety and Health Administration
SPP	Standard Programs and Processes
SSSHP	Site-Specific Safety and Health Plan
TVA	Tennessee Valley Authority

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MEMORANDUM DATED OCTOBER 31, 2025, FROM JASON REGG
TO GREG STINSON



Evaluation 2025-17547 – Oversight of Contractor Safety

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

The Occupational Safety and Health Administration states that establishing a safety and health program is one of the most effective ways of protecting workers. The Tennessee Valley Authority (TVA) Standard Programs and Processes 18.004, *Contractor Safety Management*, establishes the contractor safety program and defines oversight requirements for managed taskⁱ contractors and subcontractors working on TVA-owned-or-controlled sites to meet state and federal safety and health regulations.

TVA Standard Programs and Processes 18.004 outlines several contract pre-mobilization requirements, including requiring all contractors to submit a Site-Specific Safety and Health Plan (SSSHP), which should adequately identify hazards inherent to the work environment and address safe-work practices based on the scope of work identified in the contract. In addition, the process requires (1) a TVA Contractor Oversight Representative (COR) be assigned as the single point of contact for providing appropriate technical direction and oversight of work performed by each contractor and (2) TVA Safety to conduct audits of contractor safety performance. Due to the importance of the health and safety of personnel working at TVA sites, we performed an evaluation of TVA's oversight of contractor safety.

What the OIG Found

We determined TVA was not providing adequate oversight of contractor safety in accordance with the contractor safety program. While some oversight was provided through tracking and trending of contractor safety performance, there were several areas that were not adequate. Specifically, TVA (1) could not provide completed SSSHPs for some contracts, (2) could not identify the COR for most of the contracts we reviewed or provide documentation that some of their responsibilities were being performed, and (3) did not perform safety audits as required.

ⁱ Managed task contractors are contract employees managed and supervised by a supplier providing services to TVA.



Evaluation 2025-17547 – Oversight of Contractor Safety

EXECUTIVE SUMMARY

What the OIG Recommends

We made four recommendations to the Vice President, Safety and Shared Services, related to completing SSSHPs, assigning CORs for each contract and increasing awareness of CORs' responsibilities, and conducting audits of safety performance as required.

TVA Management's Comments

In response to our draft report, TVA management provided planned actions to address our recommendations. See the Appendix for TVA management's complete response.

Auditor's Response

We agree with TVA management's planned actions to address our recommendations.

BACKGROUND

According to the Occupational Safety and Health Administration (OSHA), employers have a responsibility to (1) provide a safe workplace, free from serious recognized hazards and (2) comply with standards, rules, and regulations issued under the “Occupational Safety and Health Act of 1970.” OSHA states that establishing a safety and health program is one of the most effective ways of protecting workers.

As of September 18, 2025, the Tennessee Valley Authority (TVA) had over 14,000 managed task contractors¹ that provide services such as construction, maintenance, and modification work. TVA Standard Programs and Processes (SPP) 18.004, *Contractor Safety Management*, establishes the contractor safety program and defines oversight requirements for managed task contractors and subcontractors working on TVA-owned-or-controlled sites. TVA Safety is the governance owner of TVA-SPP-18.004 and is responsible for ensuring safety processes and procedures are in place to comply with OSHA requirements for managing contractors.

TVA-SPP-18.004 outlines several contract pre-mobilization requirements, including requiring all contractors to submit a Site-Specific Safety and Health Plan (SSSHP), which should adequately identify hazards inherent to the work environment and address safe-work practices based on the scope of work identified in the contract. The process also requires that a pre-start safety conference is conducted and documented, using TVA Form 21407, *TVA Contractor Oversight Checklist* (or an equivalent form). The checklist includes steps for TVA personnel to (1) review the SSSHP, (2) ensure that minimum training requirements have been documented, and (3) verify that a drug-screening program has been implemented. Once a contractor is mobilized, the procedure requires TVA Safety to perform routine audits and assessments, as well as track safety performance.

TVA assigns a Contractor Oversight Representative (COR) as the single point of contact for providing appropriate technical direction and oversight for work performed by each contractor. CORs are required to (1) ensure that contract employees have received all required TVA-specific safety training and (2) perform inspections of the jobsite and contractor performance for compliance with the SSSHP. Contract technical stewards serve as the liaison between the COR and TVA’s Supply Chain organization.

Due to the importance of the health and safety of personnel working at TVA sites, we performed an evaluation of TVA’s oversight of contractor safety.

¹ Managed task contractors are contract employees managed and supervised by a supplier providing services to TVA.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to determine if TVA was providing oversight of contractor safety in accordance with the contractor safety program. The scope included oversight and governance of managed task contractors and subcontractors working on TVA-owned-or-controlled sites during calendar year 2024. To achieve our objective, we:

- Reviewed TVA-SPP-18.004, *Contractor Safety Management*, and interviewed contract technical stewards, TVA Safety personnel, contract managers, project managers, and Generation personnel to obtain an understanding of TVA's contractor safety program.
- Performed analysis of contractor-related safety incidents between calendar years 2015 through 2024 to identify any specific areas of increased risk.
- Reviewed documentation for 8 of 1,560² randomly selected contracts to determine if select TVA-SPP-18.004 requirements were met, including:
 - Completing contract pre-mobilization safety processes and procedures.
 - Conducting routine safety performance audits, jobsite and contractor performance inspections, and random annual safety assessments.
 - Tracking safety incidents and analysis of contractors' safety performance.
 - Verifying documentation and completion of required training.
- Reviewed available documentation to determine if TVA had taken actions to address (1) trends of contractor-related safety incidents and (2) issues identified from audits, jobsite inspections, and assessments.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

We determined TVA was not providing adequate oversight of contractor safety in accordance with the contractor safety program. While some oversight was provided through tracking and trending of contractor safety performance, there were several areas that were not adequate. Specifically, TVA (1) could not provide completed SSSHPs for some contracts, (2) could not identify the CORs for most of the contracts we reviewed or provide documentation that some of their responsibilities were being performed, and (3) did not perform safety performance audits as required.

² We randomly selected 2 each from Major Projects, Facilities, Nuclear, and 1 each from Generation and Transmission to get coverage across multiple business units.

COMPLETED SAFETY AND HEALTH PLANS COULD NOT BE PROVIDED FOR SOME CONTRACTS

According to TVA's contractor safety program, SSSHPs should include an effective strategy to address hazards, as well as injury and illness prevention based on the scope of work in the contract. TVA-SPP-18.004, *Contractor Safety Management*, requires CORs and TVA Safety to review each contractor's SSSHP and ensure they are complete prior to contract mobilization. However, TVA could not provide completed SSSHPs for 3 of 8 contracts we reviewed. For 2 of the contracts, TVA could not provide any documentation indicating the SSSHPs had been completed. The other SSSHP was provided by a Contract Technical Steward but was missing information such as:

- Signature of the project/site manager or TVA Safety personnel.
- Lists of responsible and OSHA competent personnel.
- How management and first-line supervisors would incorporate safety observations in the field.

Missing or incomplete SSSHPs increase the risk of an unsafe work environment for contract workers.

CORs COULD NOT BE IDENTIFIED FOR MOST CONTRACTS

TVA's contractor safety program states that CORs are the single point of contact for providing appropriate safety-related technical direction and oversight for work performed by contract workers. CORs are responsible for some of the program's key oversight functions such as performing jobsite inspections, ensuring contract workers have required safety training, and conducting pre-start safety conferences. However, TVA could not identify the CORs for 7 of 8 contracts we reviewed.

Additionally, TVA could not provide documentation that some of the CORs' responsibilities were performed, including:

- Jobsite inspections for all 8 of the contracts we reviewed.
- Verification that contract workers had completed all required TVA safety training for 4 of 8 contracts.
- Pre-start safety conferences for 2 of 8 contracts.

TVA Safety personnel, contract managers, project managers, and contract technical stewards also indicated a general lack of awareness of the COR role. For example, some individuals indicated that they either (1) were not aware that the COR role existed or (2) believed the COR was equivalent to a different role such as the contract manager.

A lack of awareness of CORs' roles and performance of their responsibilities could decrease the effectiveness of TVA's contractor safety program. According to TVA Safety, they have started conducting workshops to increase awareness and understanding of the CORs' roles and responsibilities.

SAFETY PERFORMANCE AUDITS WERE NOT PERFORMED AS REQUIRED

TVA Safety representatives are required to perform audits of safety performance for compliance with the documented SSSHP. However, TVA could not provide documentation that audits of safety performance were being performed for any of the 8 contracts we reviewed. According to TVA Safety personnel, the audits are not being performed TVA-wide and to the extent intended by the procedure. By not performing audits of safety performance, TVA is unable to identify instances of noncompliance with SSSHPs and take actions to prevent recurrence.

RECOMMENDATIONS

We recommend the Vice President, Safety and Shared Services:

- Perform a review to identify active contracts without completed SSSHPs and expedite completion of the plans by the contractors.

TVA Management's Comments – TVA management plans to initiate a review to identify missing SSSHPs and coordinate with respective business units to address missing plans. See the Appendix for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned action.

- Perform a review to identify active contracts without a COR and assign individuals to fill those roles and complete the required responsibilities.

TVA Management's Comments – TVA management plans to conduct this review concurrently with the SSSHP review and will coordinate business unit assignment of CORs and ensure completion. See the Appendix for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned action.

- Continue taking steps to enhance identification and awareness of the CORs' roles and responsibilities.

TVA Management's Comments – TVA management plans to reestablish the COR High Impact Team and make the COR workshop permanent to ensure personnel understand the roles and responsibilities of the COR. See the Appendix for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned action.

- Take steps to verify audits of safety performance are completed and documented in compliance with TVA-SPP-18.004.

TVA Management's Comments – TVA management is developing a strategy to strengthen procedural adherence and enhance operational safety monitoring through recurring audits and engagement activities. See the Appendix for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned action.

October 31, 2025

Greg Stinson, WT 2C-K

RESPONSE TO REQUEST FOR COMMENTS - Draft Evaluation 2025-17547 Oversight of Contractor Safety.

This letter is in response to the Draft Evaluation 2025-17547 Oversight of Contractor Safety.

TVA Safety and Shared Services appreciate John Jacosalem, Samantha Moore and the Office of Inspector General's thorough evaluation of contractor safety oversight practices. We recognize the importance of continuous improvement which ensures the safety of all personnel working on TVA-owned or controlled sites.

General Comments:

TVA has initiated several improvement efforts in advance of this report. These include the launch of COR workshops and the re-establishment of the Contractor Oversight High Impact Team which both aimed at addressing self-identified needs in contractor safety management.

Also, other products and services aimed at improving contractor safety are as followed during the four-year period beginning in 2022:

- Three Contractor Safety Effectiveness Reviews (CSERs) were conducted with key partner contractors.
- A pilot Contractor Safety Program Evaluation Tool (CSPET) was completed to assess contractor safety program maturity and effectiveness.

These efforts demonstrate Safety and Shared Services commitment to contractor safety.

Recommendations:

1. **Perform a review to identify active contracts without completed SSSHPs and expedite completion of the plans by the contractors.**

Response

Safety and Shared Services will initiate a BU level review to identify missing SSSHPs and will coordinate with the respective business units to address missing plans.

2. **Perform a review to identify active contracts without a COR and assign individuals to fill those roles and complete the required responsibilities.**

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Response

Safety and Shared Services will conduct this recommendation concurrently with the SSSHP review. We will coordinate BU assignment of CORs and ensure completion.

- 3. Continue taking steps to enhance identification and awareness of the CORs' roles and responsibilities.**

Response

Safety and Shared Services will reestablish the COR High Impact Team and make the COR workshop permanent. These steps will ensure personnel understand the roles and responsibilities of a COR. The COR workshop supplements the TVA COR computer-based training (LMS#50011984) and OSHA 30 requirement.

- 4. Take steps to verify audits of safety performance are completed and documented in compliance with TVA-SPP-18.004.**

Response

Safety and Shared Services is developing a strategy to strengthen procedural adherence and enhance operational safety monitoring through recurring audits and engagement activities. This approach ensures safety performance audits are completed and documented in alignment with TVA-SPP-18.004.



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