

# HANFORD ADVISORY BOARD

*A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act*

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US Dept of Energy  
US Environmental  
Protection Agency  
Washington State Dept  
of Ecology

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Department of Health

June 17, 2005

Keith Klein, Manager

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Roy Schepens, Manager

U.S. Department of Energy, Office of River Protection  
P.O. Box 450 (H6-60)  
Richland, WA 99352

Re: Safety Issues in Contracting with Small Business

Dear Messrs. Klein and Schepens,

The Hanford Advisory Board (Board) is concerned that in an effort to encourage small business to successfully bid on Hanford projects, there may not have been adequate consideration regarding issues with safety and the environment. Recent contract awards seem to suggest that the appropriate standards, which the Board and the public would expect to be utilized in evaluation, may not have been met, e.g., full oversight, thorough review of a company's history regarding safety practices, and the history of its subcontractor(s).

Concerns also exist regarding the Department of Energy's (DOE) oversight of small contractors, where small contractor requests for proposals may not be specific enough in describing the authority of the DOE Contracting Officer.

## **Advice**

To provide full confidence that all safety and environmental reviews and considerations are given the full weight expected, the Board advises the following activities.

Pre-proposal:

- Ensure evaluation criteria for every request for proposals place higher priority on evaluating past performance of bidding contractors, especially regarding personnel safety and environmental violations.
- Conduct a thorough and comprehensive introductory meeting with prospective bidders to make clear DOE's high level of expectations regarding safety.

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Page 1

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- Provide detailed guidance to prospective bidders, where applicable, regarding the implementation of Integrated Safety Management, the use of Enhanced Work Planning and the Employee Job Task Analysis, linked to the site wide surveillance system.
- Provide a thorough understanding to bidding contractors of their responsibility for the actions of their subcontractors.

During procurement:

- Include individuals with responsibilities in safety and the environment, with full voting privileges, on any selection board reviewing and recommending small contractors for work at Hanford.
- Include scrutiny of subcontractors that may perform high-risk work for Hanford contractors having a direct contract with DOE.
- More thoroughly evaluate and ascribe more importance to past performance of bidding contractors, especially regarding personnel safety and environmental violations, utilizing the principals of Integrated Safety Management as a guide for such evaluations.

Post-contract award:

- Encourage successful bidders to embrace and build on existing taxpayer-funded safety programs that have already demonstrated success with the incumbent work force.
- Include contract terminology that gives full confidence to DOE officials with oversight responsibility that no attenuation of their ability to regulate is expressed or implied.

Sincerely,



Todd Martin, Chair  
Hanford Advisory Board

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*This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.*

cc: Susan Grant, Office of Management, Budget & Evaluation, Department of Energy, Headquarters  
Ron Kreizenbeck, U.S. Environmental Protection Agency, Region 10  
Jay Manning, Washington State Department of Ecology  
Howard Gnann, Deputy Designated Federal Official, U.S. Department of Energy  
Nick Ceto, Environmental Protection Agency  
Michael Wilson, Washington State Department of Ecology  
Melissa Nielson, U.S. Department of Energy Headquarters  
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