in light that we have a rather ambitious schedule 1 today, I'll hold my remarks to the witnesses. 2 CHAIRMAN CONWAY: Dr. Mansfield? 3 DR. MANSFIELD: As will I. 4 CHAIRMAN CONWAY: Dr. Matthews? 5 DR. MATTHEWS: Just quickly, I want to 6 the presenters for taking the time to come 7 and just to put it in context that my real 8 issue in this is the age-old problem of balancing 9 productivity and safety. And particularly in the 10 world of accelerated clean-up, I think that is the 11 12 issue, so I'll be looking for that in your testimony. 13 Thank you. And I might say that CHAIRMAN CONWAY: 14 for each witness that appears before us this morning, 15 16 we have an autobiography which we will submit, put in the record, preceding each of your testimonies, and 17 with that, I'll turn to Mr. Jeffrey Allison, 18 Manager of Savannah River Operations Office for the 19 20 Department of Energy. Mr. Allison. Good morning, Mr. Chairman 21 MR. ALLISON: I'm Jeffrey Allison, the 22 and members of the Board. 2.3 Manager of the Savannah River Operations Office, and 24 I appreciate the opportunity to talk to you today 25 concerning safety oversight at the Savannah River

Site. There is no more important subject to me than the subject of safety. While I believe the Savannah River Site has a sound and mature safety program, with an excellent safety record, I also know that continuous improvement is necessary to maintain or improve this performance. The safety of the federal and contractor workforce, the public, and the environment receive daily attention from me and my staff.

will discuss how Ι Today I ensure and procedures are in place safely execute the work process at the Savannah River Site. May I have the first slide, please? Next slide. will discuss the following topics during the course talk. We'll talk about how I establish expectations, how I organize and staff for success from the oversight standpoint, how I manage the contract, my personal involvement in operations and safety oversight, and how the Savannah River Operations Office reviewed and took lessons from the NASA [National Aeronautics and Space Administration] Columbia accident, then I'll conclude with a remarks.

This slide details how the Savannah River Operations Office receives policy and direction from

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Headquarters, and formulates that into procedures to conduct its oversight. DOE Policy 450.5 [Line Safety, and Environment, Health Oversight for oversight. expectations Headquarters kev portion of the policy reads, "DOE Line Managers must acquire and maintain sufficient knowledge of program activities in order to make informed decisions on safety resources of their activities."

robust contractor self-assessment program is one of the key elements of line ES&H [Environmental Safety and Health] oversight The DOE field elements oversight function processes. maintains operational awareness, and that's very key, οf contractor work activities; it evaluates contractor self-assessment results using operational awareness, and conducts assessments when required, example, Operational Readiness Reviews [ORR], when need is indicated by operational awareness activities or when merited by the results of evaluation of contractor self-assessments.

Another key portion of this is also DOE Policy 411.1 [Safety Management Functions, Responsibilities, and Authorities], which establishes the ultimate responsibility and accountability for ensuring adequate protection of the operation of DOE

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facilities, which rests with DOE line management. DOE fulfills this role where contractors are employed by establishing expectations in contractor requirements, overseeing compliance, and managing contracts. All of these, of course, flow into the direction that I have.

I have a Functions, Responsibilities, and Authorities Procedure which I call FRAP [Functions Responsibilities Policyl, and Authorities which roles responsibilities, provides the of accountabilities and authorities for, among other things, safety and operational oversight, and that's a key aspect of how I provide direction to my direct reports and also my workforce on how they need to provide oversight of the contractor. A key aspect of that is also a senior management team, called the Executive Technical Management Board, and this is my senior management responsible for line operations and We meet periodically to discuss areas of safety. cross-cutting interests to the site, share lessons learned, and to make policy decisions that need to be made in the areas where policy and direction may not be as clear as it should be.

I also have an SRS [Savannah River Site] workplace safety, health, and security policy, and

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safety, rights, and workers' provide this It's a document that's signed off responsibilities. by all the DOE and contractor counterparts at the and so we have a shared understanding as a council that these the management senior expectations that the workers need to do to operate safely, as well as the responsibilities and rights that they have as employees.

Finally, the Westinghouse contract, and part of that is the oversight plan that we put together, which we call the Performance Evaluation and Measurement Plan. This document provides direction to my staff as well as an understanding by the contractor of the activities that we're going to oversee in order to safely conduct their activities in the contract.

I also wanted to talk a little bit about point DOE Policy 226.1 DOE Oversight I have reviewed the DOE 226.1 and provided Policy]. comments back to Headquarters that I believe would clarify the intent of that policy. The proposed policy maintains an emphasis on reliance on contractor's feedback and improvement program. of the proposed policy, and in review consideration of the current programs previously

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significant would not expect that mentioned. Ι changes would be necessary to implement the policy.

Now I want to talk a little bit about how I organize and staff for success. Oversight at the Savannah River Operations Office is really conducted levels. three I've Facility at got my Representatives that really are employees that have broad-based duties that provide observation of dayto-day operation and safety of the facilities, and they're really my eyes and ears out in the facility, and they're a very important aspect of my oversight They are kind of like my first line of process. defense. They're the ones who are out there on a day-to-day basis that are looking at things, they're smart, they're not necessarily experts every area, but they're smart, and they understand when there's issues that they need to bring to the Specialists are folks that look at tech specialist. criticality safety, nuclear safety, RADCON [Radialogical Control], industrial safety, all the various subject matter experts [SME].

The way I've organized this, line organizations have all the technical resources they need to conduct their duties. I also have an ES&H [Environmental Safety and Health] organization that

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provides cross-cutting, site-wide reviews of safety and health programs and operations. They look for trends, they share lessons learned, they look across the various line organizations. They also provide an independent assessment aspect for me, so they look at the line organizations. Their role is to really help the line organization implement their safety and operations oversight, but if they also feel that the line organizations are not adequately discharging those duties, they have, through the fact that they report to me, also an avenue to report any concerns to me so that I can resolve those issues. So it provides a check and balance for me in my oversight.

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standpoint of staffing, the Facility Reps, I've got 29 Facility Reps currently, and they're all fully qualified. I have a total of 206 positions that fall in the technical qualification programs, 152 of those positions are fully qualified. In a recent reorganization back in June, I moved some folks around to give them some new responsibilities and duties, and so of the 54 people that are currently not qualified in the technical qualification program, 23 of those were previously qualified, so I do have a fairly sound and technical

workforce.

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Now I want to talk about managing the This slide, under operational oversight, contract. provides many of the aspects and things that we do to oversee what the contractor does. Now the most Ι believe, is maintaining thing, important operational awareness. Just getting out in the facilities, understanding what's going on, overseeing the operations, and doing observations, and from walk-throughs, those observations, management management presence is also very important, not only the technical folks. We go out and we develop formal technical assessments. We also look at performance Those are very critical in understanding indicators. trends.

But probably the most important thing is looking at day-to-day operational activities, whether it's occurrence reports, or just field observations, looking at that information, analyzing it, understanding what it means and looking for trends. That's probably the most important thing that we can do, and then, of course, providing that feedback to the contractor is very important because the whole idea of oversight is to improve performance, and so providing feedback and my expectations for my senior

line management is that they are providing feedback to the contractor on a routine basis, so when I send the contractor a letter there should be no surprises.

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I also believe that something that's very important is my personal involvement in safety and understanding what's going on out in the field and One of the things that I have on my the operations. staff of direct report to me and the manager of the I have a technical assistant who is office, is assigned to my staff to ensure I am kept fully aware operational issues in all facilities and work activities, and this person is a former Senior Facility Rep, and that person provides a lot directly insight to me. This person also attends all the daily conference calls of operational activities so they maintain direct awareness. We review all the operational occurrences from the prior night, every morning that person and I sit down and discuss those activities. quick analysis We do а to understand if there is any trends that we need to push back from the line organizations to make sure that they are fully going out and looking at these activities and taking the appropriate action steps, and whether or not there is a need

feedback to the contractor.

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I also meet weekly with my senior staff, senior management staff, and the purpose of these meetings is to really share lessons learned, discuss operational and safety issues. I spend a lot of time personally out in the field, getting out there with my Facility Reps, understanding issues, and one of the things that I do to make sure that I'm getting clear and unfiltered information from my line managers is, I'll go out and talk with Facility Reps, and then I'll wait and see what the message I get back from the line manager on issues that they have, and that provides a good way for me to correlate whether or not I'm getting information directly, or whether it's getting filtered through the line, or if I'm not even receiving information.

I think one of the things that I try to do is have a personal ownership and commitment for safety, and I've provided those expectations through performance plans and clear communication to my senior management team.

I want to talk a little bit about what we did at the Savannah River Operations Office with the Columbia Accident Investigation Report. The first thing I did was I sent that out to my senior

management team, and asked them to read and review that, and also share that with their senior technical and Facility Reps. We sat down for a couple of hours as a senior management team and analyzed that report, and one of the things that we focused in on were some of the behaviors and organizational aspects of that and their applicability to Savannah River. Some of the things that we found that were very important clearly of that report were that came out communicating safety expectations, and so we tried to maintain that as a focus area, and I've continued to do that through all-hands meetings and talks with my Any time I get a chance to talk about safety staff. that relates my expectations and how to accelerating work activities and why safety is most important thing that we do from the standpoint of accelerating work, I take that opportunity.

We also wanted to make sure that there lines of communication. When safety were clear issues are raised, they need to be resolved either by making some correcting actions, or getting additional information and recognizing that it may not be as significant an issue as we thought. We made sure we again, reinforced that to message the so they knew that if you have a safety workforce

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issue, it's going to get resolved one way or the other. There will be no safety issues that will not get resolved.

We've continued to reinforce that and continued to talk about that through our organization and made sure people understand primarily the message of accelerated clean-up and how that doesn't diverge from having safe operations.

Let me just conclude, and then I'll be glad to take any questions from you. I believe at the Savannah River Site, we've got a sound and mature safety program with an excellent safety record. know that constant vigilance is required to maintain discipline and improve this performance. Our framework for able and due Headquarters direction for oversight is accomplished through the commitment of senior managers and their technical staff who are fully engaged in the operational oversight of their I believe I have demonstrated commitment facilities. to safety as an individual and manager, and as such, culture that fosters have created а open communication, values safety, and strives for I appreciate the opportunity continued improvement. to submit testimony and will be glad to answer any questions.

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Thank you. Dr. CHAIRMAN CONWAY: 1 Eggenberger? 2 VICE CHAIRMAN EGGENBERGER: You mentioned 3 that the oversight policy that's being put together 4 by Headquarters, or has been put together 5 Headquarters, that you have provided comments on the 6 policy and one of the conclusions that you drew was 7 that there would be no changes required on your part 8 to implement this policy. Is that -- you nod, 9 "Right." Okay. 1.0 That's correct. 11 MR. ALLISON: VICE CHAIRMAN EGGENBERGER: I'm not sure 12 what that policy is. If there is - if no change is 13 required, is this a new policy or don't we have 14 15 orders that define the policy fairly well, or can you maybe give your view on that briefly? 16 I looked at the policy and 17 MR. ALLISON: also kind of did a coarse correlation with DOE Policy 18 19 450.5 which provides line ES&H oversight. From my perspective, I believe that the new Policy 226.1 does 20 21 a good job of picking up some other areas like cybersecurity that weren't covered in DOE policy 450.5, so 22 23 I believe it's more inclusive. From the standpoint of the aspects of the policy that are implemented, I 24

believe that, you know, there's not a lot of --

1	basically the message is very similar to the current
2	policy. I didn't see where I was going to I would
3	relax my oversight, for example, in areas. It talks
4	about a graded approach, the prior policy talked
5	about a graded approach. It talks about reliance on
6	the contractor self-assessment, this policy does too.
7	My feeling is that to effectively oversee the
8	contractor, or manage the contract, there is a
9	certain level of oversight that you need to provide.
10	You need to maintain the safety envelope and make
11	sure that the contractor is doing that. As the
12	federal government, I think I have a role in doing
13	that in overseeing the contract, so I didn't see from
14	the standpoint of, you know, looking at that and
15	having some of my senior folks look at it, that I was
16	going to have to make significant changes in my
17	oversight.
18	VICE CHAIRMAN EGGENBERGER: Would you
19	agree with me that contractor self-assessment is part
20	of the contractor's job and that this is nothing new?
21	That the contractor should always be self-assessing?
22	Do you want to comment on that?
23	MR. ALLISON: I agree with you, A.J. In
24	fact, the contractor in Bobble [as heard] talked to

that as a very strong self-assessment program, you

know, from the line self-assessment as well as the independent assessment, and so I believe that the contractor needs to do that. We have, in fact, taken advantage of that in our oversight. We address and assess the contractor's self-assessment program, look at how rigorous a job they're doing, and clearly in areas where they're not finding issues, where they've done a fairly thorough job, we use that in our assessment program and make sure -- we may do a spot check in those areas. Areas where they're finding issues, we may look at a little bit deeper. So we do use that, and they do have -- the contractor does have a fairly strong self-assessment program.

VICE CHAIRMAN EGGENBERGER: You're saying it two ways here. Earlier you said that it was important for you, as the government, to examine what the contractor is doing period. That's a summary of what you said, I think. Now you're telling me well, maybe you'll look at some of the stuff that the contractor is doing, but you may rely on his selfassessment and not look at everything. Is that correct?

MR. ALLISON: Well, okay. Let me clarify that.

VICE CHAIRMAN EGGENBERGER: Yes.

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I do believe that the 1 MR. ALLISON: government has an obligation to understand what's 2 going on, that's the operational awareness, and we do 3 have an obligation to look periodically at certain 4 areas to basically validate the contractor self-5 assessment program. I don't have the resources, and 6 I don't think I should have the resources, to look at 7 everything in 100% standpoint as far as everything 8 9 that the contractor does, but I need to have people that are smart, that are looking at trends, so we can 10 go out and do a smart assessment program and make 11 sure that we're looking at the areas that are most 12 13 critical. clearly an Operational 14 Certain areas, Readiness Review, you know, if the order dictates 15 that we need to do that, we're going to do that, 16 17 regardless of how good of a ready assessment the So the point I was trying to 18 contractor has done. make is that no, we're not going to 100% review, but 19 20 we're going to do a smart sampling. A part of that sampling is based on how well of a self-assessment 21 22 the contractor is doing. 23 VICE CHAIRMAN EGGENBERGER: Thank you. 24 DR. MANSFIELD: Just one or two

On your corrective action programs, I'd

questions.

example, one that's probably use an like recent occurrence The right now. disabling of both lines of ventilation in the FB Line maintenance, clearly some change, some during maintenance procedure would have prevented that. question, and maybe it's a question for Mr. Pedde, is are procedures going to be changed, and how will you track that? How will the Savannah River Office track that, and who at Headquarters tracks you tracking that?

MR. ALLISON: Okay. Well, as far as whether or not we're going to track that, yeah, be watching, you know, Facility Reps will what changes are made and then, you know, clearly they'll report that back through their line management and to As far as who is going to be watching what I'm me. doing, Paul Golan, whom I report to, he and I stay in very close contact on operational issues, and so he will be aware of what's going on, and I'll make sure he understands the corrective measures that have been taken.

DR. MANSFIELD: Does this -- was this set of occurrences more important than most? It seems to me that the failure of two safety systems, two redundant safety systems, should take more than an

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1	ordinary amount of attention.
2	MR. ALLISON: Yes. Clearly anytime a
3	safety system fails, that is something of significant
4	concern to me and to my staff, and so and I'll let
5	Bob speak from his perspective, but clearly that was
6	a concern, and we are looking very closely at why
7	that happened, how that happened, and what the
8	corrective measures might be.
9	DR. MANSFIELD: Okay, and does Mr. Golan
10	at Headquarters keep close technical contact with
11	this?
12	MR. ALLISON: He and I talk, if not
13	daily, several times a week. He also has access to
14	any occurrences that happen, and we talk frequently
15	about issues that are of an operational nature.
16	DR. MANSFIELD: That's all.
17	CHAIRMAN CONWAY: Dr. Matthews?
18	DR. MATTHEWS: Before this meeting, I
19	kind of looked at Undersecretary Card's testimony,
20	and you did too in the previous meeting, and he said
21	something here I thought was important. He said,
22	"We're going to put pressure on the systems to
23	deliver more for less, and as a result of that
24	accelerated work," then he said, "We have to think
25	through how this is going to induce new hazards into

the system." I think that's an important statement, so I was curious about what new hazards does accelerated clean-up induce in the systems, have you identified those, and how will you predict those as the contractor goes through his job?

I think with accelerated MR. ALLISON: clean-up, just as before, it's very important to have a good understanding of what your scope of work is and to clearly analyze the hazards. I mean, I think [Integrated Safety Management] has become, if ISM anything, more important in how we're doing work, and to have deliberate, very good understanding of that skillful work, what the boundaries are, it's very important right now, and so that's really what the focus has been on, you know, having that good upfront planning, and making sure you have the right controls in place, whether it's protective clothing That has become more and or engineering controls. more important, and so that's really been an area of focus and an area of concern.

DR. MATTHEWS: Okay, but you didn't tell me any new hazards you may have identified. Let me tell you one that I would identify, and then I'll let you respond to that, and because of this sort of managing the contract, not the contractor concept,

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and pretty significant awards for meeting milestones and deliverables, and accelerated clean-up (And by the way, I congratulate the contractors for making against progress on your site.) I'm not accelerated clean-up as such, I'm just worried about the safety of locations [activities]. But I would a new hazard would be that there may be motivation by some to cut corners, and therefore, take a little more risk in order to get done faster. Do you see that as a hazard? Is that the type of thing you think about?

MR. ALLISON: Well clearly, that's an issue of concern, and that's got to be part of the message that we communicate as a management that, you know, safety will not be relaxed because we're accelerating clean-up. Clearly you've got to take the same rigorous approach to executing work as you did before. There is no relaxation of safety requirements or procedures, but clearly, know, as over the years I think we've come to the conclusion that probably layered we have additional requirements above and beyond what needs to be done to get work done, and so what we're trying to do, and the way I look at is, de-layer or peel back some of those requirements that don't

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necessarily add value from the standpoint of getting
work done or safety, but were just additional checks
and balances that we put in because of prior events.
So we're trying to delayer those work
activities and procedures clearly maintaining a focus
on safety, but also trying to balance that with
getting work done and reducing risk.
DR. MATTHEWS: Can you give me an example
of a delayered requirement that would accelerate
work?
MR. ALLISON: Well, not necessarily a
specific example, but I know in some of our job
planning and job hazards analysis, you know, we've
over the years just added additional requirements on
top of requirements, and in some of our procedures,
as you go through those and look at them, they've
just become too, you know, jobs that should take four
hours take eight hours. I think I can provide you
with an example. I'll submit that for the record
separately.
DR. MATTHEWS: Yeah, I'll give you an
example I would use, is you know, a stack of paper
that high with hazards assessment doesn't really help

the operator minimize hazards. Is that the kind of

1	thing you're
2	MR. ALLISON: Yeah, that's the kind of
3	thing, but I think I can provide you with some
4	specific examples of I will do that.
5	DR. MATTHEWS: Good.
6	CHAIRMAN CONWAY: Let me follow up if I
7	may. Are you finished? Let me follow up on that
8	now. Have you made during the past year any
9	modifications of your engineering manuals of
10	practice? Isn't that some of the changes you've
11	made?
12	MR. ALLISON: Yes.
13	CHAIRMAN CONWAY: Okay, and how they use
14	these manuals? Are these specific changes you're
15	making?
16	MR. ALLISON: Yeah, well, the contractor
17	is making those.
18	CHAIRMAN CONWAY: How did you make the
19	decisions in what you're going to change in your
20	manuals of practice? I mean, these are specific
21	changes you're making, as I've been told.
22	MR. ALLISON: Yeah.
23	CHAIRMAN CONWAY: Well, this is in answer
24	to his question, your manuals, engineering manuals of
25	practice are pretty fundamental for your people. Now

1	you're making modifications to those, are you not?
2	MR. ALLISON: Yes.
3	CHAIRMAN CONWAY: Okay, well, that would
4	be one of the things I think you could have explained
5	to Dr. Matthews. Now that's pretty significant. Now
6	is this because of the new policies that are coming
7	out from Headquarters?
8	MR. ALLISON: No. This is
9	CHAIRMAN CONWAY: This is something you
10	would have done anyway?
11	MR. ALLISON: Yeah.
12	CHAIRMAN CONWAY: So you had these in
13	this is not because of the new policies coming out of
14	Headquarters?
15	MR. ALLISON: No, they're not related to
16	that.
17	CHAIRMAN CONWAY: So these are something
18	you're doing on your own initiative?
19	MR. ALLISON: Yes, as we're trying to
20	figure out, you know, basically, like I said, de-
21	layer some of these procedures and policies that
22	we've added requirements that are above and beyond
23	the standards, we're trying
24	CHAIRMAN CONWAY: But why did you have
25	some of these in the past if they weren't really

1	necessary? You've been here for quite awhile. I
2	suspect, but I'm hearing you say no, that this is in
3	furtherance of or in following on the new policies
4	that are coming out of Washington.
5	MR. ALLISON: No. I mean, what we're
6	trying well, in an effort to try to accelerate the
7	work, we're looking at ways in which we can basically
8	de-layer and make allow the worker to do the work
9	safety, but without having all kinds of excess
10	requirements layered on top of him.
11	CHAIRMAN CONWAY: So these were decisions
12	you made on your own down at
13	MR. ALLISON: Yeah.
14	CHAIRMAN CONWAY: in furtherance of
15	this.
16	MR. ALLISON: Yeah. As we've looked at
17	policies and procedures, looked at ways in which we
18	can accelerate the work, we've also taken advantage
19	of things that have been done at other sites, lessons
20	that they've learned
21	CHAIRMAN CONWAY: Okay. How do you
22	disseminate these new approaches now to your workers
23	out in the field? How do you now you're making
24	changes, you're no longer following all these
25	procedures that were in the manuals, now how do you

1	get that down to your working people?
2	MR. ALLISON: Well clearly we have to
3	communicate as management and let them know, you
4	know, why this change is being made
5	CHAIRMAN CONWAY: Are you doing this in
6	writing or is this all verbal?
7	MR. ALLISON: I think most of it is
8	I'll have to let Bob talk to that.
9	CHAIRMAN CONWAY: All right.
10	MR. ALLISON: I know I've had a lot of
11	communication with my workforce in accelerated clean-
12	up so that's just
13	CHAIRMAN CONWAY: Okay. So these changes
14	are being made because of the from the
15	contractors' point of view?
16	MR. ALLISON: Well, the contractors
17	proposed them clearly as
18	CHAIRMAN CONWAY: So it's a contractor
19	proposal. It's coming out of the contractor to you,
20	and you're approving or disapproving some of them, I
21	presume.
22	MR. ALLISON: Yeah.
23	CHAIRMAN CONWAY: Okay, so then I should
24	turn to Bob Pedde and let him explain some of these
25	changes you're making or proposing to the government