

HANFORD ADVISORY BOARD

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

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US Environmental
Protection Agency
Washington State Dept
of Ecology

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June 6, 2008

Dave Brockman, Manager
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Shirley Olinger, Manager
U.S. Department of Energy, Office of River Protection
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Richland, WA 99352

Re: Uniform Site-Wide Safety Standards

Dear Mr. Brockman and Ms. Olinger,

The Hanford Advisory Board (Board) is aware that Hanford has an enviable safety record compared to similar industrial activity across the U.S. However, the mission of the site, the relative frequency of contractor change, and the nature of the site's hazards create a need for a uniform, effective safety program in order to achieve cleanup activity that wins and maintains the approval of the public, the tribes, and those agencies responsible for public safety.

The Board recognizes the significant strides the U.S. Department of Energy (DOE) is making in improving workplace safety on the Hanford Site. Putting the responsibility of formulating a uniform safety system for the new Hanford Contracts onto the Mission Support Contract (MSC) contractor, yet to be named, has the potential to provide a safety process that has been the wish and desire of Hanford workers for decades. Making the Hazardous Materials Management and Emergency Response (HAMMER) Training facility a part of the process is also applauded.

The mobility of the Hanford workforce as it moves from project to project makes obvious the need for uniformity of safety rules and procedures, especially where compliance with procedures is mandatory. Lack of uniformity has the potential to create uncertainty for workers and to put them in jeopardy. Hesitancy created by such uncertainty can lead to mistakes as work is being performed, setting up scenarios where safety and environmental barriers can be breached. Procedures, too, are often confusing, contradictory and difficult for workers to implement.

HAB Consensus Advice #208
Subject: Uniform Site-Wide Safety Standards
Adopted: June 6, 2008

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Allowing each contractor to develop separate safety training, respiratory protection programs, and Integrated Safety Management Systems (ISMS), even when meeting DOE requirements, has always resulted in enough difference to foster significant uncertainty and increased risk for workers.

Concern exists that good intentions, as expressed in the MSC Request for Proposal and by DOE officials at a recent meeting of the Board's Health, Safety and Environmental Protection Committee, will not translate into full implementation in the workplace.

Advice:

The Board advises that DOE and its contractors make a special effort to ensure that a carefully formulated uniform safety policy and safety training policy is fully implemented and demonstrated by its effectiveness in the workplace. It should give consideration to the following that the Board believes to be critical elements:

- Uniform safety training and implementation of ISMS for all employees of all contractors and sub-contractors.
- To ensure uniform and fair competition for sub-contract awards, there should be a uniform amount added for costs associated with safety training in all contracts.
- Construction and implementation of a uniform respiratory protection program.
- Maintain the single, uniform Lockout-Tagout program.
- A single, uniform radiation worker training program.
- A single, uniform site-wide beryllium safety program covering all facilities and workers.
- Worker participation in creation and implementation of procedures and safety programs, including worker-led, management-supported safety councils meeting regularly.
- Create and maintain a centralized, site-wide database to track all worker safety and qualifications training.

- All site contractor and sub-contractor participation (including worker representation) in a single, monthly site safety council meeting.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

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: Elin D. Miller, U.S. Environmental Protection Agency, Region 10
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