

July 11, 2002

Roy Schepens, Manager
U.S. Department of Energy, Office of River Protection
P.O. Box 450
Richland, WA 99352

Keith Klein, Manager
U.S. Department of Energy, Richland Operations
P.O. Box 550 (A7-50)
Richland, WA 99352

Re: Maintaining and Improving Hanford's Integrated Safety Management System (ISMS)

Dear Messrs. Schepens and Klein,

Assistant Secretary Roberson identified safety performance as the number one priority in her Environmental Management goals and priorities. The emphasis on new measures of safety performance is a signal of the Department of Energy's (DOE) commitment to worker safety, which is implemented at Hanford through the Integrated Safety Management System (ISMS). The Hanford Advisory Board (Board) is concerned about ensuring that all contractors are included in the sitewide ISMS. To be successful, the ISMS must be universally applied, have clear, measurable outcomes and routine follow-up to assure its goals to maintain worker health and safety are met.

Hanford has been quite successful in implementing ISMS, using a sitewide hazard recognition system, the Employee Job Task Analysis (EJTA) that is connected to a computer driven match to appropriate medical surveillance. For the individual worker, this medical program provides evaluation of worker hazards and ensures worker health is monitored appropriately based upon risk – past, present, future and cumulative. For the site this Hanford Occupational Health Process (HOHP) provides a sitewide surveillance system, promoting feedback that is used to identify and prevent health and safety problems better protecting all workers. This process has been successful because adherence to the program is written into contracts with prime and lower-tier contractors.

Recently, the HOHP participation requirement was waived in the Bechtel National, Inc. (BNI) contract, which opted out of the sitewide medical surveillance system for its construction workers and utilizes its own health and safety system. The rationale was that

in this contract, BNI was working in an uncontaminated part of the site on new construction.

The Board recommends the integrated qualities of ISMS be preserved by writing future contracts for work conducted on contaminated sites that include participation in the HOHP with its individualized hazard assessment (EJTA) and sitewide medical surveillance program. Before Waste Treatment Plant workers become involved in hot testing and operation of waste treatment systems that include high-level tank waste, a plan for transitioning the plant workers into the HOHP is required. DOE-Richland Operations Office (DOE-RL) and Office of River Protection (DOE-ORP) should also continue to require the contractors to utilize the sitewide emergency services to optimize communication. Further, we ask that DOE-ORP advise the Board when transition to site medical and surveillance services in anticipation of hot testing and turnover to operations at the Waste Treatment Plant is accomplished.

Sincerely,

Todd Martin, 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: John Iani, U.S. Environmental Protection Agency, Region 10
Tom Fitzsimmons, Washington State Department of Ecology
Wade Ballard, Deputy Designated Federal Official, U.S. Department of Energy
Michael Gearheard, Environmental Protection Agency
Michael Wilson, Washington State Department of Ecology
Martha Crosland, U.S. Department of Energy Headquarters
Defense Nuclear Facilities Safety Board
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)

Gordon H Smith
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