

November 5, 2004

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U.S. Department of Energy, Headquarters  
1000 Independence Avenue  
Washington, D.C. 20585

John Shaw, Acting Assistant Secretary  
Division of Environmental Safety and Health  
U.S. Department of Energy, Headquarters  
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Washington, D.C. 20585

Keith Klein, Manager  
U.S. Department of Energy, Richland Operations  
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Roy Schepens, Manager  
U.S. Department of Energy, Office of River Protection  
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Richland, WA 99352

Linda Hoffman, Director  
Washington State Department of Ecology  
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Ron Kreizeneeck, Regional Administrator  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Subject: Stop Work Authority

Dear Mssrs. Golan, Shaw, Klein, Schepens, Kreizeneeck and Ms. Hoffman,

The Hanford Advisory Board (Board) is concerned that the stop work practice built into the Integrated Safety Management System (ISMS) is rarely, if ever, being utilized by construction forces at Hanford. Contractor and subcontractor workers infrequently stop work for safety or health reasons because of fear of possible management reprisal or peer pressure. Failure to stop work when appropriate may result in an unsafe work environment or financial risk to the contractor or subcontractor.

Our concern is the health and safety of all workers on the Hanford site. Therefore, the Board recommends that safety policies, including stop work policies for safety concerns, be uniform for all worker categories, including all subcontractor groups.

The Board also recommends the Department of Energy (DOE) and its prime contractors increase auditing on the implementation of ISMS principles to ensure training and implementation occur at all levels. Planning and reviewing safety policies are key elements required to execute a project successfully.

Suggested activities for construction workers to prepare for a job restart include, but are not limited to:

- Planning and reviewing key job elements and steps for safety;
- Enrollment in required training;
- Medical evaluations for routine and newly discovered hazards and job qualifications required to work at Hanford; or,
- Job reassignment when possible.

Modification to current practice would seem to be essential to the proper implementation and nurture of Integrated Safety Management, especially in regard to the principle of worker participation.

The Board is supportive of the application of ISMS to the performance of work at Hanford. The Board recommends that this important health and safety guidance be implemented via a Hanford Site Right to Stop Work policy update distributed sitewide by DOE in a cooperative approach with contractors and labor.

### **Advice**

- The Board recommends that safety policies, including stop work policies for safety concerns, be uniform for all worker categories, including all subcontractor groups.

- The Board recommends DOE and its prime contractors increase auditing on the implementation of ISMS principles to ensure training and implementation occur at all levels.
- The Board recommends that this important health and safety guidance be implemented via a Hanford Site Right to Stop Work policy update distributed site-wide by DOE in a cooperative approach with contractors and labor.

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: Howard Gnann, Deputy Designated Federal Official, U.S. Department of Energy  
Dan Opalski, Environmental Protection Agency  
Michael Wilson, Washington State Department of Ecology  
Jim Bateman, Hanford Atomic Metal Trades Council  
Mike Keizer, Central WA Building and Construction Trades Council  
Sandra Waisley, U.S. Department of Energy Headquarters  
The Oregon and Washington Congressional Delegations

U.S. Senators (OR)

Gordon H Smith  
Ron Wyden

U.S. Senators (WA)

Maria Cantwell  
Patty Murray

U.S. Representatives (OR)

Earl Blumenauer  
Peter DeFazio  
Darlene Hooley  
Greg Walden  
David Wu

U.S. Representatives (WA)

Brian Baird

Norm Dicks

Jennifer Dunn

Jay Inslee

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Jim McDermott

George Nethercutt

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State Senators (WA)

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