

FINAL MEETING SUMMARY

**HANFORD ADVISORY BOARD
HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION COMMITTEE**

*August 9, 2012
Richland, WA*

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This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.

Opening*

Mike Korenko, Health, Safety and Environmental Protection Committee (HSEP) Chair, welcomed the committee. Mike said HSEP did not hold meetings in June or July due to budget concerns and lack of any time sensitive material. He said there will not be a meeting in September either and HSEP will plan to meet in October. Mike provided an overview of the meeting agenda for the day. The committee approved the May 9 and May 10 joint Tank Waste Committee (TWC)/HSEP meeting summaries as edited.

HSEP Values Statement consensus check

Committee Questions and Response

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

HSEP then considered the draft HSEP Values Statement (Attachment 2). Mike said there have been several iterations of the draft through email, but he wanted the chance to discuss the values in-person

* Please see Attachment 1 – Transcribed Flip Chart Notes for key points/follow up actions recorded during the committee discussion.

instead of relying on email consensus. The committee recommended several wording changes to the draft values.

C: The values should include a point about the importance of worker involvement, which is a key Integrated Safety Management (ISM) value. Worker involvement is important for work planning, review of any incidents that went wrong, and to ensure that someone is accountable for any plan deviations.

C: The committee discusses worker training quite a bit. There are workers who feel they are only valued in the amount of physical labor they can provide; not any thoughts or insights they have on improving safety. Workers follow procedures and will often get in trouble if something goes wrong. Some contractors have great worker involvement and empowerment programs as core principles of their operation, but other contractors do not share those principles. Some statement that reflects this issue should be included with the HSEP values.

C: The word “health” is also not mentioned in the values statement. That should be added somewhere.

Q: Do the workers participating in safety programs receive a rating that is recorded?

R: [Board member] Based on the Board’s understanding, workers must at least pass a computer exam in HGET (Hanford General Employee Training) to complete the training. Some training programs have requirements for measurable achievement while still others are based solely on exposure to the training material. HGET participants can go through the material as many times as necessary to receive a check-mark, so it is really exposure based.

Q: Do all contractors offer the same trainings?

R: [Board member] Ray Corey, United States Department of Energy (DOE)-Richland Operations Office (RL), would be better able to address that question. There is a site-wide program initiative to reconsolidate safety at the Hanford Site. Training is standardized when it can be. Other times training is tailored to individual needs as appropriate.

C: Standardization is important particularly among sub-contractors. Accidents and exposure incidents with the subcontractor should be kept in mind when writing contracts. It is important to keep experienced workers at the Hanford Site to maintain a solid knowledge base.

HSEP accepted the values statement as edited. Susan Hayman, EnviroIssues, will forward the statement to Susan Leckband, Hanford Advisory Board (Board or HAB) Chair, and Ken Niles.

Draft Advice – Integrated Safety Management*

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Issue Manager framing

Mike, Issue Manager (IM) for the ISM draft advice, said he and Keith Smith first drafted the advice two months ago. There have been several iterations since the first draft that incorporates comments received. Mike provided copies of the current version of the ISM draft advice (Attachment 3). Mike said he also met with Ray and incorporated some of Ray's comments. Through the iterations, the advice has been reframed to reflect a positive tone, while still acknowledging that there are problems that must be described in the draft advice. Mike said the ISM advice is meant to be offered in the spirit of continuous improvement.

Agency perspectives

Tiffany Nguyen, DOE-RL, said Ray Corey provided some feedback on the draft advice after meeting with Keith and Mike. DOE-ORP and DOE-RL also provided feedback using tracked changes in Word. She distributed copies of that feedback (Attachment 4).

Ed Parsons, DOE-RL, said DOE appreciates HSEP's comments and values the Board's opinion. DOE's comments on the draft advice are not an attempt to dissuade the Board from bringing forward any advice points. After reading the draft advice, DOE is unsure how they would respond because the problem is not clearly stated in the advice. DOE hears a lot of input from many different sources regarding safety culture. Input recommending an action to be taken is much more valuable than just hearing there is a problem without any recommendations for how to address that problem or what the underlying issue might be. DOE would like to listen to the Board and to the many other voices that are investigating safety at the Hanford Site. Changes in safety culture are occurring and DOE is taking some unique approaches to address concerns. There is a multi-company team that includes the spectrum of employee responsibilities. This team is asking questions on a peer-to-peer level to better understand the concerns and find ways to improve safety at the Hanford Site, bringing forward concerns that might not be brought up at the management level because they are able to ask questions at a basic level with more trust than management could ever do. Some of the advice points seem to reflect actions that DOE is already taking but may not have communicated those effectively to the Board.

Brian Harkins, DOE-Office of River Protection (ORP), said DOE is not opposed to criticism and values input that helps DOE find ways to improve. The struggle is in understanding the information provided by the Board. DOE would appreciate if the Board could provide insight on whether the issues addressed in the advice are isolated or global across the Hanford Site. Global issues require different evaluations than localized conditions; understanding the scope of the issues would help DOE to better respond to the Board's advice.

Dan McDonald, Washington State Department of Ecology (Ecology), said one HSEP member made an important point that reflects what the Board appears to be trying to articulate in the advice but is not stated clearly. The advice includes a number of points about programs that DOE is attempting to implement, but does not describe the drivers. HSEP seems to agree that workers are the drivers of

program success and need to feel that they own ISM instead of having ISM instituted at the management level. However, leadership must drive safety culture.

Committee Questions and Response

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Susan H. projected the ISM draft advice onscreen for editing. Those participating virtually via GoToMeeting could access the draft advice, as well. The committee worked their way through DOE's comments on each section of the draft advice.

C: There is a clear disconnect when reading the comments from DOE between what HSEP members feel and observe versus what DOE believes. HSEP has not completed an inquiry or established a record or basis for conclusions in the draft advice. DOE has an ISM program at the Hanford Site that has been around for years, but nobody is really following it. A lot of workers are repeatedly complaining that ISM is just the flavor of the day. Workers say that procedures are complied with only when it appears someone is watching them and measuring results. The Tank Farms and Waste Treatment Plant (WTP) are the most obvious example of this. Past employee concerns regarding asbestos are also applicable. There was widespread dissatisfaction with workers not being listened to. Workers raised issues every day about the approaches for handling buildings with asbestos. If ISM had been working properly, there should have been a stop work and an evaluation of concerns instead of proceeding with the same approach to asbestos control. ISM did not withstand the pressure of cost and schedule. The same is true of the WTP, which has been confirmed by a DOE-Headquarters report issued in January 2012. Cost and schedule were overriding considerations over safety.

C: The problem with ISM is in the execution. The program is in place, but it is not really enforced. The draft advice may not go far enough to really address the underlying issues. The advice agrees that ISM is important and lists principles that should be adhered to, but might not state clearly enough that the ISM programs are not working properly and should be reinvigorated. Contractors have dismantled a lot of the worker involvement aspects of ISM, although it is unclear if anyone has objectively evaluated those concerns.

C: DOE's comments to the draft advice are appreciated. The usual process is for the Board to write advice and then officially submit it before receiving any comments. Several Board members have been following ISM issues for years. DOE said they have the ISM program in place and the Board should wait until it is fully implemented before offering any potential advice. In that time period, there have been developing issues that would not have occurred if ISM was working properly. It is time for the advice to move forward without any further delays. The Board will try to accommodate comments received from DOE and recognize it is a sensitive area. Some comments may not be accommodated. The Board can include some positive paragraphs praising the ISM program accomplishments, but the Board also has serious questions on why ISM has not been assimilated in the field.

C: Even though the ISM program might be great, if no one is using that program it is not living up to its potential and should be reconsidered. The foundation and a key value of HSEP is the ability to voice concerns over safety issues. Different perspectives should be invited to promote dialogue.

C: If the program is not user-friendly and if it is not promoted well, eventually people become jaded and the program becomes meaningless. Some of DOE's recent efforts and progress should be applauded.

C: The employees do not always change when the contractor changes, especially for those workers in the trenches. Ultimately, these employees are DOE employees in that sense, although they do have an employee relationship with the contractor as well. DOE's responsibility to the workforce cannot be delegated to the contractors. The idea to get the workforce more engaged is a good idea. The idea for behavior change is also a good one. These things do take resources and time. The process is not easy.

C: DOE should be ensuring that programs are implemented effectively. There is a difference between putting something on paper and making it a physical reality. That is a different challenge.

C: DOE should be more engaged in workplace behavior, which can be tricky. The presence of someone monitoring will change the behavior.

C: Workers are more likely to complain to other workers than to management because it is easier. It is easy to find complainers; the quality of the complaint is more important than the numbers of complaints.

C: Are there increasing incidents of health or safety concerns at the Hanford Site? There have only been two deaths out of 18,000 employees over 16 years. The Hanford Site is a safe place or at least it has been a safe place in the past. It is important to maintain a good safety record. The Board should consider whether there really are safety concerns now or if those concerns were mostly in the past.

R: [DOE] There are safety problems at any given time. DOE can work to lessen risks, which is the new mantra within the agency.

C: Simply adhering to federal law as justification for decisions such as how many Facility Representatives (Fac Reps) to hire is not necessarily adequate. The Hanford Site is unique so there may need to be provisions that go beyond federal law to ensure safety of the workforce. The Board is asking DOE to take a deeper look at different aspects of safety culture where it does not appear to be an integral part of operations. Board advice can be taken as recommendations for areas to be improved from the Board's perspective. Hopefully, DOE can respond by describing what they are doing in some detail and how their processes are adequate for the needs at the Hanford Site. There are too many places where DOE only responds to the draft advice by saying they are meeting the expectation. Operations at the Hanford Site should not be equivalent to operations at nuclear reactor stations or other facilities. The Board would like to understand from DOE what they are doing to mitigate the Board's concerns about safety culture.

C: While the Hanford Site does currently have a good record on health and safety, it only takes a little bit of slippage in vigilance for that to change. Continuous improvement and constant vigilance are crucial.

Sometimes safety messages are not conveyed from the management level to the workforce. In addition to the fatalities, there have also been several close calls.

C: Communication between management and the workers has always been one of the issues. There are differences in perspective, which is a likely contributor to the breakdown between ISM implementation at the management and worker level. Some of the current progress is very encouraging and should be emulated and reinforced throughout the Hanford Site so that it becomes institutionalized in order to withstand any management or contract changes.

C: DOE's response to all the advice points indicates they are already working towards all the Board's recommendations. The Board should better anchor the message to ensure the advice is saying what the Board truly wants to recommend.

C: If people are fundamentally afraid to come forward with concerns, internal surveys will not reveal the truth. The survey from DOE-Office of Health, Safety and Security (HSS) made a difference because it was done differently and workers were made to feel comfortable with raising concerns. DOE has said they embrace the HSS report and the agency should not ignore its own produce. The Board does not need to create an entire new record, but can reference the report DOE created itself only in the last few months.

HSEP reviewed the draft advice on-screen and made a number of edits. The committee will need additional work on this draft advice before it is ready for a final consensus review to bring it to the September Board meeting. The committee may come back to this discussion at the end of the meeting, and complete committee business on next week's committee call.

DOE-RL Maintenance Policy*

Issue Manager introduction

Keith Smith, IM for the DOE-RL maintenance policy topic, said most HSEP members know the infrastructure on the Hanford Site and that the maintenance of various operational parts is very important. The only fatalities were a direct result of infrastructure failure or improper use of infrastructure. A sound maintenance policy is crucial to keep equipment and facilities in good working order. There used to be a notion at the Hanford Site that operations could simply be turned over to the contractors, but that ignores the importance of having a solid infrastructure in place with a maintenance policy that must be adhered to. Another area of concern is the poor attitude of some contractors about safety policy and safety procedures.

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Keith said the Board has not offered any advice on infrastructure at the Hanford Site. Potential advice could include recommendations about decisions such as a maintenance policy following a run to failure approach. For instance, some Board members have been told that the electrical substations are going to be run to failure. Such an approach would cause serious concerns. The Board would like an indication of what DOE's plan is and how they are ensuring there will be adequately maintained infrastructure.

Agency presentation

Pete Garcia, DOE-RL, and Burt Hill, DOE-RL, presented information on the DOE-RL Operations Office Maintenance Policy (Attachment 5). Pete said DOE is aware of concerns that were raised in the past about the policy of running to failure and shares those concerns.

Committee Questions and Response

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

C: Fatalities not only include accidents where infrastructure fails. Fatalities also include people who become sick and die from being exposed to a chemical or radioactivity. The National Cancer Institute found elevated levels of cancer at DOE facilities in almost every category, which lead to the DOE Employee Occupational Health Act. There are identifiable cases where workers have been splashed with waste and have died of cancer within five years; that is not acknowledged as a fatality for the site. The Board should be attentive to hazards beyond falls or electrical circuitry.

C: Rocky Flats used a Safety Analysis Recall System (SARS), which would not work at the Hanford Site. The SARS had to be rewritten for incremental change. If there are technical specifications for a piece of equipment in the Plutonium Finishing Plant (PFP), there will be no choice but to follow those specifications. How do you relate a decommissioning project to the risks? As risk does down, the SARS can decrease as well.

R: [DOE] The regulatory requirements for the work are nuclear and those are the overriding requirements. DOE cannot decide to decrease requirements by choice. There are specific criteria for the operability of a system with specifications for contractors that are outlined in a Documented Safety Analysis (DSA). Problems might be something like an exhaust fan related to a ventilation system not working properly or failing but being separate from the filtration system. The Supplemental Contract Requirements Document (SCRD) will address equipment like that, but it may not be where the true problem is. SCRD was written to be applied by Mission Support Alliance (MSA) where there are no nuclear facilities. However, MSA must support facilities at the Hanford Site that do handle samples for cleanup and remediation. DOE takes a graded approach that applies to all systems; not just nuclear systems.

Cost also plays a role. If water is being supplied to a nuclear system, someone could be hurt if that failed. This type of issue is very different than if there is a general internal pump that needs to be replaced. DOE would like the contractor to think about the consequences of failure and

risks of specific equipment failure. Mission impacts or health and safety impacts are considered differently for maintenance policy.

Q: A person conducts an inspection at the tank farms by doing a walk-around inspection for radiation and determining if anything has changed over the last week or last month. Would that type of activity be considered maintenance in the field? The frequency of inspection has steadily decreased for budgetary reasons. How will maintenance programs be impacted by budget cuts? What are the priorities?

R: [DOE] Contractors are required to have contractor assure systems so that activities meet contractual and regulatory requirements. There are metrics for tracking performance in a variety of areas that have been reviewed with several HSEP members. DOE would like to begin tracking and trending those metrics. Programs cannot be improved unless they are tracked to measure progress. All contractors now have performance metrics, which is a relatively new process. The amount of work has been impressive.

Q: Is the problem larger than an equipment maintenance issue? It is important to have the right scope.

R: [DOE] The SCRD was put in place and focused on equipment. DOE-RL is a remediation office and is always trending the line between efficient funding and effectiveness of programs. DOE does not want to maintain systems that do not need to be maintained. Decisions on what needs maintenance become more difficult as funding decreases, although DOE does hope to be smarter with funding decisions.

C: Self-assessments are important. Can DOE speak to its Best Practices reviews?

R: [DOE] DOE has worked with the contractors for three years to build and improve contractor assurances. The Certification Review Committee (CRC) now has close to 50 metrics to consider on a monthly basis. Senior managers also review these metrics once a month. These reviews are a useful way for DOE to leverage contractor information. DOE does not want to invest resources in areas that the contractors are already focused on improving. There will be a self-assessment later this year that will encompass a broader review than just safety consciousness in the work environment. There will be a cross-section of people involved to determine best practices.

The self-assessment presents a golden opportunity to consider both sides of the equation. DOE is discovering one to three good practices a day from being in the field. These practices range from team level to fairly significant impacts across the Hanford Site. Everybody within DOE-RL is participating and there are also team members from multiple contractors. DOE-RL decided to train the entire MSA/ISM surveillance team to use the question approach. The program involves discussions to bring information back to DOE and it is parallel to the safety survey, but not conjoined with it. The safety culture survey was conducted in a way that allows comparative studies at a more personal level. DOE can consider what the behaviors are, the core values of a learning organization and whether workers are engaged and involved.

C: It sounds like DOE is making good progress in terms of addressing the everyday safety concerns, which is a huge step for establishing confidence that safety really is the top priority.

R: [DOE] DOE is working to break down some of the hierarchical barriers and bringing Health Physicians Technicians into meetings with mid-level management.

Q: It appears that there have not been any performance evaluations previously. Is this information new or revised? How have performance measures changed?

R: [DOE] The measures have likely existed for years. These have just been elevated through DOE involvement. DOE can determine what is occurring on a more real-time basis than in the past and the field offices are becoming more involved. Additionally, DOE senior management is reviewing this information on a monthly basis.

C: This presentation has been interesting and maintenance policy at the Hanford Site has clearly matured over the past three years. DOE used to take a more hands-off approach to maintenance policy and is now stepping back into a larger role.

C: There is a subtle difference in how the maintenance policy is used and emphasized. There is nothing really new on the maintenance side. HSEP may want to reconsider these issues again in the future.

Q: Where do equipment warranties fit into DOE policies on maintenance? Some maintenance may be required in order to receive the benefits of warranties.

R: [DOE] Those types of considerations would be included in cost/risk examinations. There might be a question on whether it is worthwhile to maintain the warranty depending on how the equipment is being used.

HSEP requested to receive additional briefings in future meetings about best practices between DOE-RL and DOE-ORP and the contractor assurance system.

Committee Business*

The committee requested a call to finish drafting the ISM advice. It will be important to get the advice as refined as possible before the Board meeting because time will be limited. HSEP agreed to hold the call on Monday at 10:30 a.m. There will also be a committee call in August to discuss a potential addition of a draft advice point on tank vapors for the Site-Wide Permit advice (Tom Carpenter and Becky Holland will work on this), hear an update on Kadlec, frame SARS for future discussion and discuss committee business.

* Please see Attachment 1 – Transcribed Flip Chart Notes for key points/follow up actions recorded during the committee discussion.

Attachments

Attachment 1: Transcribed flip chart notes

Attachment 2: HSEP Value Statement

Attachment 3: Draft HAB Advice on Integrated Safety Management v.3

Attachment 4: Draft HAB Advice on Integrated Safety Management v.3 with DOE Edits

Attachment 5: DOE-Richland Operations Office Maintenance Policy

Attendees

Board Members & Alternates

Tom Carpenter	Steve Hudson	Liz Mattson
Sam Dechter	Mike Korenko	Margery Swint

Others

Brian Harkins, DOE-ORP	Erika Holmes, Ecology	Nicole Addington, EnviroIssues
Andrew LeBrun, DOE-ORP		Susan Hayman, EnviroIssues
Dana Bryson, DOE-RL		Sharon Braswell, MSA (phone)
Ray Corey, DOE-RL		Barb Wise, MSA
Pete Garcia, DOE-RL		
Burt Hill, DOE-RL		
Rick McCullough, DOE-RL		
Tiffany Nguyen, DOE-RL		
Ed Parsons, DOE-RL		