



Department of Energy

Washington, DC 20585

June 12, 2015

Mr. Jeff Dolven
President and Chief Executive Officer
Skookum Contract Services
P.O. Box 5359
Bremerton, Washington 98312

WEL-2015-03

Dear Mr. Dolven:

The Office of Enterprise Assessments' Office of Enforcement conducted an investigation into the partial finger amputation sustained by a Skookum Contract Services (Skookum) worker on December 4, 2014, during transformer demolition at the Office of Secure Transportation's Vehicle Maintenance Facility (VMF) in Oak Ridge, Tennessee. Based on information collected from our site visit (March 25 through 26, 2015), employee and management interviews, and a review of Skookum documents and records, the Office of Enforcement determined that work activities performed while using a forklift for removing a transformer at the VMF were inconsistent with Skookum's 10 C.F.R. Part 851 (Part 851) *Worker Safety and Health Program* (WSHP) in the areas of management and worker roles and responsibilities, processes for hazard identification and mitigation, employee training, injury reporting, and recordkeeping. Specifically:

- Skookum did not prepare a job hazards analysis that critically examined the occupational hazards for each step of the demolition. While a generic activity hazard analysis existed for operating the forklift, the demolition proceeded without identifying all potential hazards, incorporating necessary hazard controls into the work evolution, assessing the skill set of the workforce, or ensuring the availability of management to supervise all phases of the work.
- The hot work permit titled *Removal of hold-down bolts (transformer) for disposal* did not provide a complete and accurate record of work crew participation. Therefore, the Skookum permit authorizing individual (PAI) did not have an opportunity to ensure that all participants were trained and capable of performing their assigned tasks. In addition, the welding/burning/hotwork involved with cutting the transformer bolts was performed by a craftsperson not authorized by the PAI to perform the task.
- Skookum did not report the work-related injury consistent with the Department of Energy's (DOE) Manual 231.1A, *Environment, Safety and Health Reporting*, as required by Part 851 and the Skookum WSHP. DOE



contractors are responsible for submitting injury and illness incident reports electronically for receipt on or before the fifteenth and the last working day of the month using DOE's Computerized Accident/Incident Reporting System (CAIRS) database. The CAIRS report for this event, submitted on January 16, 2015, classified the injury as an avulsion. However, the tip of the finger was amputated, so the work-related injury must be reported.

- Skookum had not reviewed the effectiveness of the medical portion of its site emergency plan in accordance with Part 851 and thus was unaware that the medical emergency response capabilities available through a community medical facility would not meet the immediate needs of the injured Skookum worker. A delay in appropriate medical triage exacerbated the worker's injury. Skookum also had not performed self-assessment evaluations of medical aid, triage, and offsite injury/illness treatment procedures and capabilities to identify these limitations.
- Skookum was not attentive in controlling, preserving, and documenting the accident scene to allow an accurate investigation of the event. Before Skookum began its investigation, the accident scene was cleaned and equipment removed, thereby destroying evidence that could aid in identifying causal factors and developing corrective actions. In addition, Skookum did not discuss the results of its investigation with employees before issuing the investigation report, *Summary of Post Accident Investigation*, to ensure its technical accuracy and completeness.

DOE acknowledges that Skookum promptly investigated the event, prepared a causal analysis, and developed corrective actions to prevent recurrence. However, Skookum did not evaluate the event for regulatory noncompliances to ensure that the corrective actions addressed all relevant Part 851 requirements and safety and health standards.

DOE has elected to exercise enforcement discretion and will not pursue further enforcement activity in this matter. Consequently, DOE is issuing this letter to share these regulatory concerns regarding Skookum's implementation of Part 851 requirements. Skookum should consider the information contained in this letter as evidence that its WSHP warrants improvement to maintain compliance with the Department's regulatory requirements and to reduce the potential for worker injuries. In coordination with the National Nuclear Security Administration, the Office of Enforcement will continue to monitor Skookum's efforts to maintain a safe and healthful workplace.

This letter imposes no requirements on Skookum, and no response is required. If you have any questions, please contact me at (301) 903-7707, or your staff may contact Mr. Kevin Dressman, Director, Office of Worker Safety and Health Enforcement, at (301) 903-0100.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Simonson". The signature is written in a cursive style with a large, stylized 'S' at the beginning.

Steven C. Simonson
Director
Office of Enforcement
Office of Enterprise Assessments

cc: Maurice Correa, Skookum Contract Services
Kerry Clark, NNSA-OST