WSI-Nevada

Report from the Department of Energy
Voluntary Protection Program
Onsite Review
February 13-22, 2012

U.S. Department of Energy
Office of Health, Safety and Security
Office of Health and Safety
Office of Worker Safety and Health Assistance
Washington, DC 20585

Foreword

The Department of Energy (DOE) recognizes that true excellence can be encouraged and guided, but not standardized. For this reason, on January 26, 1994, the Department initiated the DOE Voluntary Protection Program (VPP) to encourage and recognize excellence in occupational safety and health protection. This program closely parallels the Occupational Safety and Health Administration (OSHA) VPP. Since its creation by OSHA in 1982, and implementation by DOE in 1994, VPP has demonstrated that cooperative action among Government, industry, and labor can achieve excellence in worker safety and health. The Office of Health, Safety and Security (HSS) assumed responsibility for DOE-VPP in October 2006. HSS is expanding complex-wide contractor participation and coordinating DOE-VPP efforts with other Department functions and initiatives, such as Enforcement, Oversight, and the Integrated Safety Management System.

DOE-VPP outlines areas where DOE contractors and subcontractors can surpass compliance with DOE orders and OSHA standards. The program encourages a *stretch for excellence* through systematic approaches, which emphasize creative solutions through cooperative efforts by managers, employees, and DOE.

Requirements for DOE-VPP participation are based on comprehensive management systems with employees actively involved in assessing, preventing, and controlling the potential health and safety hazards at their sites. DOE-VPP is available to all contractors in the DOE complex and encompasses production facilities, laboratories, and various subcontractors and support organizations.

DOE contractors are not required to apply for participation in DOE-VPP. In keeping with OSHA and DOE-VPP philosophy, *participation is strictly voluntary*. Additionally, any participant may withdraw from the program at any time. DOE-VPP consists of three programs with names and functions similar to those in OSHA's VPP: Star, Merit, and Demonstration. The Star program is the core of DOE-VPP. This program is aimed at truly outstanding protectors of employee safety and health. The Merit program is a steppingstone for participants that have good safety and health programs, but need time and DOE guidance to achieve true Star status. The Demonstration program, expected to be used rarely, allows DOE to recognize achievements in unusual situations about which DOE needs to learn more before determining approval requirements for the Merit or Star program.

By approving an applicant for participation in DOE-VPP, DOE recognizes that the applicant exceeds the basic elements of ongoing, systematic protection of employees at the site. The symbols of this recognition provided by DOE are certificates of approval and the right to use flags showing the program in which the site is participating. The participant may also choose to use the DOE-VPP logo on letterhead or on award items for employee incentive programs.

This report summarizes the results from the evaluation of WSI-Nevada during the period of February 13-22, 2012, and provides the Chief Health, Safety and Security Officer with the necessary information to make the final decision regarding its continued participation in DOE-VPP.

TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS

ANSI	American National Standards Institute
BLS	Bureau of Labor Statistics
CATS	Consolidated Action Tracking System
CFR	Code of Federal Regulations
CIH	Certified Industrial Hygienist
DART	Days Away, Restricted or Transferred
DOE	Department of Energy
ESC	Employee Safety Council
ES&H	Environment, Safety and Health
HSS	Office of Health, Safety and Security
IGAN	Independent Guard Association of Nevada
ISM	Integrated Safety Management
MSDS	Material Safety Data Sheet
MSHA	Mine Safety and Health Administration
NAICS	North American Industry Classification System
NNSA	National Nuclear Security Administration
NNSS	Nevada National Security Site
NSO	Nevada Site Office
NSTec	National Security Technologies, LLC
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PFSC	Pro Force Safety Committee
RAR	Risk Analysis Report
SOMD	Site Occupational Medical Director
SSC	Senior Safety Committee
SPC	Statistical Process Control
SPO	Security Police Officer
Team	Office of Health, Safety and Security DOE-VPP Team
TRC	Total Recordable Case
VPP	Voluntary Protection Program

EXECUTIVE SUMMARY

The WSI-Nevada (formerly Wackenhut Services, Incorporated-Nevada) mission is to ensure appropriate levels of protection for activities at Nevada National Security Site (NNSS) facilities against unauthorized access, theft, or diversion of special nuclear material; acts of sabotage or espionage; theft or loss to classified matter; theft or loss of government property; and other hostile acts that may cause unacceptable impacts on national security or on the health and safety of employees, the public, or the environment. The Star level recognition was initially awarded to WSI-Nevada in 2001, and was recertified in 2004, and again in 2008. In February 2012, a new contract was awarded to WSI-Nevada. The contract change was a change in contractor name only with the new contract being fulfilled with the same management team and employees.

The Department of Energy (DOE) Voluntary Protection Program (VPP) onsite review of WSI-Nevada was conducted from February 13-23, 2012. The review included facilities and locations at NNSS in Mercury, Nevada, and North Las Vegas, Nevada. This report documents the results of the Office of Health, Safety and Security's DOE-VPP team's (Team) review and provides the Chief Health, Safety and Security Officer with the necessary information to make the final decision about WSI-Nevada's DOE-VPP status.

The Team determined that WSI-Nevada has maintained its safety culture. WSI-Nevada managers are clearly committed to a strong and self-sustaining safety culture where all employees actively care for the safety of each other. Mature policies, programs, and procedures are in place to support continuous safety improvement. Employees are engaged in safety activities and improvements at WSI-Nevada. Employees are participating in safety awareness campaigns and are involved in safety committees. WSI-Nevada has retained the basic structure for hazard analysis through the contract change and reduction of force. Its process is documented, and the workforce is familiar and comfortable with the mechanics of the process. Further, WSI-Nevada understands the fundamental hazards posed by the mission at NNSS. WSI-Nevada is actively engaged in identifying and preventing hazards in the workplace. Adherence to the hierarchy of controls is evident and utilized by managers, safety staff, and employees. WSI-Nevada has an established training and qualification program that ensures employees are appropriately trained to recognize hazards and to protect themselves and coworkers. Additional safety focus occurs during the employee Safety Summit, Occupational Safety and Health Administration's 10-hour safety course, and defensive driving courses for newly hired uniformed employees.

WSI-Nevada managers and employees exhibited a desire to continuously improve the safety program. The Team recommends that WSI-Nevada continue to participate in DOE-VPP at the Star level based upon firsthand observation and reviews.

Consistent with the DOE-VPP quest for excellence in safety performance, the Team identified a number of opportunities for improvement. Listed in Table 1, these opportunities for improvement require no formal corrective action plan, but should be considered and addressed by WSI-Nevada in conjunction with its ongoing efforts for continuous improvement.

TABLE 1
OPPORTUNITIES FOR IMPROVEMENT

Opportunity for Improvement	Page
WSI-Nevada should modify its management observations to regularly invite workers to accompany them in order to better clarify management expectations and perspectives and provide workers a better means of expressing their concerns.	5
WSI-Nevada managers should find effective means to communicate with employees when rumors or misinformation begin to permeate the workforce.	7
WSI-Nevada should ensure the annual evaluation addresses both positive and negative observations, focuses on causes and contributing factors, and involves members of the uniformed and nonuniformed workforce.	8
WSI-Nevada should challenge itself to change the paradigm from “injuries are unavoidable and expected during training” to “we can train and do it safely.”	8
WSI-Nevada should consider reevaluating the structure of its safety committees, location of meetings, and tenure of committee members to maximize participation by workers and ensure the process is optimized for maximum benefit.	9
WSI-Nevada should ensure that employees are aware of their job functions and are notified and trained on new responsibilities when organizational changes occur.	10
WSI-Nevada should consider training other employees on accident and incident investigations and including them as members of the accident or incident investigation team.	10
WSI-Nevada should ensure that hazard analysis validates control selection, avoids the use of generic descriptors, and documents the rationale for control selection quantitatively if practical.	12
WSI-Nevada should consider creating a common tracking database or expanding use of one of the existing issues databases to track issues raised by employees and the Safety Councils, and foster better communication of results to WSI-Nevada employees.	13
WSI-Nevada should consider a safety logbook to use during muster to track and trend issues and communicate updated information and feedback.	13
WSI-Nevada should consider instituting a central point for all tracking and trending of employee concerns and expanding the formats used for performance objectives and measures to include the use of SPC charts that are directly linked to measurable contractor actions that will improve workplace safety and prevent	14

accidents and injuries.	
WSI-Nevada needs to update the SP-2-008,*Respiratory Protection Program Procedur*e, to reflect current practice with respect to WSI-Nevada personnel performing the fit-test.	16
WSI-Nevada should verify with NSO that the appropriate approvals and endorsements are valid and compliant with 10 CFR 851 exemption requirements.	16
WSI-Nevada Protective Force lesson plans could be improved by having a section that summarizes the training activity hazards and controls which is used to brief students during the training activity to confirm students' knowledge and provide an opportunity for questions or clarification.	18

I. INTRODUCTION

The WSI-Nevada (formerly Wackenhut Services, Incorporated-Nevada) mission is to ensure appropriate levels of protection for activities at Nevada National Security Site (NNSS) facilities against unauthorized access, theft, or diversion of special nuclear material; acts of sabotage or espionage; theft or loss to classified matter; theft or loss of government property; and other hostile acts that may cause unacceptable impacts on national security or on the health and safety of employees, the public, or the environment. The Star level recognition was initially awarded to WSI-Nevada in 2001, and was recertified in 2004. In 2007, WSI-Nevada was awarded a Conditional Star status due to organizational stresses and other factors. In 2008, WSI-Nevada was reinstated as a Star site. On December 31, 2011, the WSI-Nevada contract was extended approximately 1 month; and on February 2, 2012, a new contract was awarded to G4S-Government Solutions (G4S-GS), which included the former WSI-Nevada. Because of the history and corporate identity at the site, the company is electing to continue using the name WSI-Nevada and is legally registered as such in Clark and Nye Counties. The new contract is being staffed with the same management team and employees.

The Department of Energy (DOE) Voluntary Protection Program (VPP) onsite review of WSI-Nevada was conducted from February 13-23, 2012, at NNSS. In accordance with DOE-VPP requirements, the triennial recertification review is due in 2012. This report documents the required recertification of WSI-Nevada.

The Office of Health, Safety and Security (HSS) DOE-VPP team (Team), consisting of safety and security professionals with VPP experience and expertise from DOE Headquarters and other DOE sites, evaluated WSI-Nevada safety programs against the provisions of DOE-VPP. In order to ensure an appropriate balance between safety and security concerns, the Team included two members with safety expertise and three members with security backgrounds. During the site visit, the Team observed extensive work activities, evaluated relevant safety documents and procedures, and conducted interviews to assess the strength and effectiveness of WSI-Nevada health and safety programs.

The Team interviewed approximately 50 percent of the workforce either formally or during work observations. Interviews included uniformed, nonuniformed, supervisory, and management personnel. The Team had the opportunity to observe a variety of field activities, including: firearms training, muster (patrol shift prejob), weapons issue and turn-in, prejob/exercise walkdowns, prejob/exercise safety briefings, and postjob debriefings. The Team also observed preparation for, and conduct of, tactical training and exercises. Safety hazards encountered during performance of WSI-Nevada work include those associated with paramilitary training and storage of weapons and explosives, vehicle and traffic operations (onsite traffic control of vehicle incidents, convoy escort, and occasionally backup for Nye County Sheriff vehicle stops), and the industrial hazards associated with maintenance activities. Environmental hazards, such as high winds, heat or cold stress due to extreme weather conditions, and poisonous snakes and insects also make up a significant portion of the risk exposure. While these are the predominant hazards, workers may also encounter radiological hazards at NNSS.

II. INJURY INCIDENCE/LOST WORKDAYS CASE RATE

Table 2.1 Injury Incidence/Lost Workdays Case Rate (WSI/NV)					
Calendar Year	Hours Worked	Total Recordable Cases (TRC)	TRC Rate	DART* Cases	DART Case Rate
2009	927,524	9	1.9	8	1.7
2010	875,085	11	2.5	9	2.1
2011	799,248	10	2.5	8	2.0
Last 3 Years	2,601,857	30	2.3	25	1.9
Bureau of Labor Statistics (BLS-2010) average for NAICS** Code # 922120 (Police Protection)			6.7		4.1

Table 2.2 Injury Incidence/Lost Workdays Case Rate (Subcontractor)					
Calendar Year	Hours Worked	TRC	TRC Incidence Rate	DART Cases	DART Case Rate
2009	10,692	0	0	0	0
2010	11,258	0	0	0	0
2011	9,447	0	0	0	0
Last 3 Years	31,397	0	0	0	0
Bureau of Labor Statistics (BLS-2010) average for NAICS Code # 922120 (Police Protection)			6.7		4.1

* Days Away, Restricted or Transferred
**North American Industry Classification System

TRC Incidence Rates, including subcontractors: 2.3
DART Case Rates, including subcontractors: 1.9

Conclusion

Per the DOE-VPP documents, NAICS codes are submitted with verification by the applicant and are subject to acceptance by DOE based on the predominant contractor activity at the site. Where there are any questions, DOE will make the determination on the basis of the relative amounts of time spent on the contractor's or subcontractor's various activities at the site. WSI-Nevada officially reports its accident and injury statistics through BLS using NAICS code 561612, *Security Guards and Patrol Services,* which addresses unarmed, uniformed security personnel, such as night watchmen and mall security. WSI-Nevada security forces carry firearms, are authorized to use lethal force to protect National Nuclear Security Administration (NNSA) assets, train much the same as police force special response teams, and must pass

rigorous physical performance evaluations to remain qualified. In 2011, during the VPP review of security forces at the Strategic Petroleum Reserve's West Hackberry site in Louisiana, the Occupational Safety and Health Administration (OSHA) issued a report using NAICS code 92212, *Police Protection*, as a more accurate comparison industry. After discussion with WSI-Nevada safety representatives and senior managers, DOE Nevada Site Office (NSO), NNSA, and HSS managers relating to the comparison BLS code, the Team agreed that NAICS code 92212 should be used instead of 561612. Based on this comparison, WSI-Nevada is performing significantly better than other organizations with similar missions. The difference in comparison injury rates is 2.1 injuries per 200,000 hours worked for *Security Guards and Patrol Services* and 6.7 injuries per 200,000 hours for *Police Protection*. WSI-Nevada managers, health and safety personnel, and employees recognize this change in comparison industry is not a license for higher injury rates, and have expressed their intention to work toward reducing the rates. As such, WSI-Nevada meets the expectations for continued participation in DOE-VPP at the Star level.

III. MANAGEMENT LEADERSHIP

Management leadership is a key element of obtaining and sustaining an effective safety culture. The contractor must demonstrate senior-level management commitment to occupational safety and health, in general, and to meeting the requirements of DOE-VPP. Management systems for comprehensive planning must address health and safety requirements and initiatives. As with any other management system, authority and responsibility for employee health and safety must be integrated with the management system of the organization and must involve employees at all levels of the organization. Elements of that management system must include: (1) clearly communicated policies and goals; (2) clear definition and appropriate assignment of responsibility and authority; (3) adequate resources; (4) accountability for both managers and workers; and (5) managers must be visible, accessible, and credible to employees.

The 2007 review suggested that WSI-Nevada find additional opportunities to encourage and improve communications between managers and workers by providing more top management visibility and look for opportunities to encourage workers to ask questions of managers and ensure those questions are answered openly. During the 2008 review, it was clear that this area of concern had been addressed. During the current review, evidence of management visibility in the workplace was confirmed with both employees and managers alike. Open forums for employees to ask management questions are conducted to encourage employees to communicate and open dialogs that foster partnerships. The 2008 report documented the improvements in trust and partnership, but as discussed in this report, there are additional opportunities to pursue excellence.

In the months prior to this assessment, WSI-Nevada has had several activities that had the potential to induce significant organizational stress. In January 2012, WSI-Nevada performed a Force-on-Force exercise monitored by HSS experts from Headquarters and successfully demonstrated its ability to execute the elite force concept and fulfill its Protective Force mission. In addition, a contract extension occurred for the month of January until the formal contract was signed in February. During that extension, WSI-Nevada had to conduct a reduction in force of over 20 employees. Despite these organizational stresses, WSI-Nevada managers were able to maintain the WSI-Nevada focus on continuous improvement in safety.

WSI-Nevada Policy P2-01, *Environment, Safety and Health*, clearly establishes a written policy that WSI-Nevada operations are to be performed in a manner that ensures employee safety and health, minimizes impact on the environment, and provides opportunities to involve employees. The policy also clearly assigns responsibility to managers, directors, and supervisors for implementation. This policy is posted and readily available in all areas and can be downloaded electronically as needed via the company Web page. Interviews indicate that managers and employees have read and understand the written policy and know how to reference the policy in the future if needed.

The Worker Safety and Health Program is a comprehensive program that defines the elements of management leadership, employee involvement, hazard prevention and control, worksite analysis, and safety and health training. The program specifically addresses the size and design of the workforce and addresses in detail the hazards associated with WSI-Nevada work.

Interviews with employees indicate they are aware of the hazards and recognize WSI-Nevada's commitment to safety and health in the workplace.

Interviews with senior managers and the WSI-Nevada General Manager indicate a very strong commitment to the safety and health of employees. The General Manager holds the senior management team accountable for implementing the safety and health policy and there is a strong sense of accountability throughout the management team. This may be partly attributable to the strong military background among the senior managers and their desire to follow orders. However, some middle managers may not reflect the personal commitment exhibited by the General Manager. Paramilitary organizations that participate in VPP often struggle with communication styles. The military "order" concept and expected compliance may be contrary to the VPP concepts of questioning attitude and employee empowerment. Middle managers and frontline supervisors at WSI-Nevada exhibit a strong desire to carry out the direction and policies of the senior managers. Middle managers and supervisors may not always be receptive or supportive of efforts to encourage the workforce to question the status quo and make suggestions for improvement.

In 2007, it was observed that senior managers needed to be more visible in the working areas. Since then, they have increased their presence through regular participation in Protective Force musters, annual Protective Force training, and more frequent workspace visits. Managers' expectations for safety are included in muster announcements, as well as inspections of field personnel during the shift. Managers in nonuniformed activities do not have daily musters, prejob briefs, or other similar activities, but they are sufficiently visible to the workforce to support the management commitment to safety. Managers perform regular walkdowns and inspections of workspaces, but do not regularly invite workers to participate with them during those activities. WSI-Nevada should modify its management observations to regularly invite workers to accompany them in order to better clarify management expectations and perspectives and provide workers a better means of expressing their concerns.

Opportunity for Improvement: WSI-Nevada should modify its management observations to regularly invite workers to accompany them in order to better clarify management expectations and perspectives and provide workers a better means of expressing their concerns.

A significant hazard faced by many WSI-Nevada workers is associated with driving either to and from the site or in the performance of patrol duties. These hazards are especially significant since security forces work 12-14 ½ shifts, are expected to maintain physical requirements at an offsite location, and typically commute to and from work an hour or more. The General Manager has continued to support safe driving policies that help reduce the number of WSI-Nevada government-owned, vehicular-related incidents at NNSS. Over a 5-year period, WSI-Nevada government vehicle incidents have been reduced by approximately 50 percent. One of WSI-Nevada's 2012 safety and health goals is to achieve one million miles of driving without incurring a preventable accident. To that end, the General Manager has implemented a partnership between WSI-Nevada and the Nye County Sheriff's department to reduce the number of personal vehicle incidents through safety campaigns and visibility. While speeding is a primary concern, the General Manager, Senior Management Team, and First Line Supervisors

have repeatedly conveyed the expectation that the commute to and from work does not require workers to exceed the speed limit, and workers' arrival at work and home safely is their primary concern.

The General Manager and the management team recognize the contribution of training to help workers continue safe operation and demonstrate the improvements expected of a VPP Star site. In 2010 and 2011, WSI-Nevada conducted an OSHA 10-hour training class on *General Industry* that exceeds the minimum required safety training to provide more employees with the opportunity to gain additional safety knowledge. WSI-Nevada provided this training to approximately 36 employees both in the bargaining unit and nonbargaining unit. Additional training is planned in 2012.

Discussions with managers and safety personnel indicate that there are adequate safety resources available for the workforce. To address the need identified in 2008, WSI-Nevada has hired a Certified Industrial Hygienist (CIH) to enhance its safety organization. He has been the company's CIH for 3 years and was promoted to section manager in February 2012.

WSI-Nevada uses a variety of awards to encourage the performance of safe behaviors. SP2-017, *Safety Awards Program,* describes the positive reinforcement that is used by WSI-Nevada. Employees interviewed were most familiar with the Safety Slogan contests while managers mostly cited the Safety Bravo program. First line supervisors are given the authority and resources to reinforce safe behaviors by giving "safety bravo" awards to employees. These consist of a variety of gift cards, typically $20 value, to recognize an act that clearly demonstrates the purpose and goals of the employee safety program. Employees regularly compete in a variety of safety incentive programs, such as the Bravo awards and the Safety Slogan contests. The Employee Safety Council (ESC) awards a monthly $50 award for a safety slogan that is published in the company newsletter and posted on bulletin boards with credit to the author. The company has recently revised its driver safety award to provide a $25 award to each employee that goes 3 months without having a preventable traffic accident or incident. Although the potential exists that this might be seen as a disincentive to reporting vehicle accidents, WSI-Nevada personnel perform daily vehicle inspections that would reveal any unreported vehicle damage, thus minimizing this concern. Another award is the "Above and Beyond the Call of Duty (ABCD)" award, which may include safety. Most employees interviewed acknowledged that WSI-Nevada managers demonstrate an obvious commitment to the safety program and safety committees and work towards accomplishing safety goals and encouraging employees to be involved.

Accountability for WSI-Nevada is accomplished via annual performance evaluations, daily station inspections, line up (muster), and monthly and weekly safety committees and staff meetings. There is an approved disciplinary process. Interviews with managers and employees confirmed knowledge of the WSI-Nevada disciplinary system. Most could cite an incident involving safety where disciplinary action was taken. SP2-018, *Motor Vehicle Safety Program,* also identifies disciplinary actions, which vary depending upon the employee type. The procedure contains prescriptive actions for Security Police Officers (SPO) and nonexempt employees, but is vague if the person was a manager. Most employees and managers believe the process is fair and appropriate. Employees are familiar with the process and gave examples of

what behaviors and outcomes would warrant disciplinary action. Examples given in interviews were speeding, vehicle accidents, habitual tardiness, or violations of established safety rules.

A very small group of employees perceived a potential fear of reprisal that was discussed at length with both the employees and WSI-Nevada managers. This perception may have sprung from an incident where a supervisor was removed from the Special Response Team and returned to the regular guard force. The individual involved did not regard the removal as reprisal. Because of privacy concerns, facts surrounding the incident could not be shared with the workforce. Consequently, rumors and misinformation about the incident flourished.

The WSI-Nevada Environment, Safety and Health (ES&H) section conducted a due diligence review of a National Security Technologies, LLC (NSTec), subcontract and discovered that a subcontractor selected by the NSTec purchasing agent did not have the required Exhibit E documentation of training and medical qualifications, or the health and safety plan for a job involving lead remediation when the contract was awarded. As a result of WSI-Nevada's discovery, NSTec obtained the documents demonstrating the workers were qualified to perform the work. WSI-Nevada's review ensured the required deficiencies were corrected, and potential noncompliance issues were avoided. WSI-Nevada workers believed an unqualified contractor was allowed to continue work and did not receive adequate information. The lack of effective communication between NSTec and WSI-Nevada led to misperceptions by WSI-Nevada personnel regarding the subcontractor's qualifications. As a result of this issue, NSTec and WSI-Nevada instituted improvements in the communication of the procurement process between the two entities.

Both these cases could have been addressed earlier before they became issues with the workforce by clearer communications to and from employees. WSI-Nevada managers should find effective means to communicate with employees when rumors or misinformation begin to permeate the workforce while continuing to protect privacy information.

Opportunity for Improvement: WSI-Nevada managers should find effective means to communicate with employees when rumors or misinformation begin to permeate the workforce.

The annual WSI-Nevada self-assessment does not reflect a critical self-evaluation of VPP performance. DOE-VPP requires an annual self-assessment of the program by the participant. This assessment should highlight the successes of the participant's efforts, as well as critically evaluating the processes and implementation of the five tenets. The current self-assessment indicates only positive attributes in all tenets and itemizes issues currently being addressed and items for consideration. A WSI-Nevada critical evaluation of processes and implementation should evaluate issues raised by the employee survey, continually evaluate the effectiveness of communication, try to determine means to increase participation, evaluate the construct of safety committees and their effectiveness, and encourage employee ownership at all levels. WSI-Nevada should ensure the annual evaluation addresses both positive and negative observations and focuses on causes and contributing factors. This will enable WSI-Nevada to gain insights into continued improvements. These critical evaluations should involve members of the uniformed and nonuniformed workforce to be effective.

Opportunity for Improvement: WSI-Nevada should ensure the annual evaluation addresses both positive and negative observations, focuses on causes and contributing factors, and involves members of the uniformed and nonuniformed workforce.

WSI-Nevada has the primary mission of protecting special nuclear material and classified information. This mission requires a highly trained, disciplined workforce that is willing to put themselves at risk of injury or death in order to prevent loss or diversion of nuclear material. To ensure a highly skilled, disciplined, and trained workforce requires frequent training that may involve hazardous behaviors and actions. During such training opportunities, safety has to be aggressively managed as the probability and severity of injuries increases during intense training activities. Interviews indicate a perception that injuries during training are unavoidable and are the price to pay for a highly trained workforce. WSI-Nevada should challenge itself to change the paradigm from "injuries are unavoidable and expected during training" to "we can train and do it safely."

Opportunity for Improvement: WSI-Nevada should challenge itself to change the paradigm from "injuries are unavoidable and expected during training" to "we can train and do it safely."

Conclusion

WSI-Nevada managers are clearly committed to a strong and self-sustaining safety culture where all employees actively care for the safety of each other. Mature policies, programs, and procedures are in place to support continuous safety improvement. There are areas where WSI-Nevada can improve its performance and gain employee support by modifying its management observations, improve its annual evaluation process, and change managers and workers' belief that injuries are unavoidable and expected during training to "we can train and do it safely." WSI-Nevada managers should continue to explore methods to improve communications and further develop partnerships with workers based on communication, respect, and trust. WSI-Nevada meets the Management Leadership tenet of DOE-VPP at the Star level.

IV. EMPLOYEE INVOLVEMENT

Employees at all levels must continue to be involved in the structure and operation of the safety and health program and in decisions that affect employee health and safety. Employee involvement is a major pillar of a strong safety culture. Employee participation is in addition to the right of an individual to notify appropriate managers of hazardous conditions and practices. Managers and employees must work together to establish an environment of trust where employees understand that their participation is crucial and welcome. Managers must be proactive in recognizing, encouraging, facilitating, and rewarding workers for their participation and contribution. Both employees and managers must communicate effectively and participate collaboratively in open forums to discuss continuing improvements to recognize and resolve issues and to learn from their experiences.

The 2008 review identified a change to the three safety committees and noted that involvement and participation had increased. All employees interviewed knew who their safety committee representative was by name and were comfortable raising issues and reporting potential problems. Safety committee members felt empowered to review and take action as appropriate without fear of reprisal. The Safety Representatives continue to conduct periodic walkdowns and safety inspections of all areas per SP2-015, *ES&H Inspection, Assessment and Employee Involvement Program*. Most employees demonstrated a significant pride in their safety program and are familiar with their basic rights under DOE-VPP and title10, Code of Federal Regulations, part 851 (10 CFR 851).

SP2-027, *Safety Committee Program*, defines the process, rules, and charters for WSI-Nevada safety committees. The safety committees are the primary means of employee representation in the safety program. The Employee Involvement section of the WSI-Nevada 2011 VPP self-evaluation points primarily to the safety committees and the employee surveys as the tools for employee involvement. Of the three safety committees, the only committee with significant employee involvement (nonmanagement) is ESC. The Senior Safety Committee (SSC) and the Pro Force Safety Committee (PFSC) are management-driven with minimal nonmanagerial involvement. The Independent Guard Association of Nevada (IGAN) representative is a voting member of both the SSC and the PFSC, and there is an additional nonmanagerial member of the PFSC. The Team noted that in ESC there is a strong employee presence with 14 representatives, each representing various units within the company. There are a total of 14 voting members in ESC. The ES&H staff members serve as advisors, but are nonvoting members. Although the safety committees are the primary means of employee representation, employee participation is eclipsed by the managerial participation. The safety committees are overlapping with slightly different scopes and functions. The IGAN members (largest segment of the company) are represented on the PFSC (1 member) and the SSC (2 members). WSI-Nevada should consider reevaluating the structure of its safety committees and location of meetings to maximize participation by workers and ensure the process is optimized for maximum benefit.

Opportunity for Improvement: WSI-Nevada should consider reevaluating the structure of its safety committees, location of meetings, and tenure of committee members to maximize participation by workers and ensure the process is optimized for maximum benefit.

Turnover or change within the committees is rare. Three members of ESC have held their positions for 3 to 5 years with little rotation or new membership. The newest member of ESC was assigned in 2010 just before the VPP assessment began. Rotation of committee members maximizes employee involvement and contributions to the pursuit of excellence. WSI-Nevada should rotate safety representatives and committee membership on a periodic basis to improve ownership, leadership, and expand the knowledge base.

Interviews with employees indicate that the majority of the employee concerns that are voiced through the safety committees or through supervisors are addressed in a timely fashion, but some issues may not be adequately captured, tracked, and corrected. Feedback to employees raising safety issues was often lacking unless the corrective action was readily apparent, such as burned out lights or building repairs. WSI-Nevada should find more effective ways to track safety issues raised by workers and provide timely feedback regarding issue status or correction. For example, a safety logbook could be instituted and reviewed at muster so issues and concerns from employees could be regularly updated and communicated (See Worksite Analysis for the Opportunity for Improvement).

During the contract transition period from December 31, 2011, through February 2, 2012, several employees, supervisors, and managers were released through a reduction in force. Their duties and responsibilities were transferred to remaining employees, although in many instances, the remaining employees were unaware of the additional duties. For example, Protective Force supervisors were unaware of new responsibilities related to the vehicle inspection checklist (or other documentation) required by SP2-020, *Safety Patrols*. Tracking required under SP2-015, *ES&H Inspection, Assessment and Employee Involvement Program,* was not always being performed. While some tracking methods did exist, such as the trouble call log utilized by some SPOs to track reporting of concerns, this method was not utilized by all safety representatives and supervisors responsible for reporting concerns. While other methods were mentioned in documents such as SP2-015, specifically the Consolidated Action Tracking System (CATS), not all safety concerns or employee suggestions fall under this category nor would they be entered into this system. WSI-Nevada should ensure that employees are aware of their job functions, and are notified and trained on new responsibilities when organizational changes occur.

Opportunity for Improvement: WSI-Nevada should ensure that employees are aware of their job functions and are notified and trained on new responsibilities when organizational changes occur.

Employees are not substantially involved in accident or incident investigations. Employees interviewed by the Team indicated that those activities were done by management. WSI-Nevada should consider training other employees on accident and incident investigations and including them as members of the accident or incident investigation team. The company could benefit from their expertise and would demonstrate to the workforce that their input and knowledge are valuable assets to the success of WSI-Nevada.

Opportunity for Improvement: WSI-Nevada should consider training other employees on accident and incident investigations and including them as members of the accident or incident investigation team.

Conclusion

Employees are engaged in safety activities and improvements at WSI-Nevada. Their suggestions are being addressed although the opportunity to better communicate the status of their inputs could use some management attention. Employees expressed a need to be given greater opportunities to participate in those activities, such as training on accident and incident investigations, and including them as members of the accident or incident investigation team. Employees are participating in safety awareness campaigns and are involved in safety committees, but management presence on some committees may be eclipsing employee participation. Despite this management presence, workers remain significantly involved in their personal safety and that of their peers. They understand their rights to a safe and healthy workplace and their responsibility for helping to create that condition. Based upon Team observations and interviews, WSI-Nevada meets the Employee Involvement tenet of DOE-VPP.

V. WORKSITE ANALYSIS

Management of health and safety programs must begin with a thorough understanding of all hazards that might be encountered during the course of work and the ability to recognize and correct new hazards. There must be a systematic approach to identifying and analyzing all hazards encountered during the course of work, and the results of the analysis must be used in subsequent work planning efforts. Effective safety programs also integrate feedback from workers regarding additional hazards that are encountered and include a system to ensure that new or newly recognized hazards are properly addressed. Successful worksite analysis also involves implementing preventive and/or mitigating measures during work planning to anticipate and minimize the impact of such hazards.

Worksite analysis-related programs, processes, and tools used by WSI-Nevada were relatively unchanged since the last DOE-VPP onsite review in 2008. SP2-016, *Risk Analysis Program,* continues to place the primary responsibility for ensuring timely completion of a risk evaluation or Risk Analysis Report (RAR) on directors and managers. The ES&H organization was involved in the update of 21 RARs during 2011. The RARs provide the analysis, but do not clearly link the analysis to the hazard control or provide enough detail on the control. Generic descriptors without basis are frequently used. For example, the Obstacle Course RAR 07-017 stated, "Training is stopped when light is too low for instructors to enforce safety rules." This subjective statement fails to provide a specific trigger, such as the amount of lumens or foot candles, or provide a method for the instructor to make that determination. The same RAR stated, "Shooters limit exposure to solvents to the minimum necessary to accomplish the task." WSI-Nevada changed the solvent of choice for weapon cleaning after exercises to a more "eco-friendly" cleaner. There was no discussion in the RAR on the acceptability of the available gloves or reference to the Material Safety Data Sheet (MSDS) precautions for the new solvent. SP2-016, *Risk Analysis Program,* uses the concept of risk to determine whether activities are acceptable and the level of control that needs to be applied to activities. The procedure only provides for a qualitative assessment of the probability of occurrence. The consequence of an occurrence is also qualitatively assessed. However, the qualitative determinations are rarely based on more detailed quantitative analysis. For example, the hazards discussed in the preceding paragraph were not quantitatively analyzed. WSI-Nevada should ensure that quantitative analyses are performed and documented whenever information or experience is available as a means of refining risk acceptance criteria.

Opportunity for Improvement: WSI-Nevada should ensure that hazard analysis validates control selection, avoids the use of generic descriptors, and documents the rationale for control selection quantitatively if practical.

SP2-003, *Industrial Hygiene Programs,* describes the triennial health hazard inventory of all WSI-Nevada facilities. Inventory results are maintained on an NSTec database. This condition is a result of WSI-Nevada's previous dependence on NSTec for industrial hygiene services identified in 2008. Since WSI-Nevada has hired its own CIH, the need for this data to reside with NSTec has diminished. WSI-Nevada is working to improve access to the data by moving it to a WSI-Nevada-controlled database.

SP2-101, *Assessment Program*, describes the processes used to identify issues. The CATS database, located on a secure system, is used to track assessment findings, observations, and opportunities for improvement. The database had approximately 100 entries at the time of the review. The database is monitored weekly with e-mails sent to managers responsible for actions with upcoming due dates. Managers believed all inspection results were being entered and tracked in CATS, but the Team observed that Facility Safety Inspection and Safety Patrol inspection results were not being entered. Incomplete data in CATS limit WSI-Nevada's ability to perform effective trending of safety issues identified on inspections. WSI-Nevada should consider creating a common tracking database or expanding use of one of the existing issues databases to track issues raised by employees and the Safety Councils and foster better communication of results to WSI-Nevada employees.

Opportunity for Improvement: WSI-Nevada should consider creating a common tracking database or expanding use of one of the existing issues databases to track issues raised by employees and the Safety Councils and foster better communication of results to WSI-Nevada employees.

The employees know who to contact to get an issue resolved. Employees consistently stated they report safety issues mostly to their supervisor with a few stating they tell their PFSC or ESC safety representative. However, there is no systematic procedure to consistently provide feedback to employees. Also, the Protective Force workshift scheduling process leads to frequent changes in supervisory assignments and makes it difficult to provide feedback between the person and supervisor who were originally involved. Interviews with employees indicated that they are not aware of a common source they can access to review safety issues. Most Protective Force members stated they do not have access to a computer or to the CATS database. WSI-Nevada should consider a safety logbook to use during muster to track and trend issues and communicate updated information and feedback.

Opportunity for Improvement: WSI-Nevada should consider a safety logbook to use during muster to track and trend issues and communicate updated information and feedback.

The Quality and ES&H organizations both produce trend charts. The Quality organization produces trend charts based on the CATS database and the ES&H organization produces trend charts on injuries and motor vehicle accidents based on the Computerized Accident/Incident Reporting System database. The Quality organization uses the ES&H charts for some reports. Although WSI-Nevada endeavors to provide information that managers can act upon to improve performance, it has had only limited success accomplishing that objective. For example, both groups produce bar charts, but neither group has used statistical process analysis to determine upper and lower control limits that would be useful in interpreting trends. Recommendations provided in assessments using the charts are general in nature and not traceable to the specific findings of the trends. The Quality organization person who is responsible for the charts understands the usefulness of statistical process control charts, but WSI-Nevada has not yet implemented that practice. WSI-Nevada should consider instituting a central point for all tracking and trending of employee concerns and expanding the formats used for performance objectives and measures to include the use of Statistical Process Control (SPC) charts that are

directly linked to measurable contractor actions that will improve workplace safety and prevent accidents and injuries.

Opportunity for Improvement: WSI-Nevada should consider instituting a central point for all tracking and trending of employee concerns and expanding the formats used for performance objectives and measures to include the use of SPC charts that are directly linked to measurable contractor actions that will improve workplace safety and prevent accidents and injuries.

Investigations of accidents and injuries are guided by SP2-002, *Accident Investigation, Reporting and Recordkeeping*. The process is largely a management function with ES&H becoming involved to check for completeness. The IGAN President was unable to explain why the procedure specifically excludes IGAN members from participating on the injury/accident investigation of other IGAN members.

Conclusion

WSI-Nevada retained the basic structure for hazard analysis through the contract change and reduction of force. Its process is documented and the workforce is familiar and comfortable with the mechanics of the process. Further, WSI-Nevada understands the fundamental hazards posed by the mission at NNSS. WSI-Nevada should devote more attention to refining its hazard analysis methods by assuring that hazard analysis validates control selection, avoids the use of generic descriptors, and documents the rationale for control selection, quantitatively if practical. WSI-Nevada has access to a tracking database that can be used to monitor issues raised by employees and the Safety Councils, but it should continue looking for additional methods to foster better communication of results to WSI-Nevada employees. Based upon Team interviews and observations, WSI-Nevada has fulfilled the basic attributes of the Worksite Analysis tenet of DOE-VPP.

VI. HAZARD PREVENTION AND CONTROL

Once hazards have been identified and analyzed, they must be eliminated (by substitution or changing work methods) or addressed by the implementation of effective controls (engineered controls, administrative controls, or Personal Protective Equipment (PPE)). Equipment maintenance processes to ensure compliance with requirements and emergency preparedness must also be implemented where necessary. Safety rules and work procedures must be developed, communicated, and understood by supervisors and employees. These rules and procedures must also be followed by everyone in the workplace to prevent, control the frequency of, and reduce the severity of, mishaps.

WSI-Nevada effectively uses all elements of the hierarchical approach to hazard controls. Several examples were seen where hazards had been eliminated. WSI-Nevada is just bringing online a simulated training system that will eliminate some of the live fire training exercises. Where elimination cannot be accomplished, WSI-Nevada attempts to substitute a different product that is less hazardous. For example, the armorers had changed their gun cleaning fluid to a less hazardous product that will reduce exposures to certain solvents. The Electronic Security Systems organization changed its wall penetration process to include the use of a wall scanner, drill bit depth limiter and inspection scope to confirm the presence of items behind a wall it needs to penetrate. SPOs determined that live ammunition in the guard towers during force-on-force exercises could become a hazard. They developed a way to secure live ammunition in a lockable container so it could not be introduced into the exercise. Administrative controls are utilized as the next line of defense for hazardous activities. This is evident in the controls for firing range activities where the discipline and structure is stringent. The last choice for protection is PPE.

WSI Nevada's SP2-04, *Hazard Communication Program,* describes the WSI-Nevada maintained database of nearly 300 MSDS' of chemicals. The database is new since the last review and contains only the latest MSDS. The procedure also allows copies of MSDS' to be present in Right-to-Know stations. Employees use both depending on their personal preference. Employees clearly understood the procedure and the restrictions on use of secondary containers to the quantity required for 1-day use and the requirement to label it with the products name.

After the 2008 review, WSI-Nevada added a full-time CIH to its roster in addition to the certified safety professional. The CIH has just been promoted to the ES&H manager's position and will maintain the industrial hygiene responsibilities in addition to the management duties.

The ES&H staff members were known by nearly every person interviewed. Many employees indicated they see the ES&H staff in their work area on a frequent basis. Interviews consistently found employees were aware of the WSI-Nevada procedures and any PPE requirements related to their job. PPE was cited as being readily available. Employees frequently contact their ES&H staff for questions relating to PPE or other safety questions. Several employees had been issued flame-retardant clothing for use when resetting breakers and were comfortable with the process. Consistent with the availability of safety support discussed above, they confirmed the communication link to their safety contact was readily available and responsive.

Since 2008, WSI-Nevada has assumed responsibility for respirator fit-testing for WSI-Nevada personnel. WSI-Nevada has also procured and trained staff on using a portable, quantitative

mask fit-tester. In the past year, a new AVON C50 respirator® has replaced the previous respirator used by the SPOs, which had a fit-test failure rate of approximately 25 percent. It was reported that there have been no fit-test failures with the new mask. The procedure SP2-008, *Respiratory Protection Program,* has not been updated to reflect the program changes.

Opportunity for Improvement: WSI-Nevada needs to update the procedure SP-2-008, *Respiratory Protection Program Procedure,* to reflect current practice with respect to WSI-Nevada personnel performing the fit-test.

WSI-Nevada's Worker Safety and Health Plan has been approved by the NNSA NSO with the statement that the 10 CFR 851 prescribed American National Standards Institute (ANSI) Z88.2, *Respiratory Protection,* is not applicable to the WSI-Nevada contract as it has been cancelled by the ANSI organization. However, according to ANSI this standard has not been cancelled. WSI-Nevada should verify with NSO that the appropriate approvals and endorsements are valid and compliant with 10 CFR 851 exemption requirements.

Opportunity for Improvement: WSI-Nevada should verify with NSO that the appropriate approvals and endorsements are valid and compliant with 10 CFR 851 exemption requirements.

Occupational medical services are provided by NSTec. The Site Occupational Medical Director (SOMD) is a positive role model for other doctors due to his style of using his medical knowledge and willingness to work with all levels of the organization. The SOMD has developed a Severity of Injuries Index that is provided to WSI-Nevada management to help interpret the magnitude of injuries, as well as overall health of the ES&H program. WSI-Nevada SPOs over the age of 40 are provided a medical stress test with the use of heart dyes. The current Protective Force has a Computed Axial Tomography Angiogram performed on all members over 40 years, every 4 years. This process enables medical professionals to better diagnose potential problems or heart conditions within the Protective Force and could result in saved lives among Protective Force personnel during stressful conditions, such as annual physical qualifications.

Conclusion

WSI-Nevada is actively engaged in identifying and preventing hazards in the workplace. Adherence to the hierarchy of controls is evident and utilized by managers, safety staff, and employees. The occupational medical provider has instituted several programs that benefit the wellness of employees and the ability of managers to assess and manage the magnitude of any injuries that occur. WSI-Nevada should address applicability of national consensus standards in respiratory protection with NSO and update its respiratory protection procedure. Based upon interviews and observations, the Team believes that WSI-Nevada has fulfilled the basic attributes of the Hazard Prevention and Control tenet of DOE-VPP.

VII. SAFETY AND HEALTH TRAINING

Managers, supervisors, and employees must know and understand the policies, rules, and procedures established to prevent exposure to hazards. Training for health and safety must ensure that responsibilities are understood, personnel recognize hazards they may encounter, and they are capable of acting in accordance with managers' expectations and approved procedures.

The 2008 review did not reveal any deficiencies or opportunities for improvement. Training and qualification programs are established to ensure that all employees receive appropriate training to recognize hazards of the work environment to protect themselves and coworkers. The training process provides the requisite knowledge, skills, and abilities to perform tasks competently and safely. It applies to all employees and all aspects of WSI-Nevada operations, design, procurement, construction, and support activities.

WSI-Nevada utilizes several processes to identify and track training requirements for each employee. SP2-015, *ES&H Inspection, Assessment and Employee Involvement*, identifies general training classes for job groups. The training coordinators schedule the training and notify the employees and their managers. WSI training records are maintained by human resources.

WSI-Nevada has a dedicated training location for the Protective Force that includes firing ranges and mockups to simulate actual field conditions under which employees would perform the work activities and retain their qualifications. Some WSI-Nevada Protective Force training courses have been approved through the DOE National Training Center Training Approval Program. The SPOs must pass evaluations and demonstrate proficiency in specific activities to become and maintain SPO I, II, or III status.

The Team reviewed the safety training identified in procedure SP2-015, *ES&H Inspection, Assessment and Employee Involvement*. Most of the safety training consists of classroom training, computer-based training, and on-the-job training. ES&H training covers general topics, such as ES&H Orientation, OSHA Rights and Responsibilities, 10 CFR 851 Rights and Responsibilities, Integrated Safety Management (ISM), and VPP. Additional training on specific topics includes Hazard Communication, Hearing Conservation, Ergonomics, Motor Vehicle Safety, and others. Annual refresher training is provided to Protective Force personnel and covers ISM, VPP, Lead Awareness, Bloodborne Pathogen Awareness, and Hearing Conservation. Nonprotective Force personnel receive the same information with the addition of information on ES&H updates, ESC, Unresolved Safety Issue Form, Safety Concern Reporting Process, and incidents and injuries. Interviews and records show employees were up to date and familiar with the required training. Employees who were interviewed expressed confidence in their safety and health while at work.

The Quality organization's lessons learned coordinator screens incidents, accidents, and near-misses at NNSS and the rest of the DOE complex. The lessons learned are disseminated to managers who pass them on to their employees.

As part of their security duties, WSI-Nevada personnel may need to access underground areas at NNSS (U1A or other tunnels at the site). Although in the past 6 months security

personnel have not been required to access any underground facilities, projected activities indicate that the need will arise in the future. The Mine Safety and Health Administration (MSHA) requires that personnel performing duties in underground mines, such as office workers, maintenance, delivery, or other occasional work (not exceeding 5 consecutive days), need specific site-hazard training and annual refresher training although they do not require the full 40-hour mine safety training. WSI-Nevada is working with NSTec to develop an MSHA-approved training course for security forces.

WSI-Nevada Protective Force instructors were observed to be inconsistent in providing safety information about each training activity to students. Safety information provided to trainees during classes varied depending on the specific instructor. Lesson plans did not contain a standard section on training hazards and precautions that needed to be addressed by the instructor prior to the training activity. WSI-Nevada Protective Force lesson plans could be improved by having a section that summarizes the training activity hazards and controls, which is used to brief students during the training activity to confirm their knowledge, and provide an opportunity for questions or clarification.

Opportunity for Improvement: WSI-Nevada Protective Force lesson plans could be improved by having a section that summarizes the training activity hazards and controls, which is used to brief students during the training activity to confirm students' knowledge and provide an opportunity for questions or clarification.

The Team observed a WSI-Nevada Obstacle Course exercise for training. Prior to the exercise, the instructor and students did not walkdown the course to discuss potential hazards on the course and appropriate controls during the activity. Other Protective Forces throughout the DOE complex commonly use this technique to discuss skills to be demonstrated and the hazard controls associated with the activity in order to minimize the potential for injury. The Team observed a qualification exercise where students did not walkdown the course. WSI-Nevada believes a walkdown of the course would compromise the qualification by prealerting the students to target locations. Instead, WSI-Nevada conducts a tabletop briefing with the students covering the hazards of the course prior to the qualification exercise.

As discussed in Management Leadership section, WSI-Nevada is providing the OSHA 10-hour course to employees serving on safety committees. This ensures employees have a consistent base level of safety knowledge. This course also serves as the foundation for employees who perform facility inspections. They are also coached by ES&H staff until they are comfortable with performing the task independently. All employees, excluding Protective Force, attend a 1-day Safety Summit where topics of interest are presented. WSI-Nevada is also providing new uniformed employees the National Safety Council course DDC-4, *Defensive Driving Course*.

Conclusion

WSI-Nevada has an established training and qualification program that ensures employees are appropriately trained to recognize hazards and to protect themselves and coworkers. Additional safety focus occurs during the all-employee Safety Summit, the OSHA 10-hour safety course, and defensive driving courses for newly hired uniformed employees. The training program helps managers, supervisors, and employees to understand the established safety and health policies,

rules, and procedures to promote safe work practices and minimize exposure to hazards. Training lesson plans could be improved by having a section that summarizes the training activity hazards and controls and include walkdowns of all outdoor Protective Force training areas, such as the Obstacle Course, prior to the training activity to discuss the hazards and controls of the activity. WSI-Nevada meets the requirements of the Safety and Health Training tenet of DOE-VPP.

VIII. CONCLUSIONS

WSI-Nevada has recently undergone some organizational stresses in the month preceding this assessment that included a contract extension and change, annual Force-on-Force graded exercise, and workforce reduction. Senior managers remain totally committed to the safety of the workforce and are implementing new strategies that are the result of the new contract. Workers continuously support each other in the safe performance of their everyday tasks. Workers and managers alike understand the hazards they face on a daily basis. Improvements in the safety and health program are underway and are expected to demonstrate additional effectiveness once the new safety manager and staff have been realigned and given the opportunity to streamline the process. The reduction of hazards is ongoing as exemplified by the new simulation unit that is almost ready for use. Training continues to be a strong point for the organization with minor improvements suggested in this assessment. Although there are opportunities for improvement that the Team identified in this assessment, such as communication improvements, opportunities for employees to become more involved, and improving the hazards analysis process, the Team believes that WSI-Nevada meets the criteria for continued participation in DOE-VPP at the Star level.

APPENDIX A

Onsite VPP Assessment Team Roster

Management

Glenn S. Podonsky
Chief Health, Safety and Security Officer
Office of Health, Safety and Security

William A. Eckroade
Principal Deputy Chief for Mission Support Operations
Office of Health, Safety and Security

Patricia R. Worthington, PhD
Director
Office of Health and Safety
Office of Health, Safety and Security

Bradley K. Davy
Director
Office of Worker Safety and Health Assistance
Office of Health and Safety

Review Team

Name	Affiliation/Phone	Project/Review Element
John A. Locklair	DOE-HSS (301) 903-7660	Team Lead, Management Leadership
Tyson Allen	Battelle Energy Alliance (BEA)/Idaho National Laboratory (INL)	Management Leadership
Clint Cassingham	Security Walls, LLC/Waste Isolation Pilot Plant	Employee Involvement
Bruce Hooper	BEA/INL	Employee Involvement
Richard O. Zimmerman, CSP	Mission Support Alliance (MSA) Safeguards and Security (SAS)/Richland Operations Office (RL)	Worksite Analysis, Hazard Prevention and Control
David M. Richey	MSA SAS/RL	Worksite Analysis, Hazard Prevention and Control
Gordon W. Denman	MSA SAS/RL	Safety and Health Training