

Mission Support Alliance, LLC
Safeguards and Security
Department of Energy Voluntary Protection Program Merit Review
August 23, 2012

Background:

Located in Richland, Washington, the mission of Mission Support Alliance, LLC (MSA), Safeguards and Security (SAS), at Hanford is to maintain a standardized program for all Project Hanford Management contractors relating to safeguards and security functions and to physically protect special nuclear material, classified material, government property, and the personnel located within the confines of the Hanford Site. The Department of Energy (DOE) Richland Operations Office provides oversight of SAS.

SAS was originally admitted into the DOE Voluntary Protection Program (VPP) at the Star level in 2001 and recertified in 2004 when Day & Zimmerman, Protection Technology Hanford (PTH) was the safeguards and security contractor. PTH was subsequently replaced by Fluor Hanford (FH) SAS. The recertification of FH SAS occurred in 2008. In 2009, MSA assumed the contract from FH. Due to that transition, the Office of Worker Safety and Health Assistance (HS-12), within the Office of Health, Safety and Security (HSS), performed a reevaluation of SAS in 2011. Since the accident injury rates exceeded the comparison industry averages, the 2011 HSS DOE-VPP Team (Team) recommended SAS continue in the program at the Merit level.

Under the DOE-VPP program requirements, a review of Merit participants is required every year up to 5 years. This allows participants to continually improve and achieve Star recognition in DOE-VPP. The HS-12 review Team focused its review on injury rate improvements, disincentives to reporting of injuries, documentation of analysis logic, leading indicators, and physical fitness controls to prevent injuries. This report documents the results of the 1-year followup review conducted on August 23, 2012.

Results

The SAS 2011 end-of-year Total Recordable Case (TRC) rate of 3.0 and a Days Away, Restricted or Transferred (DART) rate of 1.6 per 200,000 hours worked is compared to the North American Industry Classification System (NAICS) Code 561612, *Security Guards and Patrol Services*, rates of 2.1 and 1.1, respectively. The rates were clearly above the National averages for the comparison industry. In order to address the needed improvements, SAS developed and implemented a plan to focus on injury rates and prevention of injuries for Security Police Officers. The 2011 assessment identified additional focus in physical conditioning and qualification activities as an opportunity for improvement (OFI). To address this OFI, an SAS fitness specialist is frequently in or immediately available to personnel using the weight room or treadmills. The fitness specialist performs frequent observations of fitness activities to ensure that personnel are using proper techniques in their workouts and in the use of equipment. He

also sends advance notices of upcoming fitness evaluations to individuals 8-10 weeks prior to the evaluation. The safety organization disseminates regular safety reminders.

SAS uses the MSA, *Case Management Desk Instruction, OSH-2*; Rev 5, dated March 10, 2010, to guide the weekly Classification Committee review for occupational injury and illnesses. In addition, a senior review team, which includes participants from CSC Hanford Occupational Health Services (Hanford Site Medical Provider), reviews the injury illness information weekly. The Team reviewed the classifications of events for 2012, to date. The Team identified weaknesses in the documentation for 3 out of 4 events that were classified by SAS as not work-related. The information in the records provided by SAS indicated the events are work-related. There was not enough information to determine if the injuries were recordable. After discussing these concerns with SAS personnel, SAS committed to reevaluating the events. It is clear that SAS is aggressively managing its cases and devoting much more attention to case classification. SAS must ensure that accident/illness case management is well documented and defensible.

<p>Opportunity for Improvement: SAS should ensure that the accident and illness documentation is complete and defensible.</p>
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HS-12 reviewed the current TRC rate, to date, and the case rate shows four recordable cases, all of which resulted in DART cases. The results produce a TRC and DART rate of 1.5 per 200,000 hours worked. If the 3 events discussed above are recordable, then the resulting TRC rate changes to 2.64 events per 200,000 hours worked. This is an improvement over the 2010 TRC rate of 3.0 per 200,000 hours worked.

HSS also believes that based upon an Occupational Safety and Health Administration (OSHA) interpretation at a site with similar security forces, NAICS code 92212, *Police Protection*, is a more appropriate industry comparison. OSHA determined the mission, training, and activities of DOE security forces more closely compare with *Police Protection*. The industry averages for NAICS code 92212 are a TRC rate of 6.3 injuries per 200,000 hours worked and a DART case rate of 3.8 per 200,000 hours worked. Based upon the downward trend in incidents and comparison to *Police Protection* activities, SAS meets the requirements for participation in DOE-VPP at the Star level.

During the 2011 review, the Team identified an OFI to remove individual performance incentives tied to injuries. SAS has revised its procedure SAS-7309, *Safety Awareness and Recognition Program*, to remove individual performance incentives tied to individual injuries, vehicle accidents, and contamination events. The revision now focuses on participation opportunities, such as attending safety meetings or participating in an onsite or offsite safety activities.

In 2011, the Team could not clearly identify a requirement or mechanism to document the logic path from hazard identification to hazard control selection through the analysis process. SAS has revised its procedure SAS-7321, *Hazard Analysis Procedure*, to include notes and a record of analysis to justify control measures identified.

SAS is identifying and exploring ways to better use data on injuries, field presence of fitness specialists, and ongoing safety observations to more effectively reduce potential for injuries, and improve the safety awareness of its workers. The discussions held with the management team and workers indicate a positive attitude toward improvements instituted since the 2011 review. The managers expect a continued improvement as a result of these actions.

Conclusions

Since 2011, SAS has made improvements in the case management and prevention of accidents and injuries to its workers. SAS clearly demonstrates that continuous improvement is a value embraced by managers and the workforce together. SAS has improved its procedures relating to capturing analysis and removing any incentives that might imply a negative context relating to accidents or injury reporting. SAS has improved the utilization of collected data to prevent injuries and have made its fitness specialists more visible to guide the employees in their qualification efforts. SAS' commitment to make continual improvements across the organization reflects the expectations for a DOE-VPP Star site. As a result, the HS-12 Team recommends that SAS continue to participate in DOE-VPP and be elevated to a Star site.