



Department of Energy
Washington, DC 20585

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Mr. Christopher Gentile, President
Honeywell Federal Manufacturing & Technologies, LLC
Kansas City Plant
2000 E 95th Street
Kansas City, Missouri 64131

Dr. Paul Himmert, President and Laboratories Director
Sandia Corporation
Sandia National Laboratories
P.O. Box 5800, MS 0101
Albuquerque, New Mexico 87185-0101

Dr. Raymond J. Juzaitis, President
National Security Technologies, LLC
Nevada National Security Site
P.O. Box 98521, NSF001
Las Vegas, Nevada 89193-8521

Dr. Charles F. McMillan, President
Los Alamos National Security, LLC
Los Alamos National Laboratory
Mailstop A 100, Drop Point 03140071S
Bikini Atoll Road, TA-3
Los Alamos, New Mexico 87545-1663

Mr. John D. Woolery, President and General Manager
Babcock & Wilcox Technical Services Pantex, LLC
Mail Drop: 12-69A
P.O. Box 30020
Amarillo, Texas 79120-0020

WEL-2014-03

Dear Messrs. Gentile and Woolery; and Drs. Himmert, Juzaitis, and McMillan:

The Office of Independent Enterprise Assessments' Office of Enforcement evaluated five worker safety and health related events that have occurred since February 2010, during work performed under contract number EP21908 by Honeywell Federal Manufacturing & Technologies, LLC (Honeywell FM&T) for the National Nuclear Security Administration (NNSA) Roof Asset Management Project (RAMP). National Security Technologies, LLC, (NSTec), Los Alamos National Security, Inc. (LANS),



and Babcock & Wilcox Technical Services Pantex, LLC, reported four of the five events into the Department of Energy's (DOE) Occurrence Reporting and Processing System (ORPS). The NNSA Sandia Field Office identified the fifth event as an area of concern in a Sandia Corporation (Sandia) *Periodic Contractor Performance Report* (PCPR). Honeywell FM&T and the four named sites were signatories to the *Nuclear Security Enterprise Roof Asset Management Program Execution Plan*, which assigns respective roles and responsibilities regarding RAMP safety and health oversight and management. The referenced ORPS reports are:

- NA--PS-BWP-PANTEX-2009-0029 - *NNSA Contractor Falls Off Building and Injures Left Shoulder*
- NA--NVSO-NST-NTS-2010-0005 - *Lockout/Tagout Violation by the Subcontractor for the Nuclear Security Enterprise Roof Asset Management Program (RAMP).*
- NA--LASO-LANL-CMR-2010-0004 - *Management Concern: Precautionary Facility Evacuation Due to Chemical Monitoring Results.*
- NA--PS-BWP-PANTEX-2011-0048 - *Disruption of Energized Circuit During Roofing Project.*
- Sandia PCPR for third Quarter Fiscal Year (FY) 2012.

The events are significant in that they exposed the involved workers to fall hazards, hazardous chemicals, heat stress conditions, or uncontrolled electrical energy sources, which did result in serious injury for the fall event, or otherwise could have resulted in serious injury or death for the other events. DOE's evaluation of the circumstances disclosed potential violations of 10 C.F.R. Part 851, *Worker Safety and Health Program*, and its invoked standards in the areas of program implementation, oversight of field conditions, management of change, hazard assessment, hazard control, and occupational exposure limits. These elements apply to one or more of the events as described below:

1. Construction Services (CS), a Building Technology Associates, Inc. (BTA) and Honeywell FM&T subcontractor, did not implement fall protection and work practices appropriate to prevent worker injury at the Pantex Plant. On May 4, 2009, a CS worker wearing a 50 foot retractable lanyard fell a distance of approximately 13 feet from a roof edge and suffered a broken shoulder and injured spleen. The worker exceeded the allowable distance that the 50 foot retractable lanyard should be extended from its anchor point in relation to that point and working surface leading edge. The CS supervision present at the time of the incident did not verify that the anchor point was positioned as required for the work being performed and the roof design.

2. BTA and Schreiber Roofing, Inc., both Honeywell FM&T subcontractors, did not implement appropriate measures to ensure worker exposure to heat stress conditions were below the applicable *American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values[®] (TLV) for Chemical Substances and Physical Agents and Biological Exposure Indices (2005)*. In Sandia's PCPR for the third Quarter FY 2012, the Sandia Field Office stated that for BTA and Schreiber Roofing, Inc., the "Oversight of the Roof Asset Management Program work for the Building 905 Roof Replacement was insufficient (e.g., heat stress management)."
3. BTA, Royal Roofing Company, Inc., and Bennett & Brosseau Roofing, Inc., did not adequately coordinate with responsible site entities to identify and assess hazards before the start of roofing work at Los Alamos National Laboratory (LANL) on May 19, 2010. This work produced airborne volatile organic chemicals that led LANS to initiate a precautionary building evacuation, and resulted in 41 individuals being evaluated by the LANL medical clinic, some of whom required minor treatment for eye irritation. LANS's ORPS report identified the causes as insufficient project pre-planning and work document development, design changes to the roofing system and adhesive, unforeseen impact of building negative air pressure, and unforeseen impact of roofing work conducted during the normal workday.
4. In two instances, RAMP subcontractors did not coordinate with responsible site entities to implement adequate project planning, work document development, and work process controls such as lockout/tagout (LOTO), to address potential hazards. These events occurred at:
 - a. Nevada National Security Site on February 10, 2010, during roof work by BTA, Schreiber Roofing, Inc., and Canyon Electric, Inc. The RAMP contractors did not adequately implement LOTO for a 110 volt circuit servicing two roof-mounted fans.
 - b. Pantex Plant, on July 28, 2011, during work by BTA and Bennett & Brosseau Roofing, Inc. The RAMP contractors did not conduct an adequate pre-job hazard assessment, and/or stop the work once roof removal conditions exceeded initial expectations, to identify and implement LOTO for a roof-located photo cell.
5. For these events, Honeywell FM&T did not maintain adequate oversight of RAMP subcontractors either initially or as work progressed to ensure that the work was performed in accordance with the applicable worker safety and health program.

Based on discussions with NNSA's Acting Associate Administrator for Infrastructure and Operations, the Office of Enforcement understands that the RAMP project deficiencies collectively revealed to NNSA the need to better define, communicate, and implement worker safety-related roles and responsibilities. Consequently, NNSA is re-examining relevant areas of the RAMP contract safety and health program, including, but not limited to, specific considerations for oversight of RAMP contractors at DOE sites, proactive engagement by safety and health personnel in hazard recognition, exposure assessments, fall protection, and selection of effective controls. Additionally,

NNSA is evaluating the common programmatic nature of these events and the resulting potential for adverse health impacts at diverse worksites participating in the ongoing RAMP program and future, similar programs. While NNSA is working to address clarity of oversight roles and responsibilities unique to this contractual arrangement, these incidents provide opportunities for prime contractors to evaluate lessons learned for continuous improvement.

Notwithstanding NNSA's role, Honeywell FM&T, as the RAMP program administrator for NNSA, and the NNSA operating contractors at the affected sites, were responsible collectively for ensuring the safety and health of workers involved in these RAMP-related events. The Office of Enforcement is issuing this letter to convey concerns about the level of rigor applied by Honeywell FM&T, other involved management and operating contractors, and the roofing subcontractors in planning and executing work safely and in accordance with DOE worker safety and health requirements. In recognition of site identification of causal factors and anticipated response at the impacted locations, the Office of Enforcement has elected to exercise enforcement discretion and not pursue further enforcement activity at this time. As RAMP work continues and is expanded in scope to other projects involving multiple contractors and multiple jobsites, NNSA contractors, in coordination with NNSA, should ensure that roles and responsibilities for ensuring worker safety are appropriately documented, clearly understood by all parties, and effectively implemented in accordance with the applicable worker safety and health program.

No response to this letter 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,



Steven C. Simonson

Director

Office of Enforcement

Office of Independent Enterprise Assessments

cc: Mark Holecek, NA-KC
Patrick Dolson, Honeywell FM&T
Geoffrey Beausoleil, NA-SN
Gabriel King, Sandia
Steven Lawrence, NA-NV
Brian Barbero, NSTec
Kimberly Davis Lebak, NA-LA
Alex Romero, LANS
Steve Erhart, NA-NPO
Kathy Brack, B&W Pantex
Richard Reback, DNFSB