



Swift and Staley Team Infrastructure Support Contract Paducah Gaseous Diffusion Plant

**Report from the Department of Energy
Voluntary Protection Program
Onsite Review
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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 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. Assessments are now more performance-based and are enhancing the viability of the program. Furthermore, 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 designed to apply 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 Swift and Staley Team at the Paducah Gaseous Diffusion Plant, during the period of May 13-17, 2013, 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.

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ABBREVIATIONS AND ACRONYMS

AHA	Activity Hazard Analysis
BLS	Bureau of Labor Statistics
CBT	Computer-Based Training
DART	Days Away, Restricted or Transferred
DOE	Department of Energy
EARP	Employee Award and Recognition Program
ES&H	Environment, Safety and Health
GET	General Employee Training
HSS	Office of Health, Safety and Security
IT	Information Technology
JTHA	Job Task Hazard Analysis
LEARN	Local Education Administration Requirements Network
NAICS	North American Industry Classification System
NFPA	National Fire Protection Agency
OSHA	Occupational Safety and Health Administration
PGDP	Paducah Gaseous Diffusion Plant
POD	Plan-of-the-Day
PPE	Personal Protective Equipment
PPPO	Portsmouth/Paducah Project Office
QA	Quality Assurance
SST	Swift and Staley Team
Team	Office of Health, Safety and Security DOE-VPP Assessment Team
TFE	Technical Field Engineering, Inc
TRC	Total Recordable Case
USEC	United States Enrichment Corporation
USW	United Steelworkers
VPP	Voluntary Protection Program
VPPPA	Voluntary Protection Programs Participants' Association
WEMS	Wastren-Energx Mission Support, LLC

EXECUTIVE SUMMARY

The Swift and Staley Infrastructure Team (SST) is the infrastructure prime contractor to the Department of Energy (DOE) Portsmouth/Paducah Project Office (PPPO) at the Paducah Gaseous Diffusion Plant (PGDP). SST is a partnering agreement among three companies. The teaming companies consist of Swift & Staley, Inc., URS Safety Management Solutions LLC, and Wastren Advantage, Inc. SST has 85 full-time employees that provide safety and health, records management, computer support, utilities, roads, parking lots, snow clearing, and other infrastructure support to the operating contractor at PGDP. SST is a small business venture with a limited scope of work at PGDP and performs much of the work itself. The United Steelworkers (USW) Union Local 550 represents approximately 35 SST workers.

SST has an excellent safety record when compared to its comparison industry with total recordable case rates 80 percent lower. SST incurred its first days away, restricted, or transferred case in over 6 years during the first quarter of 2013. A review of SST accident and injury logs did not reveal any concerns with the process to classify and report injuries. The Office of Health, Safety and Security DOE Voluntary Protection Program (VPP) Team (Team) did not identify any disincentives to reporting accidents and injuries.

Managers at SST are committed to ensuring every worker has a safe and healthy workplace, and continue to pursue DOE-VPP Star status. Since the 2012 review, SST has made significant progress addressing most opportunities for improvement that the Team recommended. Some opportunities for improvements remain open and there are plans in place to make further improvements. There are other opportunities for improvement that SST indicated as closed, but require additional time to mature and demonstrate effectiveness. In the past year, VPP efforts have slowed due to the loss of the USW Safety Representative, a reduction in employee involvement, management decisions that some employees perceived to diminish efforts to empower workers, and employee concerns related to safe work practices. SST is aware of these issues and based on discussions from this review, it is in the process of developing improvement efforts to address the issues.

SST employees are aware of their safety responsibilities and look out for their coworkers' safety. They are fully empowered to pause or stop work without fear of retribution. SST needs to continue improving employee empowerment in safety through the SST Safety Committee and the VPP Core Committee to achieve the excellence in employee involvement expected from a DOE-VPP Star site.

SST has documented processes in place to perform hazard analysis. Last year, SST, PPPO, and the Team all identified issues with the effectiveness of those processes and their implementation. SST is addressing the effectiveness of those processes in an ongoing improvement effort. SST demonstrated a new hazard analysis process to the Team prior to the Team's departure, and the Team believes it will ultimately strengthen the hazard analysis process, but it has not been tested and validated.

As part of the ongoing improvement effort for hazard analysis, SST is collecting routine activity hazard assessments. Workers, supervisors, and safety personnel then select an appropriate subset of those analyses to create a broader hazard analysis for a task. SST can build upon this foundation by effectively documenting the analysis performed and assumptions made during the process. The Team saw evidence of an improved hierarchical approach to controls as evidenced

by new procedures addressing the 2012 opportunity for improvement. Interviews with workers indicate the need for improvement in control selection, which the Team believes will result when the hazard analysis procedure is finished.

SST has a systematic training that appropriately trains and qualifies employees prior to performing work. The employees believe they are well prepared to perform their job safely. SST maintains training records that are accessible to the employees, supervisors, and managers.

The majority of the opportunities for improvement from the 2012 review are closed or have corrective action plans in place. Some opportunities for improvement that SST closed need more attention. The Work Site Analysis and Hazard Prevention and Control processes need improvement to ensure all hazards are appropriately identified, analyzed, controlled, and workers' concerns are addressed before work resumes. The Team confirmed that union support is still in place and SST remains committed to achieving Star status. The Team recommends that SST continue to participate in DOE-VPP at the Merit level.

TABLE 1
OPPORTUNITIES FOR IMPROVEMENT

Opportunity for Improvement	Page
SST managers should focus on coaching, encouraging, and empowering VPP committee members and leaders rather than directing them, and help committee members become more self-directed and improve results.	5
Managers need to ensure supervisors adequately address workers' concerns, clearly communicate how they resolved the concerns, and obtain worker agreement before work proceeds.	6
SST needs to find effective methods to encourage greater employee participation in the Safety and VPP committees, and restore employees' faith that managers value and encourage their ideas and leadership.	8
SST should continue the mentoring relationship with WEMS and customize programs to apply to its specific situations.	8
SST needs to conduct a comprehensive lessons-learned investigation into the excavation events that occurred during the 755 Trailer and the Training Trailer installation projects.	12
SST needs to ensure that all as-built drawings are updated to reflect the location of the damaged water drain and the red concrete-capped electrical feeder line in the next as-built drawing update.	12
SST should consider updating its subcontractor procurement procedures to include the evaluation of the Injury and Illness experience, and use that evaluation to adjust its oversight of contractors while performing work onsite.	13
SST should consider dedicating an area for CBT and track its progress since there are competing space reconfigurations from the Kevil office transition.	17

I. INTRODUCTION

The Swift and Staley Infrastructure Team (SST) is the infrastructure prime contractor to the Department of Energy (DOE) Portsmouth/Paducah Project Office (PPPO) at the Paducah Gaseous Diffusion Plant (PGDP). SST is a partnering agreement among three companies. The teaming companies consist of Swift & Staley, Inc., URS Safety Management Solutions LLC, and Wastren Advantage, Inc. SST provides infrastructure support to DOE and DOE contractors at PGDP including: administrative; technical; grounds maintenance; utilities; environment, safety and health; and records management support.

PGDP is located approximately 15 miles west of Paducah, Kentucky, near the Ohio River in McCracken County. The DOE property comprises 3,600 acres, 750 of which are inside the PGDP security fence. The Paducah site began operations in 1952 to produce low-assay enriched uranium. In 1993, in accordance with the Energy Policy Act of 1992, DOE turned uranium enrichment operations over to the United States Enrichment Corporation (USEC). USEC produced enriched uranium for use in the United States and abroad. DOE's primary focus is now environmental restoration of the Paducah site and managing waste generated from those activities, as well as waste generated during the period prior to the transfer to USEC operations.

SST is a small business venture with a limited scope of work at PGDP and performs much of the work itself. SST subcontracts specialty work (pest control, air-conditioning repair, etc.,) to local businesses. SST has 85 full-time employees. The United Steelworkers Union (USW) Local 550 represents approximately 35 workers.

In 2012, the Office of Health, Safety and Security (HSS) performed the initial DOE Voluntary Protection Program (VPP) assessment of SST, and SST was admitted into DOE-VPP at the Merit level. The DOE-VPP program documents require annual evaluations of Merit participants until they achieve Star status or withdraw from the program. The size of the SST organization gave the 2013 HSS DOE-VPP Team (Team) the opportunity to observe most current work and contact most of the personnel during work observations, interviews, and meetings. This report provides the results of that assessment and provides the Team's recommendation to the Chief Health, Safety and Security Officer regarding SST's continued participation in DOE-VPP.

II. INJURY INCIDENCE/LOST WORKDAYS CASE RATE

Injury Incidence/Lost Workdays Case Rate (WEMS)					
Calendar Year	Hours Worked	Total Recordable Cases (TRC)	TRC Incidence Rate	DART* Cases	DART* Case Rate
2009	163,962	0	0	0	0
2010	194,253	1	1.0	0	0
2011	182,286	1	1.1	0	0
2012	165,189	1	1.2	0	0
Best 3-Year Total	540,501	2	0.66	0	0
Bureau of Labor Statistics (BLS-2011) average for NAICS** Code #561210 Facility Support Services			3.7		1.9

*Days Away, Restricted or Transferred

** North American Industry Classification System

TRC Incidence Rate : 0.66

DART Case Rate : 0.0

Discussion

SST's safety record, when compared to its comparison industry TRC rates, averages over 80 percent lower utilizing the alternative best 3 out of 4 years for calculating comparisons. SST incurred its first DART case in over 6 years in the first quarter of 2013. Reviews of accident and injury logs, policies, processes, and procedures, as well as employee interviews, did not identify any incentives or pressure to suppress reporting of injuries. All personnel felt very comfortable reporting minor injuries (first aids or near-misses). SST did not offer any incentives tied to TRC or DART case rates. SST accident and injury rates meet or exceed the expectations for continued participation in DOE-VPP.

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 finally, (5) managers must be visible, accessible, and credible to employees.

In 2012, the Team concluded that managers at SST were clearly committed to ensuring every worker had a safe and healthy workplace and were zealously pursuing DOE-VPP Star status. In their zeal, they had focused on leading the workforce by doing rather than helping the workforce lead the effort. This approach had shifted in the weeks preceding the 2012 assessment, but needed additional time to mature and demonstrate effectiveness. SST needed to develop and demonstrate an effective self-assessment process that addressed each tenet of DOE-VPP in order to achieve DOE-VPP Star status.

Since the 2012 review, SST has retained its relatively flat management structure, which provides significant opportunities for managers to be visible to the workers. Senior managers and most administrative support personnel remain located in an offsite building in Kevil, Kentucky, approximately 7 miles from the support facilities at PGDP. The Program Manager, the senior SST manager at the site, continues to promote an open-door policy that encourages all employees to bring safety issues and concerns to him or to the Environment, Safety and Health (ES&H) Manager. His direct reports include the Operations Manager, ES&H Manager, Quality Assurance Manager, and the Human Resources Manager. Senior managers are available and approachable to the workers, but the separation between the company's two locations has unintentionally created an *insulating effect*. Typically, employees generally go to their immediate supervisors or the safety professionals located onsite with concerns because of the current geographical separation of offices. Managers at the Kevil location do not hear about problems quickly because supervisors try to address the problems without informing the managers. In some cases, supervisors are not following procedures and informing senior managers when workers stop work for safety concerns (see discussion in the Worksite Analysis section). The pending move from Kevil to the PGDP site by all SST managers and support personnel should significantly improve communication, change workers' perceptions that managers are not committed to safety, and improve workers' trust in their managers and supervisors.

As in 2012, managers remain generally open and receptive to constructive suggestions related to safety made by workers, supervisors, and the Team members. Managers have provided resources to improve conditions in facilities normally occupied by SST. The conditions needing improvement include communication, work processes, and employee involvement. In addition, managers and workers were knowledgeable and complimentary of the ability to provide timely rewards for suggestions and actions to improve safety. Based on employee interviews, SST is effectively using reward and recognition programs to recognize employees for contributing to the

success of the Company by improving processes or suggesting safer ways to accomplish tasks. The processes for recognition have not substantially changed since the last review.

SST provides screensavers for workstations that now have the ability to display the electronic message board information. The electronic message board is a continuous display of weather information, SST news, safety topics, concerns, or VPP information useful to SST employees. Employees can install the screensavers on their workstations if so desired. SST has a corporate safety goal of *Zero injuries Zero incidents* that is covered in safety meetings and displayed on the electronic message board, and on the new screensavers. SST continues to expect each person to contribute individually to company goals by: (1) working in a safe manner; (2) having no on-the-job injuries; and (3) actively participating in the safety program. SST does not exclude injured workers from reward and recognition programs, and workers did not perceive any disincentives to reporting injuries arising from these goals. Further discussion related to this topic is located in the Employee Involvement tenet.

The Team met with the local USW 550 leadership and they continue to support SST's participation in DOE-VPP. The USW local leaders believe that SST is working to give workers greater opportunity to participate in the safety program, but are also aware of the current challenges. They also clearly expressed their willingness to withdraw that support if SST failed to continue supporting greater worker involvement.

In 2012, the Team identified that SST had not completed its annual VPP report, a critical self-assessment that is a significant criteria for DOE-VPP participation. DOE-VPP expects its participants to have a process in place for an annual assessment report that evaluates each of the five tenets of DOE-VPP annually and that process must be in place for 12 months. SST performed an annual assessment for 2012, and used that report to establish specific goals and objectives. In many cases, the results of that assessment were consistent with the Team's observations, indicating the process is maturing. However, the self-assessment did not identify that some workers are skeptical of managers' commitment to safety over scheduled work completion. Senior managers are now aware of the workers perceptions, and plan to rebuild workers' trust and promote open communication.

SST has an extensive system of written policies and procedures related to ES&H. In 2012, the Team recommended that SST consider revising its procedure system significantly, eliminating redundancy, and removing procedures not applicable to its scope of work. During this review, the Team found SST continuing to rewrite its procedures to address the 2012 opportunity for improvement. SST considered the corrective actions complete, but several important procedures are still in draft form or need revision.

In 2012, managers used a set of lagging performance indicators on a quarterly basis to evaluate safety and health performance. The indicators included TRC, DART cases, as well as Initial Event Reports, Occurrence Reports, Corrective Action Closure (ahead, on time, or behind schedule), Sources of Open Corrective Actions, and Nonconformance Reports. Since then, SST has added indicators, such as near-misses, first-aid cases, participation in safety programs, and severity of unsafe conditions, to transition its performance indicators towards leading rather than lagging indicators. The new indicators have not yet been in place for a year, limiting their effectiveness to date, but initial results are promising. The ES&H Manager indicated that SST is now more aware of the potentials for injuries, and is seeking ways to prevent near-misses and first aids. (See Worksite Analysis for additional discussion)

The 2012 Team identified that SST should consider combining the two plan-of-the-day (POD) meetings into a single meeting at the Paducah support facility. SST postponed this suggestion pending the move from the leased support facility in Kevil, Kentucky, to the PGDP location. SST is funding that move through efficiencies rather than as a reimbursable cost under the contract, leading to delays due to new workscope, and workforce and funding issues. SST installed new trailers onsite, and Kevil workers were developing the plans and logistics to make the move from Kevil to the new trailers. SST should continue with its plans to complete the move and ensure the move receives sufficient priority to prevent future delays.

In 2012, SST provided multiple opportunities for employees to become involved. SST provided funding to send eight employees to the Regional Voluntary Protection Programs Participants' Association (VPPPA) conference and two to the National VPPPA conference. SST provided additional training opportunities for hourly workers to attend the National Safety Council's yearly safety conference, attend accident incident training, and the Occupational Safety and Health Administration's (OSHA) 10-hour safety training.

SST continues to work on its development of a "baseline exposure assessment" that was identified by the 2012 review. The ES&H Manager informed the Team that the baseline was almost ready for verification and validation. SST closed the corrective action although the baseline is not yet complete and validated. Once SST validates the baseline, SST needs to implement a consistent approach to hazard monitoring and control selection to ensure the baseline is maintained current.

Employees on the SST Safety and VPP Core committees voiced their disappointment in the way these committees were functioning. The employees expected that managers would empower and engage them in developing improvements. The employees explained that they became an audience to listen to solutions decided by others who senior managers appointed. SST managers should focus on coaching, encouraging, and empowering committee members and leaders rather than directing them, and help committee members become more self-directed and improve results.

Opportunity for Improvement: SST managers should focus on coaching, encouraging, and empowering VPP committee members and leaders rather than directing them, and help committee members become more self-directed and improve results.

Workers reported that SST has not effectively implemented managers' expectations for stopping work. SST procedure, Suspension of Work (Safety-Related), *Procedure 3.1.3/R5 (07/25/11), section 4.1*, requires a person who identifies an unexpected condition; a potential change in scope; a component in the wrong configuration; or a new, undefined, or unexpected hazard is responsible for:

- Suspending work activities or the processes immediately;
- Placing the work or task in a safe configuration if it is safe to do so;
- Making notifications to the supervisor and the SST ES&H staff;

Additionally, section 4.2 requires the supervisor to:

- Communicate with involved employees and organizations;
- Notifying the affected SST Functional Manager (FM), ES&H Manager, and the Quality Assurance (QA) Manager;

- Assisting in identifying, developing, and initiating pertinent corrective actions;
- Updating applicable work control documents; and
- Resuming work activities upon approval.

Sections 4.3 and 4.4 provide additional responsibility for the ES&H and Operations Managers to assist in the development and verification of corrective actions prior to approving the restart of work. However, supervisors do not always follow this procedure when workers call for stop work.

For example, last year two workers moved a fire safe down some stairs using a borrowed stair mover device. The stair mover replaces a hand truck and walks a load up and down staircases with minimal physical exertion by the workers. Since the workers borrowed the device, they had limited experience with its operation, but received a briefing leading them to believe it was simple to use. While moving the fire safe down a set of stairs, the workers lost control of the stair mover, and the entire assembly (including the fire safe) fell down the stairs. The worker stated that he and his coworker suggested they stop the work to evaluate why the equipment failed to perform as expected. The supervisor told the workers that no damage occurred so they should continue using the stair mover to move the fire safe to the delivery point. The operator believed the supervisor ignored his suggestion to stop work. Managers need to reinforce their expectations to supervisors regarding stop work, and ensure workers agree with the resolution before resuming work.

Another example where supervisors apparently did not adequately address workers' concerns occurred when workers expressed concern regarding four mowing tractors that required air-conditioning recharges. Managers wanted employees to drive the tractors down Highway 60 into town for the service. Workers thought driving the tractors on a major highway presented unacceptable risks and suggested SST have the service organization perform the activity onsite. Workers believed that managers had accepted their suggestion, but were later surprised to find the tractors were in town the next day for service. Managers directed other workers to drive the tractors into town because onsite-servicing costs exceeded the budget. Managers need to ensure supervisors adequately address workers' concerns, clearly communicate how they resolved the concerns, and obtain worker agreement before work proceeds.

Opportunity for Improvement: Managers need to ensure supervisors adequately address workers' concerns, clearly communicate how they resolved the concerns, and obtain worker agreement before work proceeds.

Conclusion

SST is progressing in the Management Leadership tenet, but has not yet empowered employees effectively to develop and implement solutions for safety issues. SST should continue to explore ways for employees to participate and champion their efforts to seek solutions. Managers should insist that decisions communicated to workers include hazard analysis and rationales for those decisions. Managers need to reinforce their expectations to supervisors and ensure supervisors fully address worker concerns before resuming work, not just assigning the work to other workers. Managers should make a more concerted effort to visit employee workspaces and provide positive interaction with workers that reinforces their safety commitments. SST is improving, but needs additional time to demonstrate the Management Leadership expected of a DOE-VPP Star participant.

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 individual right 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 adds value, is crucial, and welcome. Managers must be proactive in recognizing, encouraging, facilitating, and rewarding workers for their participation and contributions. Both employees and managers must communicate effectively and collaboratively participate in open forums to discuss continuing improvements, recognize and resolve issues, and learn from their experiences.

Senior managers at SST remain committed to ensuring every worker has a safe and healthy workplace. In 2012, the Team found the SST management team zealously pursuing DOE-VPP Star status. In their zeal, they focused on leading the workforce by doing rather than empowering the workforce to lead the effort. Since 2012, attempts to support and empower the workforce have met with limited success. Several events in 2012 impaired the efforts to improve the VPP culture at SST, and remnants of the leading versus empowering approach exist. The loss of a USW champion due to medical issues, and employee disappointment with the modified structure and conduct of the VPP and safety programs also hindered SST's progress toward the DOE-VPP Star.

During the 2012 review, the Team recommended that SST should continue looking for additional external education, training, and mentoring opportunities for workers. SST managers responded by sending employees to the regional and National VPPPA conferences and to the National Safety Council conference. Managers also provided accident and incident training to several hourly workers so they could become resources in the event of an accident or injury. For workers that chose to participate, SST provided the OSHA 10-hour safety training.

Employees were eagerly seeking additional involvement and anticipated greater participation because of their attendance to the regional and national conferences. After attending the conferences, employees volunteered to participate on the VPP Committee and the SST Safety Committee. The Team interviewed employees that had volunteered for these committees, but had subsequently resigned. When asked why they no longer participated, employees expressed that rather than contributing, being part of the solution, and making SST a better and safer place, they became an audience to listen to decisions made by a few people. Currently, there is only one bargaining unit member on the VPP Committee and minimal bargaining unit participation in the Safety Committee. Although the Team did not attend a Safety Committee meeting during this assessment, a review of Safety Committee meeting minutes in May showed three people attended the scheduled safety meeting, which included the chairman and the secretary. The Team did attend the VPP Committee meeting. Attendees included the ES&H Manager, one salaried representative, one USW representative, an information technology (IT) representative, and an engineer appointed by SST to fill in for the USW safety representative. SST must find effective methods to encourage greater employee participation in the Safety and VPP committees, and restore employees' faith that managers value and encourage their ideas and leadership.

Opportunity for Improvement: SST needs to find effective methods to encourage greater employee participation in the Safety and VPP committees, and restore employees' faith that managers value and encourage their ideas and leadership.

In 2012, the Team identified an opportunity for improvement to ensure SST employees could remain anonymous when submitting safety issues or suggestions. SST employees could submit issues or concerns in writing using forms available at unlocked suggestion boxes located in the lunchrooms and break rooms. SST provided locks for the boxes and implemented a control procedure that addressed the 2012 opportunity for improvement. Additionally, during the VPP Committee meeting, the Team observed a demonstration of an electronic tool where an employee can submit a safety concern. This tool allows the anonymous submission and tracking of the safety concern until corrective actions are completed. The Employee Concerns Program that allows employees to call in and submit anonymous concerns is still in place.

SST did not seek a mentoring relationship with an existing VPP participant until immediately before the 2012 onsite assessment. The mentoring consisted primarily of a gap analysis conducted over a 4-day period. A primary theme of that gap analysis was that SST needed greater employee leadership and involvement. This mentoring helped the employees, the Safety and VPP committees, and managers significantly; and SST began making progress. After the 2012 assessment, SST engaged Wastren-Energx Mission Support, LLC (WEMS) employees as a mentor for SST in an effort to draw from WEMS' Star status in DOE-VPP and experience in similar contract scope. This effort also provided a positive influence on SST. Unfortunately, attempts to transfer WEMS programs to SST without appropriate adjustments were not as successful as initially expected. SST is working to overcome previous missteps that have hampered its journey towards DOE-VPP Star status. SST should continue the mentoring relationship with WEMS and customize programs to apply to its specific situations.

Opportunity for Improvement: SST should continue the mentoring relationship with WEMS and customize programs to apply to its specific situations.

Most workers identified the Program Manager and the ES&H Manager as the key promoters of VPP. The USW Safety Representative also plays an extremely important role in promoting VPP. The importance of the Safety Representative's contributions was not fully apparent until he went out on medical leave. Both managers and the workforce have sorely missed the communication conduits provided by his efforts. USW had not taken action to provide an interim Safety Representative at the completion of this assessment. The loss of communication and counsel provided by the USW representative is contributing to a decline in worker participation in VPP.

In 2012, employees told the Team that they understood their right and responsibility to pause or stop work, when appropriate, without fear of retribution. Posters identifying this right, including the Kentucky Department of Labor, OSHA, and DOE posters, were evident in the lunchroom and break rooms at the SST offices at the PGDP site, as well as at the Kevil offices. Most workers stated their preferred alternative is to pause, analyze the situation, and then find safe alternatives to complete the job. As discussed in Management Leadership and Worksite Analysis sections, in some cases supervisors failed to involve appropriate senior managers to resolve stop work issues, circumventing the expectation of the Safety Stop work procedure. Employees encountered by the Team did not express any apprehension with initiating a pause in

work, and then consulting with their supervisors, the safety and health supervisors, the ES&H Manager, or the Program Manager.

The Employee Award and Recognition Program (EARP), identified in 2012, is still in place. It honors and encourages employees that contribute to the Company's success, including safety. EARP awards range from written recognition from managers to plaques and gift cards. Other awards available for employees include On-the-Spot awards and safety awards that include gift cards.

Conclusion

SST employees are seeking additional involvement opportunities, but are frustrated with the current committee structure, perceived communication barriers, and improvements that were not tailored to their situation. SST needs to address the loss of key personnel, the delayed move from Kevil to the site, and inconsistent compliance with stop work procedures in order to better engage the workforce, and demonstrate the Employee Involvement expected of a DOE-VPP Star participant

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.

In 2012, the Team found that SST had documented processes in place to perform hazard analysis. SST, PPPO, and the Team identified the effectiveness of those processes and their implementation as an issue that SST was addressing in an ongoing improvement effort. The Team also recommended that SST should evaluate performance indicators to include those worker participation attributes that SST had been recently working to improve, concentrate on meeting expectations contained in DOE-VPP, and allow the process enhancements to mature.

In 2012, the Team recommended that SST should improve the hazard assessment process by using the existing appendices and attachments in its procedures, developing clear instructions for using the attachments, and addressing all hazards as indicated in the DOE-VPP guidance documents. SST has made significant progress towards completing this goal; however, several procedure updates remain incomplete, including the Work Control and Hazard Analysis procedures. The hazard analysis procedure is not yet complete because SST identified an additional improvement establishing the Job Task Hazard Analysis (JTHA) process. SST intends for the JTHA to provide a documented hazard analysis for all general activity work. SST is developing the individual JTHAs for work as performed, and SST hopes to have a complete set of JTHAs for all general work by the end of 2013. However, SST needs to evaluate the effectiveness of the updated work control and hazard analysis procedures to ensure they will address the additional hazard analysis vulnerabilities identified in this report.

SST continues to evaluate the current spectrum of procedures, determine its applicability, eliminate redundant procedures, and tailor procedures to its specific scope of work. At the time of this review, several ES&H procedures continued to be in the review process with additional review and approval required. SST has adequately documented its accident and incident investigation process in a procedure, titled *Safety Event Investigations*, and has developed and conducted the recommended training for specific employees, such as the union safety representative, in accident and investigation techniques.

The 2012 review recommended that SST should identify and use leading indicators directed at activities controlled by workers, supervisors, and managers to improve safety, such as participation in walkdowns, work planning, and worksite inspections, establish goals related to those indicators, and make progress toward those goals visible to the workforce. In addition, SST now considers near-misses, first-aid cases, participation in safety programs, and severity of unsafe conditions to transition its performance indicators towards leading versus lagging indicators.

Workers reported several cases where SST failed to analyze hazards prior to conducting work. Several issues identified stemmed from the 755 Trailer Installation Project. SST held a meeting

in December 2012 where managers, engineers, supervisors, and workers discussed the 755-trailer installation project. The trailer installation supported SST's intent to move upper management personnel and staff from the Kevil building to the site. SST managers proposed starting work in January and completing the project by the end of February, but workers expressed concern that the schedule was rather aggressive, and that successful completion by the due date was unlikely. Employees stated that multiple changes occurred in the scope of work without proper consideration of changes and impacts. Based on these interviews, there is a perception by the workers that completion of the project appeared to take priority over safe practices and proper planning.

For example, the SST *Excavation and Penetration Procedure, SST 11.2.3: dated 03/4/2013*, states in a note box that "Numerous problems have occurred in older DOE facilities due to active and inactive utility lines, pipes, and structures that exist underground, but are not identified on plant drawings. Since various detection equipment types have different capabilities and limitations, it may be necessary to perform subsurface surveys using two or more methods." In keeping with that note, *SST 11.2.3* requires subsurface investigations prior to excavation. Workers reported several cases to the Team where employees encountered unidentified potential hazards during excavations because SST did not perform subsurface investigations and relied solely on as-built drawings that only identified water lines. In one case, during the fiber optic line installation for the Trailers Installation Project, the excavation activity resulted in a backhoe striking a red-dyed, concrete-capped substation electrical feeder line (voltage unknown). Historically, the previous contractor at Paducah installed electrical underground feeders with concrete caps and applied a red-dyed grout to identify the hazard should excavation later be required. A backhoe operator stated he had encountered concrete and large rocks during the excavation activity prior to making contact with the red-dyed concrete cap. Before the backhoe operator had removed sufficient material, he assumed it was another rock or obstruction. The operator was attempting to remove this *obstruction* when the spotter and electrician identified the red-dyed concrete cap and halted the digging. Workers notified their supervisors, but the supervisors did not notify the Operations and ES&H Managers. While waiting for the supervisors to respond, the workers reevaluated the excavation permit and drawings and found no indication of an existing electrical feeder line at that location. The supervisors indicated that no damage occurred and the workers were to proceed and complete the excavation while using caution. This decision is contrary to the SST procedures when encountering an unknown hazard.

During another phase of this project, excavation activity damaged an unidentified Polyvinyl Chloride (PVC) drain line. Work continued after the drain line was repaired, but work was not stopped and no additional hazard analysis was performed for the task after this incident. Several weeks after this event, excavation activities occurred in support of the Training Trailer Installation Project. During this activity, the same backhoe operator was involved in a trenching operation in support of the training trailer installation. During this operation, the backhoe operator contacted two inactive subsurface grounding wires. As before, there was no indication of the grounding wires in the excavation permit and there is no indication that SST conducted a subsurface investigation other than referencing the as-built drawings. According to workers, SST has not yet updated the as-built drawings to include the newly discovered hazards.

Contact with buried utilities is an increasing risk for SST during excavation work. Contractors at PGDP no longer cap underground electrical lines, so newly installed underground electrical lines represent a significantly greater potential hazard to workers performing excavations. Kentucky Utilities recently installed an underground 7,200V line under the entrance to the SST facility.

This line has no protective concrete cap and if an excavation occurred in that area, the backhoe could easily penetrate that conduit. The only safety indicator provided with that particular installation is the placement of a red *ribbon* one foot over the electrical conduit to act as a warning in the event of excavation activities. SST should conduct a comprehensive lessons-learned investigation into the excavation events that occurred during the 755 Trailer Installation and the Training Trailer Installation projects. The investigation should include input from all personnel involved in the planning, safety and engineering, supervision, and performance of the work. The reviews should determine how and why the excavation permit system failed and what corrective actions are necessary to ensure the failures do not occur again.

Opportunity for Improvement: SST needs to conduct a comprehensive lessons-learned investigation into the excavation events that occurred during the 755 Trailer and the Training Trailer installation projects.

Opportunity for Improvement: SST needs to ensure that all as-built drawings are updated to reflect the location of the damaged water drain and the red concrete-capped electrical feeder line in the next as-built drawing update.

During one phase of the 755 Trailer (28, 27, 26) Installation Project, workers were required to pull electrical wire through a conduit of nearly 80 feet. The configuration of wires represented a significant weight load and the two SST electricians assigned to the work were incapable of performing this task manually. The workers recommended the use of a cable puller. No cable pullers were available in the local area and the nearest device was in Nashville, Tennessee. The supervisor asked one electrician about other methods he knew for pulling wire without the use of a cable puller. The electrician stated he has seen instances where a piece of rope attached to a backhoe was used to pull wire. The backhoe would lift the rope attached to the wires and the knot in the rope adjusted as the backhoe lifted the wires through a few feet at a time. However, he did have concerns regarding safety since he was unsure what load rating for the rope would be required or how to determine that load rating. The supervisor decided to use the backhoe, and electricians pulled the wire using that method. No records could be located that indicated that a task specific Activity Hazard Analysis (AHA) was performed for this task. Interviews with the workers suggested that the activity occurred under the electrician's general AHA.

The trailer installation project also included the pulling and installation of fiber optic cable. An electrician pulled the fiber optic wire in place and performed a visual inspection of the fiber optic ends prior to connection. SST assigned IT specialists from the Kevil facility to connect the fiber optic lines to the ports within the trailers and test them. They were performing this function while the electrician was performing the visual inspection of the fiber optic cables. The electrician performed the visual inspection using a 100X magnifying scope to inspect the ends of the fiber optic cables to ensure they were undamaged. When the IT specialists activated the fiber optic cables, they potentially exposed the electrician to a laser hazard directed at the electrician's eye. The work between the electrician and the IT specialists was not coordinated and only identified through casual conversation. The work control process should have addressed the coordination between the two work activities, and the task-specific hazard analysis review should have specified the potential eye hazard presented by the visual inspection of an energized fiber optic cable.

SST uses a *Flow-down of ES&H Requirements* form to provide the contractual safety and health requirements and expectations for any subcontractors performing work for SST. The document defines the contract type, which determines the level of safety and health controls required for that subcontractor. The form provides instruction for safety and health requirements to the vendor, and the subcontractor or vendor acknowledges those requirements by signature prior to performance of the work. SST uses the same method to communicate ES&H requirements for purchase orders.

The SST procurement procedures do not include the consideration of a subcontractors' OSHA Injury and Illness experiences as part of their subcontract review process when evaluating prospective bidders. SST should consider updating its subcontractor procurement procedures to include the evaluation of the Injury and Illness experience. Although injury and illness performance should not automatically disqualify a prospective subcontractor, SST should use that data to adjust its oversight of contractors while performing work onsite.

Opportunity for Improvement: SST should consider updating its subcontractor procurement procedures to include the evaluation of the Injury and Illness experience, and use that evaluation to adjust its oversight of contractors while performing work onsite.

Conclusion

SST has made significant progress addressing the opportunities for improvement identified in the 2012 review; however, SST has not yet implemented improvements to the hazard analysis and work control processes. As a result, in some cases SST has exposed workers to unanalyzed hazards. SST needs to complete its improvements to the hazard analysis and work control processes and ensure the planning process analyzes all hazards to meet the expectations of a DOE-VPP Star participant.

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/procedures must also be followed by everyone in the workplace to prevent mishaps or control their frequency/severity. Where hazards cannot be eliminated, they are mitigated through the appropriate use of controls in a hierarchical approach, first engineered controls, then administrative controls, and/or use of PPE.

In the 2012 assessment, the Team determined that SST had implemented some hazard controls through the hierarchy process. SST's system, using a collection of routine AHAs, and including them in a broader hazard analysis, was an effective foundation that SST could build upon by documenting the analysis and assumptions. The Team saw evidence of a hierarchical approach to controls at some work locations, but PPE tended to be the first control selected rather than elimination or substitution. Opportunities for improvement in hazard control needed to start with effective and comprehensive hazard analysis and include elimination or substitution as part of the selection process for controls. The 2012 Team concluded that addressing the opportunities for improvement would help SST become more consistent and strengthen its performance in the Hazard Prevention and Control tenet.

After the 2012 assessment, SST initiated a new hazard elimination program adopted from its mentor (WEMS) that uses several techniques to identify and eliminate workplace hazards. One technique is the Safety Hazard Mapping System developed by USW at the Tony Mazzocchi Center for Health, Safety and Environmental Education. A safety hazard map identifies the potential for injuries or near-misses in a work area. Workers and safety personnel use blank maps (floor plans) to walk through an area, evaluate hazards, and note the location of the hazards. Once identified, workers, supervisors, and managers can then consider strategies to mitigate or eliminate the hazard. Supervisors have pictures of the hazards and their locations posted in their workspace. When a hazard is eliminated, the supervisor crosses out the associated picture and location. In support of developing safety hazard maps, SST provided 10-hour OSHA training and National Fire Protection Agency (NFPA) 70E training to interested employees. To date, 25 percent of SST employees have completed the training.

In addition, the 2012 review recommended that SST should reevaluate the safety of personnel working alone, particularly in remote locations where injured workers could not reliably notify SST of their location or condition. Specifically, mowing operations or road grading operations could involve working in isolated locations with limited expectations of assistance in the event of an accident. SST immediately recognized the significance of this potential and modified the workers assignments so that no individual would be operating in isolated locations without a coworker operating in the same location. In response to the 2012 Team's concern regarding adequate underground shelter capacity, SST evaluated occupancy requirements for the underground shelters prior to moving personnel from the Kevil complex out to the site. The occupancy reviews demonstrated the underground shelters were more than adequate to accommodate the additional Kevil personnel without additional modifications to the shelters.

In April 2013, the Office of Safety and Emergency Management Evaluations (HS-45), within HSS, issued its final report titled, “Independent Oversight Review of Preparedness for Severe Natural Phenomena Events at the Paducah Site,” with several significant findings related to the preparedness of the Emergency Management Program at the Portsmouth Gaseous Diffusion Plant. The site contractors and DOE are continuing their analysis and corrective actions in response to the HS-45 review. USEC retains responsibility for emergency management at PGDP. SST is working with USEC and HSS to achieve consensus on any required actions by SST.

Conclusion

SST has improved its hazard control processes since the 2012 review, but some vulnerability still exists. SST continues to work in conjunction with the site’s prime contractors to develop an effective emergency management program in compliance with DOE Order 151.1c. The issues in the current hazard analysis process are leading to uncontrolled hazards during work. SST needs to finalize and implement its draft hazard analysis processes and appropriately control all hazards to meet the expectations of a DOE-VPP Star participant.

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.

In 2012, the Team determined that SST had a systematic approach that appropriately trained and qualified employees prior to performing work. The employees believed they were well prepared to perform their job safely. SST maintained training records that were accessible to the employees, supervisors, and managers. All of the employees' records examined were current, and SST met the requirement of the Safety and Health Training tenet of DOE-VPP at the Star level.

The safety and health training program continues to provide the training needs of SST employees. Most of the employees have years of experience and are aware of the training requirements. The managers support the training program with an emphasis on education, such as a reimbursement program for associate degrees and certificates. The SST training coordinator, the associated subject matter expert, and the functional manager (i.e., Operations and Maintenance, Security Manager, etc.) develop each employee's training requirements based on the position. This has changed from a few years ago when the training was employee-centric, and there were cases when similar craft had different training requirements. ES&H and other functional managers may add other required training based on their review. In addition, each of the three companies that make up SST may add Company-specific training, such as a business conduct or an ethics course. SST generates the requirements on the Position Assignment Form (PAF) 2013, along with the employee's badge number, position title, and hourly or salary employment. Hourly and salary employees have additional, but different training requirements. The form is sent to Technical Field Engineering, Inc. (TFE), to input into the Local Education Administration Requirements Network, or LEARN. The employees' access the LEARN system to take computer-based training (CBT) courses and indicate completion of required reading. TFE and the training coordinator update employee records of any classroom training. The employee is required to complete training requirements annually, except those identified as once only.

SST uses several service providers to obtain training. TFE provides the majority of the CBT courses, some classroom training, and most of the equipment qualifications training. The USW Local 550 provides Hazardous Waste Operations and Emergency Response (HAZWOPER) 40-hour and refresher training. USEC provides the radiation training and refresher courses, respiratory protection training, and lockout-tag out (LOTO) training. The American Red Cross provided first-aid training this year. In addition to onsite training, SST encouraged employees to participate in USW, OSHA, and NFPA courses that provide additional safety awareness (see discussion in Hazard Prevention and Control). SST is fostering a "train the trainer" program to take advantage of workers that desire to teach safety courses. This will draw from onsite work experiences that trainers can pass on to other employees and new hires. Currently, CBT makes up 56 percent of the training, while classroom training accounts for 36 percent, and the remaining is through demonstration of proper equipment use.

SST also requires reading documents as part of the training program. For example, from two training plans retrieved from LEARN, one position needs to read 23 documents, and the other

needs to read nine documents. The 2012 report suggested SST should consider replacing the required reading with another form of training to ensure that the employees have actually mastered the concepts or lessons presented in the required training. Four functional areas within SST have developed PowerPoint presentations containing general concepts or policy information. The courses are: General User Cyber Security Awareness Training (module 50009), General ES&H Policies and Procedures (module 50031), General Policies and Procedures (module 50017), and General Security Policies and Procedures (module 50018). These courses replace the required reading assignments of the procedures from which the courses are based. In the next revision of these courses, the functional manager will add questions to check training comprehension. The development and use of the four PowerPoint presentations as a means to educate the general concepts and policies of the functional areas is a positive tool.

To understand the status of the employee training program, SST and TFE constantly query the LEARN database. Through SST direction, TFE submits an end of week report to ES&H, QA, and the Training Coordinator. The report includes employees that are delinquent in training, and employees that will be delinquent in the next 30 days. Upon approval of the report, TFE notifies the employee via e-mail. Employees without SST e-mail accounts, normally hourly workers, receive notifications through their supervisor's e-mail. Managers receive an end-of-the-week training report for discussion at the Monday morning management POD.

The Team reviewed the weekly training status report. As of this assessment, two employees were past due on classroom and equipment training; however, the classroom training occurred during the assessment week, and SST was waiting for a forklift to arrive so the training could occur. No one was past due for required reading.

In 2012, the Team recommended a dedicated training area for employees without computers to complete their training. Since that assessment, an entire trailer became dedicated for VPP and training. However, with the impending move of the Kevil office to the site, the training area has shrunk to only a quarter of the same trailer. With the potential of more space reconfigurations to accommodate the transition of SST to the site, the Team is repeating this opportunity for improvement until the dedicated training area is completed.

Opportunity for Improvement: SST should consider dedicating an area for CBT and track its progress since there are competing space reconfigurations from the Kevil office transition.

PPPO initiated a project to integrate General Employee Training (GET) between the Portsmouth and Paducah sites due to similar missions. An extensive power point slide presentation is in final review. The new GET course qualifies individuals for both sites. Each site may supplement the course with site-specifics not covered in GET.

In addition, SST encourages employee development by participating in the SST sponsored reimbursement program for associate degrees and certificates. SST managers wanted to develop the workforce from within and invest in the post-high school education system in the area. They approached West Kentucky Technical and Community College and worked together to develop two course curriculums leading to the Mechanic Maintenance Associates degree and the Chemical Operators Certificate. Both degrees are relevant to jobs performed at PGDP. Both degrees provide an expanded perspective that encompasses supervision, PGDP work, and safety. To launch this education initiative, SST paid all tuition and book costs upfront for the six SST

employees who entered into this curriculum. Eventually, five employees earned their Associates degree. Two of the individuals left SST for better paying jobs at a different company, but SST realized this might happen, but did not have the employees sign a payback period. Another individual is now a supervisor at SST since he achieved his degree. SST continues to offer its employees educational certificates or degrees on a reimbursement basis, as long as the education is relevant to SST. Other employees have earned business/logistics degrees and welding or HVAC certificates.

Conclusion

SST has taken the training opportunity for improvements suggested from the 2012 review and has applied them to its training program. The development and use of the four PowerPoint presentations as a means to educate the general concepts and policies of the functional areas is a positive tool. As SST revamps its training program, they are relying more on CBT courses and some in-house resources for supplying its training. In addition, the degree education program is an excellent highlight of managers' support to develop qualified workers from within that contribute to process improvements and safety awareness. SST has an effective training program that enhances its experienced workforce. The Safety and Health Training tenet meets the DOE-VPP expectations of a Star participant.

VIII. CONCLUSIONS

SST remains committed to achieving DOE-VPP Start status. Managers and workers agree on that goal. The challenge facing SST is how to reach that goal. The efforts addressing the 2012 opportunity for improvement, securing a mentor with similar workscope, plans to collocate managers with the workforce, along with further improvements in employee ownership and managers' reinforcement of expectations, will facilitate maturation of the SST safety program. Continued critical self-evaluations by SST will identify vulnerabilities and provide opportunities for SST to provide an employee-led, manager-supported VPP culture. SST needs to embrace continued improvement through teamwork to sustain a robust organization that can weather the loss of individuals without serious detriment to the VPP effort. To date, efforts to achieve DOE-VPP Star status have not yet been effective. Therefore, the Team recommends that SST continue to participate in DOE-VPP at the Merit level.

Appendix A

Onsite VPP Audit Team Roster

Management

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