

Department of Energy
Washington Closure Hanford, LLC.
River Corridor Closure Contract
Voluntary Protection Program Annual Report
Calendar-Year 2012

A. SUMMARY

Company:

- Washington Closure Hanford, LLC.
- 1,391 employees
- 2,883,166 total man hours for 2012

NAICS Code/Bureau of Labor Statistics Incident Rates

- **56291-Remediation Services/4.9 Total Recordable Case Rates (TRCR)/2.1 Days Away, Restricted, or Transferred (DART) AVERAGE FOR 2011**

Number of Occupational Safety and Health Administration Reportable Incidents-Rates For The River Corridor Closure Contract:

- **TRCR: 0.14** with 2 recordable incidents
- **DART: 0.14** with 2 Days Away/Restricted Cases

STATISTICAL COMPARISON		
RCC 3 Yr. Ave TRCR: 0.24	NAICS code of 4.9	78% below the DOE 3 Year Average of 1.1
RCC 3 Yr. Ave. DART: 0.06	NAICS code of 3.0	85% below the DOE 3 Year Average of 0.4

The success of any Safety and Health (S&H) program is evident in the culture exhibited by employees who are responsible for and accountable to the program. As the Washington Closure Hanford, LLC (WCH) program evolves, becomes more responsive to employees, and successfully decreases the number of injuries on the Project, continuous improvement becomes the focus. Without continuous improvement, injuries and illnesses are still a possibility. Until the ultimate goal of zero injuries and illnesses is achieved, improvements are necessary and expected. For this reason, WCH continues to develop a rigorous improvement process to encourage employees to achieve the next level of safety excellence.

WCH's S&H program is supported by a strong employee safety culture that questions work environments and co-worker behavior. WCH employees are proactive by implementing innovative and lasting improvements in an effort to reach the overall WCH goal of zero injuries and illnesses for themselves, and for the entire WCH workforce. When a hazardous condition is observed, their questioning attitude even affects non-WCH employees. The WCH S&H Program is successful because all WCH employees, from front-line staff and craft to mid-level supervisors, technical leads, and senior managers, own and believe in this program not only at work but at home.

B. CONTINUOUS IMPROVEMENT

1. ACCOMPLISHMENTS/BEST PRACTICES

WCH achieved 6 million safe work hours for the first time in the contract's history in December 2011. In recognition of this accomplishment, WCH senior management conducted an all-hands safety meeting offsite in January 2012 with the U.S. Department of Energy, Richland Operations Office (DOE-RL) in attendance to reinforce this tremendous achievement and attribute the positive safety culture and results achieved by the employees as teamwork in action. The achievement of 6 million safe work hours was a record achievement for Deconstruction and Demolition (D&D) work for the U.S. Department of Energy (DOE).

The evidence of a positive safety culture and the team approach was confirmed in a DOE-RL safety culture survey where River Corridor Closure (RCC) employees voluntarily completed the survey, indicating that WCH was a safe place to work where employees felt comfortable in raising concerns and addressing safety issues at all levels. Employees stated they felt

empowered to take safety into their own hands and would stop work and correct safety issues as these were identified and took ownership of the process.

One Team for Safe, Visible Cleanup of the River Corridor

Safety Successes

- ✓ DOE VPP Star of Excellence and Contractor Champion's Award
- ✓ FY11 – Lowest safety rates since contract inception
- ✓ Surpassed 6 million safe work hours
- ✓ 7 URS President's Awards
- ✓ URS Safe Project of the Year

**One Team ...
MANY Successes!**

- Developed CRATER
- WCH elected to the VPPPA-BOD-Region X
- Facility Completion – 251 out of 316
- D4 – 7 years without a day away from work
- WCH Re-elected to the National VPPPA-BOD
- Successful implementation of ISMS Phase 1 & 2
- Completed safe removal of the 309 Building dome
- Completed 100% of all cleanup work at 100-F Area waste sites
- Set a record for disposal of 8 million tons of waste at ERDF
- Achieved Environmental Management System (ISO 14001) certification
- Awarded more than \$170 million (nearly 91%) in subcontracts to small businesses
- Completed a 630-ton scrap metal recycling campaign at the 100-B/C Area storage
- Surpassed the 8 million safe mile mark for truck drivers working on the River Corridor Project
- Completed cleanup of six waste silos containing highly radioactive debris
- Completed placement of the N Reactor Heat Exchanger Facility in interim safe storage
- Completed a \$100 Million expansion and upgrade of ERDF without a lost day injury
- Began excavation of the hazardous waste trenches at the 618-10 Burial Ground
- Completed orphan site walkdown evaluations (527 miles) of Segments 4 and 5
- Achieved DOE VPP Star Site Designation (2009) and Re-Certification in 2012
- Completed safe demolition of the 337 Building and the 309 Building stack
- Achieved six years of work without a recordable incident at Fermi
- Eliminated the disposal of nearly 212,000 tons of concrete rubble at ERDF
- Removed 30 miles of railroad track and nearly 70,000 railroad ties
 - Completed nonintrusive characterization of the 618-11 Burial Ground
 - Remediated 308 of 550 hazardous waste sites and burial grounds
 - 618-10 Burial Ground – 3 years without recordable incident

Date: September 2012



Nationally, WCH was recognized with three best practices in the National Voluntary Protection Program Participants Association (VPPPA) Best Practices manual for the creation and implementation of the VPP Passport; the VPP Gap Analysis tool; and its communication vehicle, “*The Safety Roundup*.” All three items have been shared with both government and private contractors and companies to encourage employee participation and ownership of safety.

2. INTEGRATED SAFETY MANAGEMENT (ISMS)/VOLUNTARY PROTECTION PROGRAM (VPP) ANNUAL REVIEW

WCH systematically integrates safety into management and work practices at all levels so that goals, objectives, and the overall mission of the contract are accomplished while protecting the public, the worker, and the environment. WCH accomplishes this through effective integration of safety management into all parts of the integrated work control process including work planning and execution. This integration ensures that the safety and health of workers, the public, and the environment is not compromised. A priority is placed on managing and reducing risks in the workplace as well as risks to the public and the environment. WCH operations are based on procedures and practices that meet and/or exceed DOE Orders and U.S. Department of Labor Occupational Safety and Health Administration (OSHA) requirements. Every employee at the RCC Project is responsible for implementing the ISMS and to ensure protection of the worker, the public, and the environment.



WCH has been on a journey of systematically and organizationally improving and integrating our safety and health programs into all facets of the work process. WCH has effectively incorporated safety and health as the way business is conducted. From the planning process within the Integrated Work Control Program process to ensuring the necessary flowdown of requirements to both WCH and subcontractors through Exhibit G, safety and health is incorporated.

Upon the review and confirmation of an effective system during the ISMS Phase II Verification by the DOE, WCH put into place an annual process to review, evaluate, and update the WCH ISMS and the Integrated Safety Management System Description (ISMSD). The scope of the WCH annual ISMS review included all projects, facilities, and activities managed by WCH. The set of tailored criteria, modeled after the ISMS Phase II assessment, included performance

objectives, measures, and commitments (POMCs) along with the WCH Safety and Health Improvement Plan (SHIP) action items and the integrated assessment schedule, all used to evaluate the WCH system and effectively assess and evaluate throughout fiscal year 2012 (FY12).

It was determined that the WCH ISMS is effectively implemented and maintained based upon the mechanisms, procedures, and processes reviewed and verified throughout the year. During the annual WCH ISMS/VPP review; a thorough evaluation and review of internal assessments, external assessments; management observations in the field; Environmental, Safety, Health, and Quality Assurance (ESH&QA) metrics; and the completion and implementation of ISMS actions in the Corrective Action Management (CAM) system was conducted. Extent of condition evaluations were performed for issues identified for improvement.

WCH implemented an aggressive internal assessment schedule comprised of areas and topics identified as potential improvement areas and topics identified in the POMCs and the SHIP to facilitate continuous improvement. Effectiveness reviews and assessments were also conducted to determine the level of implementation of an improvement action. All types of internal assessments provided feedback on the health and degree of implementation of WCH programs and processes. In each assessment, improvements were identified and best practices reiterated and institutionalized to ensure these processes could be repeated and continued. Observations and findings were entered into the CAM system and tracked to closure to determine the effectiveness of the corrective actions.

External assessments and reviews were conducted in concert with internal WCH assessments. Program assessments, Defense Nuclear Safety Board reviews, Department of Transportation, Security, external corporate reviews, and DOE assessments and investigations were conducted to assure implementation and programmatic compliance. Results of these assessments were positive and provided valuable confirmation that newly implemented programs and practices were effectively implemented and identified additional improvement opportunities to provide a greater level of worker safety. These assessments also confirmed that improvements put in place have been effective.



To complement both internal and external assessments, WCH management, at all levels, is a visible presence in the field. Management conducts regular management walk-through observations and inspections with field and site S&H personnel, as well as Safety Trained Supervisors (STSs) conducting walk-through inspections. Both type of management reviews document their observations, provide feedback to the site management and safety representatives, and facilitate corrective actions based upon these observations.

Observations from assessments, management, LSIT members, and STSs contribute to the defense and analysis of ESH&QA metrics. These metrics are evaluated on a monthly basis to provide real-time data on the health and implementation status of our ISMS programs and processes. DOE is also provided a health report on a monthly basis of the WCH Contractor Assurance Program and the overall health of the program. WCH, together with DOE, determine areas of improvement and confirm effectiveness of actions taken to help reduce the risk of reoccurrence of issues.

WCH senior management is provided a briefing on a monthly basis for these metrics and offers feedback to process owners and facilitators on how to correct any emerging trends or additional metrics that may need reviewed and tracked. Quarterly, these metrics are provided to DOE-RL with an analysis of the programmatic changes that have occurred and the corrective actions that have been implemented.

To bring the assessments, reviews, observations, and metrics full circle, improvements and/or corrective actions identified are entered, analyzed, and tracked to closure within the CAM system. This system allows for the trending and tracking of all WCH issues, regardless of the level of severity, to ensure that all are documented and implemented effectively. This system also allows the integration of issues that were found to be programmatic in nature, to be addressed, not as individual issues, but as process improvements.

The annual ISMS review was conducted throughout FY12 identifying areas for improvement, developing and incorporating corrective actions, and evaluating changes to systematically improve our ISMS processes. Subject Matter Experts (SMEs) provided updates, improvements, process changes, current initiatives, and opportunities for improvement for each area under their jurisdiction. Each section was evaluated to determine if ISMS implementation was effective and

functioning. In addition, WCH conducted a rigorous review of the POMCs and SHIP commitments and adjusted emphasis areas accordingly to ensure effective improvements were implemented and validated.

A management assessment was conducted in the fall of 2012 using the principles and functions of ISMS along with the tenets of VPP to determine improvements, gaps, and overall compliance and implementation of all the elements of this integrated process. This annual ISMS effectiveness review assessed the implementation of the ISMSD, the adequacy of the ISMS performance, and determined the effectiveness and continuous improvement of the WCH ISMS Program. This process utilized the tailored criteria to determine the continued effectiveness and implementation of the ISMS and VPP tenets. Updates for each criterion were collected from SMEs, management personnel and employees who provided improvement actions, areas of success, and items of concern with action plans and mechanisms for addressing those self-identified issues for their focus area. The information provided, along with WCH self-assessments, corrective actions, and management input, determined the overall ISMS performance, trends, assessment results, and programmatic improvements. This management assessment confirmed that the WCH safety culture and requirements are identified and in place.

Positive Work Practices and Activities

The WCH safety culture is continuing to evolve and grow to continuously improve the S&H processes and programs. Employees are actively involved in the planning and development of work controls. Employees exercise their right to stop work and feel free to raise concerns.

WCH issued PM-ESHQ-15, Nuclear Safety Culture to emphasize the management expectation for a strong, enduring and continuously improving nuclear safety culture and safe work environment is the expectation for all employees. To provide clarification to the safety culture expectations, WCH issued PSD-11, Nuclear Safety Culture Expectations Matrix which provided nuclear expectations and accountability attributes for senior managers, managers, supervisors and individual contributors. Leadership and Organizational Learning behaviors were identified with specific expectations provided for each level of employee in the organization.

In the recent safety culture survey conducted by DOE-RL, WCH achieved significantly higher ratings in nearly all evaluated focus areas than the overall DOE-RL site. WCH has evaluated the

report and will work on the areas that ranked the lowest in the overall survey results. These areas include Clear Expectations and Accountability, Questioning Attitude, Internal Avenues of Redress, Job Characteristics, and Alternate Problem Identification Processes. While these were the lowest ranking for WCH, they still remain high in confidence overall. These areas are identified and will be tracked for improvement through the FY13 POMCs.

Involvement in safety initiatives continues to be strong with initiatives focusing on emerging issues and complex and DOE trends. Lessons learned are being used in the field and are also being generated by both WCH and subcontract personnel with information shared throughout the Hanford complex and other DOE contractors.

Along with company achievements, WCH demonstrates the willingness and initiative to provide the lessons learned and focused safety activities to others through the Hanford VPP site champions meeting, attendance at VPPPA National and regional conference through presentations, and having personnel on both the national and regional board of directors. Additionally, WCH has participated in numerous internal VPP assessments for other DOE VPP contractors and has assisted in three DOE HQ VPP assessments as team members. WCH is also mentoring several sites including Washington River Protection Solutions and the Waste



Treatment Plant at the Hanford Site and the East Tennessee Technology Park in Oak Ridge, Tennessee. Continued mentoring was in the form of best practices provided by WCH and included in the Best Practices Manual for the National VPPPA, which is distributed to VPP companies across the nation. WCH had the following three best practices recognized:

- VPP Passport Employee Involvement Tool-Listed in the VPPPA National Best Practices Manual
- Weekly Roundup S&H Communication Tool- Listed in the VPPPA National Best Practices Manual
- DOE VPP Gap Analysis Tool.

Improvement Areas

- Occupational Medical Review: SH-1-2.7 had an out of date reference to DOE Order 440.1A.

Action: Updated the reference in the revision of the procedure. Action completed.

- The employee job task analysis (EJTA) direction provided by DOE-RL in the fall of 2011 was not included in SH-1-2.7 as represented in the direction letter from DOE-RL dated December 21, 2011, and response letter to DOE from WCH dated March 8, 2012.

Action: Updated SH-1-2.7 to include this information: IF-2012-0435. Action completed.

- Identified outdated information and references in SH-1-3.21 in relation to the site occupational medical provider, process steps and S&H Department positions and titles. Found similar information in SH-1-2.7.

Action: Consolidated information in one procedure eliminating SH-1-3.21 and include updated references and information in SH-2.7. Action completed.

- Reviewed the Injury/Illness reporting forms and identified four different forms that were currently being used by Project Safety Professionals.

Action: Consolidated these forms into one concise form that includes the tracking and trending information needed for the leading indicators for the FY13 POMCs. Included this form in the updated version of SH-1-3.20. This allowed the elimination of SEM-2-3.1, which contained another Occupational Medical form that was outdated. Action completed.

- Identified SH-1-2.9, Medical Case Management as a specialized process only used by a few people within WCH and should not be proceduralized.

Action: Information in this procedure was evaluated and incorporated into the newly named SH-1-3.20, "Injury/Illness Management," for consistency and a streamlined process. Action completed.

- Medical appointment notification and scheduling continues to be an issue with the timely notification of both WCH and subcontract personnel.

Action: An updated distribution list was developed based upon areas, managers, Subcontract Technical Representatives, and WCH and subcontract administrative assistants along with E-mail calendar invitations set up for those with e-mail access. Action completed.

- Identified inconsistent signage throughout the RCC regarding sitewide program safety signage (SH-1-3.26). An evaluation identified that a revision of the signs, signals, and barricades procedure was necessary to update the signs appropriately to the sitewide programs and flow down to subcontractors. IF-2012-0474

Action: This procedure was revised and is estimated to be issued in early 2013.

- References to the management structure and organization were not up to date in the ISMSD document. This will continue to be an issue for WCH as the company is continuously downsizing and reorganizing.

Action: Updated the ISMSD document on October 4, 2012, with a change notice to revision 9 to reflect the correct Environmental Management System structure and authority. Action completed.

- VPP OFI: WCH should consider revising its leading indicators to implement a statistical baseline, upper and lower control bands, and then investigating variations outside those control bands to more effectively evaluate and use leading indicators. Confirmed that WCH will review the leading indicators to determine statistically significant variations to effectively evaluate improvements and the effect of program changes.

Actions: Added to the FY13 POMCs to track and trend report only (Self/No-Treat) incidents in order to develop corrective actions, programs, and implement awareness topics to prevent a more serious incident from occurring. This action will be tracked through the FY13 POMCs.

- VPP OFI: WCH should systematically review older job hazard analyses (JHAs) and revise or replace them to conform to the new process expectations. As a result of the latest revision to IWCP, implemented in July 2012, the new review requirements for JHAs are to review every 6 months to ensure adequacy of the Work Package and JHA. The comment is valid but was self-identified and corrected with the latest revision of IWCP. The specific step in PAS-2-1.1 is 5.3, which states “All Work Packages open for longer than 6 months shall receive a review

by the RM semiannually to ensure the JHA and associated Work Packages are adequate. This review shall be documented in the status log.”

Actions: This action was added to the FY13 ISMS POMCs for the review and evaluation of hazard analysis for current scopes of work to conduct at least three evaluations per month to be tracked and trended. Also, the update in PAS-2-1.1 found in section 5.3 states that all Work Packages open for longer than 6 months shall receive a review by the RM semiannually to ensure the JHA and associated Work Package are adequate. This review shall be documented in the status log. These reviews will start in January 2013. This action will be tracked through the FY13 POMCs.

- VPP OFI: WCH should ensure the Final Hazard Categorization for 618-10 Burial Ground is updated to reflect current operational conditions and expectations." WCH is preparing a Documented Safety Analysis to address the planned remediation of the vertical pipe units (VPUs). The current Final Hazard Categorization for 618-10 (and associated approval from DOE) does not authorize intrusive activities within the VPUs, but does authorize nonintrusive work. The Document Safety Analysis contains the "appropriate hazard analyses" for the planned VPU remediation and has already been submitted to DOE for approval.

Actions: The scheduled approval date is January 2013. The approved Documented Safety Analysis will supersede the Final Hazard Categorization document for work associated with the VPUs. Consequently, the Final Hazard Categorization document will be updated upon implementation of the Documented Safety Analysis.

- VPP OFI: WCH should ensure that the RWP and radiological associated controls are consistent and captured in work instructions for radiological activities. Per DNFSB guidance, WCH has deliberately removed work controls from RWPs and placed them into work packages. The work package should contain the controls for radiological activities and maintain that the work control document should contain the appropriate radiological controls.

Action: Per the update of IWCP, controls are identified in the work control document. This document is the analysis document and contains both the analysis and the rationale for the

controls. The RWP is used to reiterate the controls and provides the details for the specific radiological requirements. Action completed.

- VPP OFI: WCH should ensure controls identified in operator aids have a documented analysis captured within the WCH work control process that supports the recommended controls, and clearly define who is responsible for performing identified actions. WCH should ensure operator aides currently in use are appropriately analyzed and authorized using the work control process. Confirmed that the work controls and responsibilities should be captured in the work control document.

Action: CONOPS-1-17, Operator Aids was revised and incorporated the requirements for documented analysis and updated roles and responsibilities. Action completed.

Updates to the ISMS criteria are reflected within WCH-4, *Integrated Safety and Management System Description (ISMSD)*, and accurately describe the current WCH ISMS. The WCH ISMSD is effectively maintained and has evolved to incorporate the improvements and changes made since its initial issue in August 2005. Changes made to the WCH ISMSD are outlined in the Revision History section of WCH-4, *Integrated Environment, Safety, and Health Management System Description*. The description outlines the reasons for each revision, the date of the revision, and the revision initiator.

WCH has reviewed the ISMSD document and confirms that the information contained accurately reflects the WCH ISMS.

Updates to the WCH ISMSD document include:

October 2012

- Review of the 1S014001 (2004E) standard for Environmental Management systems identified that the Environmental Compliance/Services Manager should be assigned as the management representative responsible for WCH's EMS to be consistent with the standard. WCH-4 section 1.1 fourth paragraph, the reference to the Environmental Protection Manager (within the Environmental Protection organization), was changed to reflect Environmental Compliance/Services Manager.

May 2012

- Updated Section 10: Removed the POMCs and referenced contractual requirements and ISMS Declaration for new POMCs.
- Removed project lifecycle flowcharts A-E.
- Updated references to current DOE/contract requirements and WCH procedures/processes.
- Completed all Transition Initiatives (Appendix G) – Renamed to incorporate in document the Hanford Sitewide programs.
- Incorporated Hanford Sitewide Procedures:
 - DOE-0346, Hanford Site Fall Protection Program (HSFPP)
 - DOE-0360, Hanford Site Confined Space Procedure (HSCSP)

September 2010

- Updated the POMCs, ISMS Performance Indicators, and integrated the FY11 SHIP.
- Updated references to current DOE/contract requirements and WCH procedures/processes.
- Completed all Transition Initiatives (Appendix G) – maintained title page to support document formatting.
- Incorporated Hanford Sitewide Procedures:
 - DOE-0343, Stop Work
 - DOE-0342, Chronic Beryllium Disease
 - Prevention Program (CBDPP)
 - DOE-0344, Hanford Site Excavation, Trenching and Shoring.

September 2009

- Updated Environmental Management System (EMS) description to reflect ISO 14000 and DOE O 450.1A requirements.
- Updated the POMCs, ISMS Performance Indicators and integrated the FY10 Safety Health Improvement Plan.
- Clarified the IWCP process to detail the procedural improvements (development of Job Hazard Analysis – What IF procedure).
- Incorporated Safety Ownership Program as part of the continuous improvement program.
- Updated references to current DOE/contract requirements and WCH procedures/processes.
- Provided clarification to Subcontractor 10 *Code of Federal Regulations* (CFR) 851 applicability (Appendix J). Eliminated redundancy to implementing documentation (i.e., Exhibit G).

September 2008

- Updated Organizational change to reflect Operations Programs re-structured to be included in Engineering, SH&Q, and Training.
- Updated the POMCs, ISMS Performance Indicators and integrated the FY09 Safety Health Improvement Plan.
- Clarified the IWCP process to detail the procedural improvements (modified the work control flow chart – Appendix C to reflect changes).
- Updated references to be consistent with 10 CFR 851 compliance matrix and WCH procedures and processes.
- Removed the 10 CFR 851 Compliance Matrix from appendix and moved it into a separate (referenced) Program Support Document (PSD-8).

April 2007

- Incorporation of DOE comments on 10 CFR 851 Worker Health and Safety Program (WHSP) descriptions.
- Revision of WCH Organizational Chart – Figure 1-7 and organizational descriptions.
- Consolidation of WCH projects into three (D4/ISS, Waste Operations, Field Remediation).
- Update Appendix I (ISMS Requirements Implementation Matrix).

WCH provides an update to both DOE and contractor elements to ensure that all personnel have the latest version of the document. As these changes are considered program revisions, the WCH ISMSD document will be submitted along with the WCH Declaration for FY13.

Based upon the reviews conducted against the core functions and guiding principles of ISMS and tenets of VPP throughout the fiscal year, and in conjunction with a review of self-assessments, independent assessments, surveillances, and a systematic review of the CAM System, it is the judgment of WCH that the ISMS and VPP is effectively implemented and has systematically integrated safety into all levels of work.

VPP Application

WCH reviewed the VPP application in preparation for the 3-year recertification and determine that the core ISMS processes and VPP tenets remain effective for WCH. The WCH-4 was updated to add organizational changes and sitewide programs. However, these changes do not change the fundamental processes attributed to the methods and mechanisms that WCH uses to implement the tenets of the DOE VPP.

C. GOALS AND OBJECTIVES

Goals and objectives were developed for 2012 to continuously improve programs and foster new initiatives for both management and employees to achieve the desired goal of zero injuries and illnesses in an effort to continuously improve the safety culture. Goals and objectives were tracked and monitored. The following is a brief summary of each goal and the results obtained.

1. 2012 SAFETY PERFORMANCE OBJECTIVES, MEASURE, AND COMMITMENTS FY12 RESULTS

WCH instituted a set of ESH&QA performance metrics that are analyzed and reviewed monthly in a standing meeting involving the WCH President, all Directors and DOE. Through this process, several areas were identified as opportunities for improvement and actions were assigned to achieve those improvements demonstrated through subsequent trending by the performance indicator. Areas improved include reducing workplace injuries and illnesses; vehicle/transportation safety; control of hazardous energy; employee involvement in safety; ESH&QA programmatic compliance; and improving S&H observations, issue identification, documentation, and feedback. DOE facility representatives as well as the DOE VPP assessment team have witnessed these performance metric meetings and provided positive feedback.

WCH has been successful in reaching the FY12 POMCs. All POMCs with established metrics are within the goals established for 2012. Performance within most of the areas has been exemplary. The results of these improvements and trends identified in FY12 assisted WCH in creating the POMCs for FY13. Additionally, as the scope of the contract for WCH concentrates on completion of work and turnover of segments back to DOE, WCH has streamlined the improvement goals to further the successful closure and turnover mission. The S&H actions that employees have a direct impact on are included in a monthly SHIP that is updated on a monthly basis and provided to all employees.

Throughout FY12, WCH has been self-critical of our processes to ensure our processes were postured to maintain safety and quality as production activities increased. WCH recognizes that continuous improvement is needed to maintain this balance. WCH has improved many of the key processes associated with the safe performance of work and has maintained a focus on feedback and improvement.

The FY12 POMCs were developed, communicated, and provided to all field safety representatives, the Local Safety Improvement Team (LSIT) chairs and co-chairs, and the Senior Leadership Team. Focus improvement areas included the following:

- Working toward an injury-free workplace
- Environmental program compliance
- Subcontractor Oversight
- Sitewide Program Participation and Implementation
- Continuous improvement and feedback.

Working Toward an Injury-Free Workplace

Working toward an injury free workplace – incident severity reduction for FY12 focused on three areas: 1) Injury/Illness Review, 2) Injury Rate Continuous Improvement, and 3) Integrated Work Control Process.

Injury/Illness Review. Analyze and track all first aid, recordable, and/or days away/restricted cases. Director level review of each injury with the safety representative and the management, document actions to preclude or mitigate similar injuries on the S&H Injury Management Review Report form (base goal). Actions identified for improvement in this area include the following:

- 100% of the incidents that occurred in the quarter were documented and have been reviewed with the Director of SH&Q and/or scheduled for review with the field representatives where the incident occurred.
- Stretch goal met.

Injury Rate Continuous Improvement. Monitor TRC and DART 12 Month Moving Average (MMA) trends and implement improvement plans if trending unfavorably. Initiate a targeted corrective action improvement plan when any adverse trend, defined as quarter ending 12 MMA TRC or DART rate is greater than the previous quarter's end, is identified (base goal). Rates are not to exceed 1.4 for TRCR and 0.6 for DART (stretch goal).

- The first quarter of FY12 demonstrated slight increase in the quarterly rate with an overall finish to the calendar year better than the previous year (down by 31% from 0.36 to 0.25 TRCR). WCH did experience 1 recordable incident involving a shoulder tear. There were no lost time incidents during this quarter. In response to this incident, WCH issued two safety awareness refocus presentations on vehicle safety, disciplined operations, safety culture and behavioral safety using the concepts of human performance in safety. Additionally, safety topics and alerts reminded employees to keep their focus on the task at hand and always observe changing conditions.
- The second quarter of FY12 demonstrated an increase in the quarterly rate with a rate of 0.41 and 0.14 for recordable and DART cases respectively. WCH experienced 1 recordable incident involving a finger injury and one Day Away/Restricted case resulting from a vehicle rollover incident. In response to these incidents, WCH issued two safety awareness refocus presentations on vehicle safety, disciplined operations, safety culture and taking safety to the next level. Additionally, a focused safety presentation on fall protection prevention and requirements was provided to all employees.
- The third quarter of FY12 demonstrated a decrease in the quarterly rate with a rate of 0.00 and 0.00 for recordable and DAR cases respectively. WCH did not experience any recordable or Day Away/Restricted cases. However, WCH did conduct a review of all the incidents reported in the third quarter and provided this summary along with improvement actions for employees as part of the Independence Day Safety Refocus. In addition, WCH issued a safety awareness pre-refocus presentation prior to the July 4th holiday on the specific incident that occurred in June of 2012 as an increase in report only and self-treat incidents was noted.
- The fourth quarter of FY12 maintained the superior safety performance in the quarterly rate with a rate of 0.00 and 0.00 for recordable and DAR cases respectively. WCH did not experience any recordable or Day Away/Restricted cases. However, WCH did conduct a review of all the incidents reported in the third quarter and provided this summary along with improvement actions for employees as part of the Independence Day Safety Refocus and a review of the incidents in the fourth quarter with a sorted list to all project safety personnel for tracking and trending.

- Rates for FY ending were 0.27 and 0.13 for Total Recordable Cases and Days Away/Restricted respectively.
- Stretch goal met.

Integrated Work Control Process

Re-establish the SOP for all employees through the integration of established and implemented programs (i.e., ISMS, VPP, EMS, Work Control, etc.). Document and distribute the information, communication, and activities to support the implementation of the tenets of SOP...Follow the Instruction, Ask the Question, Fix it Now, and Own the Result (base goal).

- WCH initiated the SOP program to reinforce the employee ownership of the conduct of operations. Awareness activities were provided through the weekly roundup, reviewed at senior staff and Plan of the Day meetings, and staff meetings. Additional communications for the SOP were provided sitewide via electronic information and posters.



- WCH conducted a Work Control assessment using the information and direction from the URS work control guide to develop lines of inquiry. This assessment provided improvement actions and lessons learned that were used in the revision and improvements incorporated into the IWCP. Specific improvements included the review and attention to detail regarding activity level hazard analysis and the review of analyses developed and implemented for continuous work packages. This review enabled changing conditions and unanticipated hazards to be reviewed and incorporated into the work packages to ensure the hazards were identified and controlled. Training was conducted on these changes with Conduct of Operations mentors and coaches assisting site locations to improve the rigor and disciplined operations involving work control documents and drawings.
- Project specific action plans were developed for ERDF, D4, and FR to address the disciplined operations issues and concerns. These were highlighted in the refocus in the beginning of December 2011 with action items entered into the CAMs for tracking, progress and closure.

- Base goal met.

Environmental Program Compliance

Significant attributes of the Environmental Program Compliance were listed as POMCs for FY12 to ensure that each were tracked and trended with actions put in place when an adverse trend was identified. These attributes contributed to the overall Environmental Management System and helped WCH to maintain and recertify as an ISO 14001 site. The three areas specifically reviewed involved 1) Environmental Protection Index, 2) Environmental Noncompliances, and 3) Protection of Environmental and Cultural Resources.

Environmental Protection Index per quarter equal to 0.9/1.0 (base/stretch goal). This index is calculated based upon criteria specified for compliance relative to air quality permitting, spill prevention control, excavation plans, ecological/cultural plans, and sample management.

- WCH ended the 4th quarter of FY12 with an index of 0.89, which demonstrates a well balanced approach to environmental protection. Improvements continue to be made with additional focus in FY12 on spill management.
- Base goal met.

Environmental Noncompliance as defined by DOE M 231.1-2, Group 9 SC4 per quarter equal to 1/0 (base/stretch goal).

- WCH had zero environmental noncompliance issues in FY12.
- Stretch goal met.

Protection Environmental and Cultural Resources as defined in DOEM 231.1-2, Group 5, Subgroup B per quarter equal to 1/0 (base/stretch goals).

- WCH had zero environmental protection and/or cultural resource issues in FY12.
- Stretch goal met.

Subcontractor Oversight – Subcontractor Safety Program Performance. Review the subcontractor safety program via field observations, assessments, and Subcontract Technical Representative Oversight to determine overall safety and health program performance. Evaluated on a quarterly basis (base goal).

- The Subcontractor safety and health program criteria dashboard. This is based off of the WCH S&H Program dashboard to include safety, IH, work control, electrical safety, radiological safety, fall protection, and vehicle safety and is in line with the WCH S&H program health report reviewed on a monthly basis. Subcontracts were modified to include the dashboard criteria with STRs trained and S&H professionals assisting in the evaluation and completion of the review. Eligibility for safety incentives for new subcontracts is based upon this dashboard with the comprehensive evaluation of the elements of the dashboard.
- Conducted traffic control reviews of subcontractor vehicle areas in ERDF and 118K. Provided feedback on speed of vehicles at the ERDF facility to subcontractor supervision and conducted a briefing on this issue for all employees.

Implement the Sitewide Respiratory, Confined Space, Fall Protection, and Electrical Programs, including adopting the new sitewide program document, training, and protocols. Document the status of implementation in the sitewide program schedules. Meet 90%/100% of WCH scheduled items as outlined in the Sitewide Implementation Schedule (stretch/base goal).

- WCH is fully supporting the development, review, and implementation of the sitewide programs through committee attendance, program reviews, and field implementation.
- Reiterated the Stop Work Program through messages from the WCH President, Hot Topics in the Roundup and reviews of the program at staff and plan-of-the-day meetings.
- Provided feedback on interpretations for both the confined space and fall protection sitewide programs on scaffolding and sign issues.
- WCH is currently involved in the following programs:
 - Respiratory Protection
 - Electrical Safety

- Fall Protection
 - Confined Space
 - IH Sitewide Database
 - EPCRA Report
 - EJTA
 - Chronic Beryllium Disease Protection Program.
- Sent out the sitewide programs for both confined space and fall protection for review with implementation in December 2012. Conducted gap training for these programs to ensure personnel were trained prior to issuance of the new sitewide programs. These programs were added as required reading for safety and supervisory personnel along with employees conducting this work.
 - WCH confirmed that all equipment needed for gates and offsets for roof access of WCH structures for the current building listing was in place.
 - A part of implementation of the sitewide confined space program, the permits for both permit and nonpermit confined spaced were updated with criteria for a non-permit required confined space to site safety professionals.
 - Provided a briefing for site personnel of the overall schedule for implementation for subcontractors and the general changes for both confined space and fall protection.
 - Developed the implementation criteria and plan for the respiratory protection sitewide program. Full implementation of this program will be completed in FY13.
 - Stretch goal met.

Implement the Hanford Sitewide Beryllium Program by completing the WCH actions assigned per the Hanford Sitewide Beryllium CAP. Document the status of the implementation in the WCH Plan of the Week Schedules. Meet 90%/100% of scheduled items (base/stretch goal).

- WCH continues to participate in all scheduled meetings and meet the scheduled items listed in the beryllium CAP.
- Beryllium facility training completed in February 2012.
- Stretch goal met.

Continuous Improvement and Feedback

WCH Key Performance Indicator. Monthly Evaluations conducted per quarter equal to 3/2 (stretch/base goal). Conduct key performance indicator monthly evaluations involving senior staff personnel charged to evaluate the RCC performance and determine measurements and improvement initiatives to address program trends and issues identified.

- Twelve key performance indicator evaluations were conducted in FY12 evaluating the contractor indicators with corrective actions, improvements, and analysis performed to continuously improve performance throughout FY12.
- WCH indicators were documented through the Contractor Assurance dashboard and communicated to DOE-RL on a monthly basis with actions for improvements documented through action plans and in the Corrective Action Management System.
- Stretch goal met.

Operating Experience Documents. Operating Experience documents issued per quarter internally equal to 30/40 (base/stretch goal) (e.g., LL, Do it Right the First Time, Flash, Rude, Safety, Alerts, Hot Topics).

- Operating Experience documentation issued exceeded the stretch goal each quarter. Operating experience documents include,



Lessons Learned, Do It Right the First Time information, Flash bulletins, Just in Time bulletins, Rude Awakenings, Take 5 for Safety, Toolbox Topics, Safety Awareness, Hot Topics, Safety Refocus Documents, Safety Alerts, Occurrence Reports, and DOE safety bulletins. These totaled 232 documents issued during FY12.

- Stretch goal met.

Safety Culture. Ensure that safety initiatives, programs, and/or awareness campaigns are developed and implemented project wide to continue to foster an improving safety culture. These efforts will be communicated to all employees and tracked through quarterly update reports. Communication and implementation will be measured by evaluating the participation in the program and LSIT initiatives, LSIT logbook entries, periodic self-assessments, injury/illness rates, and documented in the ISMS/VPP annual review (base goal).

Results:

- WCH provided employees with slip, trip, and fall cards to raise awareness of the potential for these safety incidents. WCH reminded employees to use approved paths and walkways and to keep hands free of materials for balance and in order to catch oneself in the event of a fall.
- Site locations launched 90 safety campaigns to raise awareness on cold stress conditions and staying focused on the job at hand.
- Conducted the Safety Ownership Program to raise awareness for employees to take ownership of their safety and the safety of others around them. This program encourages a questioning attitude and to fix issues as they are identified and own the results.
- Conducted the “Let Safety Catch Your Fall” campaign to reinforce the use of handrails and raise awareness of slips, trips, and falls in the office.
- Provided ice scrapers for use for employees staged at exit locations at the Fermi building in preparation for inclement weather.
- Conducted observations of personnel when entering and exiting the Fermi parking area. Installed a speed sign to determine driving speed entering the parking areas and staged LSIT and safety staff members in the parking lot reminding personnel to use safe behaviors when



driving and walking in parking areas. Procured flashing lanyards for Fermi residents to increase pedestrian visibility in both the morning and evening hours when walking to and from the building in the parking areas. Continued with the vehicle safety program with the acquisition of a new speed sign for the Fermi building parking areas.

- Conducted the 360° vehicle observation program again. Emphasis on parking areas, pedestrian crossing, and speed limits. All employees were asked to conduct a 360° observation of their vehicles and were rewarded by their LSIT if they found and returned a 360° magnet.
- Added handrail signs to the steps of the stairs of the Fermi building reminding personnel to hold the handrail while using the stairs. These signs were on both the steps and the landings and were changed out to keep the message current and fresh.
- Highlighted the achievement of 6 million safe work hours at a WCH all hands meeting. Provided employees with a 6 million hour recognition award and affirmation from both WCH and DOE to all personnel.
- Conducted refocus safety presentations after each holiday break and on prior to the end of the year holiday break.
- Fermi personnel were afforded the opportunity to obtain blood screenings for total cholesterol and sugars along with other screenings and health-related information provided by the WCH Occupational Medical Provider.
- Safety launched a comprehensive ESH&QA hotline number for employees to call in to report concerns, ask questions, and offer suggestions to environmental, safety, health, and/or quality items.
- Employees were reminded again of their rights under DOE and VPP to stop work without any fear of retaliation and that this is encouraged by WCH management and staff personnel.



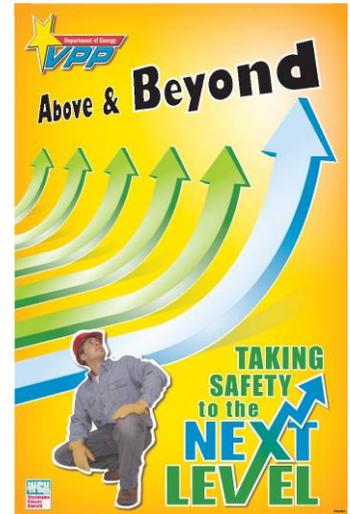
- Taking Safety to the Next Level involving the LSIT to generate new and innovative ideas to continuously improve the safety culture by generating the “Focus on the Fundamentals”. This is an observation based program with focused reviews on actions and conditions. Every two weeks, a new focus area was provided to the field personnel with recognition for those who complete the observation.



- Conducted the Big Clean Up in the Fermi office location. Kicked off a 3-month campaign to improve housekeeping and general office appearance.
- WCH Managers and Supervisors attended an off-site safety leadership meeting where Carol Johnson and members of her staff provided safety expectations, learning opportunities, and roll playing activities to continue to the culture and leadership skills of the management staff for WCH.

- Awareness and safety activities were conducted in preparation for the VPP re-certifications with employee interviews, Daily Bulletin communications, posters, POD topics, site reviews, and other preparation activities to include:

- New, updated site project banners for safety awareness
- Focused reviews of the VPP tenets with supervision, senior management, employees, and LSIT committee members
- Goals stated and communicated to all employees
- Development of a safety culture video that was provided to the DOE VPP team during the in-brief presentation
- Update and revision to the ISMS Description Document for WCH



- WCH participated in the DOE-RL Safety Culture Survey and assisted in the coordination and development of the focus of the survey with DOE.

- Eight employees attended the Region X VPPPA conference with a presentation provided by two WCH employees on Employee Involvement. Attendees included management, staff, and craft personnel.
 - Warehouse achieved 90 days of safety with zero vehicle incidents by applying self-awareness and helping to get to a standard where the operation of the company vehicles is safe and efficient.
 - Conducted the lean Six Sigma of the warehouse to reduce the wasted time and movements and improved productivity. Provided training to employees on the tools for use of Lean Six Sigma.
 - Sites continue to work injury free with 618-10 completing 3 years without a recordable incident. Employees were provided a recognition award as appreciation for this milestone.
 - Celebrated 6 year without a recordable for the staff personnel located at the Fermi building.
 - Celebrated 7 years without a recordable incident for the D4-SM&U group.
- Stretch goal met.

2. SAFETY PERFORMANCE OBJECTIVES, MEASURE, AND COMMITMENTS FY13

The FY13 POMCs are found in Table 1 with the summary of the sections of improvement areas as follow:

- Work Toward an Injury-Free Workplace
 - Injury/Illness Review
 - Injury Rate Continuous Improvement
 - Integrated Work Control Process-focus on activity level hazard analysis
 - Leading Indictors through work control, fall protection, and injuries/illnesses.

- Environmental Program Compliance
 - Environmental Protection Index
 - Environmental Reportability.
- Contractor Assurance Program-Internal focused independent assessments integrated into the FY13 assessment schedule.
- Sitewide Program Participation and Implementation
 - Implement the currently active programs and evaluate effectiveness through scheduled assessments within the FY13 Integrated Assessment Schedule
 - Participate in the Hanford Sitewide EJTA and IH Database development and implementation
 - Deploy phase 1 and 2 of the Beryllium product improvements with assessments conducted for each phase to confirm implementation and identify areas for improvement.
- Continuous Improvement and Feedback
 - WCH Key Performance Indicator monthly evaluations
 - Operating Experience documents
 - Safety Program Improvements-Focus on the Fundamentals and Awareness Activities to respond to trends and provide mechanisms to enhance continuous improvement
 - Safety Culture-Implement action plans based upon the Safety Culture Survey and improvement actions designed to improve the SCWE for WCH.

Integrated Safety Management Performance Indicators

WCH will continue to review and report on a comprehensive set of ESH&QA performance indicators that are used routinely by senior management and staff to evaluate the implementation and effectiveness of the ISMS. The ISMS performance indicators listed below are modified, as

needed, to ensure that the correct ISMS attributes are being assessed. Current ISMS performance indicators include the following:

- OSHA Total Recordable Case Rate: Number of OSHA recordable injuries and illnesses multiplied by 200,000 and divided by the total number of work hours (including subcontractors).
 - WCH had a total of four recordable incidents in FY12 with a TRCR of 0.27
- DART Case Rate: The number of OSHA recordable cases involving days away from work, days involving restricted work or job transfer multiplied by 200,000 and divided by the total number of work hours.
 - WCH had a total of two incidents in FY12 with a DART of 0.13
- Radiological Uptakes: Radiological uptakes, as defined by DOE M 231.1-2, Group 6, Subgroup C, Criteria 3.
 - WCH experienced zero radiological uptakes in FY12
- Radiological Skin Contaminations: Radiological skin contaminations, as defined by DOE M 231.1-2, Group 6, Subgroup D, Criteria 3.
 - WCH experienced zero radiological skin contaminations in FY12
- Hazardous Energy Contact as Defined by DOE M 232.1-2, Group 2, Subgroup E, Criteria 2-3; or Group 2, Subgroup E and F, Criteria 1.
 - WCH experienced zero Hazard Energy Contact in FY12.
- Hazardous Energy Procedure Noncompliance/Violation (LOTO) as Defined by DOE M 231.1-2, Group 2, Subgroup E, criteria 2-3; or Group 2, Subgroup F, Criteria 2-3.
 - WCH had six incidents in this category.
 - WCH worked with the other DOE-RL contractors as well as the Sitewide Electrical committee for clarification of expectations and criteria within the program. This

information was communicated to project personnel with changes made to the electrical procedures.

- Standing orders were put into place to provide additional measures for safety concerning power lines and expectations for subcontractors. No personnel injuries or illnesses resulted in these incidents.
- Reporting of these incidents was made using conservative interpretations and evaluations to ensure that the appropriate focus and corrective actions were implemented with effectiveness evaluated during FY12 and continuing in FY13 as an improvement area.
- Spills and Releases: As defined by DOE M 231.1-2, Group 5, Subgroup A
 - WCH experienced zero spills and releases in FY12.
- Transportation Safety: Transportation safety events as defined by DOE M 231.1-2, Group 8.
 - WCH experienced zero transportation safety related events in FY12.
- Near-Miss Occurrences: A reportable event or situation as described by DOE M 231.1-2, Group 10 in which an inappropriate action occurs, or a necessary action that could be reasonably expected to occur, is omitted and could have resulted in a serious personnel injury. This includes a situation in which controls that should have been in place were absent or overlooked.
 - WCH experienced zero Near-Miss Occurrences in FY12.
- Technical Safety Requirement Violations at nuclear facilities.
 - WCH experienced zero technical safety requirement violations in FY12.
- Completed Corrective Actions: Number of actions completed within the CAM system.
 - Greater than 70% of the actions entered into the CAM system were completed in FY12 which meets the base goal.
- Percent of corrective actions that are overdue: Items within an IF in the CAM system.

- Less than 11% of the actions within the CAM system were overdue which slightly exceeds the base goal. This was in part due to corrective actions assigned as due by the end of the fiscal year. This arbitrary date may have been selected based upon a time table instead of determining the actual time needed to complete the task. This information is being communicated to users to ensure that completion dates are based upon the work load and the time needed to effectively accomplish the activity and/or task.
- Percent of actions that are greater than 180 days old: Items within an IF in the CAM system.
 - Less than 5% of the actions were greater than greater than 180 days old which meets the base goal.
- Percent of actions that are extended: Items within an IF in the CAM system.
 - Less than 13% of the items listed in the CAM system were extended, which marginally exceeds the base goal. This was in part due to corrective actions assigned as due by the end of the fiscal year. This arbitrary date may have been selected based upon a time table instead of determining the actual time needed to complete the task. This information is being communicated to users to ensure that completion dates are based upon the work load and the time needed to effectively accomplish the activity and/or task.
- In accordance with the RCCC (DE-AC06-05RL14655) Clause I.93, “Integration of Environment, Safety, and Health into Work Planning and Execution” (DEAR 952.223-71), WCH is required to annually review and update its ISMS POMCs. POMCs are updated using inputs from the previous year’s performance, internal and external assessments, and worker input via the various feedback mechanisms available through WCH. The POMCs were developed in accordance with QA-1, *Quality Assurance*, QA-1-1.15, “Development, Review, Approval and Submittal of ISMS Performance Objectives, Measure, and Commitments.” The POMCs for FY13 are described in Table 1.

Leading Indicators

As programs are developed and implemented, addressing issues before they result in an incident is an integral part of the WCH safety and health program. As a DOE VPP Star site, WCH tracks and trends leading indicators that when identified and corrective actions deployed, incidents are

prevented. WCH tracks and trends incidents that are considered “report only” which do not result in personnel injury. Participation in employee safety committees, awareness campaigns, health fairs, and LSIT log book entries are examples of leading indicators that WCH tracks, evaluates, and responds to according to the trends identified during analysis. Project Managers, senior staff, employee committee members and safety professional are provided the trends and assist in developing action plans to prevent and/or eliminate incidents. Certain trends that are considered company-wide may be entered into the CAM system to conduct a systemic review and determine the extent of condition of the trend.



On a monthly basis, WCH reviews the leading indicators and develops action plans accordingly depending on the focus area and issues that area identified. Examples include the implementation of a Winter Safety Campaign where employees were provided methods and information for the safe travel across potentially slick, slippery, and icy walking/working surfaces. This trend was identified through the “report only” self/no-treat process. Annual trends were also reviewed as part of this leading indicator analysis review and indicated that this is a reoccurring issue. WCH instituted preventative measure prior to conditions becoming hazardous and was successful in eliminating personnel injuries resulting from slips, trips, and falls.

The active review of LSIT logbook entries, S&H Campaign Participation, Senior Management Presence in the field, self/no-treat incidents, and participation in health fairs will continue in FY13 and is listed as a POMC.

2013 WCH POMC

The FY13 POMCs are found in Table 1 with the summary of the sections of improvement areas as follows.

General Safety and Health Improvements. General improvements for the S&H program include the following emphasis areas:

- Effective communication of safety information via the Safety Roundup
- Providing topical information based upon seasonal information and project events
- Outlining emphasis campaigns to raise awareness in the general S&H program focus area.

Working Toward an Injury-Free Workplace. Incident Severity Reduction for FY12 will focus on four areas 1) Injury/Illness Review 2) Injury/Illness Rate Continuous Improvement, 3) IWCP-hazard analysis, and 4) use and incorporation of leading indicators to correct adverse trends. Actions identified for improvement in this area include:

- Tracking and trending all incidents.
- Review of injuries and illnesses and implement improvement actions.
- Conduct activity level hazard analysis with controls documented and incorporated on a real-time basis in the work documents.
- Provide trend data for incidents by project. Develop additional performance indicators as necessary to track and trend specific areas of emphasis.

Environmental Compliance

- Calculate the environmental index
- Document Environmental Reportability regarding spills and releases.

Contractor Assurance Program

- Contractor Assurance Program to employ internal independent assessments.

Sitewide Program Participation and Implementation. Effectively analyze and incorporate the issued and contractually incorporated sitewide programs into the WCH processes, procedures, and document hierarchy. Sitewide Program implementation emphasis areas include:

- Implement the Sitewide Programs for those currently applicable to the WCH contract. These include:

- Fall Protection
- Hoisting and Rigging
- Fire Protection
- Confined Space
- Respiratory Protection
- Chronic Beryllium Disease Prevention Program
- Stop Work
- Lock Out/Tag Out
- Electrical Safety
- Excavation
- HazWoper Training
- Emergency Planning.
- Support the development and implementation of the programs still in the development phase. These include:
 - EJTA
 - IH Database.
- Fall Protection-systematic review of the FPWPs.
- Conduct an effectiveness review of the Beryllium phase 1 and 2 products.

Continuous Improvement and Feedback

- WCH Key Performance Indicators
- Operating Experience Documents

- Safety Culture.

The 2013 POMCs were submitted as a part of the 2012 ISMS Annual Declaration and were approved by DOE-RL.

Improvements were be made throughout the year with updates documented on a quarterly basis. Incorporation of additional focus areas will be added to ensure continuous improvement of the S&H program. All employees are provided the updates to the overall project goals on a monthly basis through the Safety Roundup. This electronic publication is provided to all project employees. For those who do not have computer access, the status and improvement actions are communicate via the plan-of-the-day meetings at the site locations. Other goals that are introduced throughout the year are communicated electronically as they occur and through safety initiatives both company wide and site specific. Incidents and lessons learned that affect the WCH goals and improvement actions are distributed through the S&H Mail Box electronically and provided in the Safety Roundup.

Table 1. ISMS Performance Objectives, Measures, and Commitments for Fiscal Year 2013 Rev. 0. (3 Pages)

Objective	Quarterly Performance Measures and Commitments
Work Toward an Injury-Free Workplace	<p>Injury/Illness Review – Analyze and track all first aid, recordable, and/or DART cases. Director level review of each significant (significant first aid *, recordable, lost workday) injury with the safety representative and line management, document actions to preclude or mitigate similar injuries on the WCH Incident Report Form (base goal).</p> <p>* Significant first aid determined by S&H Manager/ESHQ Director</p>
	<p>Injury Rate Continuous Improvement – Monitor TRC and DART 12 MMA trends and implement improvement plans if trending unfavorably. Initiate a targeted corrective action improvement plan when any adverse trend, defined as quarter ending 12 MMA TRC or DART rate is greater than the previous quarter’s end, is identified (base goal). Rates are not to exceed 1.1 for TRCR and 0.6 for LWCR (stretch goal).</p>
	<p>Integrated Work Control Process – Conduct a systematic review of hazard analyses (via internal site reviews, VPP, ISMS and/or POET assessments) within work documents for each active site location for work packages open for longer than 6 months. This review shall be conducted semiannually to ensure the JHA and associated Work Packages are adequate. Revise/update the analysis and controls as needed with review and/or updates documented in the work document status log (base goal).</p>
	<p>Leading Indicators – Monitor and track “report only” incidents (self/no-treats) to determine trends and implement program improvement/initiatives to address the trend and facilitate improvement in the identified areas. Data will be evaluated on a monthly basis to evaluate if negative trends exist with action plans implemented and documented quarterly to determine effectiveness. (base goal)</p>

**Table 1. ISMS Performance Objectives, Measures, and Commitments
for Fiscal Year 2013 Rev. 0. (3 Pages)**

Objective	Quarterly Performance Measures and Commitments												
Environmental Program Compliance	<p>Environmental Protection Index per quarter equal to 0.9/1.0 (base/stretch goal). This index is calculated based on criteria specified for compliance relative to air quality permitting, spill prevention control, excavation plans, ecological/cultural plans, and sample management.</p>												
	<p>Environmental Reportability as defined by DOE M 231.1-2, Group 5, Subgroup A equal to 0/1 (stretch goal/base goal) regarding environmental spills and releases.</p>												
Contractor Assurance Program	<p>Contractor Assurance Program– Employ internal, independent assessments (e.g., ISMS, VPP, POET) and incorporate the schedule and topical areas into the WCH integrated assessment schedule for FY13 accomplishing 3/4 (base goal/stretch goal)</p>												
Sitewide Program Participation and Implementation	<p>Implement the Site-Wide Programs-Support implementation of the current Site-Wide Safety programs through performance of program implementation assessments (independent, self-assessment, surveillances, and/or management reviews) completion of 3/4 per quarter (base/stretch goal) for the following programs:</p>												
	<table border="0"> <tr> <td>• Fall Protection</td> <td>• Stop Work</td> </tr> <tr> <td>• Hoisting and rigging</td> <td>• LO/TO</td> </tr> <tr> <td>• Fire protection</td> <td>• Electrical Safety</td> </tr> <tr> <td>• Confined Space</td> <td>• Excavation</td> </tr> <tr> <td>• Respiratory Protection</td> <td>• HAZWOPER Training</td> </tr> <tr> <td>• Chronic Beryllium Disease Prevention Program</td> <td>• Emergency Planning</td> </tr> </table>	• Fall Protection	• Stop Work	• Hoisting and rigging	• LO/TO	• Fire protection	• Electrical Safety	• Confined Space	• Excavation	• Respiratory Protection	• HAZWOPER Training	• Chronic Beryllium Disease Prevention Program	• Emergency Planning
	• Fall Protection	• Stop Work											
	• Hoisting and rigging	• LO/TO											
	• Fire protection	• Electrical Safety											
• Confined Space	• Excavation												
• Respiratory Protection	• HAZWOPER Training												
• Chronic Beryllium Disease Prevention Program	• Emergency Planning												
<p>Implement the Site-Wide Programs-Support development and initial implementation of the following Site-Wide Safety Programs per the sitewide committee schedule and achievement of 80%/100% implementation activities (base/stretch goal) for the EJTA and IH Database program implementation.</p>													
<p>Fall Protection-conduct oversight of fall protection activities through a systematic review of 1/3 (base goal) of the initiated FPWPs. FPWPs will be evaluated as generated with S&H Management to determine which FPWPs will be evaluated on a case by case basis. This review will be tracked on a quarterly basis and document the results of the review.</p>													
<p>CBDPP-Be phase 1 and 2 products deployed in the field with an effectiveness assessment conducted 60/90 days after declaration of completion (stretch/base goal).</p>													
Continuous Improvement and Feedback	<p>WCH Key Performance Indicator monthly evaluations conducted per quarter equal to 3/2 (stretch goal/base goal).</p>												
	<p>Operating Experience documents issued per quarter internally equal to 40/30 (stretch goal/base goal). (Lessons Learned, Just in Time, Do It Right the First Time, Safety Flash, Rude Awakening, Safety Alerts)</p>												
	<p>Safety Program Improvements – Provide employees with focused safety topics and activities to enhance the knowledge and overall awareness of Safety Culture/ISMS/VPP and Safety Topical Areas through the Focus on the Fundamentals Activities. Issue activities each month and track improvements/actions through review of incidents, near miss, and self/no-treat data (base Goal)</p>												
	<p>Safety Culture – Evaluate the safety culture survey conducted for WCH and develop initiatives to facilitate improvements in the overall safety culture for WCH. The plan for these initiatives will be developed by 5/31/13</p>												

**Table 1. ISMS Performance Objectives, Measures, and Commitments
for Fiscal Year 2013 Rev. 0. (3 Pages)**

Objective	Quarterly Performance Measures and Commitments
	with a schedule of activities to implement these initiatives with accomplishing 80% of scheduled activities (base goal).

DART= days away, restricted, or transferred;
 EMS = Environmental Management System;
 FPWP = Fall Protection Work Permit;
 FY= fiscal year;
 IH= Industrial Hygiene;
 IWCP= Integrated Work Control Program;
 LSIT = Local Safety Improvement Team;
 LWCR= lost work day case rate;

MMA= month moving average;
 S&H= Safety and Health;
 SOP = Safety Ownership Program;
 TRC= total recordable case;
 TRCR= total recordable case rates;
 VPP = Voluntary Protection Program;
 WCH = Washington Closure Hanford

D. CONTRACTOR AND SUBCONTRACTOR INCIDENCE RATES

TRC and DART rates for WCH and the RCC as a whole have been improving over the past 3 years, and are BELOW the comparison industry average. These rates for the past 3 years clearly meet the expectations for participation in the DOE-VPP.

Table 2. RCC Contractor and Subcontractor Incidence Rates.

A. WCH INCIDENCE RATES					
WCH RECORDABLE CASE RATE					
WCH recordable injury/illness case rate includes subcontractors who are directly supervised by the contractor and are included on the OSHA 300 Log.					
Calendar Year	WCH Recordable Case Rate Includes CAIRS*	Number of Recordable Cases	Total Hours Worked	NAICS # 56291 Incident Rate 2011	DOE Average CAIRS*
2010	0.00	0	1,439,746	4.9	1.24
2011	0.24	2	1,693,516		1.1
2012	0.26	2	1,533,150		1.0
3 Year Total	N/A	4	4,666,412		N/A
3 Year Avg.	0.33	2.6	1,555,470		1.1
*DOE Computerized Accident/Incident Reporting System (CAIRS) Database. Some data submitted to the CAIRS Coordinator, including revised reports for previous years, have not yet been entered into the CAIRS database.					
WCH is Remediation and other Waste Management Services #56291					
WCH LOST WORKDAY CASE RATE					
WCH lost workday injury case rate includes subcontractors who are directly supervised by WCH and are included on the OSHA 200/300 Log.					
Calendar Year	WCH Lost Workday Case Rate Includes CAIRS*	Number of Lost Workday Cases	Total Hours Worked	NAICS # 56291 Incident Rate 2012	DOE Average CAIRS*
2010	0.00	0	1,439,746	3.0	0.54
2011	0.00	0	1,693,516		0.5
2012	0.26	2	1,533,150		0.4
3 Year Total	N/A	2	4,666,412		N/A
3 Year Avg.	0.08	0.66	1,555,470		0.4
*DOE Computerized Accident/Incident Reporting System (CAIRS) Database. Some data submitted to the CAIRS Coordinator, including revised reports for previous years, have not yet been entered into the CAIRS database.					

B. SUBCONTRACTOR INCIDENCE RATES – Subcontractors not directly supervised by WCH**SUBCONTRACTOR RECORDABLE CASE RATE**

Calendar Year	Subcontractor Recordable Case Rate (# of recordable injuries per 200,000 work hours)	Number of Recordable Cases	Total Hours Worked
2010	0.88	5	1,135,210
2011	0.25	2	1,563,590
2012	0.00	0	1,350,015
3 Year Total	N/A	7	4,048,815
3 Year Average	0.55	3.7	1,349,605

SUBCONTRACTOR LOST WORKDAY CASE RATE

Calendar Year	Subcontractor Lost Workday Case Rate (# of lost workday cases per 200,000 work hours)	Number of Lost Workday Cases	Total Hours Worked
2010	0.00	0	1,135,210
2011	0.00	0	1,563,590
2012	0.00	0	1,327,662
3 Year Total	N/A	0	4,048,815
3 Year Average	0.00	0	1,349,605

C. TOTAL RATES FOR WCH AND ALL SUBCONTRACTORS**TOTAL RECORDABLE CASE RATE**

Calendar Year	Total Recordable Case Rate (# of recordable cases per 200,000 work hours). Includes CAIRS*	Number of Recordable Cases	Total Hours Worked
2010	0.39	5	2,574,956
2011	0.25	4	3,257,106
2012	0.14	2	2,883,166
3 Year Total	N/A	11	8,715,228
3 Year Average	0.24	3.6	2,905,076

TOTAL LOST WORKDAY CASE RATE

Calendar Year	Total Lost Workday Case Rate (# of lost workday cases per 200,000 work hours). Includes CAIRS*	Number of Lost Workday Cases	Total Hours Worked
2010	0.00	0	2,574,956
2011	0.00	0	3,257,106
2012	0.14	2	2,883,166
3 Year Total	N/A	2	8,232,977
3 Year Average	0.06	6.7	2,744,325

STATISTICAL COMPARISON

WCH 3 Yr. Ave TRCR: 0.24	NAICS code of 4.9	78% below the DOE 3 Year Average of 1.1
WCH 3 Yr. Ave. DART: 0.06	NAICS code of 3.0	85% below the DOE 3 Year Average of 0.4

Injury/Illness Type	Injury/Illness Definition	Cost per event ⁽¹⁾	Incident Reduction	Cost Savings
First Aid ⁽²⁾	Injury/Illness that received medical attention from the Site Occupational Medical Provider or private physician. (Non-recordable or lost time)	\$2,000	10	20K
Minor Event	Injury/Illness that received medical attention from the Site Occupational Medical Provider or private physician. (Recordable or 1-5 days lost time)	\$50,000	2	100K
Major Event	Injury/Illness that required surgery, rehabilitation and/or lead to disability or death.	\$500,000	0	0K
1) Costs include both direct and indirect costs, but not any fines or penalties that may be imposed by the DOE. Direct costs include both the employee's medical and lost time. Indirect costs include management/co-worker time, training/briefings, and administrative and potential process/facility changes. 2) First Aids does not include self-treat and in all first aids the employee returned to work.				Total Savings: 120K

E. MENTORING AND OUTREACH

As a way to incorporate new and innovative ideas for the S&H program, WCH is aggressive in providing outreach and mentoring to other companies in both private industry and DOE. Mentoring allows WCH to learn from others while providing valuable information, tools, improvement ideas, and overall assistance. A summary of sharing with others is collected on a monthly basis and provided to the parent companies of WCH along with the materials for sharing across company lines. Below is an overview of the mentoring and outreach activities for 2012.

- Attended and presented at the National Voluntary Protection Program Participants' Association (VPPPA) conference in Anaheim. Presentation included topics on Employee Involvement in the safety program.
- Attended and presented at the Region X VPPPA annual conference with topics including Employee Involvement and Sustaining Star.
- WCH employee elected to the Region X VPPPA Board of Directors as a Director at Large.
- WCH employee maintains position on the National Board of Directors at the Representative from a DOE-VPP site.
- Mentored Washington River Protection Solutions and the Waste Treatment Plant at the Hanford Site and East Tennessee Technology Park in Oak Ridge, Tennessee.
- Provided VPP mentoring to the Olmstead Dam project in preparation for their OSHA VPP re-certification.
- Provided VPP presentations to personnel across the country in response to the employee involvement presentation provided at the National VPPPA conference.
- Provided presentations at the Region X VPPPA conference on Employee Involvement and Sustaining VPP Star.
- Provided support to WTP during their annual VPP assessment as a team lead.

- Team members provided for the re-certification of NSTech in Las Vegas as part of the DOE-HQ VPP team.
- Maintained the mentoring of the Washington River Protection Solutions through on-site assessment preparation, internal assessment briefings, and management and employee participation in safety programs and initiatives. Assisted Washington River Protection Solutions in their internal VPP assessment.
- Provided STS training at the VPPPA National Conference
- Provided safety initiatives, recognition awards, and presentations the Hanford Sitewide VPP Champions group and posted items via the Hanford VPP website.

F. MANAGEMENT LEADERSHIP

WCH Management has set the expectation that safety is the responsibility of all employees by establishing goals and expectations for all of the management team for safety. Management was involved and contributed to the continuous improvement of the safety culture for their sites and the project as a whole through the POMC goals and the SHIP. Both utilized the lessons learned from the previous year's safety experience, leading indicators, and emerging issues. Each director was accountable and responsible for reporting on the status and progress on their part in achieving the POMCs and SHIP goals. WCH Senior Staff took the lead on ensuring the issues identified in the SHIP were tracked, monitored, and adjusted throughout the year as necessary to improve the safety of the program and the culture.

The status for improvement actions was provided to all project personnel on a monthly basis. Improvement actions identified in the ISMS/VPP self-assessment were monitored on a monthly basis and used in the development of the SHIP for 2013. Self-assessments, increased surveillances, and improved safety communications have resulted in a heightened awareness for safety as a result of the improvement actions in both the POMCs and the SHIP and have enabled WCH to continue to improve.

WCH Line Management is involved with the direct and continuous management, leadership, and oversight of WCH and subcontractor work functions. WCH managers understand and accept their safety responsibilities inherent in mission accomplishment and do not depend on supporting organizations to build safety in all activities. The management team at WCH has been exemplary in their demonstration of leadership and commitment to safety. Over the past few years, WCH has progressed from an organization that was perceived by the workforce as valuing production over safety to an organization that values production because of safety. Management spent time in the field coaching, mentoring, and reinforcing standards and positive behaviors. WCH continued with coaches and mentors for conduct of operations to reinforce the requirements and expectations regarding disciplined operations. These coaches and mentors are assigned to each project organization and facilitate continuous improvement, self-identification of issues, and a team approach to work and safety.

WCH employees are both encouraged and favorably recognized when concerns regarding safety and work control are raised. As an integral part of WCH New Hire Orientation, all employees are provided the information on the expectation of raising concerns, how to do this, who concerns can be raised to, and that no employee will be retaliated against for doing so. Employees are advised that the act of identifying and communicating issues concerning, safety and quality is not only their right but considered an expectation for all employees.

Plan of the Day (POD) and Pre-Evolution (Pre-Ev) meetings reinforce that employees are not only afforded the opportunity but expected to stop work when a condition or action is unsafe or not understood. Stop Work actions are reviewed with management and the employee raising the concern. HAMTC safety representatives are also notified when a stop work is called. Employees have the right to also contact their union steward if they choose to help mitigate the stop work issues and conditions. These stop work instances are highlighted in the S&H communication *Safety Roundup* where employees not only see that bringing forth issues is encouraged but can also learn from the actions taken at other site locations.

WCH maintains a culture where all employees from senior management to front line employees feel free and have the ability to raise concerns. Methods to raise concerns include:

- Site suggestion boxes.
- HGET VPP Survey comment section.
- LSIT Logbook.
- Management/LSIT Walk Through Inspection reports.
- Corrective Action Management System.
- Direct feedback with first line supervision, LSIT committee members/chairs, WCH site management, WCH senior management, HAMTC safety representatives, union stewards, WCH Project Safety Representatives, WCH SH&Q Senior management, HAMTC Union Hall, WCH Project Safety Committee, DOE-RL ES&H personnel, DOE-RL Facility Representatives, DOE-RL Senior Management, and DOE Headquarters personnel.
- WCH Employee Concerns and DOE-RL Employee Concerns.
- WCH Legal Department.
- WCH ECP Hotline.
- Hanford Employee Concerns Council.
- Internal focused assessment reports (via ISMS/VPP annual assessments, POET assessments, and focused reviews).
- External Regulators (DNFSB, Washington State, EPA, Inspector General).

Interviews with both WCH and DOE-RL Employee Concerns confirm that the level of concerns has dramatically decreased since the inception of the contract. Concerns still exist but are dealt with in a timely and satisfactorily manner for both the employee and the company. The number of anonymous concerns has also been reduced providing documentation that employees do not have a fear of retaliation from either WCH or DOE. Exit interviews with employees who have raised a concern did confirm that their requests were satisfactorily dealt with in a timely manner.

With the issuance of the Safety Culture Policy and Expectations Matrix, management continues to mentor and guide employees while establishing clear and concise expectations. WCH took the lead in this area in response to complex wide concerns about safety culture and the potential affects a negative trend would manifest. Management flowed this information down to all employees and provided these expectations to employees with the results from the VPP and Safety Culture surveys indicating that employees hold themselves accountable for safety and raise concerns when identified.

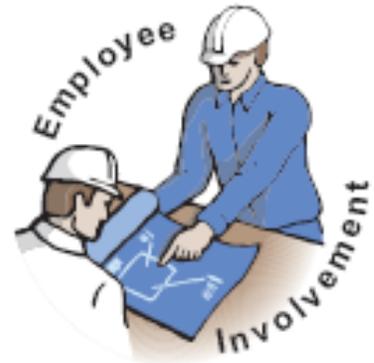
WCH allows for interactions between employees and management that encourage a free flow of information. During PODs and Pre-Ev meetings, employees are explained the work tasks and review the work packages to ensure that all job duties, actions, and tasks are understood and are able to be conducted as planned. When a question is raised, the team works together to review the method to perform the work correctly and safely with the work package adjusted and revised to reflect the agreed upon safe mechanism to accomplish the work. Teamwork was proceduralized in the latest revision of the conduct of operation program, PAS-2-1.1, Integrated Work Control Process by adding an SME list for the review of hazards. Specific disciplines were identified as required reviewers depending upon the work scope and hazards identified within the work document.

All levels of employees are afforded the opportunity and expected to raise concerns in Fact Finding meetings after an event. These meetings begin with the premise that information gained is not to place blame but to learn the facts of the incident. All those present in the meeting are provided this information prior to initiation of the fact finding meeting.

Management continues to demonstrate the actions that personal leadership and involvement in safety and the relentless focus on doing the job right are evident. Through participating in safety initiatives, performing walkthroughs, and talking to employees to provide a visible presence and involvement in offsite outreach events, WCH management reinforces their commitment to safety at WCH.

G. EMPLOYEE INVOLVEMENT

The RCC continues to empower and provide mechanisms and information to all employees to improve not only their own safety but the safety of their co-workers. A comprehensive approach of bringing safety home was offered as part of the implementation of safety initiatives to help in the behavior modification process and to sustain the positive effectiveness observed in the WCH safety culture. This was assessed throughout the year during self-assessments, management assessments, and verified during the WCH ISMS/VPP annual assessment.



Employee involvement and a positive safety culture continue to be demonstrated through ISMS and Voluntary Protection Program (VPP) activities. WCH successfully maintained and continuously improved the VPP star status earned in June 2009 and recertified in 2012. WCH continues to maintain safety and health rates significantly below the industry average, innovations and creative ways to engage all levels of the workforce, and mentor sites both current and actively pursuing VPP. WCH maintains its presence on the Voluntary Protection Program Participants' Association National Board of Directors with the re-election of a WCH employee as the Representative from a DOE VPP site and the newly elected Director at Large for the Region X VPPPA and maintains the designation as the official mentor for the East Tennessee Technology Park (URS CH2MHill Oak Ridge Operations) and assistance to Washington River Protection Solutions and the Waste Treatment Plant within the DOE complex.

Safety Campaigns

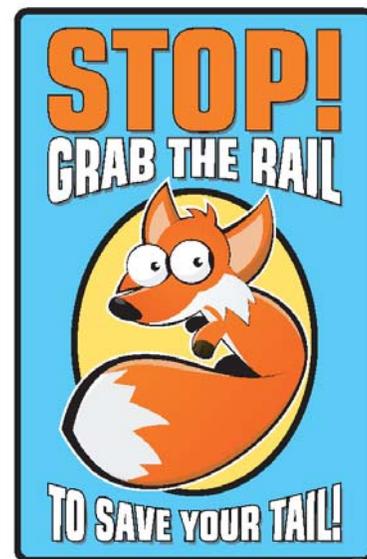
A comprehensive safety campaign and incentive program continued in 2012. Project Directors designated points of contact to coordinate and track safety campaigns resulting in a coordinated effort to facilitate safe behavior improvements. Sites reviewed the emerging issues, changing conditions, injuries/illnesses, and focus areas for their location to determine the campaigns. The LSIT personnel were heavily involved in the execution and successful completion of these campaigns. Senior management support was evident at milestone



celebrations where employees were personally congratulated on their achievements and accomplishments.

Healthy Living Campaign

The Fermi office location launched a healthy living campaign to raise the importance of good health and wellness in the reduction of soft tissue injuries and overall incidents. Criterion was provided to all personnel in this location with weekly, monthly, and end-of-the-campaign acknowledgement of their participation. Criteria included use of handrails, water consumption, walking during the day, taking the stairs, healthy snacks, and flex and stretch exercises. A health station was set up at the Fermi location as well with blood pressure cuffs, weight scales and other screening devices to help employees monitor their progress. Recipes, stretch bands, and tips for exercise and wellness were provided as well with weekly recipes and tips provided electronically to employees. Food journals were one of the mechanisms provided to the employees to encourage behavior changes in diet along with scheduled health fairs offered by the site Occupational Medical Provider at the site location encouraging employee interaction. The ERDF also conducted a healthy living campaign providing an activity book with methods to earn points while losing weight and getting fit. Points were redeemed for safety incentives with a recognition event for all those who participated in this safety activity.



As part of a comprehensive health program, WCH continued to offer health screenings to employees. Total cholesterol and glucose tests were offered along with additional information offered by the Hanford Site Occupational Medical Provider. Flu shots were also offered to all personnel by the medical provider prior to the flu season.

90-Day Safety Incentive Campaigns

Project site locations created and participated in short-term incentive campaigns designed to maintain focus on safety, conduct of operations, electrical incidents, and environmental compromises. These campaigns used safety topics, daily plan-of-the-day meeting information, and pre-evolution meeting information to continue to reinforce the positive behavior during the

conduct of work. Employees were recognized by their project's senior management and the S&H Management staff for these achievements with a small safety token and a celebration.

Refocus Safety Meetings

After each holiday, WCH provided a special safety refocus presentation to all WCH employees and subcontractors. These briefings used topical areas of concern depending upon the time of year, encouraged employees to look for changed conditions, and to put their minds back on safety as their first action upon returning to work. These presentations set the stage for a safe start after the holidays and provide the necessary reminder that the safety of the workers is the first concern and value for WCH.

Topics reviewed in the fiscal year 2012 refocus presentations included:

- Post-Winter Holiday Refocus highlighted work control, changing conditions, vehicle safety and watching out for fellow co-workers.
- President's Day refocus concentrated on ensuring that employees were ready for the tasks at hand and fit for duty. Employees were encouraged to look at what had changed from the last shift worked and ensure that they had the correct tools and additional hazards identified were analyzed and controlled.
- Memorial Day Refocus presentation highlighted fitness for duty and health and wellness concentrating on ensuring that personnel were hydrated and understood the signs of heat stress.
- July 4th Refocus highlighted fall protection issues and work control to ensure that work documents contained the necessary hazard analysis and controls to safely perform the work.
- Summer refocus included a highlight of fall protection and confined spaces with special emphasis on ladders and scaffolding. Inspections and the need for competent personnel were communicated along with the requirements for a Fall Protection Work Permit.
- Labor Day Safety Refocus with topics including human behaviors, workplace hazards and your surroundings, changes to the work packages and ensuring fitness for duty.

- Thanksgiving Day Refocus referenced precautions for changing conditions after a long holiday break. Hazard analysis was emphasized as site conditions may have changed requiring additional analysis to be performed.
- Holiday Pre-Focus was provided for employees on the topic of stress and how to deal with work pressures along with the holiday season. Distractions are common during this time of year and to ensure that the time before the holiday was as safe as possible, employees reviewed mechanisms and techniques to remove stress from both work and home.

These presentations have been provided to other DOE contractors both on the Hanford Site and across the complex as helpful, useful safety tools via the Hanford Site Champions VPP web site.

Safety Communication

To provide a timely and consistent method of communication, WCH initiated the Safety Roundup. This communication for both Safety and Quality-related issues is collected on a weekly basis and provides a timely and consistent message to project employees and enables project employees to receive the weekly safety information in one convenient and consolidated location. This communication tool is provided to all staff on the Thursday of each week for use in the Monday plan-of-the-day meetings. The Safety Roundup communication includes: Medical/Vehicle Incidents, Hot Topics, Safety Events, Safety Topics, General Safety Information, Safety Awareness, Surveillances/Assessments, Upcoming Events, and Safety Bulletins (e.g., Take 5, This Week in Safety, SHIP information, Do It Right the First Time – safety topic information, Corrective Actions, and Lessons Learned).

In 2012 WCH maintained the issuance of the Rude



Awakenings, which are non-project-related incidents across the globe that offer lessons learned on the prevention of serious incidents. These publications prompt employees to identify information on how to prevent similar incidents from happening at their work location.

An assessment of the WCH Integrated Work Control program using the URS work control standard was launched in December 2011 and continued through the beginning of 2012 to provide continuous improvement in disciplined operations and ensures that this standard is effectively implemented into the RCCC work practices. In support of this effort, WCH re-implemented the Safety Ownership Program designed to focus on disciplined operations with employees owning the program. Tenets for this program included “Follow the Instructions,” “Ask the Questions,” “Fix It Now,” and “Own the Result.” Mentors and coaches for this program were implemented in the field and office locations as a result of self-assessments and to continuously improve work control for WCH and subcontractors.

Vehicle Safety Initiative



Since 2010, WCH maintained a focus on vehicle incidents. Awareness information via the Safety Roundup was provided to all employees along with Flash notices when an incident occurred involving a WCH or government-owned or leased vehicle. These incidents were also reviewed with the field safety representatives, the S&H Manager, and the ESH&QA Director. Improvement actions were flowed out to the project locations with lessons learned and reminders provided to employees at plan-of-the-day and Pre-Evaluation meetings.

While efforts continued in FY12, WCH still experienced numerous vehicle incidents. Because of the continuation of these incidents, WCH has maintained the 360 magnet campaign in all project locations. Additional improvement actions were implemented in 2012 to include parking lot safety with speed signs installed at the staff office building and at the ERDF location. This small investment demonstrated a marked decrease in speed issues and near miss incidents that were observed prior to the installation of the

Taking Safety to the Next Level

FOCUS ON THE FUNDAMENTALS
#1 Automobile and Truck Safety

Actions
Distracted Driving is a Major Hazard!
To get to the next level we ALL need to be involved. If you observe positive actions regarding automobile and truck safety, have a conversation with the person doing the act. If you see acts that could be improved, have that conversation as well.

What is Distracted Driving?
1. Visual: Taking your eyes off of the road
2. Manual: Taking your hands off of the wheel
3. Cognitive: Taking your mind off of what you are doing

While Operating ANY moving vehicle:

Should:

- Conduct 360° walks
- Wear seatbelts
- Follow all laws
- Drive courteously
- Drive defensively
- Plan your route
- Concentrate only on driving

1. Positive Action (who and what): _____

2. Areas for improvement (what): _____



Should NOT:

- Use a cell phone
- Eat or drink
- Talk to passengers
- Groom yourself (or others)
- Read, including maps
- Use a PDA or navigation system
- Watch a video (if happens)

Person completing form: _____ Name: _____
Supervisor: _____ Supervisor: _____
Location: _____ Location: _____

Turn this in to ANY LSIT Chair

speed signs. Employees offered that the speed signs provided consistent behavioral reinforcement for adhering to speed limits and triggered awareness information provided by supervision to be aware when driving and walking in parking areas and traffic patterns. This enhancement provided a 35% reduction in the number of vehicle incidents from the previous year.

LSIT Recognition Initiative

Employees involved in their LSIT wanted a mechanism for employees to recognize fellow employees for safe acts and behaviors. In response the LSIT launched the Focus on the Fundamentals awareness campaigns. LSIT members looked at both behaviors and acts with focus areas provided to each team member. The focus areas are an “A” to “Z” set of topics that provide timely and consistent information to all project employees. These activities, issued bi-weekly, offered employees the opportunity to review their personal work areas and implement the improvement actions suggested on the activity. While not a mandatory activity, the LSITs encouraged employee participation by reviewing the completed activities and recognizing those employees in the plan-of-the-day meetings with specific recognition for employees who recognized and implemented improvement actions through LSIT spot awards.

H. WORK SITE ANALYSIS

The emphasis on work control, hazard analysis and planning has continued to improve within WCH. While improvements are consistently on-going, WCH attributes the success in maintaining a high level of employee safety due to the rigor and attention provided to the activity level hazard analysis and the establishment of appropriate controls based upon the hazards identified. Employees are expected and encouraged on a daily basis to identify and analyze previously unidentified hazards and ensure that all the necessary controls are in place PRIOR to starting work and confirming that all the necessary tools and trained personnel are in place. Confirmation of specific activity level hazard analysis and effective controls was confirmed during the DOE VPP re-certification in June 2012 for VPP Star status. The onsite review team stated that WCH was the only site that effectively conducted an effective hazard analysis and demonstrated controls based upon the analysis results.



A review was conducted with an independent URS, CH2MHill, and Bechtel review team to review the effectiveness of corrective actions identified in the CAP following the fall event relative to hazard analysis and effectiveness of controls and improvements made since the incident. This review included CRADs developed specifically against the CAP items. The reviewed included Record Reviews, Interviews, and field observations. Operations, Engineering, Safety, Management personnel, and workforce personnel were part of the interview process. WCH procedures, work packages, Job Hazard Analyses, Fall Hazard Prevention Analyses, assessment schedules, training records, and Pre-Job and Pre-Ev documentation were reviewed. Internal assessments were conducted by WCH prior to this effectiveness review using the CRADS outlined in the 2011 URS Corporation Work Planning and Control Standard. A follow-up review was conducted by WCH in October 2012 to address the questions raised by DOE-RL on the effectiveness of the WCH fall protection program and oversight of site activities. Both assessments resulted in additional oversight of supervision and safety professionals during active field activities, increased rigor in work planning prior to issuance of work packages, and refined guidance and expectations for focused surveillances and assessment. The need for an internal dedicated focused team to review trending issues and/or those items identified as needing improvement. This team was established by WCH in the fall of 2012 and has been included in the FY13 POMCs as a tool to conduct focused and critical topic reviews throughout the fiscal year.

Overall results of the assessment confirmed that WCH has a functioning work control and planning processes using the established IWCP process, (PAS-2-1.1). Improvements have been made in this process as WCH continues to improve and ensure that safety is fully integrated into the work planning and control process. RCC employees were given specific site briefings to go over the improvements and changes to the program in the summer of 2012. Specific improvements included:

- Addition of the SME list for review and analysis of work documents with criteria for individuals who are designated as required reviewers.
- Training and work scheduling requirements prior to issuance of work documents were established and clarified.

- Direction was provided for the Work Package revision process.
- Field changes to Work Packages and Stop Work process steps were outlined in unique sections of the procedure.
- The term “Emergency Work” was changed to “Urgent Work.”
- Technical Procedures are now required to be developed by a qualified Work Control Planner.

The Job Hazard Analysis (JHA) process in place is part of the Integrated Work Control Program (IWCP) Procedure, PAS-2-1.1. When a qualified work planner prepares a work control document, he or she will develop a JHA based on the process identified in the IWCP, Section 6.2 Job Hazard Analysis. This process was incorporated into the work control procedure in addition to preventative maintenance. Clarification was provided to the JHA walk-down expectations with a set of criteria established for routine work. Pre-ev meetings are also required for Type 1 Work Packages, PM Packages, Craft Work Packages and Continuous Use Tech Procedures. This procedure was extensively revised to reflect the work control improvements identified during the internal and corporate assessments, with training and work scheduling requirements added to the procedure, along with direction for the Work Package revision process. Field changes to Work Packages and Stop Work were given their own sections and Emergency Work was changed to Urgent Work. Criteria has been established by Attachment 5, for when a SMRT evaluation is required and Attachment 4, is a list of SMEs for when they are required to concur with changes to Work Control Documents and/or be chosen members of the Planning Team. The Technical Procedure section has been simplified and Technical Procedures are now required to be developed by a qualified Work Control Planner.

The planner has the responsibility of developing the work control document with the input from the affected parties conducting the work. The JHA is reviewed by Safety, IH, Rad Con, craft representatives conducting the work, engineering (as needed), 1st line supervision, and project supervision (as needed depending upon the scope of the work). Project personnel use the existing Health and Safety Plans (HASPs) for each work area as well as the Hazard Identification Document (HIM), WCH-289, WCH SH-1-3.5, and the S&H procedure manual for applicable requirements.

Personnel involved with a job site walk down include Project Safety Representative, Planner, Affected worker craft representative, supervisor (1st line). Depending on the scope of the work and hazards, IH, Rad Con, and engineering may attend the job site walk down.

Work control document and specifically JHAs are broken into steps that identify known and potential hazards and are supported by a number of mitigation steps. Another analysis process includes the Radiological Work Permit (RWP). This analysis process identifies radiological hazards and applies As Low As Reasonably Achievable (ALARA) criteria for prevention of the spread of contamination and employee contamination. Additional analysis is performed via the Fall Protection Work Permit (FPWP), which is required when any worker could be potentially be exposed to a fall hazard. The WCH program was used as the model for the Hanford sitewide program where WCH is actively involved in the clarification and continued implementation of the program. The IWCP process improved the rigor of the analysis phase by outlining the required personnel for each type of review based upon the known and perceived hazards.

Provided is the improvement to the work control process outlining the list of SMEs to be used for a specific work package action. The selection chart was implemented to ensure that the necessary personnel are involved in the development of the work control documents (work packages and Job Hazard Analyses). Members are selected based on the criteria in this table. All original reviewers are not required to concur with changes; selection is based on the impacts of the change.

Discipline	When Required
Craft Personnel	Always for original the WP/JHA.
Design Authority/ Systems Engineer	<p>Modification, periodic maintenance, or corrective maintenance performed on any Configuration Managed Structure, System or Component (CM SSC).</p> <p>When a like-for-like replacement is proposed.</p> <p>Modification to processes that impact the design of that process (flow, temperature, pressure, configuration, etc.) on any CM SSC.</p>

Discipline	When Required
	The WP/JHA will direct operating systems or components be operated in a manner not addressed or contrary to approved operating procedures.
Electric Utilities	Work affecting the electric distribution system greater than 600V.
Engineering	Activities where engineering support (e.g., engineered items, analysis, etc.) is needed for completion of the task.
Environmental Protection	<p>All work where the work activity involves implementation of environmental controls or requires limitations/concurrence of the work scope, such as work:</p> <ul style="list-style-type: none"> • Performed under CERCLA authority; • Requiring an environmental permit or other authorization; • Involving modifications, repair, or maintenance of a facility or structure that has an environmental permit or license; • Requiring implementation of controls to prevent or minimize release of hazardous substances or regulated materials; • Requiring procurement of environmentally preferred products; • Requiring cultural and/or ecological reviews and/or the implementation of controls related to those reviews; • Implementing regulatory requirements associated with environmental regulation, agreement or permit/license (PCB management, Asbestos, UIC, USTs, RCRA Treatment/storage, Liquid discharge, environmental sampling, etc.); or • Requiring an excavation permit. • Items that may result in generation of liquid effluents, air emissions, generation of regulated waste, or require work on regulated features of a permitted or licensed air emission unit.
Field Work Supervisor	<p>Always for changes to the WP/JHA.</p> <p>Always for original the WP/JHA.</p>

Discipline	When Required
Fire Protection Engineer or Hanford Fire Marshal	<p>Work affecting fire protection systems or processes, including those that are credited in the DSA.</p> <p>Work requiring Hanford Fire Marshal permits per MSC-RD-8589, Hanford Fire Marshal Permits.</p> <p>All modifications.</p> <p>All D&D work, until determined unnecessary for a specific project or building by the FPE.</p> <p>Work affecting building occupancy classification, or impacting Life Safety Code characteristics, per MSC-RD-9717, Fire Prevention for Construction/ Occupancy/Demolition Activities.</p>
Hoisting and Rigging	Work involving hoisting and rigging activities defined as “critical lift”, by the Hanford Site Hoisting and Rigging Manual (DOE-RL-92-36).
Nuclear Safety/ Safety Analysis	Work affecting safety systems or processes credited in the DSA, including fire protection.
Industrial Hygiene	Work with the potential to contain hazardous energy, hazardous substances, or other occupational/industrial hazards (other than radiological hazards).
Project Safety Rep.	<p>Always for changes to the WP/JHA.</p> <p>Always for original the WP/JHA.</p>
Quality Assurance	Work affecting Safety Class/Safety Significant systems’ primary functions.

Discipline	When Required
	<p>Work affecting or per regulatory permits.</p> <p>Work where QA Hold Points or inspections are required.</p> <p>Work on Type A or higher packaging (Transportation & Packaging) other than routine preventive maintenance.</p>
RadCon	Work potentially containing Radiological Hazards
Responsible Manager	<p>Always – for all work documents.</p> <p>Always – for changes to the WP/JHA.</p>
USQ Screener/ Evaluator	<p>Work at hazard category 2 or 3 nuclear facilities.</p> <p>Work adjacent to a hazard category 2 or 3 nuclear facility.</p> <p>Work activities in Less than Hazard Category 3 facilities that have been identified in a Final Hazard Categorization evaluation as having the potential to change the form or distribution of material to place the facility into Hazard Category 3.</p> <p>Work related to Transportation & Packaging that involves > A2 quantities of radioactive material.</p>
Waste Services Lead/Waste Transportation Specialist	Work involves storage, transportation or disposal of waste.
Work Control Planner	<p>Always for changes to the WP/JHA.</p> <p>Always for original the WP/JHA.</p>

The approval process for a work control document is through the planners, the affected craft discipline, the safety personnel (safety, IH, Rad), engineering if applicable, and the project manager for that work. The review of the work control documents and JHA are conducted at the Plan of the Day and in detail at the Pre-Ev meetings prior to conducting work. The affected workers, supervision, and safety personnel are present during this meeting to address concerns, provide clarification, and make adjustments, additions, and changes as necessary.

As a confirmation of the aggressive and effective hazard analysis process, the DOE VPP Headquarters team confirmed during the VPP re-assessment for star in June 2012 that WCH and its subcontractors understand and effectively analyze the hazards and place the necessary and adequate controls in place based upon the hazards. The analysis is understood and known by both supervision and the employees with an awareness of the controls, limitations of PPE, and the rationale for the controls based upon the hazards identified. WCH is unique in that this is the first time that the DOE VPP HQ team has ever verified that a contractor effectively analyzed the hazards and demonstrated the appropriate controls consistently.

I. HAZARD PREVENTION AND CONTROL

The IWCP implements the portion of Integrated Safety Management (ISM) for the planning and performance of work at the activity level. The IWCP is applicable to all work activities managed and performed by WCH and its subcontractors and is flowed down to subcontractors in accordance with subcontract terms and conditions as required by subcontract documents. (For subcontracted work, the IWCP key roles may be filled by WCH or subcontractor personnel, as specified in subcontract documents.) IWCP is not applicable to work performed by Other Hanford Contractors (OHCs), such as MSA or PNNL, that utilize their own DOE approved work control programs. Work performed by OHCs for WCH should be approved and authorized by WCH Management.

Work packages identify the necessary controls for the work place hazards with the majority of the controls implemented through overarching Hazard Control Documents, such as Health and Safety Plan (HASP) or Hazard Identification and Mitigation document (HIM). Signs, placards, barricades, PPE, and boundaries provide additional information and protection for employees conducting work in and around the areas in the control of WCH.

Field work supervisors (FWSs) are instructed to implement the Observational Approach methodology in instances where the nature of the work is prone to unknowns and hazards are not readily apparent (e.g., Burial Ground Remediation). During work activities, personnel are directed to stop work if:

- Additional work or work scope not identified in the procedure needs to be performed
- A procedure step cannot be performed as written (including sequence)
- Following the procedure will create an unsafe or noncompliant condition
- An unexpected hazard or condition is encountered or hazard controls are determined to be inadequate.

For a stop work, workers shall:

- Not attempt to remedy changed conditions or fix problems beyond the minimum required to place the component, system, or work area in a stable and safe condition and stop work.
- Immediately notify the FWS/Manager.

The FWSs or Manager shall document with management the stop work and make appropriate notifications. The STR is notified of all subcontract stop work actions. To restart work the following actions are conducted:

- The Manager notifies (as appropriate) SMEs, managers, and their director to help assess new hazards and/or changed conditions.
- The Manager and (as appropriate) SMEs, managers, and director determine measures necessary to safely restart work.
- The FWSs and/or Manager will initiate appropriate changes to procedures and/or work areas to resolve the issue(s). Subcontractors will coordinate all such changes through the STR.

Hazard controls identified during the hazard analysis are required to be incorporated into the work instructions, making them user friendly to the FWS. The WCH hazard analysis process is performed in real time by a contingent made up of Planners, First line Supervisors, Project

Safety Representatives, appropriate craft, and SMEs. The process does not rely on automated systems but rather takes advantage of the synergistic group dynamic of performing the analysis real time, collectively. This provides for the most thorough hazards analysis possible.

In conjunction with the program improvements, WCH initiated a Maintenance of Disciplined Operations (MODO) Improvement Plan outlining the improvement areas self-identified during internal assessments and recommendations identified by DOE-RL. Results of the assessments and reviews identified continued opportunities in work control and disciplined operations. Document review and field observations by the DOE indicated that WCH could add additional rigor in the development, review, and close out of work packages. Work execution was also identified as needing additional attention to detail with minor incidents occurring. Issues identified inattention to detail, lack of focus, and consistent disciplined operations.

In response, functional project locations developed individual improvement plans and briefings to address site-specific actions needed to improve disciplined operations at their site location. Focused inspection checklists were also developed as additional tools for both supervision and employees to add rigor to disciplined operations and overall safety and health of project activities. Both the improvement plans/briefings and the focused inspection checklists are a continuing initiative in 2013.

J. HEALTH AND SAFETY TRAINING

To keep sharp on requirements and ensure that personnel are qualified and feel comfortable in conducting their work tasks, WCH has instilled a rigorous training program. Training is verified prior to performing work and is updated, as necessary, to maintain certifications and qualifications.

WCH has gone above and beyond what is required in training personnel by offering the STS program. As of December 2011, WCH has 167 active personnel in the STS program. This voluntary certification provides employees with information involving Occupational Safety and Health Administration (OSHA) Safety and Health Regulations for Construction in 29 CFR 1926, "Safety and Health Regulations for Construction," and other construction safety practices. As

part of the preparation for the STS certification, WCH offered an OSHA 29 CFR 1926 10-hour course to enhance employees' safety knowledge.

Cross training and S&H professional development is critical in order to support the closure of the WCH contract. As progress continues and sites are completed, the S&H staff will be reduced accordingly which necessitates the need for remaining staff to be able to accomplish many functions. In response to this reality, WCH S&H enlisted offsite and onsite training to assist in expanding the knowledge base of current personnel. Training was provided at the WCH facilities or in the Tri-Cities to allow for numerous personnel to attend this training. Onsite training also reduced the overall cost to WCH by eliminating the travel expenses for this training. Additionally, WCH provided this training, as space was available, to other Hanford Site contractors, allowing for additional cost savings to DOE. WCH is leading the Hanford Site in bringing in training to not only improve RCCC staff skills but others within our business as well.

Training provided included:

- OSHA Recordkeeping
- Safety Trained Supervisor-Hanford Site
- ASP/CSP prep training
- Mine Safety Appliance Fall Protection Training
- STS training at the National Voluntary Protection Program Participants' Association (VPPPA) Conference.

K. AWARDS AND RECOGNITION

- 1 Million Safe Hours April 2012
- WCH elected to the Region X BOD May 2012
- DOE VPP Re-Certification June 2012
- 2 Million Safe Hours September 2012