

APPROVAL PAGE

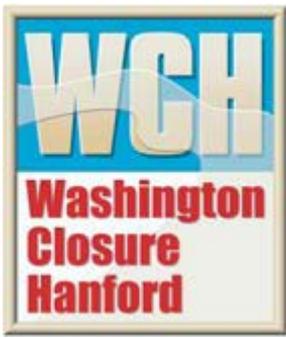
Title: Voluntary Protection Program Annual Report Calendar Year 2013

Company: Washington Closure Hanford LLC.

Approval: Doug Hiebert, Safety & Health Manager


Signature

2/13/14
Date



Department of Energy
Washington Closure Hanford LLC
River Corridor Closure Contract
Voluntary Protection Program Annual Report
Calendar Year 2013

A. SUMMARY

Company:

- Washington Closure Hanford, LLC.
- **1,120** employees
- **2,329,588** total man hours for 2013

NAICS Code/Bureau of Labor Statistics Incident Rates

- 56291-Remediation Services / Total Recordable Case Rates (TRCR): 5.4 / Days Away, Restricted, or Transferred (DART): 3.4 AVERAGE FOR 2012

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

- **TRCR: 0.51** with 6 recordable incidents
- **DART: 0.00** with 0 Days Away/Restricted Cases

STATISTICAL COMPARISON		
WCH 3 Yr. Ave TRCR: 0.30	NAICS code of 5.3	68% below the DOE 3 Year Average of 0.94
WCH 3 Yr. Ave. DART: 0.04	NAICS code of 3.4	90% below the DOE 3 Year Average of 0.4

MENTORING/OUTREACH

As a way to incorporate new and innovative ideas for the Safety and Health (S&H) program, Washington Closure Hanford, LLC (WCH) is aggressive in providing outreach and mentoring to other companies in both private industry and the U.S. Department of Energy (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.

- Attended and presented at the National Voluntary Protection Program Participants' Association (VPPPA) conference in Nashville.
- Attended and presented at the Region X VPPPA annual conference with topics including Employee Involvement and Safety Trained Supervisor.
- WCH employee member of the Region X VPPPA Board of Directors as a Director at Large.
- WCH employee maintains position on the VPP National Board of Directors as the Representative from a DOE-Voluntary Protection Program (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 presentations to personnel across the country in response to the employee involvement presentation provided at the National VPPPA conference.
- Provided support to Waste Treatment Plant in preparations for their DOE VPP assessment.
- 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 safety initiatives, recognition awards, and presentations the Hanford Site-wide VPP Champions group and posted items via the Hanford VPP web site.

- Provided VPP Update Webcast for URS Corporation.

B. CONTINUOUS IMPROVEMENT

1. ACCOMPLISHMENTS/BEST PRACTICES

The success of any S&H program is evident in the culture exhibited by employees who are responsible for and accountable to the program. As the 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 also at home.

The evidence of a positive safety culture and the team approach was confirmed in a DOE, Richland Operations Office (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.

Nationally, WCH was recognized by the VPPPA with the VPP Outreach Award. This award was provided to WCH at the National VPPPA conference in August 2013 along with the other Hanford Site contractors for outstanding outreach and mentoring to Hanford employees as well



as general industry sites across the country. WCH also received the DOE VPP Legacy of Stars award for earning the DOE VPP Star of Excellence for four consecutive years.

2. INTEGRATED SAFETY MANAGEMENT (ISMS)/VOLUNTARY PROTECTION PROGRAM 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 River Corridor Closure 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 flow down 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 WCH throughout fiscal year 2013 (FY 2013).

Current work scope for the RCC includes:

Field Remediation:

- **300 Area (Field Remediation/Deactivation, Decontamination, Decommissioning, and Demolition (D4) combo)** – Work continues on 309 and 340. Continue min-safe operations in 324. Remediation continues on waste sites and piping.
- **100-B/C** - Backfill continues at 100-C-7:1.
- **100-D** – Continued remediation with possible expansion at two waste sites.
- **100-H** – Remediation continues on several sites.
- **100-K** – Re-vegetation is in progress at K orphan sites.
- **100-N** - Remediation continues on several sites.
- **618-10 Trench Remediation** - Continued excavation and sorting of trench area, load out and drum characterization & handling activities.
- **100-IU-2/6** – Remediation continues on two waste sites along with backfill.

Deactivation, Decontamination, Decommissioning, and Demolition:

- **100-N** - Removal of 181-N anchor blocks (last D4 scope at N Reactor)
- **100-B** - 183 B Clearwells (last D4 scope at B Reactor).

ISMS Description Document

The WCH-4, *Integrated Safety and Management System Description (ISMSD)*, was evaluated against DOE G 450.4-1C, *Integrated Safety Management System Guide*, to determine whether it meets the intent of the revised Guide and to evaluate the extent of changes made since the last

determination of effectiveness. The document review focused on those sections that have the greatest potential for changing and would exhibit the greatest risk in FY 2014 including:

- Section 10.0, Contractor Assurance System
- Section 11.0, Performance Objectives
- Appendix H, Worker Safety and Health Program Plan (10 *Code of Federal Regulations* (CFR) 851).

Updates to the ISMS criteria are reflected within WCH-4 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. The description outlines the reasons for each revision, the date of the revision, and the revision initiator.

WCH has reviewed the ISMS Description Document and confirms that the information contained accurately reflects the WCH Integrated Safety Management System. Updates to WCH-4:

July 2013

- Revised the document to reflect correct DOE orders.

October 2012

- Review of the 1S014001 (2004E) standard for EMS, 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 through 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 Site-wide programs.
- Incorporated Hanford Site-Wide Procedures
 - DOE-0346, Hanford Site Fall Protection Program
 - DOE-0360, Hanford Site Confined Space Procedure.

September 2010

- Updated the POMCs, ISMS Performance Indicators, and integrated the FY 2011 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 Site-wide Procedures
 - DOE-0343, Stop Work
 - DOE-0342, Chronic Beryllium Disease Prevention Program (CBDPP)
 - DOE-0344, Hanford Site Excavation, Trenching and Shoring.

September 2009

- Updated EMS
- EMS description to reflect ISO 14000 and DOE O 450.1A, *Environmental Protection Program*, requirements.
- Updated the POMCs, ISMS Performance Indicators, and integrated the FY 2010 SHIP.

- Clarified the Integrated Work Control Program (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 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; Environment, Safety, Health and Quality (ESH&Q); and Training.
- Updated the POMCs, ISMS Performance Indicators, and integrated the FY 2009 SHIP
- 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 descriptions.
- Revision of WCH Organizational Chart – Figure 1-7 and organizational descriptions.
- Consolidation of five WCH projects into three (D4/Interim Safe Storage), Waste Operations, Field Remediation).
- Update Appendix I (ISMS Requirements Implementation Matrix)

ISMS Assessment Results

A critical self-assessment of the Integrated Safety Management System program was conducted to ensure the continued improvement of the overall WCH safety system. Opportunities for Improvement were identified with status of the actions and results provided below.

Worker Safety and Health Program

The Worker Safety and Health Program Plan for WCH and WCH Subcontractors can be found in WCH-4, Appendices H and J, respectively. Review of the documents found them to be in compliance with 10 CFR 851. In terms of field implementation of the program in FY 2013, a review of the surveillances, Self-, management, and independent assessments (including Corporate and Performance Oversight and Evaluation Team [POET]), the issues management system, and DOE surveillances identified the following areas warranting attention:

- Fire Protection (DOE Surveillance)
- Implementation of the Lock Out/Tag Out Committee (POET)
- General recognition of industrial hazards in the workplace; hazards identification and mitigation as part of the Integrated Work Control Program (POET)
- Ensuring exposure assessments are accurately written (Corporate).

Specific issues associated with these topical areas were documented, in most cases, in the formal issues management system and corrective actions have been or are currently being implemented. Additional oversight activities that are ongoing for continuous improvement of the Safety and Health program, including Industrial Hygiene, are Corporate/Independent Assessments, Management Walk-Throughs, Surveillances, and Self-Assessments.

Contractor Assurance System

WCH has a vigorous and robust contractor assurance program that enables the self-critical identification of emerging trends and occurrences. The established safety culture at WCH has reduced the severity of events and continues to improve the overall safety system and the involvement of the employees.

Event Reporting:

Event reporting within WCH is conducted in accordance with:

- SEM-3, *Incident Response and Investigation*, SEM-3-1.2, “Occurrence Categorization and Reporting”
- SEM-3-2.2, “Event Management.”

The majority of incidents are managed under SEM-3-2.2 which includes fact findings, accident investigations, and general reporting of incidents and injuries. WCH has continued to improve the event reporting process in the areas of timeliness of the reporting incidents (categorization), adequacy of the reports and corrective actions, and overall reporting of events. WCH initiated an Occurrence Reporting Improvement Plan as documented in Issue Form (IF)-2012-0720 with the following improvements implemented within 2013:

- Defined expectations and roles and responsibilities for conservative reporting and categorization of events and fact finding meetings
- Revised and institutionalized the process used to ensure required attributes are addressed in Occurrence Reporting and Processing System (ORPS) reports
- Performed in-process reviews of occurrence reports to ensure they meet client expectations
- Re-aligned the existing occurrence report metric and create an additional metric that measures the quality of completed report products
- Re-institutionalized a control measure to ensure IFs and ORPS have a 1:1 correlation

Performance Analysis Metrics:

A review of the Performance Analysis process identified a number of improvements that have been implemented over the past year. As a result of this review the Performance Analysis process was revised to be more quantitative vs. qualitative regarding the evaluation of data. Additional improvements were made to the Performance Analysis process including a revision to the procedure transitioning from a single trend analysis process to one that is a detailed performance analysis process. The procedure revision also included clarification of definitions,

clear roles and responsibilities, and defined reporting for Contractor Assurance. The change was well received by the client and is continuing to be monitored. Benchmarking was conducted with other Hanford contractors and URS affiliates to determine what metrics are available and used to monitor project-wide/cross-cutting metrics. Benchmarking efforts resulted in the coordination of periodic meetings with other Hanford Site Performance Assurance Managers. In addition, two metrics were developed to measure the quality of completed cause analysis reports and monitor project-wide issues.

The 2013 POET reviews evaluated the effectiveness of the Performance Assurance function, including trending as part of continuous improvement. In several of the POET reviews issues were identified relating to strengthening the trend codes and formal structuring of the process. These issues were formally documented in the issues management system and improvement in performance is continuing to be exhibited by the Project.

Issues Evaluation and Reporting:

The issues evaluation and reporting system includes not only the documentation of issues, but also the screening, analysis, and generation of corrective actions associated with internally and externally-identified issues. This program is very aggressive in self-identification of issues and trends with improvement actions tracked and trended and validated through quarterly POET reviews. Improvement actions were completed to improve performance of personnel in the evaluation and reporting of issues. A summary of these actions, which support continuous improvement include the following:

- Corrective Action Management procedure, QA-1, *Quality Assurance*, QA-1-1.2, “Corrective Action Management,” was revised to streamline the issue form process, including closure and objective evidence based on level of significance
- Development and communication of a User’s Guide that describes how to conduct cause analysis with examples of how the expectations for cause analysis, extent of condition, and corrective actions are implemented
- Designation of individuals within each Project/Function to perform functions in the Corrective Action Management (CAM) System

- Revision of the issue form to be more use-friendly when submitting an issue
- Communication management expectations for Screen Out/Trend only IFs
- Creation of a User's Guide for Administrative Closure of IFs.

These actions were in addition to any issues identified related to the corrective action management system in the POET reviews.

Assessment Program:

The assessment program includes independent assessments, management assessments, self-assessments, management walkthroughs, and subcontractor oversight. The assessment program was enhanced with the addition of the POET reviews which conduct a cross cutting review of emerging issues and trends. 2013 focused on quality assessments reducing the number performed in favor of focused evaluations including management and subject matter experts on each review to provide the critical look needed to achieve improvements and confirm program and process implementation. A review of the Integrated Assessment schedule identified a total of six Independent Assessments conducted during FY 2013. These assessments included the following:

- Corporate Review on Work Planning and Control
- Safeguards and Security – Biennial
- POET on D4, Field Remediation, Waste Operations, and Performance Improvement Initiatives.

Topical areas for POET reviews included:

- Nuclear Safety
- Occupational/Industrial Safety
- Radiological Controls
- Operations/Maintenance

- Work Control/Conduct of Work
- Quality Assurance
- Training and Qualifications
- Environmental Management System
- Engineering
- Management Systems
- Performance Assurance
- Safety Culture (POET Review of Improvement Initiatives only).

The Corporate Work Planning and Control assessment was specifically organized by the ISMS core functions. Results of the review were positive with program implementation verified. Other improvement items were identified and will be reviewed as part of the POET conducted by WCH in February 2014. This review will consist of a senior, independent review team designed to improve the conduct of operations and compliance with nuclear and safety requirements for all WCH projects and programs.

Management Assessments (MAs) were performed within the ESH&Q Department and Field Remediation. Additionally, numerous self-assessments and surveillances were performed by all Projects and Functions. A review of a random number of self-assessments and surveillances found them to be broad-based and addressing ISMS topic areas.

The Management Walk-Through (MWT) process was thoroughly evaluated as part of the POET reviews. Results of the reviews found that several hundred MWTs were completed in FY 2013 with the process being used promoting continuous improvement. The POET reviews identified an area needing improvement in the MWT process with the generation of issue forms when deficiencies are identified. This particular issue was documented in the formal issues management system and corrective actions are ongoing.

Worker Feedback:

Per WCH-4 there are a number of mechanisms credited for fulfilling the Worker Feedback element of ISMS. These mechanisms include: Employee Concerns, Integrated Work Control Process, Safety Meetings, Event Management, and the Local Safety Improvement Teams (LSIT).

The LSIT continued to be successful in FY 2013 with the launch of two safety campaigns, the *360 Walk Around Campaign* which targets vehicle safety, and the *Behavior Accident Risk Reduction (BARR) Program* which promotes personnel to be more observant of safety issues. It is a behavior-based program based on the premise of no name-no blame observations. Both programs were well accepted by the workforce and are viewed as being successful in raising the level of worker participation and feedback at the workplace. An additional program was launched within the Safety Department, *Focus on Fundamentals*, to heighten the awareness of hazard identification, mitigation, and reporting. All three of these safety programs are ongoing at the time of this assessment. Employee/Worker Participation was also evaluated as part of the POET review in July 2013. Results of the POET review found that WCH employees expressed a uniform and consistent personal commitment to everyone's safety and their input is valued by the WCH leadership team and that worker ideas are considered in the decision-making process.

Operating Experience/Lessons Learned Program:

Evaluation of the Lessons Learned (LL) program found that it is effective with continuous improvements recommended to include a metric that tracks the number of LL generated by WCH, including by department. This improvement will be evaluated in 2014 with results documented through the WCH performance indicators.

Employee Concerns Program and Differing Professional Opinion Process

A review of the Employee Concerns Program (ECP) and Differing Professional Opinion (DPO) process was conducted as part of the POET review in July 2013. Results of the review found that the Employee Concerns Program is in the process of being transitioned to a site-wide procedure; therefore, changes to the program were not warranted at that time. In addition, an ECP metric is reviewed on a monthly basis, as part of the Performance Analysis process, to evaluate program

effectiveness. Results of the DPO review found that the process for meeting the DOE requirement for quarterly notification to employees has consistently been met.

Overall Assessment Conclusions

Results of the ISMS assessment found the WCH ISMS effective with documented areas of improvement throughout 2013. Review of both the ISMSD and Worker Safety and Health Program Plan found they were in compliance with all regulatory requirements. All of the POMCs for FY 2013 were found to be met. Improvement opportunities were identified and were entered into the formal issues management system for analysis and corrective actions. Ongoing oversight activities are continuing in FY 2014 to ensure continuous improvement.



DOE VPP Assessment Improvement Areas

The following items were identified as part of the DOE VPP HQ Star re-certification assessment. The items below were still open during 2013 with all other actions from the 2012 review closed and validated within the WCH 2012 VPP Annual Report. Provided is the status of the items that were reviewed and improved during 2013:



- Identified inconsistent signage throughout the RCC regarding site wide program safety signage (SH-1, *Safety and Health*, SH-1-3.26, “Signs, Signals, and Barricades”). An evaluation identified that a revision of the signs, signals and barricades procedure was necessary to update the signs appropriately to the site wide programs and flow down to subcontractors. IF-2012-0474

Action: This procedure was revised and issued 2013. Action Closed.

- 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: This action was added to the FY 2013 POMCs to track and trend report only (Self/No-Treat) incidents to put corrective actions, programs, develop awareness topics to prevent a more serious incident from occurring. This action was tracked through the FY 2013 POMCs with the incorporation of the Focus on the Fundamentals campaigns to raise awareness of leading indicators and behavioral actions that could be implemented by employees. This campaign was a success in achieving a higher level of awareness and engagement by the workforce and reduced the severity of the incidents that occurred in 2013 as indicated in the injury/illness rates with zero DART cases. Action Closed.

- 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, the 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, *Integrated Work Control Program*, PAS-2-1.1, "Integrated Work Control," 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 FY 2013 ISMS POMCs for the review and evaluation of hazard analysis for current scopes of work to conduct at least 3 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 started in January 2013. This action was tracked through the FY 2013 POMCs and used as a focus area in the POET reviews during 2013. Continued improvement was identified in the development and revision of work packages with improvements incorporated into work documents. This is an ongoing action.

- VPP OFI: WCH should ensure the Final Hazard Categorization for 618-10 Burial Ground is updated to reflect current operational conditions and expectations." WCH prepared 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 non-intrusive 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 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 which was approved in 2013. Action Closed.

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 corrective action management system, it is the judgment of WCH that the ISMS is effectively implemented and has systematically integrated safety into all levels of work.

VPP Application

WCH reviewed the VPP application in preparation for the three-year recertification and determine that the core ISMS processes and VPP tenets remain in effective for WCH. The document WCH-4 was reviewed and determined that no substantive revisions were completed in FY 2013.

C. GOALS AND OBJECTIVES

Goals and objectives were developed for 2013 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.

2013 SAFETY PERFORMANCE OBJECTIVES, MEASURE, AND COMMITMENTS FY 2013 RESULTS

WCH instituted a set of ESH&Q performance metrics which are analyzed and reviewed monthly in a standing meeting involving the WCH President and all Directors to include 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&Q 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 on the structure, process, and trending of the performance indicators.

There were a total of 15 POMCs for FY 2013. Table 1 contains a listing of the POMCs along with a determination as to whether the POMC was met. All POMCs were met for FY 2013.

The FY 2013 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 FY 2013 assessment schedule.
- Site Wide Program Participation and Implementation
 - Implement the currently active programs and evaluate effectiveness through scheduled assessments within the FY 2013 Integrated Assessment Schedule



- Participate in the Hanford Site-wide employee job task analysis and industrial hygiene 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 (safety conscious work environment) for WCH.

Table 1. 2013 POMC Results. (2 Pages)

Objective	Quarterly POMC	Met or Not Met?
Work Toward an Injury-Free Workplace	Injury/Illness Review – Analyze and track all first aid, recordable, and/or Dart cases.	Met. Reviews were tracked and documented.
	Injury Rate Continuous Improvement – Monitor TRC and DART 12 MMA trends and implement improvement plans if trending unfavorably	Met. There was a trend formally identified in July regarding an increase in the rates. A common cause analysis was performed and corrective actions are pending. In addition, interim corrective actions were conducted including a safety stand down in August.
	Integrated Work Control Process – conduct a systematic review of hazard analyses within work documents for each active site location for work packages open for longer than 6 months.	Met. This objective was met during execution of the POET reviews an separate work control reviews by the Projects (as documented in their assessment schedules)
	Leading Indicators – Monitor and track “report only” (self/no-treat) incidents to determine trends and implement program improvements.	Met. The incidents were informally monitored and trended by S&H on a monthly basis. In the summer of 2013 the trending of self/no-treats were transitioned to the Performance Assurance Group. An increase in their frequency was also identified as part of the common cause analysis for increased TRC.
Environmental Program Compliance	Environmental Protection index per quarter equal to 0.9/1.0 (base/stretch goal).	Met. Index was consistently reported as 0.99.
	Environmental Reportability as defined by DOE M 231.1-2, Group 5	Met. Consistently reported as zero over FY 2013.
Contractor Assurance Program	Contractor Assurance Program – Employ internal, IAs, and incorporate schedule	Met. Assessments were conducted and reported as scheduled.
Site Wide Program Participation and Implementation	Implement the Site-Wide Programs – support implementation through performance of program implementation assessments (3/4 quarter)	Met. WCH has supported implementation of the Site Wide Programs and performed assessments as required per the implementation schedules.
	Implement the Site-Wide Programs – Support development and initial implementation of the EJTA and IH Database.	Met. WCH successfully supported development and initial implementation of the

Objective	Quarterly POMC	Met or Not Met?
		EJTA and IH Database.
	Fall Protection – conduct oversight of fall protection activities through a systematic review of 1/3 (base goal) of the initiated FPWPs.	Met. Review of the FPWPs were found to have been completed.
	CBDPP – Be Phase 1 and 2 products deployed in the field with an effectiveness assessment conducted 60/90 days after declaration of completion.	Met. No new Be Phase 1 or 2 products were deployed in the field in FY 2013.
Continuous Improvement and Feedback	WCH Key Performance Indicator monthly evaluations conducted per quarter equal to 3/2 (stretch/base goal).	Met. Each month Performance Indicators were evaluated and communicated.
	Operating Experience documents issued per quarter internally equal to 40/30 (stretch/base goal).	Met. Throughout 2013 multiple means were used to communicate Operating Experience sharing of information. These publications included Lessons Learned, but also Safety Flashes, the Round Up publication, Do It Right the First Time, and Rad Happenings. A total of 109 OEs were issued.
	Safety Program Improvements – Provide employees with focused safety topics and activities that enhance the knowledge and overall awareness of Safety Culture/ISMS/VPP and Safety Topical Areas through the Focus on Fundamentals activities.	Met. Throughout the year safety program improvements were conducted via the Focus on Fundamentals campaign, a behavior-based safety campaign was initiated, and safety topics/refocuses were conducted. The Roundup Publication was published on a weekly basis until mid-August due to upcoming closure of the Project.
	Safety Culture – Evaluate the safety culture survey for WCH and develop initiatives to facility improvements in the overall safety culture for WCH – scheduled of activities developed by 05/31/13.	Met. A schedule of activities was informally transmitted to DOE-RL in May, 2013. In addition, the last POET review evaluated safety culture.

Improvements were be made throughout the year with updates documented on a quarterly basis. Incorporation of additional focus areas were added to ensure continuous improvement of the S&H program. All employees are provided the updates to the overall project goals via 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 (POD) meetings at the site locations. Other goals that are introduced throughout the year were 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.

The results of these improvements and trends identified in FY 2013 assisted WCH in creating the POMCs for FY 2014. 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 the SHIP that is updated regularly and provided to all employees. As of December 31, 2013, WCH had not received direction from DOE-RL regarding minimal POMCs that would be required in FY 2014; however, potential POMCs for FY 2014 have been included in this document and will be updated upon receipt of the guidance from DOE-RL.

Table 2. 2014 WCH POMCs Proposed.

Objective	Quarterly Measures and Commitments
Work Toward and Injury-Free Workplace	Injury/Illness Review – Track all first aid, recordable, and/or DART cases. Safety Manager and Line Management analyze significant first aid, recordable, and DART cases and document actions to preclude or mitigate similar injuries.
	Injury/Illness Review – Analyze and track TRC and DART rates. Goal is <1.1 TRC and <0.6 DART (both are 12 month rolling rate).
Exhibit Continuous Improvement in Safety Culture/Safety Conscious Work Environment	Complete corrective actions from the Discipline Operations Plan, Rev. 3 related to safety culture and the Management Control Plan
	Conduct an annual safety culture self-assessment in accordance with DOE G 450-4.1C.
Integrate Human Performance Improvement into Operational Practices	Complete HPI training and/or refresher training for Managers and Supervisors, Project Safety Representatives, Local Safety Improvement Teams (LSIT) Committee Chairs, and others designated by the Project Director.
Environmental Program Compliance	Environmental Protection Index per quarter equal to 0.9 (goal). The index is calculated based on criteria specified for compliance relative to air quality permitting, spill prevention, excavation plans, ecological/cultural plans, and sample management.
Contractor Assurance System	Include in the FY 2014 integrated assessment schedule three independent assessments that target areas for improvement (from FY 2013); one assessment per quarter. The assessments would target implementation of the LO/TO program, ORPS, and Issues Management.
	Conduct Root Cause Analyses for all designated Significant and select Adverse screened issues.

D. CONTRACTOR AND SUBCONTRACTOR INCIDENCE RATES

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

Table 3. RCC Contractor and Subcontractor Incidence Rates.

A. WCH INCIDENCE RATES					
WCH RECORDABLE CASE RATE					
Calendar Year	WCH Recordable Case Rate Includes CAIRS*	Number of Recordable Cases	Total Hours Worked	NAICS # 56291 Incident Rate 2011	DOE Average CAIRS*
2011	0.24	2	1,693,516	5.3	1.1
2012	0.26	2	1,533,150		1.0
2013	0.26	2	1,529,348		0.72
3 Year Total	N/A	6	4,756,014		N/A
3 Year Avg.	0.25	2	1,585,338		0.94
*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					
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*
2011	0.00	0	1,693,516	3.4	0.5
2012	0.26	2	1,533,150		0.4
2013	0.00	0	1,529,348		0.31
3 Year Total	N/A	2	4,756,014		N/A
3 Year Avg.	0.09	0.66	1,585,338		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			
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
2011	0.25	2	1,563,590
2012	0.00	0	1,350,015
2013	1.0	4	800,240
3 Year Total	N/A	6	3,713,845
3 Year Average	0.42	2	1,237,948
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
2011	0.00	0	1,563,590
2012	0.00	0	1,327,662
2013	0.00	0	800,240
3 Year Total	N/A	0	3,713,845
3 Year Average	0.00	0	1,237,948

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
2011	0.25	4	3,257,106
2012	0.14	2	2,883,166
2013	0.51	6	2,329,588
3 Year Total	N/A	12	8,469,860
3 Year Average	0.30	4	2,823,286
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
2011	0.00	0	3,257,106
2012	0.14	2	2,883,166
2013	0.00	0	2,329,588
3 Year Total	N/A	2	8,469,860
3 Year Average	0.04	0.67	2,823,286

STATISTICAL COMPARISON		
WCH 3 Yr. Ave TRCR: 0.30	NAICS code of 5.3	68% below the DOE 3 Year Average of 0.94
WCH 3 Yr. Ave. DART: 0.04	NAICS code of 3.4	90% below the DOE 3 Year Average of 0.40

E. 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. 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 Safety and Health Improvement Plan items were tracked, monitored, and adjusted throughout the year as necessary to improve the safety of the program and the culture.

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. Management spent time in the field coaching, mentoring, and reinforcing standards and positive behaviors. This was further reinforced through POET reviews and focused assessments conducted by senior managers who provided both leadership and lead by example during these assessments.

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.

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. Hanford Atomic Metal Trades Council (HAMTC) and Building Trades 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.

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.
- CAM 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 S&H 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 (Defense Nuclear Facilities Safety Board, Washington State, U.S. Environmental Protection Agency, 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 satisfactory 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. Management continues to flow down this information to all employees and provide these expectations to employees to allow them to be held 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. Team work is an integral part of the Conduct of Operation program, PAS-2-1.1, through the SME list outlining required employees for the review of hazards. Specific disciplines were identified as required reviewers depending upon the work scope and hazards identified within the work document.

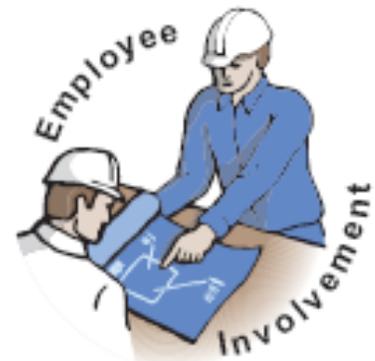
In 2013, WCH completed over 2500 Management Walkthroughs. The Management Walkthroughs are performed by Front Line Supervisors, all the way up to the Senior Leadership Team. This allows the Senior Leadership Team to spend quality time in the field engaging the workforce. WCH also completed 250 Management Assessments while increasing the number of observations in the field by encouraging, focused oversight inspections, management observations, Senior Supervisor Watch Oversights, Performance Oversight Evaluation Team reviews, and LSIT walk-through inspections. With the additional observations, both employees and management are able to team together, work to identify potential issues, and provide proactive corrective actions. Through the employee involvement process, the workplace is made safer and employees and management learn on a daily basis how to be a more active observer.

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 off-site outreach events, WCH management reinforces their commitment to safety at WCH.

F. 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. The WCH safety culture policy and implementation matrix were developed in response to the improvements identified by the DOE at the Waste Treatment Plant. The WCH safety culture policy was updated to incorporate Safety Conscious Work Environment attributes and added into the ISMS briefing. The WCH safety system allowed for the enhancement of the SCWE attributes as part of the continuous improvement of the WCH safety system allowing for employees to embrace the additions as improvements and not another training program.

Briefings were provided to all employees with specific reviews and implementation conducted by WCH senior management with the SCWE attributes incorporated into the ISMS POMCs.

Employee involvement and a positive safety culture continue to be demonstrated through ISMS and VPP activities. 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 WCH employees as the Representative from a DOE VPP site and the Director at Large for the Region X VPPPA and maintains the designation as the official mentor for the East Tennessee Technology Park and assistance to Washington River Protection Solutions and the Waste Treatment Plant within the DOE complex.

The Focus on the Fundamentals kicked off its second year in 2013. This initiative provides focused safety topics from A-Z bi-weekly to employees. The safety topics stressed safety both on the job and at home. To gain employee involvement, they provided information on topics, in alphabetical order, with a follow on section to tell the LSIT what they have been doing to improve safety. LSIT members and Project Safety Representatives review the entries and pick winners of the best safety improvements. As an incentive to maximize participation, small token safety awards are presented to employees at project meetings.

Safety Campaigns

A comprehensive safety campaign and incentive program continued in 2013. 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.

Safety Campaigns are conducted throughout the year where employees were encouraged to actively participate in the safety program and afforded an opportunity to earn a safety incentive through the following activities:

1. Spot /Individual Award (getting “caught” doing a safe act)



2. Attending and participating in Employee Safety Committee meetings
3. Giving safety share in POD/pre-evolution/staff meetings
4. Conducting Safety Toolbox talk
5. Offering safety suggestions/concerns in LSIT logbook
6. Offering safety suggestions/Lessons Learned at post-job briefing
7. Leading Stretch and Flex
8. Conducting **EXTRA** Committee/Safety Trained Supervisor walk-downs (above what is required at your site)
9. Providing feedback during PODs/Pre-Ev/staff meetings.
10. Providing information/submissions to the newsletter and/or other S&H communications.
11. Completing Focus on the Fundamental worksheets
12. Participating in BARR program
13. Conducting vehicle 360 walkarounds

Healthy Living Initiatives

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. WCH also co-sponsored and participated in the 2013 Safety Expo. The community is invited to participate in the Expo, where WCH provides safety and project information to visitors.



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 POD 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.

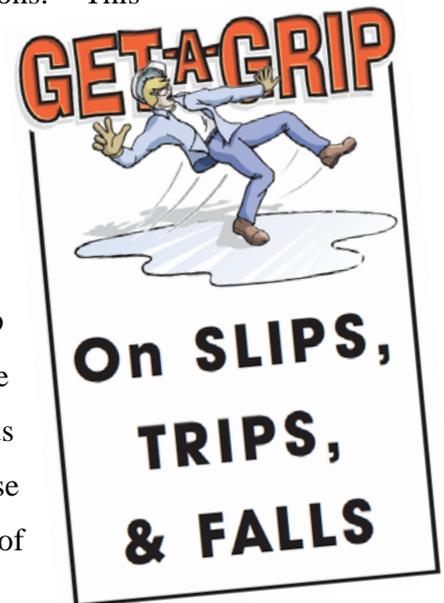
An example of a fun, effective and engaging project 90-Day safety campaign was the "SM&U Scores a Touchdown this Winter." This campaign had a football theme which is fitting because there are many similarities between football and safety. Football has rules or procedures to follow to manage risk. Team leads, like the quarterback, huddle the team before every play, or pre-job. Coaches, managers, players and employees all go over the game film, or lessons learned. This campaign was quite a success to helping guide the team to complete the period with zero incidents.



In order to ensure all employees are involved, these campaigns are extended to office and technical staff. An example of a very creative 90-Day campaign was "Meet the Fermites" conducted for employees in the Fermi Building. This safety campaign focused around the Fermite family, a family of five living in Richland, Washington. The goal of the campaign was to keep the Fermite family safe in their daily adventures and misadventures. This campaign utilized the BARR program to document unsafe acts or conditions. This campaign was extremely successful with nearly 100% of the employees participating.

Refocus Safety Meetings

Holidays are recognized as times when people lack focus on tasks at hand due to stress other work and non-work factors. In order to keep workers focused and minimize potential accidents and injuries, before and 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.

In addition to holiday distractions, all potential causes of disruption are analyzed. WCH developed a Safety Culture Management Plan for management to proactively anticipate events and implement actions to minimize disturbances at the work level.

Topics reviewed in the fiscal year 2013 refocus presentations included:

- New Year Refocus highlighted distractions, winter safety and returning from the holidays.
- President's Day Refocus combined the topics of safety, today, this week and beyond, vehicle safety, fitness for duty, and distraction and complacency.
- Sequestration Refocus combined the topics of walking/working surfaces, vehicle safety, recognizing hazards, unsafe acts, and being your brother's keeper.
- Spring Refocus highlighted ergonomics, slips/trips/falls, and hand awareness.
- Memorial Day Refocus presentation focused on what field and office personnel need to be aware of returning to work
- July 4th Refocus highlighted the BARR program and maintaining focus to changed conditions and taking extra time to review work packages, JHAs, and Task Safety Awareness cards.
- Summer refocus to address a trend of events indicating the company was at risk for a serious injury and/or significant event.
- Labor Day Safety Refocus with topics including reviewing work areas for changed conditions, safe execution of work, and planning ahead for driving in the dark, cold stress, animals on roadways, and inclement weather protection.
- Thanksgiving Refocus highlighted distractions and error preventions

In an information sharing effort, these presentations have been provided to other DOE contractors both on the Hanford Site and across the complex as helpful safety tools.

Vehicle Safety Initiative

Vehicular accidents are recognized as a major cause of worksite accidents and injuries. The Project logged 3,871,046 miles in 2013 with no incidents greater than a fender bender. To maintain an excellent vehicle safety record, throughout the year emphasis is continually placed on safe vehicle operation. For example, during April, May, and June of 2013, WCH promoted vehicle safety on a weekly basis through vehicle safety focus areas and weekly meeting briefings to minimize incidents. Awareness information via the Weekly Roundup was provided to all employees highlighting safe practices and situations to avoid. For the few minor incidents that did occur, investigations were conducted, information was shared to avoid reoccurrence and reviews were conducted with those involved, field safety representatives, the S&H Manager, and the ESH&Q Director. Improvement actions were flowed out to the project locations with lessons learned and reminders provided to employees at POD and Pre-Ev meetings.



Statistically, most workplace vehicle accidents occur when backing a vehicle or driving into a blind spot. WCH instituted new requirements to require all vehicle operators to conduct a 360 degree walk around their vehicle prior to moving it. Reminder stickers were placed on drivers' windows and bumper magnets were randomly placed on vehicles to remind and incentivize

operators to conduct the walk around inspections. Token safety awards, either a bag of low-fat popcorn or a candy bar was given to operators who found they had a magnet placed on their vehicle.

Safety Inside and Out Initiative

The Safety Inside and Out initiative was launched in 2013. This initiative focused on the use of handrails, minimizing trip hazards, and practicing good



lift techniques in the building. The initiative also focused on the parking lot safety, pedestrian right of way, and performing a 360 degree walk around of your vehicle prior to use.

Safety Communications

To provide a timely and consistent method of communication, WCH initiated the Weekly 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 bi-weekly safety information in one convenient and consolidated location. This communication tool is provided to all staff on the Thursday of every other week for use in the Monday POD meetings. The Weekly 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).



LSIT Recognition Initiative

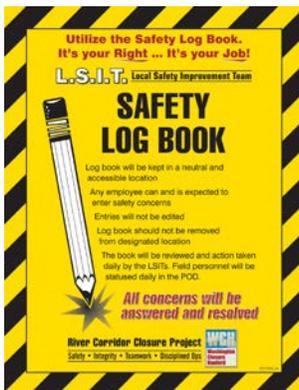
Employee involvement continued through the LSITs with the issuance of the Focus on the Fundamentals. LSIT members continued to look at both behaviors and acts with focus areas provided to each team member. These activities offer employees the opportunity to review their personal work areas and implement 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 POD meetings with specific recognition for employees who recognized and implemented improvement actions through LSIT spot awards.



In 2013, the LSIT launched the BARR program. This initiative was managed and directed by the LSITs with support/sponsorship from senior management. Two union LSIT members traveled to the Savannah River Site to baseline their Behavior Based Safety Program. They brought back ideas and enthusiasm to implement a Behavior Based Safety Program at WCH. With full management support, they developed the BARR Program and rolled it out at all projects. Training was conducted for all workers to conduct observations and reward safe behaviors and correct at risk behaviors. As a closure contract, the team was cognizant that Behavioral Based Safety Programs often require 3 to 5 years to get established. The team focused on the safety culture already ingrained in the workforce, for everyone to watch out for their coworkers' safety. They developed the moniker of "If You See Something, Say Something" and instituted a tracking card to allow for statistics and improvements. During the first quarter of the program, 126 cards were completed denoting 77% safe acts and 23% at risk acts. All of the at-risk acts were accompanied by corrective actions. The program has been proven to reinforce positive and safe behaviors, correct at risk behaviors, and provide recognition on the spot for working safely.

LSIT Teams are made up of over 150 employees. That equates to approximately 15% of both WCH employees and subcontractors. The LSIT team members, along with all employees, utilize the LSIT log documenting observations and tracking items to closure. An average of 500 entries

per year are entered into the log books and on average, concerns are closed out and corrected within 3 days. Quick resolution to these concerns is facilitated through strong management support and employee input. The LSIT logs have proven to be an effective tool in communicating and correcting safety issues. A monthly company-wide LSIT meeting is held where all local LSIT chairs come together with senior management to discuss issues, plan company-wide initiatives, and look for company-wide trends.



G. 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.



WCH initiated the POET reviews as a mechanism to conduct deep dive assessments and oversight of WCH programs and processes to self-identify issues and implement improvements. Specific reviews were conducted on work planning and control by the parent companies of WCH along with focused POET reviews of work planning and functional work areas.

The Corporate Work Planning and Control assessment was specifically organized by the ISMS core functions. Issue forms were generated for all issues identified and corrective actions are being managed in the issues management system.

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.

The JHA process in place is part of 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. 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, Industrial Hygiene, Rad Con, craft representatives conducting the work, Engineering (as needed), first line supervision, and project supervision (as needed depending upon the scope of the work). Project personnel use the existing Health and Safety Plans for each work area as well as WCH-289, *Hazard Identification and Mitigation Document*; SH-1-3.5, “Fall Prevention/Fall Protection”; 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 (first line). Depending on the scope of the work and hazards, Industrial Hygiene, Rad Con, and Engineering may attend the job site walk down.

Work control documents and JHAs are broken into activity level 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 criteria for prevention of the spread of contamination and employee contamination. Additional analysis is performed via the Fall Protection Work Permit, which is required when any worker could be potentially exposed to a fall hazard. 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.

H. HAZARD PREVENTION AND CONTROL

The IWCP implements the portion of Integrated Safety Management 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, such as MSA or PNNL, that utilize their own DOE approved work control

programs. Work performed by other Hanford contractors 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 Plans or Hazard Identification Mitigation documents. 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 subcontractor technical representative 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 subcontractor technical representative.

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 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 were implemented in 2013 (Figure 1).

Figure 1. Inspection Checklist.

WCH SAFETY OWNERSHIP INSPECTION CHECKLIST (Rev 1)			
Work Package or Procedure No.: _____ Project Name: _____ Date: _____ Contractor: _____ Location: _____ _____			
Inspector/Team Members: Check One: <input type="checkbox"/> D4 <input type="checkbox"/> FR <input type="checkbox"/> Waste Ops <input type="checkbox"/> Other Check One: <input type="checkbox"/> Team Surveillance <input type="checkbox"/> Management Walk-Through <input type="checkbox"/> Other Check One: <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Focused <input type="checkbox"/> Other			
Corrective Action Required? <input type="radio"/> Yes <input type="radio"/> No Responsible Person(s) for Corrective Actions: _____ Proposed Date of Corrective Actions: _____ Date Corrective Actions Were Closed: _____			
FOCUSED/SCOPE OF WORK INSPECTION SPECIFIC	YES	NO	N/A
PRE-ACTIVITY BRIEFING	YES	NO	N/A
- Was a brief conducted (Pre-Ev or tech proc pre-brief) prior to performance of the work?			
- Did all of the workers involved in the job attend (or obtain) the brief?			
- Were work package/technical procedure hazards and hazard controls discussed?			
- Were work package/technical procedure precautions and limitations discussed?			
- Were hold points discussed?			
- Were lessons learned (occurrence reports, etc.) discussed?			
- Were permits (RWP, Confined Space, Energized Work Permit) discussed?			
- Were the workers engaged and involved in the discussion?			

WCH SAFETY OWNERSHIP INSPECTION CHECKLIST (Rev 1)			
WORK AUTHORIZATION	YES	NO	N/A
- Is the work package/technical procedure approved?			
- Is the work package/technical procedure authorized?			
- Is the work package released?			
- Does the performance page in the craft work package properly identify the work to be done?			
- Have all the pre-requisites been met?			
WORK INSTRUCTION/PROCEDURE USE	YES	NO	N/A
- Is the work package/technical procedure available to the workers?			
- If the instruction is Step-by-Step (Type I work package; Continuous Use procedure), is it open and in use?			
- Is the work package/technical procedure in use the latest approved version?			
- Are Working Copies of work packages properly identified and controlled?			
WORK INSTRUCTION/PROCEDURE ADHERENCE	YES	NO	N/A
- Are the work instructions referenced at any time?			
- Is the work performed in the step sequence specified by the work instructions/procedure?			
- Have all of the required steps been completed?			
- Were only those steps specified performed (No additional actions taken)?			
- Were the instructions changed when they could not be performed as written?			
- Was the activity stopped and notifications made when the unexpected or abnormal occurred?			
WORK INSTRUCTION/PROCEDURE COMPLETION	YES	NO	N/A
- Is the work instruction checked for completeness?			
- Is the work package status captured for long-term work?			
OTHER	YES	NO	N/A
COMMENTS/ACTIONS/RESOLUTIONS			

I. 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 conducted 74,983 hours of training to employees and subcontractors during 2013.

The primary training mechanism provided to WCH personnel for ISMS is the Hanford General Employee Training modules augmented by WCH specific modules. Additionally, as part of the overall approach to ensuring WCH employees at all levels understand ISMS and the implementing mechanisms, briefings were provided and maintained as part of the continuous improvement process for WCH. These include:

- WCH ISMS/EMS/VPP/Safety Culture Briefing
- Management/Supervisor Safety Training-supplemented by the Safety Trained Supervisor modules
- Safety Culture Policy
- Hanford General Employee Training (HGET)/WCH-specific training modules
- WCH Safety Initiatives.

WCH Safety Culture



The following provides a review of the WCH-specific general employee training and the briefings discussed above. WCH's review of the material confirmed that the information provided addresses the key elements of the WCH ISMS program. WCH has appropriately tailored the information for the employees so that the overall safety system information is integrated and implements the key focus areas of an improving safety culture. Employees interviewed confirmed that the information was appropriate with annual refresher information providing a reinforcement of the WCH safety system.

As part of the contract transition from the ERC to WCH and preparation for ISMS phase I and Phase II certifications, WCH created a safety system that incorporated all the elements of a successful safety system and culture. Compliance alone (ISMS) would not complete the system

and maintain continuous improvement and facilitate employee involvement. With safety culture and employee involvement as key elements, WCH incorporated culture, EMS, and VPP into the overall WCH safety system. In doing so, employees were provided the information that explained a seamless approach to safety by creating one program. This allowed for additional improvements and elements of the overall safety program to be introduced with the intent that these additions were not “new” programs but a continuous improvement of the overall safety system. A briefing on ISMS, EMS, and VPP was developed covering the following topics:

- WCH Safety Culture
- ISMS
- VPP
- EMS.

The objective of the briefing was to explain how ISMS, EMS, and VPP are integrated to create a positive and improving safety culture while involving all employees. This system creates a safe work environment while protecting the worker, the public and the environment. The theme that an involved employee is a safe employee continued throughout each of the systems integrating employees into all aspect of the safety program resulting in employee ownership of safety. Key elements of the briefing included:

- Questioning Attitude
- Stop Work Authority
- Employee Involvement
- Human Performance
- Hazard Analysis and Controls.

The WCH system is outlined in HGET and WCH specific training modules and provided to all employees on an annual basis.

WCH developed management and supervisory briefings to ensure that the specific responsibilities and accountability for safety were part of the management team training. WCH specific general employee training outlined management/supervisor training to include:

- Stop Work Authority

- Differing Opinions
- Safety Ownership
- ISMS Management Implementation.

This information is provided to managers and supervisors on an annual basis and is reinforced through performance reviews and continuous improvement plans (e.g., SHIP, POMCs). Additional training was provided through the Safety Trained Supervisor training modules. These modules were offered to managers, supervisors, safety leads, and employee safety committee members. These modules were not specific to ISMS but did incorporate the work controls, hazard analyses, and observation techniques that are inherent to a successful and improving safety system. WCH maintains over 100 safety trained supervisors on staff.

WCH has gone above and beyond minimum requirements and strives to have the highest trained safety professionals by offering the Associate Safety Professional (ASP) and Certified Safety Professional (CSP) training classes. The ASP designation is the start of the process toward achieving the CSP certification. It is a temporary designation awarded by the Board of Certified Safety Professionals. It means that an individual has met the ASP experience requirement, academic requirement, and has passed the first of two examinations leading to the CSP credential.

The CSP credential is the mark of the safety professional. The CSP certification marks individuals who have met educational and experience standards and passed rigorous examinations validated against the practice of hundreds of safety professionals. No other safety certification holds the same level of demand by employers.

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 best in the business offsite and onsite training to assist in expanding the knowledge base of current personnel. Training was provided at the WCH facilities 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 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 RCC staff skills but others within our business as well.

Training provided included:

- 40 Hour Refresher
- Fall Protection
- URS Webinar series on safety subjects
- CSP/ASP by American Society of Safety Engineers.

In concert with the HGET modules, WCH developed additional contractor specific modules that augment the HGET modules providing additional information that is unique to each contractor – mainly procedure and business policy direction. The WCH specific modules address:

- VPP Survey Questions...how the VPP elements of the WCH Safety System are implemented and incorporated into the overall safety program..
- Area specific hazard recognition, alarms and controls.
- WCH specific hazards (Beryllium, Lead, Asbestos, etc.) and the controls for each.
- ISMS/EMS/VPP – details the additional guiding principles and core functions added by WCH to emphasize worker involvement and management support (Additional Core Functions: Establish Environment, Safety, and Health Policy, Management Review; Additional Guiding Principles: Worker Involvement, Communication and Stakeholder Involvement, Continuous Improvement, Senior Management Involvement).
- Guiding Principles – Lists and defines the eleven guiding principles of ISMS.
- Core Functions – Lists and defines the seven core functions of ISMS.
- Implementation – provides information regarding the WCH implementing documents and how ISMS is implemented through policies, plans, procedures, requirements documents and management directives.
- Environmental Management System (EMS) –provides details of the WCH EMS, the ISO 14001 recognition, continuous improvements, and methods for implementing environmental management systems designed to protect the environment.

The above modules were reviewed and found to be appropriately scoped to ensure that all employees are introduced and reminded on the importance of having an integrated approach towards managing and performing our work safely using the guiding principles and core functions of ISMS. WCH periodically reviews HGET and WCH modules to determine effectiveness, updates, and continuous improvement. Recent updates to both the ISMS and VPP modules have been performed.

Incentive cards were provided to employees that contained questions on both the ISMS and VPP systems for WCH. This initiative offered a teaming approach to learning while reinforcing the WCH safety system. Management and supervision were encouraged to provide these incentives and discuss the information at PODs, safety meetings, and Pre-Ev meetings.

Feedback from employees was positive in that it reinforced the elements and principles of the WCH safety system and allowed for new employees to understand and implement a safety culture that goes above and beyond compliance.

The overall adequacy and effectiveness of the ISMS program, and its associated training processes, is measured via several different mechanisms which include:

- ISMS/VPP annual review and assessment
- POMC quarterly updates
- Annual ISMS Declaration report
- VPP surveys (via HGET)
- Tracking/Trending of leading indicators to include “No Treat” and “Self-Treat” incidents
- Corrective actions-resulting in the creation/revision of plans, policies, programs, and procedures
- Results of the annual Integrated Assessment Program topical areas at both the program and site level.

Employees are trained, briefed, and updated on the WCH programs throughout the year and have a clear and concise understanding of the WCH safety system. The level and frequency of ISMS information and training has been reviewed and determined appropriate for the activities currently conducted at WCH with no additional changes recommended at this time.

J. AWARDS AND RECOGNITION

- URS Presidents Award (9 since contract start) June 2013
- VPP Outreach Award August 2013
- DOE VPP Legacy of Stars Award August 2013
- 1 Million Safe Hours August 2013
- 2 Million Safe Hours September 2013
- 2.7 Million Hours Since the Last Lost Time Injury December 2013

