

ASSESSMENT OF IDAHO TREATMENT GROUP, LLC (ITG) SAFETY CONSCIOUS WORK ENVIRONMENT (SCWE)

BACKGROUND/PURPOSE

A team from the Department of Energy Idaho Operations Office (DOE-ID) was chartered to evaluate the Idaho Treatment Group (ITG) Safety Conscious Work Environment (SCWE). The primary purpose of the review was to provide DOE-ID with a perspective on the adequacy and effectiveness of the ITG SCWE with a primary purpose of providing feedback to promote continuous improvement.

SCOPE

This assessment evaluated the adequacy and effectiveness of the ITG Safety Conscious Work Environment as outlined in DOE G 450.51C, *Integrated Safety Management System, Attachment 10, Safety Culture Focus Areas and Associated Attributes*. The assessment team evaluated the following SCWE focus areas:

- Leadership: ITG leadership demonstrates a safety environment through management engagement, open communication and clear expectations that fosters an environment free from retaliation.
- Employee and Worker Engagement: ITG employees demonstrate a personal commitment to everyone's safety through teamwork and participation in work planning and improvement.
- Organizational Learning: ITG leadership and employees demonstrate trust, credibility and a questioning attitude which leads to an effective resolution of problems.

The review was not conducted as a self-assessment but followed the DOE Headquarters SCWE self-assessment guidance in conjunction with the July 15 through 25, 2013 Idaho Treatment Group Integrated Safety Management System (ISMS) Phase II Verification. The review team used the July 15 through 25, 2013 ITG ISMS Phase II Verification Report, the ITG April 2012 AMWTP Nuclear Safety Culture Employee Survey, and interviews with ITG management and staff. The review team consisted of the following individuals:

B. K. Singh – DOE Safety & Occupational Health Manager EM-41
Shalee Bergeson – DOE-ID Office Human Resources Specialist
Jan Ogilvie – DOE-ID Employee Concerns Manager

RESULTS

The review team determined that the ITG Safety Conscious Work Environment focus areas and attributes, as outlined in DOE G 450.51C, *Integrated Safety Management System, Attachment 10, Safety Culture Focus Areas and Associated Attributes*, and as detailed in the DOE Headquarters-provided *Safety Conscious Work Environment Self-Assessment Guidance, Revision G*, was implemented and effective.

As a result of the 2012 ITG safety culture survey and Integrated Safety Management System activities, ITG developed the 2013 Safety Culture Improvement Plan (SCIP) which outlines the steps that ITG is taking to improve the Safety Culture. The plan is currently being implemented. As part of the plan employees and managers participated in ISMS Safety Culture training which covered SCWE, Human Performance Improvements (HPI), Voluntary Protection Program (VPP), ISMS, management's expectations of safety, and safety culture tools. Feedback was gathered from employees during the training and was categorized into HPI, communication, trust, production over safety, and management and leadership issues. Management teams were developed to address each of these issues and resolution will be reported to the President & Project Manager by September 30, 2013.

Based on interviews and 2012 AMWTP Nuclear Safety Culture Employee Survey the employees are aware of the avenues within ITG to raise safety issues and did not express any hesitation or fear of retaliation for reporting safety issues. In addition, the interviewees stated that they did not believe the company put production over safety.

The assessment results for each SCWE focus area are summarized below. Any Strengths identified by the review team as well as Recommendations for improvement are provided immediately following the area summaries below.

Leadership

The attributes associated with this focus area were considered implemented and effective. The results of the 2012 AMWTP Nuclear Safety Culture Employee Survey found that in the areas of management credibility, trustworthiness and ethical behavior management rated well.

During the interview with the ITG President & Project Manager, he stated that management was aware of communication issues at AMWTP. In order to improve communications, ITG is developing tools to better communicate issue resolution in a timely manner. The President is conducting "kick-off" meetings with the Sunday crews. This gives employees a chance to talk with the President and ask him specific questions about concerns they may have. This increases the visibility of senior management and should lead to better communication between management and employees.

ITG has initiated "Crew Briefs" as part of shift turnover. During the briefs, the first line supervisor gives employees information from the daily Project Notes, 1st day back briefing, and pertinent information provided by the ITG President. The purpose of the briefing is to improve communication between workers and management.

ITG senior management is in the process of including safety culture elements in all supervisor and manager performance plans for the next performance cycle.

A possible vulnerability was identified, which relates to feedback from management to employees regarding safety issues. For example, interviewees felt a lack of feedback sometimes occurs when a step back or stop work is called, the issue is subsequently resolved,

but the employees involved in the step back or stop work do not always receive information regarding the actions that took place to resolve or mitigate the issue. This occurs most often after return from shift work four days off according to interviewees. A recent example of a lack of feedback occurred following the April 1, 2013, Drill and Drain potential employee vapor exposure event. Although ITG was working on ways to resolve the issue, some of the involved employees were not apprised of management's efforts. Some interviewees also noted that there are communication delays in getting information to employees concerning events that have occurred in other areas that have potential impacts on their work. An example given by some interviewees dealt with changes involving the use of a new type of gloves.

Employee and Worker Engagement

The attributes associated with this focus area were considered implemented and effective. Based on interviews and the 2012 survey, employees did not express any hesitation or fear of retaliation for reporting safety issues. They felt that their peers are strongly supportive of reporting issues and do not feel as if they would be retaliated against. In addition, the interviewees stated that they did not believe the company put production over safety.

ITG has several mechanisms in place to ensure that employees are engaged in the integration of safety into the work being performed. Examples include the Keeping Everyone and Yourself Safe program (KEYS), the Good Catch Awards program, Planning/Scoping, Hazard Assessment Team (PSHAT), Project Notes, Start of the Roll, the Employee Safety and Improvement Team (ESIT), the Rolling Stock committee, the Employee Concerns Program (ECP), Differing Professional Opinions (DPO) Process, Pre-Job Briefings (PJB), and Post-Job Briefings/Reviews (PJR). During interviews, the employees stated that they were aware of each of these mechanisms; although it was noted there is varying enthusiasm for the effectiveness of some these programs. This was evident in the 2012 April 2012 AMWTP Nuclear Safety Culture Employee Survey where the KEYS, ECP and the DPO were rated only fair for providing employees feedback. The ECP and DPO have been separated from the Human Resources function, given direct line to the ITG Board of Directors and the AMWTP President & Project Manager, and a new manager for these programs has been hired and established.

Organizational Learning

The attributes associated with this focus area were considered implemented and effective. As part of the 2013 Safety Culture Improvement Plan, ITG conducted a 10 hour safety culture course, an HPI training course, and a 4 hour coaching/positive reinforcement course. Seventy-three percent of the employees and managers have attended the training. Based on employee feedback during the training, ITG has senior management leading cross-functional management teams that are developing improvement plans in the areas of communication, human performance, trust, and production over safety issues, issues management, and leadership. Each team's plans will be reviewed in September 2013.

Through the KEYS program, the Good Catch Awards program, PSHAT, Project Notes, Start of the Roll, the ESIT, the Rolling Stock committee, the ECP, PJBs, and PJRs, ITG is working to achieve safety excellence. These programs provide employees with numerous avenues to use their operational experience to report problems, question procedures or differences of opinion, and assist with problem solution.

STRENGTHS

- ITG management took proactive measures through the 2012 AMWTP Nuclear Safety Culture Employee Survey to baseline the ITG SCWE and developed the 2013 Safety Culture Improvement Plan (SCIP) to improve the safety culture; ITG management needs to ensure the SCIP is rigorously implemented.

RECOMMENDATIONS

1. ITG management should consider strengthening mechanisms that provide feedback between employees and management regarding safety issues.
2. ITG management should consider surveying the ITG workforce again in the upcoming year to determine the health of the SCWE.

RECORDS REVIEWED

- Ethics & Compliance Laws/Regulations & Requirements ISMS Implementation.
- 2013 Safety Culture Improvement Plan (SCIP).
- AMWTP MP-ADMN-1.8, "*AMWTP Employee Concerns Program*," Revision 5.
- IVR of the Implementation of ISMS at the AMWTP, May 20 through May 24, 2013.
- ISMS/IVR Issues/OFIs/Conclusion Comments dated July 9, 2013.
- AMWTP ISMS Program Description, June 26, 2013.
- AMWTP POL-108, "*Key Expectations for the Safe Performance of Work*," Revision 2.
- AMWTP MP-DOCS-18.4, "*Document Control Review of minutes from ESIT committee*,"
- KEYS Committee Meeting Notes and Committee Charter.
- Employee feedback to ITG and DOE-ID Employee Concerns Program (ECP).
- New homepage for ECP.
- Curriculum for 10-hour safety culture and HPI training course.
- Curriculum for 4-hour coaching and positive reinforcement training course.
- Preamble to the new union contract.
- Good Catch Awards program.
- Recent Project Notes for safety culture information.
- Start of the Roll bathroom handout for safety culture information.

INTERVIEWS

- Idaho Treatment Group President & Project Manager.
- Interim Environmental Safety & Health Director.
- Plant Manager.
- Integrated Production Planning Manager.
- ITG Ethics & Compliance Officer.
- Safety Management Systems Manager.
- Productivity Project Manager.
- Packaging & Shipping & Mixed Low-Level Waste (MLLW) Manager.
- Shift Supervisors (9).
- Labor Union Members (2).
- Maintenance Technicians (6).
- Characterization Operators (6).
- Packaging and Shipping Operators (7).
- Treatment Facility Operators (5).
- Retrieval Operators (5).
- RCTs (4).
- ES&H Employees (2).
- HR Lead (1).
- Information Technology Technicians/Engineers (3).
- Project Controls Employee (1).
- Performance Assurance Employee (1).
- Procurement Specialist (1).
- Accountant (1).
- QA Engineer (2).
- Waste Programs Employee (1).