

United States Department of Energy Waste Isolation Pilot Plant



Safety Conscious Work Environment Self-Assessment

January 2013

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EXECUTIVE SUMMARY

The U.S. Department of Energy (DOE) Waste Isolation Pilot Plant (WIPP) completed a Safety Conscious Work Environment (SCWE) Self-Assessment (hereafter assessment) in accordance with the specified guidance issued by the Principal Deputy Assistant Secretary for Environmental Management (EM). The Carlsbad Field Office (CBFO) and Nuclear Waste Partnership LLC (NWP) organizations completed this assessment by collaborating on select aspects of SCWE, including training and surveys, and by independently completing other aspects of SCWE, including programmatic commitments and evaluations by external organizations. The following sections summarize the assessment results.

ES-1 CBFO

At the request of the CBFO Manager, a team of assessors from the Environmental Management Consolidated Business Center (EMCBC) arrived in August 2012 and used Nuclear Safety Criteria Review and Approach Documents (CRADs) to evaluate, in part, "Safety Conscious Work Environment/Environment for Raising Concerns." The EMCBC assessors concluded that both CBFO and NWP are implementing employee concerns programs. The EMCBC assessors determined there was no evidence of retaliation related to identification of safety concerns. Interviewed employees did not exhibit any hesitation to identify issues that needed management attention. The assessors identified the employee perception that issues are not always being heard, but that did not appear to affect the employee's persistence in bringing issues forward. Managers from both CBFO and NWP stated that they took issues brought to them very seriously and welcomed the opportunity to resolve issues and improve performance.

Twenty-two CBFO management and staff personnel participated in NWP's Open & Collaborative Safety Conscious Work Environment Training between 11/05/2012 and 01/08/2013. This number exceeded the defined Safety Performance, Objective, Measure, and Commitment (POMC) within its Integrated Safety Management System (ISMS) document by having greater than 20% class attendance.

CBFO management and staff personnel completed the Safety Conscious Work Environment Survey created and administered by NWP between 11/05/2012 and 01/08/2013. By completing 20 surveys, CBFO exceeded the defined Safety POMC within its ISMS document by having greater than 20% survey completion. The survey results were generally favorable in demonstrating a safety conscious environment within the organization.

In accordance with EM Guidance, the CBFO Manager formally concurred with the Strategic Plan submitted by NWP for completing Criterion 7 of the DOE-EM Integrated Safety Management System (ISMS) – Quality Assurance (QA) guidance (CBFO:OESH:JS:anc:12-0816:UFC).

The CBFO Manager is coordinating with EM to support SAF-200 SCWE Training at the WIPP. This training is tentatively scheduled for 5/7-9/2013.

The CBFO Manager is coordinating with EMCBC to conduct a comprehensive ISMS Verification/Validation Review of the new WIPP management and operating (M&O) contractor, NWP. This external review is tentatively scheduled for May 2013. The review team will evaluate this SCWE Self-Assessment and determine if additional evaluation is necessary.

ES-2 NWP

NWP utilized a variety of techniques for this SCWE assessment, including a survey given to **99.98%** of employees, and the participation of **60%** of employees during the assessment in interviews, focus groups, or field questions. These high percentages and the variety of assessment techniques used yielded a significant degree of confidence in the results.

The SCWE assessment activities collectively identified one noteworthy practice, six areas of strength, 11 safety culture focus area attributes that are implemented and effective, and five attributes that are partially implemented and/or partially effective. These items were combined into seven categories of opportunities for improvement.

The NWP **noteworthy practice** was the SCWE initiative as a whole, including the training, methodologies and assessment team makeup for the SCWE assessment. Further discussion on the noteworthy practice is contained within the body of this report.

The **six areas of strength** included:

- Employee questioning attitude
- Willingness to stop work
- No fear of retaliation
- Employees' personal sense of responsibility for safe performance, including concern for their co-workers
- Bargaining unit partnership with management to focus on safety
- General employee attitude/desire to do a good job safely and in full compliance with requirements

The **11 safety culture focus area attributes that were implemented and effective** included:

ISM Safety Culture Focus Area-Leadership attributes

- Demonstrated safety leadership
- Risk-informed, conservative decision making
- Management engagement and time in the field
- Staff recruitment, selection, retention, and development
- Open communication and fostering an environment free from retribution

ISM Safety Culture Focus Area-Employee/Worker Engagement attributes

- Personal commitment to everyone's safety
- Mindful of hazards and controls

ISM Safety Culture Focus Area-Organizational Learning attributes

- Credibility, trust and reporting errors and problems
- Performance monitoring through multiple means
- Use of operational experience
- Questioning attitude

The **four safety culture focus area attributes that were partially implemented and/or partially effective** included:

ISM Safety Culture Focus Area-Leadership attributes

- Clear expectations and accountability (a SCWE specific attribute)

ISM Safety Culture Focus Area-Employee/Worker Engagement attributes

- Teamwork and mutual respect (a SCWE specific attribute)
- Participation in work planning and improvement (an open and collaborative expectation attribute)

ISM Safety Culture Focus Area-Organizational Learning attribute

- Effective resolution of reported problems (a SCWE specific attribute)

The resulting seven categories of **opportunities for improvement** were:

- Communication
- Feedback
- Teamwork
- Accountability
- Effective resolution of reported problems
- Mentoring line management, team leaders
- Enhancing employee engagement

At the WIPP, development of a mature safety culture through continuous improvement is always a focus area. The WIPP's current ISMS status is Stage 3, indicating a fully mature culture has been achieved. Organizations, however, may exhibit the characteristics of more than one stage at any given time. An organization at Stage 3 adopts the idea of continuous improvement and applies the concept to safety performance. There is a strong emphasis on communications, training, management style, and improving efficiency and effectiveness. Everyone in the organization can contribute.

Some behaviors enable improvements to take place, while other behaviors may create barriers to further improvement. Consequently, employees need to understand the impact of behavioral issues on safety. At the WIPP, the level of awareness of behavioral and attitudinal issues is high, and measures are taken to improve behavior. Progress is made one step at a time, and progress never stops.

1.0 INTRODUCTION

The U.S. Department of Energy (DOE) defines safety culture as “an organization’s values and behaviors modeled by its leaders and internalized by its members, which serve to make safe performance of work the overriding priority to protect the workers, the public, and the environment.” Safety conscious work environment (SCWE) is a subset of safety culture related to a work environment in which employees feel free to raise safety concerns to management (and/or regulators) without fear of retaliation. In its Implementation Plan (IP) for Defense Nuclear Facilities Safety Board Recommendation 2011-1 (*Safety Culture at the Waste Treatment and Immobilization Plant*), the DOE committed to performing an extent-of-condition review by federal and contractor organizations to identify whether SCWE weaknesses exist and to identify gaps to achieving an excellent SCWE.

This assessment was conducted to meet the expectation to assess an open and collaborative safety culture in accordance with Integrated Safety Management (ISM) Safety Culture Focus Area attributes, beyond the basics of those applicable to SCWE, and incorporating best practices from the Nuclear Regulatory Commission (NRC). Methodologies for this assessment were based on the Safety Conscious Work Environment Self-Assessment Guidance issued in the September 26, 2012 Memorandum from Tracy P. Mustin, Principal Deputy Assistant Secretary for Environmental Management, subject: Fiscal Year 2012 Annual Integrated Safety Management System and Quality Assurance Effectiveness Review Declaration.

2.0 ASSESSMENT RESULTS

The assessment results are presented separately for CBFO and NWP in the following sections.

2.1 CBFO

At the request of the CBFO Manager, a team from the Environmental Management Consolidated Business Center (EMCBC) arrived in August 2012 and used Nuclear Safety Criteria Review and Approach Documents (CRADs) to evaluate, in part, “Safety Conscious Work Environment/Environment for Raising Concerns.” The EMCBC assessors concluded that both CBFO and NWP are implementing employee concerns programs.

The NWP had three employee concerns over the last year, none related to concerns of potential retaliation associated with identifying safety concerns. No concerns were submitted under the CBFO Employee Concerns Program during the past year. Based on interviews with Employee Concerns Program coordinators, as well as CBFO and NWP managers and staff, the EMCBC assessors determined there was no evidence of retaliation related to identification of safety concerns. Furthermore, interviewed employees did not exhibit any hesitation to identify issues that needed management attention. The assessors identified employee perceptions that issues are not always being heard, but that perception did not appear to affect the employees' persistence in bringing issues forward. Management for both CBFO and NWP stated that they took issues brought to them very seriously and welcomed the opportunity to resolve issues and improve performance.

The current CBFO ISMS document, DOE/CBFO 09-3442, defines organizational SCWE measurements and commitments. Specifically, Appendix A, 2013 CBFO Safety Performance, Objectives, Measures, and Commitments (POMCs), states that, “FY2013 Safety POMCs were developed from select FY2012 POMCs supplemented with new POMCs based on annual ISMS/QA guidance from EM-HQ and contained in DOE G 450.4-1C, Attachment 13, Safety Performance Objectives, Measures, and Commitments.” Safety POMC 8 pertains to CBFO’s SCWE commitment.

Performance Objective	Performance Measurement/Commitment
8. Be recognized for excellent Safety Culture (Sources: DOE G 450.4-1C, Attachment 13 and FY2012 EM Guidance, Criterion 7).	Complete Safety Conscious Work Environment Self-Assessment. More than 20% of CBFO personnel complete Collaborative Safety Conscious Work Environment Training and Survey.

CBFO management and staff participated in NWP’s Open & Collaborative Safety Conscious Work Environment Training between 11/05/2012 and 01/08/2013. With 22 course participants, CBFO exceeded the defined Safety POMC within its Integrated Safety Management System (ISMS) document of having greater than 20% class attendance.

CBFO management and staff also completed the Safety Conscious Work Environment Survey created and administered by NWP between 11/05/2012 and 01/08/2013. By completing 20 surveys, CBFO exceeded the defined Safety POMC within its ISMS document by having greater than 20% survey completion. The survey results were generally favorable in demonstrating a safety conscious environment within the CBFO organization (see Attachment 1 – CBFO Safety Conscious Work Environment Survey 2012, for complete survey results).

Survey respondents answered “yes” or “absolutely yes” to the following survey items:

- I can stop work for safety issues. (100%)
- I take individual responsibility for keeping myself and coworkers safe by reporting safety issues and/or stopping work. (100%)
- Are you willing to team for continuous improvement in our safety culture? (100%)
- I am aware of the WIPP Form method of raising a concern. (100%)
- Are you willing to bring up safety issues? (94%)
- I am aware of the Open Door policy allows me to raise a concern to management. (94%)
- Our safety culture is improving. (89%)
- I am aware there is a Differing Professional Opinion program I can use if I have a technical disagreement with a peer or management. (88%)
- Is safety given a high priority by your manager? (88%)

Survey respondents answered “no” or “absolutely no” to the following survey items:

- Accountability is fair and consistent. (12%)
- Employees are involved in developing effective solutions to safety issues. (12%)
- I believe we have a fairly strong safety culture that is open and collaborative. (12%)

Collectively, these survey responses reflect a favorable safety culture. CBFO managers recognize that there is always an opportunity to improve, and these survey results provide a useful baseline to measure improvement.

In accordance with EM Guidance, the CBFO Manager formally concurred with the Strategic Plan submitted by NWP for completing Criterion 7 of the DOE-EM Integrated Safety Management System (ISMS) – Quality Assurance (QA) guidance (CBFO:OESH:JS:anc:12-0816:UFC).

The CBFO Manager is coordinating with EM to support SAF-200 SCWE Training at the WIPP. This training is tentatively scheduled for 5/7-9/2013.

The CBFO Manager is coordinating with EMCBC to conduct a comprehensive ISMS Verification/Validation Review of the new WIPP management and operating (M&O) contractor, NWP. This external review is tentatively scheduled for May 2013, and the review team will evaluate this SCWE self-assessment and determine if additional evaluation is necessary.

2.2 NWP

NWP team compositions were determined in accordance with the SCWE Self-Assessment Guidance. CBFO approved combined roles for individuals serving in the roles of team leader, team advisor, team executive, and safety culture subject matter expert as required in the SCWE Self-Assessment Guidance. The combined functions of NWP Team Advisor and Team Executive were performed by Bill Mairson, the Babcock and Wilcox corporate safety culture practitioner. Bertha Cassingham, NWP Safety Programs Manager, served in the combined roles of Team Leader and Subject Matter Expert. Additional team members represented:

- NWP senior management sponsors
- NWP managers
- Bargaining unit members
- Safety Awareness Committee
- Voluntary Protection Program (VPP) Ombudsman
- Joint Open & Collaborative SCWE Trainer
- United Steel Workers Safety Representative

The review process included CRADs, methods identified by the NRC in best practices, and the criteria referenced in the SCWE Self-Assessment Guidance. The process also included a SCWE survey, structured and informal interviews, focus groups, and Behavioral Anchored Rating Scales (BARS), adopted from the NRC. Specific information and results for each methodology can be found in the following attachments:

Attachment 2 – Safety Conscious Work Environment Survey 2012, which was conducted to assist with the survey analysis, and some of the structured interviews

Attachment 3 – CRADs 1, 2, and 3, which are based on the ISM Safety Culture Focus Area Attributes

Attachment 4 – Case Study, which was used in focus groups and in individual interviews

Attachment 5 – Behavioral Anchored Rating Scales

Each CRAD contained a set of ISM Safety Culture Focus Area attributes and lines of inquiry that were evaluated based on detailed results from the survey, input from personnel in the SCWE training using WIPP as a case study for the implementation of these attributes, focus groups, BARS, and interviews. Note the ***bold and italicized*** lettering reflects an attribute identified by DOE as a SCWE specific attribute. The other attributes were reviewed as expanded open and collaborative expectations.

The following definitions from the SCWE Self-Assessment Guide were used:

Implemented and Effective (I&E): Evidence demonstrates the expectations described in the attribute are routinely demonstrated in a repeatable, reliable manner. Processes are aligned with outcomes and performance is monitored to ensure desired results are achieved.

Partially Implemented or Partially Effective (PI/E): Evidence demonstrates that the expectations described in the attribute are not routinely demonstrated in a repeatable, reliable manner. Processes are partially in alignment with outcomes and performance is not monitored to ensure desired results are achieved.

Not Implemented or Not Effective (NI/E): Insufficient evidence – or – evidence demonstrates that the expectations described in the attribute are not being met. Processes are substantially misaligned with outcomes and performance is not repeatable or not being achieved.

CRAD 1 – Leadership Focus Area

- a. ***Demonstrated Safety Leadership – I&E***
- b. Risk-informed, conservative decision-making – I&E
- c. ***Management engagement and time in the field – I&E***
- d. Staff recruitment, selection, training, and development – I&E
- e. ***Open communication and fostering an environment free from retribution – I&E***
- f. ***Clear expectations and accountability – PI/E***

CRAD 2 – Employee Engagement Focus Area

- a. Personal commitment to everyone's safety – I&E
- b. ***Teamwork and mutual respect – PI/E***
- c. Participation in work planning and improvement – PI/E
- d. Mindful of hazards and controls – I&E

CRAD 3 – Organizational Learning Focus Area

- a. ***Credibility, trust and reporting errors and problems – I&E***
- b. ***Effective resolution of reported problems – PI/E***
- c. ***Performance monitoring through multiple means – I&E***
- d. Use of operational experience – I&E
- e. ***Questioning Attitude – I&E***

Supplemental Information Topic: Performance Measures and Contract Incentives

Details in the lines of inquiry are contained in the attachment. These lines of inquiry were met with identified opportunities for improvement related to effective resolution of problems. The last inquiry in this group is, “What evidence exists that demonstrates the organization maintains nuclear facilities in a manner that supports both production and the safe performance of work?”

With the current focus for the maintenance and work control organizations being to implement new standards affecting several hundred maintenance procedures, it was felt this line of inquiry expectation was not met, and directly impacted the employee perception that they could not get equipment repairs and aging facility infrastructure needs met in a timely manner. The maintenance work document improvement initiative is being closely monitored through external review system tracking, and will not be duplicated for closing this assessment.

3.0 CONCLUSIONS

This WIPP SCWE Self-Assessment represents a collaborative effort between CBFO, NWP, and external organizations in which considerable resources were allocated to conduct a comprehensive analysis. The CBFO completed its stated goals and is coordinating with EM to conduct future SCWE training at the WIPP site. NWP evaluated all aspects of SCWE in accordance with the EM guidance, as well as other sources. CBFO considers the NWP SCWE review and analysis to be a noteworthy practice. Based on the results of the various analytical techniques used for this assessment, NWP identifies strengths, opportunities for improvement, and recommendations.

Strengths included:

- ***Employee Questioning Attitude*** – Exemplified in interviews, **93%** survey response, and personnel stating in the training case study that employees are not shy and will bring up questions/concerns.
- ***Willingness to Stop Work*** – Exemplified in the **98%** survey response as “yes” or “absolutely yes,” they can stop work for safety issues. Follow-on questions reflected that many had actually done so. The training case study reflected this as the second strongest area for safety at the WIPP.
- ***No Fear of Retaliation*** – **91%** positive survey response. Follow-on questions strongly reflected that no one felt any employee had ever actually been retaliated against, though some felt responses to their questions did not denote effective resolution as the response might be based on budget constraints, equipment maintenance, etc. Without an effective path forward, this strength could be impacted as personnel would not be as apt to continue bringing up concerns.
- ***Employee’s Personal Sense of Responsibility for Safe Performance, including their concern for their co-workers*** – This was reflected in survey results of **98%** of respondents stating their responsibility for keeping themselves and co-workers safe by reporting safety issues and/or stopping work. Other review methodologies supported this conclusion.
- ***Bargaining Unit Partnership with Management to focus on safety*** – Survey responses reflected a **93%** positive response to willingness to team for continuous improvement in safety culture. Interviews with bargaining unit officers and safety representatives reflected a strong focus on

continuous improvement in safety and willingness to continue to partner with management for those improvements. Management interviews also reflected focus on teamwork with the bargaining unit.

- **General employee attitude/desire to do a good job safely and in full compliance with requirements** – This employee attitude was prevalent in the field observations, interviews and focus group discussions, which always reflected an unusually strong attitude of taking pride in their mission, and the desire to do a good job.

Opportunities for Improvement

1. **Communication** – The first attribute under teamwork and mutual respect is “open communication and teamwork are the norm.” When conducting the WIPP case study in the SCWE training sessions, this was identified as the #1 weakest attribute in implementation at the WIPP. Communication was the basis for many of the perceived weaknesses such as feedback, teamwork, and even effective resolutions. Many times an issue had been resolved, but employees were not aware of the resolution or how to find out the status of a reported issue. In addition, many of the systems for tracking and status awareness are computer-based. Many employees (such as the miners) have very limited computer access, so this is not an effective communication tool for them.
2. **Feedback** – This was a significant concern expressed by employees, who indicated they needed more feedback from management and wanted their own feedback incorporated. This included formally, informally, individually, and organizationally – in other words, in all areas.
3. **Teamwork** – This was identified in interviews and focus groups by reference to the fact that words such as team, group, we and us, were rarely used. Discussions focused on “stovepipes” in organizations and internally between work crews or sections.
4. **Accountability** – This was apparent in the partial implementation and/or effectiveness of the leadership attribute of clear expectations and accountability. Accountability received a 47% positive response on the survey, so additional questions were asked in field interviews during the assessment to determine the basis. The first assumption was that personnel were not held accountable for incidents, etc., after the implementation of the Human Performance Improvement initiative a couple of years ago had caused some to feel employees were no longer held accountable.

Interviews, however, instead reflected the accountability concerns were more related to uneven workloads, use of “A” employees vs. “B” or “C” employees, and a perception that friendships and poor performance enabled some to get out of having to do work. Part of this is probably due to the fact that the site has been gradually downsizing through attrition, as well as a lay-off that occurred a few months earlier. This was also tied in with the mentoring of management to ensure managers fully understand the task load of each employee and ways to provide effective oversight and support for periodic increased work scopes.

5. **Effective Resolution of reported problems** – Resource priority towards work package improvements instead of equipment repairs and budget restraints were consistently identified by employees as the cause for delays in resolving reported problems. Weaknesses were also reflected in follow-on questions to which employees answered they no longer felt management was proactively addressing safety issues, or that the resolutions were taking so long they could not be considered effective.
6. **Mentoring line management, team leaders** – This opportunity is based on ensuring appropriate accountability; timely response to employee concerns, including feedback on status and improvement initiatives; clearly defining expectations for those serving in the non-management roles of “superintendents,” “supervisors,” and “team leaders,” and the expectation to assume line management responsibility for safety when working in such roles.

7. **Enhance employee engagement** – Employees are actively seeking opportunities to be involved with ideas that could effectively improve a number of processes and current areas with ongoing improvement initiatives.

Recommendations

Communication: Enhance communications, focusing on top-down clarity/frequency, bottom-up opportunities, and horizontally across organizations. Assign a Communications Solution Assist Team to look at all current communication methods, review recommendations received, gather employee ideas and deliver a communications improvement plan for senior management consideration.

Feedback: Have the Communications Solution Assist Team address feedback recommendations as a key component in the communications improvement plan.

Efficiencies/Teamwork: Project manager should establish an expectation to identify and report new ways for plant organizations to align and achieve operational efficiencies using a collaborative/teaming method (cost savings via new efficiencies). Solution Assist Teams should be established to include a senior management sponsor and heavy employee engagement with teams led by an independent member of management outside the organization(s) being evaluated, but including some management within the organization being evaluated. These teams should make time/task analysis a component of their review.

Accountability: For the identification of operational efficiencies, the Solution Assist Team should include a time/task analysis as a component of the review. With new organizational alignments, management should be given the specific task of aligning workloads based on the time/task analysis as a starting point. In the interim, additional actions to ensure accountability should include providing all levels of management with new/focused training on subjects pertinent to the work environment, including:

- The legal side of management
- Handling employee concerns
- Managing bargaining unit employees
- Performance management and evaluation (and NWP management expectations)
- Conflict resolution

Effective Resolution of Problems: Interviews revealed the perception of weaknesses in this area attributed to Action Requests (ARs) and not knowing if a reported problem was resolved. A recommendation was to implement an automated, user-friendly AR tracking system at centralized computer stations, and train all workers on its use. In addition, during the upcoming corporate ISM review, have the review team look further at the corrective action process to determine whether perceived weaknesses are actual. Finally, increase the presence of all levels of management in the work spaces, with reinforcement of expectations to address employee concerns/safety issues in a timely manner.

Line Management: Project managers should assign teams to conduct a thorough review of management roles such as superintendents, team leads, waste-handling engineers, and supervisors to determine their effectiveness in directing daily work in the field, and make organizational recommendations accordingly.

A management mentor/coach program should be established for new managers and those assigned to management roles, such as those described above. The program would assign a more seasoned/proven successful manager to the new manager to ensure day-to-day operations are managed effectively and ensure the new manager receives insight and guidance as situations/opportunities occur.

Continue with current ongoing improvements in the Manager and Supervisor Training (MAST) program.

Evaluate the use of a “High Potential” (HiPot) program through which promising/talented employees are selected to learn and gain experience in higher levels of operational responsibility and exposure to all facets of plant operations/management. HiPot is often viewed as a valuable tool for identifying, developing, and placing talented individuals into management positions as part of succession planning.

Establish line management as being responsible for safety, instead of the Safety Organization being responsible to provide safety topics and briefings, etc. Place emphasis on the Safety Organization playing more of a support function.

Enhance Employee Engagement: Ensure active solicitation of employee input/ideas for improvement. Encourage and support employee-led and union-led initiatives, identifying areas where such initiatives would be particularly helpful. This also includes focusing on their leadership in support of upcoming safety-driven initiatives such as the VPP certification, and re-energizing the use of Solution Assist Teams.

4.0 REFERENCES

- AA:13:01001, Letter from M.F. Sharif to Jose R. Franco, Subject: Submittal of the Open and Collaborative Safety Conscious Work Environment Assessment Report, January 2, 2013.
- CBFO:OESH:JS:anc:12-0816:UFC, Letter from Jose R. Franco to Farok Sharif, Subject: Carlsbad Field Office Approval of Nuclear Waste Partnership, LLC Integrated Safety Management System and Quality Assurance Criteria 1-4, November 21, 2012.
- DA: 12:01 015, Letter from T.J. Rotert, To George T. Basabilvazo, Subject: SAFETY CONSCIOUS WORK ENVIRONMENT (SCWE) INITIATIVE, October 25, 2012.
- DOE/CBFO 09-3442, *CBFO Integrated Safety Management System Description*, Rev. 3, November 2012.
- DOE Guide 450.4-1C, *Integrated Safety Management System Guide*, September 29, 2011.
- Memorandum from Tracy P. Mustin, Principal Deputy Assistant Secretary for Environmental Management, Subject: Fiscal Year 2012 Annual Integrated Safety Management System and Quality Assurance Effectiveness Review Declaration, September 26, 2012.
- Nuclear Waste Partnership LLC, Open & Collaborative Safety Conscious Work Environment Review Plan 2012, Safety Programs Management Assessment, December 2012.
- Nuclear Waste Partnership LLC, Open & Collaborative Safety Conscious Work Environment Assessment, December 2012.
- SAF-200 Proposed Training Schedule REV 11-16-2012
- U.S. Department of Energy - Environmental Management Consolidated Business Center, Carlsbad Field Office Line Management Oversight Review Final Report, Rev. 0, October 5, 2012.

Attachment 1. CBFO Safety Conscious Work Environment Survey 2012

Company: <u>CBFO (n=20)</u>	Absolutely no	No	Sometimes	Yes	Absolutely Yes
Department: <u>N/A</u>					
Date: <u>November 2012 to January 2013</u>					
1. I am aware of the WIPP Form method of raising a concern.	0	0	0	59%	41%
2. I am aware of the Open Door policy allows me to raise a concern to management.	0	0	6%	29%	65%
3. I can Stop Work for safety issues.	0	0	0	35%	65%
4. I can bring up a Safety Concern without fear of retaliation.	0	0	24%	35%	41%
5. I take individual responsibility for keeping myself and coworkers safe by reporting safety issues and/or stopping work.	0	0	0	53%	47%
6. WIPP encourages a questioning attitude.	0	0	35%	47%	18%
7. I think management is aware of most of our safety issues.	0	6%	23%	65%	6%
8. I think management is proactively addressing our safety issues.	0	0	29%	65%	6%
9. I think we have an affective corrective action program in place to address safety concerns and issues.	0	0	47%	41%	12%
10. My manager addresses my safety concerns in a timely manner	0	6%	12%	53%	29%
11. There is a chilled environment at WIPP.	6%	35%	53%	6%	0
12. Employees take ownership and present concerns, issues, and potential solutions.	0	0	41%	59%	0
13. Accountability is fair and consistent.	0	12%	35%	47%	6%
14. Management is promptly notified when there are safety concerns.	0	0	41%	53%	6%
15. Employees have the right to raise safety concerns to CBFO or other DOE offices	0	0	6%	35%	59%
16. Management behavior fosters employee confidence in raising concerns.	0	6%	35%	59%	0
17. Employees are involved in developing effective solutions to safety issues.	0	12%	29%	47%	12%
18. I am aware there is a Differing Professional Opinion program I can use if I have a technical disagreement with a peer or management.	0	6%	6%	65%	23%
19. Our safety culture is improving.	0	0	12%	76%	12%
20. I believe we have a Safety Conscious Work Environment.	0	0	35%	59%	6%
21. I believe we have a fairly strong safety culture that is open and collaborative.	0	12%	29%	53%	6%
22. Are you aware of an occasion when an individual or team received a STAR award for a questioning attitude situation?	6%	59%	0	29%	6%
23. Is safety given a high priority by your manager?	0	0	12%	53%	35%
24. Are you willing to bring up safety issues?	0	0	6%	47%	47%
25. Are you willing to team for continuous improvement in our safety culture?	0	0	0	41%	59%



Attachment 2. Safety Conscious Work Environment Survey 2012

Company: <u>NWP</u> Department: <u>ALL</u> Date: <u>November 2012</u> Color Code for Safety Culture Focus Areas: Leadership, Employee/Worker Engagement, Organizational Learning Color Code for Responses: Strength, Needs Continued Attention, Action Required	Absolutely No	No	Sometimes	Yes	Absolutely Yes
1. I am aware of the WIPP Form method of raising a concern.	<1%	<1%	<1%	47%	51%
2. I am aware of the Open Door policy allows me to raise a concern to management.	<1%	<1%	1%	44%	53%
3. I can Stop Work for safety issues.	0	<1%	1%	38%	60%
4. I can bring up a Safety Concern without fear of retaliation.	<1%	<1%	7%	41%	50%
5. I take individual responsibility for keeping myself and coworkers safe by reporting safety issues and/or stopping work.	0	0	2%	42%	56%
6. WIPP encourages a questioning attitude.	<1%	<1%	14%	45%	39%
7. I think management is aware of most of our safety issues.	<1%	3%	27%	51%	18%
8. I think management is proactively addressing our safety issues.	<1%	4%	27%	48%	20%
9. I think we have an effective corrective action program in place to address safety concerns and issues.	<1%	5%	24%	50%	20%
10. My manager addresses my safety concerns in a timely manner.	<1%	2%	14%	53%	31%
11. There is a chilled environment at WIPP.	20%	39%	23%	12%	5%
12. Employees take ownership and present concerns, issues, and potential solutions.	<1%	3%	41%	42%	13%
13. Accountability is fair and consistent.	3%	12%	36%	37%	10%
14. Management is promptly notified when there are safety concerns.	0	1%	28%	53%	18%
15. Employees have the right to raise safety concerns to CBFO or other DOE offices.	0	2%	6%	59%	33%
16. Management behavior fosters employee confidence in raising concerns.	<1%	7%	25%	49%	18%
17. Employees are involved in developing effective solutions to safety issues.	0	4%	29%	49%	18%
18. I am aware there is a Differing Professional Opinion program I can use if I have a technical disagreement with a peer or management.	<1%	13%	11%	53%	22%
19. Our safety culture is improving.	<1%	3%	16%	59%	21%

WIPP Safety Conscious Work Environment Self-Assessment
January 2013

20. I believe we have a Safety Conscious Work Environment.	0	1%	11%	60%	28%
21. I believe we have a fairly strong safety culture that is open and collaborative.	<1%	1%	14%	59%	25%
22. Are you aware of an occasion when an individual or team received a STAR award for a questioning attitude situation?	2%	29%	9%	42%	18%
23. Is safety given a high priority by your manager?	<1%	<1%	10%	52%	36%
24. Are you willing to bring up safety issues?	0	<1%	6%	51%	42%
25. Are you willing to team for continuous improvement in our safety culture?	0	1%	6%	56%	37%

Survey Follow-up Questions: Summary of answers are written after each question on the form that was used for the questions.

Open & Collaborative Safety Conscious Work Environment Assessment
Additional Field Interview Questions

Date: _____ Location: _____
Personnel Interviewed: _____

During our recent safety culture training we all took a survey. We were trying to determine the thoughts behind some of the answers received. For instance:

1. There were a number of people that didn't feel accountability was fair and consistent. Some commented that people who don't do as much work as others aren't held accountable for not carrying their share of the load. Others commented that some employees are allowed to take shortcuts and don't get in trouble. Why do you think some feel that accountability is not fair and consistent? Can you give any examples?
Answers reflected this was a significant area of concern as "A" performers had been receiving more and more work while other employees were not required to pick up their share of the load. Also, it is perceived that friendships had more to do with lighter workloads rather than effectively managing task assignments. Significant impact on morale as salaries have been frozen for the last couple of years, meaning even if committed and handling a heavier workload there is no reward system for doing so.
2. Some stated they were only willing to bring up safety issues sometimes...do you know why that might be? Any examples? Examples given focused on equipment issues that had been brought up previously and nothing had been done (or not aware of anything done), yet the issue still existed. Therefore, the employee didn't necessarily bring it up again. Otherwise, a strong questioning attitude, with many employees willing to continue to pursue resolution to a repeat issue until it was resolved. Overall strong...with the weaknesses tied to timely resolution of maintenance issues.
3. Several stated management behaviors did not foster employee confidence in raising concerns? Have you noticed any such management behaviors that would have that effect? What were they? Any examples? Employees felt that some managers gave a stock answer of "there's no budget", so it didn't give you confidence there would be a way to address concerns. As indicated above, the weaknesses are related to timely resolution of maintenance issues and the aging infrastructure.
4. The question that asks is management promptly notified when there are safety concerns, several stated only sometimes...why do you think that would be? Any examples? In this case, the answers reflected that personnel tell immediate supervisors, etc. but they do not feel the concerns go up the chain, so the higher levels of management are not promptly notified by line management and the supervisory level. It is also perceived that if they do go up the chain, the info is significantly filtered.
5. What do you feel that management should do to more proactively address our safety issues? Be out in the field to watch work to see the issues for themselves. This was especially suggested for underground areas and the waste handling bays. Also, felt that management should focus more on safety issues, even if there are budget restraints, communicate more about what can be done to

improve and address safety. Timely feedback was the most requested thing for management to do to more proactively address safety issues.

6. Several stated they felt management was only sometimes aware of most of our safety issues? What issues do you feel they might not be aware of? What makes you think that? Why would they not be aware? Are employees not telling them or are there communication break downs in other places? If other places where do you think it is? The responses indicated a breakdown between the non-management levels such as Supervisors, Team Leads, Engineers, etc. and First Line Managers, and then between each level of managers all the way up the chain. Responses felt that line management was overly dependent on non-management personnel; engineers, team leaders and field superintendents to supervise and direct work. This results in filtered and/or incomplete communication to line management, thus interrupting the overall management awareness of issues. Conversely, due to this dependence on non-management personnel, the personnel performing work in the field are not always aware of senior management expectations.

Attachment 3: CRADs

SCWE ASSESSMENT CRAD 1, LEADERSHIP

OBJECTIVE:

1. Assess the extent that NWP organizations model the behaviors of an outstanding SCWE.
2. Determine the strengths and improvement opportunities for NWP with respect to SCWE.

CRITERIA:

1. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Leadership identified as specific to SCWE.
 - a. Demonstrated Safety Leadership.
 - b. Management Engagement and Time in the Field.
 - c. Open Communication and Fostering an Environment Free from Retribution.
 - d. Clear Expectations and Accountability.

Responses are reflected in the results below.
2. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Leadership providing additional safety culture foundation strengths.
 - a. Risk informed, conservative decision making.
 - b. Staff recruitment, selection, retention, and development.

Responses are reflected in the results below.
3. The safety culture at WIPP reflects effective implementation of the NRC best practices for the following management behaviors:
 - a. Availability - *Availability of especially senior management was strong.*
 - b. Open Door - *Open Door was considered most effective at highest levels of management.*
 - c. In the Field - *Significant improvement in this area under NWP, but some groups still not seeing much in the field, and would like to see especially more mid and high level management in the field. New Operations Manager is setting a good example of being in the field.*
 - d. Receptive-Listens, Asks for Input, Asks what if/why questions demonstrates understanding of concerns. *Varies based on the manager, overall demonstrate understanding of concerns.*
 - e. Employee Concern Sensitivity-protects identity of individual, expresses appreciation of individual *Some specific cases given as examples reflected this as a weakness as there is some focus on the individual instead of the issue.*
 - f. Employee Concern Timeliness of response (based on risk) *Weak area—as timely feedback was one of the biggest concerns in all areas in this assessment.*
 - g. Periodic Updates on status of resolution to employee concern- *Weak area—as feedback was one of the biggest concerns in all areas in this assessment.*
 - h. Safety First Focus-*Not necessarily safety first, as safety compliance and production all have balanced focus.*
4. Management Behaviors are effective in nurturing a SCWE. *Considered borderline effective based on the results to criteria 3. Much of this is attributed to the increased manpower focus on*

improvements to work control documents based on new issued standards that is affecting the overall ability to complete maintenance issues in a timely manner.

APPROACH:

Record Review: Review program plans, procedures, time in field documents, employee concerns, WIPP Forms, SCWE Survey results, assessment reports, and other documents as applicable to determine whether the above criteria has been effectively met, including adequacy of the documents to meet the requirements.

Surveys and Group Feedback: Analysis of the SCWE Survey results and of general employee input on strengths and weaknesses of these ISM Safety Culture Focus Area Attributes obtained during the Open and Collaborative Safety Conscious Work Environment Training (SAF-651) will be included in the review.

Interviews: Interview NWP personnel to determine knowledge of roles and responsibilities, and to clarify program documents and components as necessary. This will include interviews of management and personnel in one-on-one and small focus groups. The interviews will include scenarios with lines of inquiry from the DOE Safety Conscious Work Environment Self-Assessment Guidance and Benchmark NRC Best Practices including “95003.02-B, Sample Questions for Safety Culture Components” specifically for use in conducting individual interviews and focus groups.

Observations: Direct observations of work place behavior will also be used to determine management and leadership effectiveness in meeting these criteria.

Attribute Expectations of Excellence, Lines of Inquiry, and Best Practices Questions are attached.

RESULTS:

Results are written within each attribute and question below.

CRAD 1-Attachment 1:

Attributes of Excellence for Safety Culture Focus Area-Leadership

Demonstrated Safety Leadership

*Overall, this attribute is considered **implemented and effective** - Continuous improvement efforts should be focused on the levels below line managers that include superintendents, supervisors, team leads, etc.*

- Line managers understand and accept their safety responsibilities as integral to mission accomplishment.
- Line managers enhance work activities, procedures and processes with safety practices and policies.
- Leaders acknowledge and address external influences that may impose changes that could result in safety concerns.
- Line managers clearly understand their work activities and performance objectives, and how to safely conduct their work activities to accomplish their performance objectives.
- Line managers demonstrate their commitment to safety through their actions and behaviors, and support the organization in successfully implementing safety culture attributes, by conducting walk-throughs, personal visits, and verifying that their expectations are met.
- The organizational mission and operational goals clearly identify production and safety goals are intertwined, demonstrating commitments consistent with highly reliable organizations.

Risk-informed, conservative decision making

*Overall, this attribute is considered **implemented and effective**.*

- Line managers support and reinforce conservative decisions based on available information and risks. Managers and employees are systematic and rigorous in making informed decisions that support safe, reliable operations. Employees are expected, authorized and supported by managers to take conservative actions when faced with unexpected or uncertain conditions.
- Managers and employees are intolerant of conditions or behaviors that have the potential to reduce operating or design margins. Anomalies are thoroughly investigated, promptly mitigated, and periodically analyzed. The bias is set on proving that work activities are safe before proceeding, rather than proving them unsafe before halting. Personnel do not proceed, and do not allow others to proceed, when safety is uncertain and management is supportive of these decisions.

Management engagement and time in field

*Overall, this attribute is considered **implemented and effective** with continuous improvement efforts to be focused on those areas highlighted below*

- Maintaining operational awareness is a priority. Line managers are in close contact with the front-line employees. Line managers listen and act on real-time operational information. Line managers identify critical performance elements and monitor them closely.
- Line managers spent time on the floor and in employee work areas. Line managers practice visible leadership by placing "eyes on the work", asking questions, coaching, mentoring, and reinforcing standards and positive behaviors. Deviations from expectations are corrected promptly and, when appropriate, collectively analyzed to understand why the behaviors occurred.

- Managers set an example for safety through their personal commitment to continuous learning and by direct involvement in high-quality training that consistently reinforces expected employee behaviors.

Staff recruitment, selection, retention, and development

*Overall, this attribute is considered **implemented and effective** with continuous improvement efforts to be focused on those highlighted below.*

- People and their professional capabilities, experiences, and values are regarded as the organization's most valuable assets. Organizational leaders place a high personal priority and time commitment on recruiting, selecting, and retaining an excellent technical staff.
- The organization maintains a highly knowledgeable workforce to support a broad spectrum of operational and technical decisions. Technical and safety expertise is embedded in the organization. Outside expertise is employed when necessary.
- The organization is able to build and sustain a flexible, resilient, robust technical staff and staffing capacity. Staffing is sufficient to ensure adequate resources exist for redundancy in coverage as well as cope with and respond to unexpected changes in a timely manner.
- The organization values and practices continuous learning. Professional and technical growth is formally supported and tracked to build organizational capability. Employees are required to improve knowledge, skills, and abilities by participating in recurrent and relevant training and strongly encouraged to pursue educational opportunities.
- Line managers encourage and make training available to broaden individual skills and improve organizational performance. Training should include the ability to identify and mitigate unexpected conditions, to recognize and respond to a variety of problems and anomalies; to understand complex technologies and capabilities to respond to complex events; to develop flexibility at applying existing knowledge and skills in new situations, to improve communications and to learn from significant industry and DOE events.

Open communication and fostering an environment free from retribution

*Overall, this attribute is considered **implemented and effective** with continuous improvement efforts should be focused on those highlighted below.*

- A high level of trust is established in the organization.
- Reporting individual errors is encouraged and valued. Individuals feel safe from reprisal when reporting errors and incidents.
- Individuals at all levels of the organization promptly report errors and incidents and offer suggestions for improvements.
- A variety of methods are available for personnel to raise safety issues and for line managers to promptly and effectively respond to personnel who raise safety issues.
- Leaders proactively detect situations that could result in retaliation and take effective action to prevent a chilling effect.
- The organization addresses disciplinary actions in a consistent manner; disciplinary actions are reviewed to ensure fair and consistent treatment of employees at all levels of the organization.

Clear expectations and accountability

*This attribute is considered to be **partially implemented and/or partially effective** due to weaknesses in the areas highlighted below.*

- Line managers provide ongoing performance reviews of assigned roles and responsibilities, reinforcing expectations and ensuring key safety responsibilities and expectations are being met.

- Personnel at all organizational levels are held accountable for standards and expectations. Accountability is demonstrated both by recognizing excellent performance as well as identifying less-than-adequate performance. Accountability considers intent and organizational factors that may contribute to undesirable outcomes.
- Willful violations of requirements and performance norms are rare. Individuals and organizations are held accountable in the context of a just culture. Unintended failures to follow requirements are promptly reported, and personnel and organizations are acknowledged for self-identification and reporting errors.

Best Practice Questions:

A summary of responses are in italics with each question.

- What are the safety responsibilities in your job? Is safety incorporated into your job performance review? *Results to this question in interviews reflected good knowledge of the safety responsibilities in individual jobs, however, there were weaknesses in job performance review components. The bargaining unit personnel do not receive job performance reviews, and exempt employees reflected their reviews were not directly related to current job tasks and efforts, but were focused on being a development tool. The reviews are initiated by employees, with path forward actions. While there may be a statement of “doing work safely” in the performance review process, specific safety responsibilities and actions are not otherwise discussed.*
- In the past year, have you experienced any challenges or barriers to meeting your safety responsibilities? Have you had any particular successes in meeting your safety responsibilities? *Overwhelming interviews reflected that the site’s challenges with aging infrastructure and equipment maintenance as well as budget restraints were primary barriers in perceptions related to meeting safety responsibilities.*
- Does NWP have any kind of program to reward staff for improving safety, such as spot award for excellent work practices or awards for the best suggestions to improve safety? How many times in the past year as a manager have you recommended any of your staff for those awards? Do you think they make a difference in what people do around here? If not, what do you think would be more effective? *Interview answers reflected the following summary: Spot awards are not frequently used, and personnel are not aware whether they are still a viable option under the new contract. The recommended incentive for suggestions to improve safety are the STAR awards. Improvement suggestions go in the WIPP Form process, which is not the primary focus for that process. It is not apparent that Management consistently recommends personnel for STAR awards, yet they are a focus of pride for personnel, especially the STAR team awards. To be more effective, they need to be utilized more, with more publicity, such as giving them out in All Hands meetings.*
- Can you think of an instance from the past year in which your supervisor or manager spoke directly to you about a safety issue? *Consistent response of yes, discussed during morning briefings, pre-job etc.*
- How does your management treat errors? Does your management consider errors as negative to the business, as learning opportunities, or both? Give some examples. As a result would you be more or less likely to report an error you or a co-worker made?

There was a wide range of responses with multiple comments that reflected errors were ok—focus on organizational weakness, and need to focus more on employees repeating errors. Some felt management ignored errors, or worse when an error was reported peers were allowed to “tease” to the point they felt uncomfortable reporting.

- In the past few years, have you been involved in any benchmarking activities? If so, were any of your benchmarking ideas implemented? As a manager, how often do you initiate benchmarking or other continuous improvement focused efforts? Give examples. *A few employees mentioned the VPP Conference as the best benchmarking resource, and as the resource used most for effective continuous improvement. Other employees mentioned EFCOG related benchmarking like the Work Control initiative, or URS focused benchmarking, the rest stated they had not been involved in any benchmarking.*
- In your own words, what does the term, “conservative decision-making” mean? Can you give any examples where you have demonstrated “conservative decision-making?” *Most frequent answers were focused on a questioning attitude, stopping work, and other methods of assuring questions were answered before starting the work.*
- What do you take into consideration when making a decision on whether a situation is safe to continue operation? What about your management? *Responses included calling the cognizant engineer, discussing the problem with the manufacturer. Equipment abnormalities, such as equipment making noise, leaking fluid, etc. was the subject most frequently considered when determining safe continued operation. A few mentioned other scenarios such as taking samples. When asked about management, some mentioned they would expect more of a questioning attitude by managers of the cognizant engineer as to why it was safe to keep operating. There appeared to be some trust issues related to specific pieces of equipment and the cognizant engineer for that equipment.*
- Can you recall an instance in which decisions were not made at the appropriate organizational level, and as a result, a safety issue arose? *Only examples given all focused on the rework of maintenance work packages where feedback had previously been given and someone at a different level was not incorporating the feedback in the final documents. The other area mentioned by several employees dealt with decisions being made by a team lead level rather than being taken to the manager for the decision. The overall majority felt decisions were made at the appropriate levels.*
- When a situation arises that requires a choice between safety and production, how is the decision handled and who decides? *The comfort zone responses felt the highest level decisions were the safest, or those where the employees stopped work were the best decisions for choice between safety and production and where the strongest trust levels existed.*
- Do management decisions regarding operational issues (such as changes to the scope of work or response to operational events) reflect the appropriate focus on safety? Give examples. *Several mentioned a recent exercise as a positive example for this question, or a few years ago when the night shift was cancelled due to employee concerns regarding travel safety due to inclement weather.*

- Do management decisions related to deferred outage items, corrective vs. elective maintenance, and treatment of emergent outage items reflect the appropriate focus on safety? *The current focus of maintenance resources to implement new standards into the work control maintenance documents and the aging infrastructure and equipment reflected negatively in these responses, showing an impact on perceptions and on the overall safety culture impression of effective problem resolution.*
- What are your management's expectations of you as a manager regarding handling employee (safety) concerns (e.g. responsiveness, timeliness, availability, confidentiality)? How has your management documented these expectations? How are these expectations measured/assessed (e.g., performance appraisal)? *Though these expectations are in Management Safety Responsibilities Training, they do not appear to be frequently mentioned or reinforced, and are not part of the performance appraisal process.*
- How do you typically address your employee's safety concerns? *See if there is a need for immediate mitigation, otherwise go talk with management or put in a WIPP Form. At times, budget limitations mean we are not able to do exactly what the employee would like to see implemented.*
- How do you actively encourage your employees to bring concerns to you? *Actually they are not shy and bring up concerns without having to be encouraged. They take a lot of ownership in their work.*
- Do you know what is expected of you in handling employee concerns? Do you feel able to effectively handle employee concerns? Are you held accountable for your handling of employee concerns? How? *Yes, they know what is expected, and most of the time feel able to effectively handle the concern. However, many concerns are related to equipment reliability issues that can only be mitigated due to budget restraints. Again, the focus of maintenance resources to incorporate new standards into the work control maintenance documents is causing a delay in the response to ARs and the repair of equipment issues.*
- Does your management tolerate retaliation of any kind (including subtle) for raising concerns? *The majority stated absolutely no retaliation was tolerated. One section had challenges specific to their group with peer pressure by "teasing" and embarrassment. No true retaliation, but even this more subtle form of "teasing" is not accepted and will be researched further.*
- How do you prevent retaliation or the perception of retaliation associated with disciplinary actions or changes to the plant organization to ensure actions do not chill others? *This has not been an issue. Mainly, make sure HR is involved to help ensure the situation is appropriately handled.*
- How do you ensure you don't discourage the reporting of issues when there is pressure to meet production goals? *Manager responses all stated employees are open and report issues even when under pressure to meet goals. There is no discouragement in reporting of issues. Managers did not state how they ensure they don't discourage the reporting of issues. Some employees felt that production is a focus and sometimes addressing issues are postponed until work is finished.*

- Are self-assessments and continuous improvement in safety important at this site? What does your management expect you to do in this area? *There are a number of management assessments conducted, however employees are not actively engaged except for VPP and ISM assessments. Assessments have not been a heavy focal point (per the majority of responses to this question).*
- How effective is your corrective action program? *The overall perception is the program is not as effective as it should be, as many employees mentioned they felt an action was taken just to close the paperwork and did not really address the cause. Others mentioned the frequency of recurring issues, etc.*
- Which performance indicators do you track or trend? How useful are they? *A wide number are tracked including the monthly performance dashboard and those in the contract.*
- What kinds of safety concerns do you receive most often? What actions do you take? *Concerns related to equipment issues. Write an Action Request.*

SCWE ASSESSMENT CRAD 2, EMPLOYEE/WORKER ENGAGEMENT

OBJECTIVE

1. Assess the extent that NWP organizations model the behaviors of an outstanding SCWE.
2. Determine the strengths and improvement opportunities for NWP with respect to SCWE.

CRITERIA:

1. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Employee Worker Engagement identified as specific to SCWE.
 - a. Teamwork and mutual respect.

Responses are reflected in the results below.

2. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Employee/Worker Engagement providing additional safety culture foundation strengths.
 - a. Personal commitment to everyone's safety.
 - b. Participation in work planning and improvement.
 - c. Mindful of hazards and controls.
 - d.

Responses are reflected in the results below.

3. The safety culture at WIPP reflects effective implementation of the NRC best practices for the following employee behaviors:
 - a. Accepts responsibility for reporting concerns - *This was an exceptionally strong area as reflected in surveys.*
 - b. Clearly communicating concern and ensure understanding of person receiving concern - *Consensus that one on one communication of the issue and understanding was clear, but feedback was weak.*
 - c. Share suggested solution - *Employee engagement in solutions was another continuous improvement opportunity identified.*
 - d. Follow-up to ensure issue is addressed - *Due to continued equipment maintenance and aging infrastructure issues, some employees stated they did not follow up and did not know when an issue might get addressed.*
 - e. Show respect to others raising concerns - *For the most part, respected each other, with some pockets of immature teasing.*

APPROACH:

Record Review: Review program plans, procedures, time in field documents, employee concerns, WIPP Forms, SCWE Survey results, assessment reports, and other documents as applicable to determine whether the above criteria has been effectively met, including adequacy of the documents to meet the requirements.

Surveys and Group Feedback: Analysis of the SCWE Survey results, and of general employee input on strengths and weaknesses of these ISM Safety Culture Focus Area Attributes obtained during the Open and Collaborative Safety Conscious Work Environment Training (SAF-651) will be included in the review.

Interviews: Interview NWP personnel to determine knowledge of roles and responsibilities, and to clarify program documents and components, as necessary. This includes interviews of management and personnel in one-on-one and in small focus groups. These will include scenarios with lines of inquiry from DOE Safety Conscious Work Environment Self-Assessment Guidance, and Benchmark NRC Best Practices including “95003.02-B, Sample Questions for Safety Culture Components” specifically for use in conducting individual interviews and focus groups.

Observations: Direct observations of work place behavior will also be used to determine effectiveness in meeting these criteria.

Attribute Expectations of Excellence, Lines of Inquiry, and Best Practices Questions are attached.

RESULTS:

Results are written within each attribute and question below.

CRAD 2, Attachment 1: Attributes of Excellence for Safety Culture Focus Area- Employee/Worker Engagement

Personal commitment to everyone's safety

*Overall, this attribute is considered **implemented and effective**, continuous improvement efforts should be focused on those areas in italics below.*

- Responsibility and authority for safety are well defined and clearly understood as an integral part of performing work.
- The line of authority and responsibility for safety is defined from the senior manager to the individual contributor. Roles and responsibilities, authorities and accountabilities are clearly defined in writing and are understood by each individual.
- Individuals understand and demonstrate responsibility for safety. Safety and its ownership are apparent in everyone's actions and deeds.
- *Individuals outside of the organization (including subcontractors, temporary employees, visiting researchers, vendor representatives, etc.) understand their safety responsibilities.*
- The organization knows the expertise of its personnel. Line managers defer to qualified individuals with relevant expertise during operational upset conditions. Qualified and capable people closest to operational upsets are empowered to make important decisions, and are justly held accountable.

Teamwork and mutual respect

*Overall, this attribute is only **partially implemented and/or partially effective**, considered particularly weak as each attribute needs additional focus in continuous improvement.*

- *Open communications and teamwork are the norm.*
- *Individuals at all levels of the organization listen to each other and effectively engage in crucial conversations to ensure meaning, intent and viewpoints are understood; and that differing points of view are acknowledged.*
- *Discussion on issues focus on problem solving rather than on individuals.*
- *Good news and bad news are both valued and shared.*

Participation in work planning and improvement

*Overall, this attribute is only **partially implemented and/or partially effective**, with weak attributes that should be focused on in italics below.*

- *Individuals are actively involved in identification, planning, and improvement of work and work practices. (Note: weaknesses in employee engagement was a finding overall for this assessment)*
- Individuals follow approved work practices and procedures.
- Individuals at all levels can stop unsafe work or work during unexpected conditions. (Note: this attribute was identified as a major strength in this assessment).
- *Design, analysis and continuous improvement of work practices and processes are valued as core organizational competencies; expertise in these competencies is evaluated and rewarded.*

Mindful of hazards and controls

*Overall, this attribute is considered **implemented and effective**. This was a particularly strong attribute as identified in the Behavioral Anchored Rating Scales. None were identified as being weaker.*

- Organizational safety responsibilities are sufficiently comprehensive to address the work activities and hazards involved.
- Work hazards are identified and controlled to prevent or mitigate accidents, with particular attention to high consequence events with unacceptable consequences.
- Individuals understand and proactively identify hazards and controls before beginning work activities.
- Individuals are mindful of the potential impact of equipment and process failures, demonstrate constructive skepticism and are sensitive to the potential of faulty assumptions and errors. They appreciate that mindfulness requires effort.

Best Practice Questions:

- What are the safety responsibilities in your job? Is safety incorporated into your job performance review? *Results to this question in interviews reflected good knowledge of the safety responsibilities in individual jobs, however, there were weaknesses in job performance review components. The bargaining unit personnel do not receive job performance reviews, and exempt employees reflected their reviews were not directly related to current job tasks and efforts, but were focused on being a development tool. Reviews are initiated by employees, with path forward actions. While the performance review includes a statement of “doing work safely”, specific safety responsibilities and actions are not discussed during the review.*
- Please describe an example from the past year in which you, your manager or a peer stopped work or delayed completing a task because of a safety issue or concern. What was the nature of the issue? How was it identified? How was it resolved? Were you personally satisfied with the resolution? If not, what would you have liked to see happen? *Many examples were given with personnel consistently stating that stop work was an effective approach for resolution of concerns, and that they would and did use it as needed to address issues.*
- Where would you go to raise a safety issue? Are there other avenues or methods available to you for raising safety issues? Which do you feel is the most effective? *Responses included notifying the Central Monitoring Room, their manager, the safety department, the WIPP hotline, issue a WIPP Form, and others. Most effective is stop work.*

- Are you willing to raise a safety concern? Are there any conditions under which you would be hesitant to raise a safety concern? *Nearly all stated they were willing to raise a safety concern. The only hesitancy was if the equipment had already been logged a number of times before.*
- Have events or circumstances occurred in the past year that have reduced: (*majority of responses*)
 - Your willingness to identify or raise safety issues? *No.*
 - Your confidence in the corrective action program? *Yes, based on delays in the maintenance of equipment.*
 - Your willingness to challenge actions or decisions you believe are wrong? *Several related to budget restraints which can't be changed.*
 - Your comfort level in voicing your viewpoints and opinions? *No.*
- Does your management encourage you to submit improvement ideas? *There is an ongoing program if you want to submit ideas related to cost savings and the ability to issue a WIPP Form. Being on a Solution Assist Teams may be a way to let you help improve things.*
- Have you ever submitted an issue to the WIPP Form Process? If not, why not? If yes, was the issue adequately addressed? Do you believe that the WIPP Form process is generally successful in addressing issues that are submitted? Can you provide an example related to your answer? Are issues addressed in a timely manner? *The WIPP Form process is not seen as being effective, as the way it is addressed, how it is closed, seems to be subjective based on the manager input. The employee who identifies the concern needs to be part of the action review and provide input, or have more involvement in the closure of the issue. Sometimes the action taken doesn't seem to address the cause of the issue.*
- When you submit a safety concern through the Open Door Policy to your manager, is it addressed in a timely manner? *Answers were dependent on whether submitting to manager or to supervisor or team lead. It was felt the Open Door at senior management level was more effective than line management level.*
- Does NWP have any kind of program to reward staff for improving safety, such as spot award for excellent work practices or awards for the best suggestions to improve safety? How many times in the past year as a manager have you recommended any of your staff for those awards? Do you think they make a difference in what people do around here? If not, what do you think would be more effective? *Interview answers reflected the following summary: Spot awards are not frequently used, and personnel are not aware whether they are still a viable option under the new contract. The closest incentive for suggestions to improve safety are the STAR awards. Improvement suggestions go in the WIPP Form process, which is not the primary focus for this process. It is not apparent that Management consistently recommends personnel for STAR awards, yet they are a focus of pride for personnel, especially the STAR team awards. To be more effective, they need to be utilized more, with more publicity, maybe give them out in All Hands meetings.*
- When there is a problem to be solved that will affect several work groups or other departments, how is that handled? Who is usually involved with the resolution (e.g. employees or managers)? If the solutions are identified by managers, do employees have input? *The solutions seem to be handled at senior management levels. Employees are rarely involved with*

the resolution and do not have input except when they walk down a change to a procedure, for example.

- When a situation arises that requires a choice between safety and production, how is the decision handled and who decides? How do your managers balance production and safety? *The decision is made by the person that is there, which are the team leads, waste handling engineers, superintendents or supervisors. Employees don't think the decision actually goes up to a true manager, and managers are OK with that.*
- Based on your experiences, does your manager fully understand safety issues that you or members of your work group raise? How does your manager handle if s/he doesn't understand your issue? Is your input solicited during the problem resolution if you enter an issue into the WIPP Form process? *Consensus in responses, they understand, they just feel they can't do anything about it due to budget restraints and the maintenance resource focus on implementation of new standards in the work control maintenance documents. Input is not solicited in the WIPP Form process. The employee is not involved in any way and sometimes the issue is closed and the action never really addressed the issue.*
- Do managers observe your work? If so, how often? What do they do when they are observing? Are you aware of any changes to how work is performed at the site that have resulted from management observations? *The responses varied by group. Many employees said managers do observe their work, "watching over their shoulder. A small percentage said they never see managers. A high percentage stated management time in the field is improving. Some changes came about when managers were doing the senior supervisor watch program and saw challenges in implementing procedures as written.*
- Do management decisions related to deferred outage items, corrective vs. elective maintenance, and treatment of emergent outage items reflect the appropriate focus on safety? *With the resource focus on the implementation of new standards to the work control documents, the appropriate focus on safety seems more challenging and impacts perceptions accordingly.*
- What kind of safety concerns do you hear about or know about most often? Are they resolved effectively? *Concerns related to equipment issues. Write an Action Request.*

SCWE ASSESSMENT CRAD 3, ORGANIZATIONAL LEARNING

OBJECTIVE

1. Assess the extent that NWP organizations model the behaviors of an outstanding SCWE.
2. Determine the strengths and improvement opportunities for NWP with respect to SCWE.

CRITERIA:

1. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Organizational Learning identified as specific to SCWE.
 - a. Credibility, trust and reporting errors and problems.
 - b. Effective resolution of reported problems.
 - c. Performance monitoring through multiple means.
 - d. Questioning attitude.

Responses are reflected in the results below.

2. The safety culture at WIPP reflects the implementation and effectiveness in meeting the attribute expectations of excellence in each of the following attributes of the ISM Safety Culture Focus Area-Organizational Learning providing additional safety culture foundation strengths.

- a. Use of operational experience.

Responses are reflected in the results below.

3. The program processes supporting the supplemental information topic of performance measures and contract incentives reflect appropriate support to maintain SCWE demonstrating a focus on continuous improvement in accordance with this CRAD focus on organizational learning. Lines of Inquiry for this criteria are taken directly from the SCWE Self-Assessment Guidance, Attachment 1, Supplemental Information Topic.

This criteria was determined to be met except for the last line of inquiry in the group, where opportunities for improvement related to effective resolution of problems were identified.

APPROACH:

Record Review: Review program plans, procedures, time in field documents, employee concerns, WIPP Forms, SCWE Survey results, assessment reports, and other documents as applicable to determine whether the above criteria has been effectively met, including adequacy of the documents to meet the requirements.

Surveys and Group Feedback: Analysis of the SCWE Survey results and of general employee input on strengths and weaknesses of these ISM Safety Culture Focus Area Attributes obtained during the Open and Collaborative Safety Conscious Work Environment Training (SAF-651) will be included in the review.

Interviews: Interview NWP personnel to determine knowledge of roles and responsibilities, and to clarify program documents and components, as necessary. This will include interviews of management and personnel in one-on-one and small focus groups. These will include scenarios with

lines of inquiry accordingly from DOE Safety Conscious Work Environment Self-Assessment Guidance, and Benchmark NRC Best Practices including “ 95003.02-B, Sample Questions for Safety Culture Components” specifically for use in conducting individual interviews and focus groups.

Observations: Direct observations of work place behavior will also be used to determine management and leadership effectiveness in meeting these criteria.

Attribute Expectations of Excellence, Lines of Inquiry, and Best Practices Questions are attached.

RESULTS:

Results are written within each attribute and question below.

CRAD 3, Attachment 1: Attributes of Excellence for Safety Culture Focus Area-Organizational Learning

Credibility, trust and reporting errors and problems

*Overall, this attribute is considered **implemented and effective**, continuous improvement efforts should be focused on those in italics below.*

- *Credibility and trust are present and continuously nurtured so that a high level of trust is established in the organization.*
- *Organizations, managers and line supervisors provide accurate, relevant and timely information to employees. Line managers are skilled in responding to employee questions in an open, honest manner.*
- Reporting individual errors is encouraged and valued. Individuals are recognized and rewarded for self-identification of errors.
- Line managers encourage and appreciate safety issues and error reporting.
- *Managers and line supervisors demonstrate integrity and adhere to ethical values and practices to foster trust.*
- Managers and line supervisors demonstrate consistency in approach and a commitment to the vision, mission, values and success of the organization as well as the individuals (people).
- Mistakes are used for opportunities to learn rather than blame.
- Individuals are recognized and rewarded for demonstrating behaviors consistent with the safety culture principles.

Effective resolution of reported problems

*Overall, this attribute is considered only **partially implemented and/or partially effective**, continuous improvement efforts should be focused on those in italics below.*

- *Vigorous corrective and improvement action programs are established and effectively implemented, providing both transparency and traceability of all corrective actions. Corrective action programs effectively prioritize issues, enabling rapid response to imminent problems while closing minor issues in a timely manner to prevent them from escalating into major issues.*
- *Results from performance assurance activities are effectively integrated into the performance improvement processes, such that they receive adequate and timely attention. Linkages with other performance monitoring inputs are examined, high-quality causal analyses are conducted, as needed, and corrective actions are tracked to closure with effectiveness verified to prevent future occurrences.*
- Processes identify, examine and communicate latent organizational weaknesses that can aggravate relatively minor events if not corrected. Organizational trends are examined and communicated.

- Organizational systems and processes are designed to provide layers of defenses, recognizing that people are fallible. Lessons learned are shared frequently; prevention and mitigation measures are used to preclude errors from occurring or propagating. *Error-likely situations are sought out and corrected, and recurrent errors are carefully examined as indicators of latent organizational weaknesses.*
- Incident reviews are conducted promptly after an incident to ensure data quality and to identify improvement opportunities. *Causal analysis expertise is applied effectively to examine events and improve safety work performance. High-quality causal analysis using multi-discipline analytical perspectives is the norm. Causal analysis is performed on a graded approach for major and minor incidents, and near-misses, to identify causes and follow-up actions. Even small failures are viewed as windows into the system that can spur learning.*
- *Performance improvement processes require direct worker participation. Individuals are encouraged, recognized and rewarded for offering innovative ideas to improve performance and to solve problems.*

Performance monitoring through multiple means

*Overall, this attribute is considered **implemented and effective**.*

- Line managers maintain a strong focus on the safe conduct of work activities. Line managers maintain awareness of key performance indicators related to safe work accomplishment, watch carefully for adverse trends or indications, and take prompt action to understand adverse trends and anomalies. Management employs processes and special expertise to be vigilant for organizational drift.
- Performance assurance consists of robust, frequent, and independent oversight conducted at all levels of the organization. Performance assurance includes independent evaluation of performance indicators and trend analysis.
- Line managers throughout the organization set an example for safety through their direct involvement in oversight activities and associated performance improvement.
- The organization actively and systematically monitors performance through multiple means, including leader walkarounds, issue reporting, performance indicators, trend analysis, benchmarking, industry experience reviews, self-assessments, peer reviews, and performance assessments.
- The organization demonstrates continuous improvement by integrating the information obtained from performance monitoring to improve systems, structures, processes, and procedures.
- Line managers are actively involved in all phases of performance monitoring, problem analysis, solution planning, and solution implementation to resolve safety issues.
- The organization maintains an awareness of its safety culture maturity. It actively and formally monitors and assesses its safety culture on a periodic basis.

Use of operational experience

*Overall, this attribute is considered **implemented and effective**.*

- Operating experience is highly valued and the capacity to learn from experience is well developed. The organization regularly examines and learns from operating experiences, both internal and in related industries.
- Organization members convene to swiftly uncover lessons and learn from mistakes and successes.
- The organization embraces feedback from peer reviews, independent oversight, and other external sources.

- The organization documents and shares operating experiences (lessons learned and best practices) within the organization and with industry.

Questioning attitude

Overall, this attribute is considered **implemented and effective**, continuous improvement efforts should be focused on those in italics below.

- Line managers encourage a vigorous questioning attitude toward safety, and *foster constructive dialogues and discussions on safety matters.*
- Individuals cultivate a constructive, questioning attitude and health skepticism when it comes to safety. Individuals question deviations, and *avoid complacency or arrogance based on past successes.* Team members support one another through both awareness of each other's actions and constructive feedback when necessary.
- Individuals pay keen attention to current operations and focus on identifying situations where conditions and/or actions are diverging from what was assumed, expected, or planned. *Individuals and leaders act to resolve these deviations early before issues escalate* and consequences become large.

Supplemental Information Topic: Performance Measures and Contract Incentives Lines of Inquiry

Contract incentives achieve a reasonable balance between cost/schedule and safety pressures.

- What incentives are in place to prevent budget or schedule pressures from impairing the effectiveness of formal processes for identifying, documenting, and resolving: nuclear, safety, quality, and technical concerns; along with issues raised by employees, and issues associated with the management of complex technical issues?
The contract provides for both performance based incentives and award fee incentives. The incentives are balanced to provide for the safety of NWP employees, the public and the environment and to encourage deliverables of high quality. For example, award fee incentives are based on:
 - Maintenance and upkeep of WIPP facilities and equipment.
 - Establishment of controls for proper supervision of the work force to mitigate safety incidents and inefficient project performance.
 - Coordination and cooperation with cognizant DOE officials.
 - Responsiveness to DOE direction.
 - Quality of delivered products and services.
 - Integrity of NWP's quality assurance program.
 - Accuracy of documents, references and background material.

Performance metric insights into SCWE

- What insight does Performance Assurance System data provide regarding SCWE and whether the organization learns from safety concerns? The recommended team approach is to evaluate the issues management system to determine whether: 1) When employees raise issues, are they involved in determining the solution? - *they are not in some programs, this was identified as a weakness.* 2) Do they receive feedback on the resolutions of their concerns? - *feedback in all areas was identified as a weakness* 3) Do workers actively participate in the preparation and execution of corrective actions? - *employee engagement involvement was identified as a weakness* 4) Are employees part of improvement initiatives at their work locations? - *employee engagement involvement was identified as a weakness* and 5) Do the performance indicator trends show the system is being effectively used by workers and managers to identify and

address issues? (e.g., trends could exist in: the rate of corrective action completion, the number of overdue corrective actions, the average age of incomplete corrective actions, or the number of issued deemed as recurring) - *Trending demonstrated the system is being effectively used, though perceptions as to the effectiveness of this use was weak.*

- What evidence exists to show decision making reflects a safety first attitude? The recommended approach is to evaluate operations and management information/metrics to determine whether trend and changes are present in performance indicators, such as: 1) the rate of unplanned LCO entries; 2) the rate and nature of procedural violations; 3) the rate of deferred/overdue training; 4) currency of SCWE-related procedures and policies (e.g., Differing Professional Opinion process, Employee Concerns Program); and 5) the number of problem identification reports submitted on a periodic basis (e.g., monthly). *Objective evidence reflected the appropriate focus on safety. One weakness, the Worker Protection Program Management Policy should be updated to include SCWE specifics.*
- What evidence exists to show how effectively the organization monitors the SCWE aspects of their safety culture? The recommended team approach is to evaluate performance assurance system information to determine what trends and changes are present in performance indicators such as: 1) the rates of overdue/delayed/cancelled audits & assessments; 2) the number and quality of findings; 3) the turnover in audit/assessment staff; 4) the rate and nature of externally-vs. internally identified findings; and 5) the rate and nature of reportable events. *Though this assessment is the first SCWE specific focus, the referenced performance indicators are tracked.*
- What evidence exists that demonstrates managers/supervisors perform first hand observations of the work environment, listen to workers, and make changes where necessary? The recommended team approach is to evaluate performance assurance system information to determine what trends and changes are present in performance indicators such as: 1) the number of management observations by senior manager; 2) the number of management observations that identify deficiencies or best practices; and 3) the number of deficiencies or best practices that result in change. *With the initiation of the new NWP contract there is a significant focus on management walkarounds with the expectation that at least 25% of management time is spent in the field. There are definite improvements occurring as a result of this expectation, but the specifics regarding the number of identified deficiencies or best practices, and the level of detail is not yet being trended.*
- What evidence exists that demonstrates the organization maintains nuclear facilities in a manner that supports both production and the safe performance of work? The recommended team approach is to evaluate facility performance metrics to determine what trends and changes are present in performance indicators such as: 1) the number and age of LO/TOs hanging; 2) the number and age of temporary modifications; 3) the rates of deferred maintenance; and 4) the number and age of inoperable or impaired safety systems. *Though surveys reflected a high percentage of personnel feel that our safety culture is improving with the NWP contract, the current focus of maintenance resources on the implementation of new standards for the maintenance work documents do not currently reflect effective maintenance of nuclear facilities in a manner that supports both production and the safe performance of work, and that these issues definitely are impacting morale and the safety culture, as people are frustrated with what they feel is a lack of effective resolution of problems.*

Attachment 4: Case Study

This is the case study that was used in the focus groups. It was impressive that across the board, not just the management focus groups, but employees also, wanted more information at the Part I level before determining “culpability”. With Part II they quickly started identifying organizational weaknesses automatically which reflected strengths in the use of the WIPP Culpability Model as personnel naturally looked for those components in their individual thought processes.

- I. Please read the following case study and follow the instructions listed at the end.

Proposed Termination of Jesse

A disciplinary action has been proposed against Jesse for insubordination and poor performance. Jesse is a senior engineer with 20 years of experience with the organization, assigned to develop and review nuclear technical products. Based on your positional authority, you are the deciding official for this action.

HR and Jesse’s immediate manager recommend terminating Jesse. You are provided the following information:

- Jesse has missed project milestone deadlines that impacted projects.
- Repeated errors in the employee’s work products have resulted in rework.
- About six months ago, a non-disciplinary coaching session was conducted with Jesse that included a Performance Improvement Plan.
- Jesse refused to perform work as directed (insubordination).
- Jesse’s behavior has begun to create tension in the workplace.

Jesse’s HR file contains the following information:

- Issued a verbal warning by his manager four months ago for errors in work products.
- Issued a letter of reprimand three months ago for missed deadlines/milestones.
- Suspended without pay for several days, two months ago.

You determine it is necessary to obtain more information and schedule a meeting with Jesse’s immediate manager (Gabe), Jesse’s one-over-one manager (Maria), and the HR representative.

During this meeting, the following information is revealed:

- Gabe has been working with the entire group to meet the deadlines.
- Gabe has been working really hard over the last few months to work with Jesse, but Jesse’s attitude and behaviors are making it hard to manage Jesse.
- Actions taken to date have been minimally effective as Jesse has continued to question Gabe, often resulting in the delay of work.
- Maria is an acting director and has been travelling significantly to support other projects. Maria has just returned this week. Other acting directors have been in “rotation” and none are aware of any of the issues Gabe has had with Jesse.

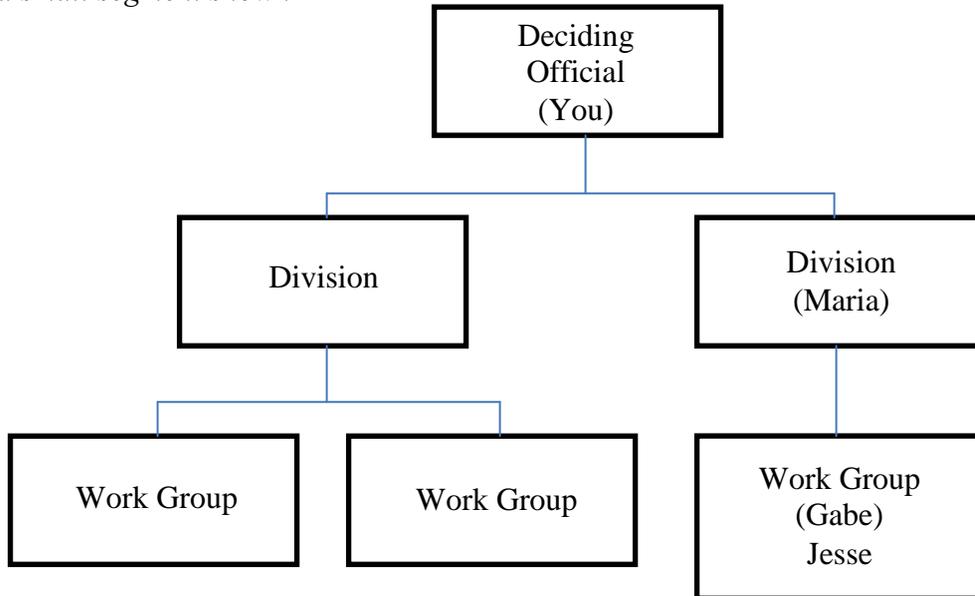
After the meeting, you request the Quality Assurance Director to run a report of the reporting system for the workgroup to identify what issues have been submitted within the last year. The report identified the following:

- Jesse wrote a problem report nine months ago that identified a preparer of calculations was not qualified to perform those calculations.

- Jesse's workgroup showed a 50% reduction in the number of problem reports issued over the last six months.

Organization Chart

...only a small segment shown



Note: This is a 2-part exercise

Part I: Small Group Exercise

Instructions:

- Break into your assigned small group.
- Using the case study “Jesse,” answer the following questions:
 - Do you terminate Jesse?
 - Do you need more information?
 - If so, what information do you need?
 - Are there any immediate actions you need to take?
- Capture your responses on a flip chart.
- Select a spokesperson to present your group responses.
- Respond to questions.

Note: This is a 2-part exercise

Part I: Individual

Instructions:

- On a separate piece of paper and using the case study “Jesse,” answer the following questions:
 - Do you terminate Jesse?
 - Do you need more information?
 - If so, what information do you need?
 - Are there any immediate actions you need to take?

Discuss your answers with the attending facilitator.

- II. Please read the following case study and follow the instructions listed at the end.

Proposed Termination of Jesse II

A disciplinary action has been proposed against Jesse for insubordination and poor performance. Jesse is a senior engineer, with 20 years of experience with the organization, assigned to develop and review nuclear technical products. It has been determined you are the deciding official for this action based on your positional authority. Termination is the recommendation from HR and immediate management.

Supplemental Facts from the Independent Investigation Report

Division Manager Maria (Jesse’s One-over-One)

- I became aware of Jesse’s performance issues when Jesse’s letter of reprimand was issued three months ago.
- I’ve been so busy with my detail. The few weeks I have been back Jesse’s manager Gabe has asked me to concur on a disciplinary action against Jesse.
- I’ve always known Jesse to be a strong performer—so it was quite a surprise to me when I was approached about this matter. But I trust Gabe... He was one of my best engineers/technical -guys and I was the one who selected him for this promotion. I have no reason to doubt his judgment.

- I know how much stress Gabe is under. He's told me about the issues that have been raised in his work group and the ways the issues have impacted important goals that directly affect our mission.
- Not only is my management and the organization concerned, but I've heard rumblings the top brass are not very happy with us...

Workgroup Manager Gabe (Jesse's Immediate Supervisor)

- I've been in this position as the manager of the group for 10 months.
- It has been a real struggle since the very beginning. I believe my job is to protect my management and the organization.
- I always meet my deadlines. Our mission is clear—cost and schedule is important.
- We are so busy... we have so much to do. Jesse takes up so much of my time!
- Jesse is constantly questioning me about everything. It often results in delays to our projects. We have a lot of visibility right now. My reputation and the reputation of the organization are riding on making these commitments. To be honest, I think Jesse is jealous because I was selected for the position 10 months ago, so now he just questions me about everything, in front of everyone—so it makes me feel like he's questioning my competence and my authority.
- I was just trying to make sure that the issues were being addressed in a timely manner. During a staff meeting several months ago my acting manager Maria told us that the problem report backlog was increasing and that she expected the numbers to improve.
- The issue he keeps raising... well, we've met on it countless times. He just won't let it go... something to do with "the qualifications of the engineer who performs calculations." I mean, come on, the engineer he is complaining about has made a few mistakes, but he's a good guy and he always meets his deadlines. That's more than I can say for Jesse.

Jesse's Interview:

- I don't know what has happened here. I've been a good and loyal employee for over 20 years. I take pride in making sure the products I prepare are accurate and correct. I am a licensed engineer and I take that seriously; it means something to me. It's become obvious to me that not everyone in this organization thinks about this the same way I do.
- I've brought the issue up about the guy who prepares the calculations being unqualified—and even wrote a problem report about it. But nothing ever happened with it—because Gabe is the one who responded and just closed it out with no questions asked.
- I knew Gabe was not happy with me about raising these issues. I just didn't realize how upset with me he was. I received a written reprimand that indicated I'd been "counseled." But, in reality, Gabe never "counseled" me—it didn't even make sense. I went to HR and they didn't help me—all they said was for me to go back to Gabe. There was nowhere I could appeal.

- Then a month later I received a letter of suspension for insubordination! This was because I raised the issue of the qualifications again—and because we missed a deadline associated with fee. That sure made it clear what was important to my management.
- Since I've come back from the suspension Gabe has been avoiding me, won't look me in the eye, and is treating me differently than other employees. He even left me off the staff meeting invitation. He told my co-workers it was an accident, but he hasn't even talked to me about it.
- The problem is things are getting worse. The engineer who prepares the calculations is not just unqualified. The document he prepared the week before last, well, he actually falsified information on it. I'm not sure, but I believe Gabe may even know about it, and may have even directed him to falsify the information, just so the deadline could be met. We are not talking about simple systems here... we are talking about nuclear technical products!
- After coming back to work after the suspension, and still dealing with this issue, I realized that I just couldn't raise it to management again. So, last week I decided to go to the Inspector General. I didn't really want to go, but I didn't feel like I had a choice. For the first time, I feel like someone really listened and heard the issue I was trying to raise and... that something will finally be done.
- Everyone in my workgroup has become afraid to raise any issues. If you don't believe me, you should ask them.

Co-Worker Interviews

- Twenty five employees consisting of engineers, quality assurance, program analysts, and support staff make up Jesse's workgroup. Of the 25, two refused to be interviewed. Of the 23 interviewed, four (17%) said they would not raise safety issues to the group manager Gabe.
- Employees cited lack of responsiveness, feedback, and closure on issues raised, not only to Jesse's workgroup but to management within the organization as well.
- Asking questions about the work environment, co-workers of Jesse volunteered information to indicate that Jesse's manager (Gabe) is treating Jesse differently and that it may be related to Jesse raising concerns.

Additional Information:

- Two years ago, trends identified that issues within Jesse's workgroup were being promptly prioritized and responded to promptly, and documentation within the problem resolution system demonstrated that employees were provided feedback (that is, traceable and transparent).
- About nine months ago, just two months after Gabe was promoted into the position, issues began to languish in the system. Specifically, issues within the system appear to have been consistently prioritized at the lowest level, with little or no documentation and no documentation demonstrating feedback to employees.
- Within the last month and a half, the problem resolution system process identified that zero problem reports have been filed by employees of Jesse's workgroup.

- A report of the Employee Concerns Program identified two employee concerns associated with Jesse's workgroup have been filed within the last three months.

Exercise – Part II. Small Group

Instructions:

- Break into your assigned small group.
- Using this Case Study, "Jesse II," answer the following questions:
 1. How has the new information changed this situation?
 2. What red flags do you see now that you did not see before?
 3. What risks exist to the organization?
 4. How did management contribute to the situation?
 5. How can you recover/mitigate this situation?
 6. Which tools from Lesson 5 could have used to prevent this situation? What tools can you use to mitigate the situation?
 7. What assistance do you need from others? From whom?

Instructions:

- Capture your group responses on a flip chart.
- Select a spokesperson to present your responses to classroom.
- Responds to questions.

Exercise – Part II. Individual

Instructions:

- A separate piece of paper and using this Case Study, "Jesse II," answer the following questions:
 1. How has the new information changed this situation?
 2. What red flags do you see now that you did not see before?
 3. What risks exist to the organization?
 4. How did management contribute to the situation?

5. How can you recover/mitigate this situation?
6. Which tools from Lesson 5 could have used to prevent this situation? What tools can you use to mitigate the situation?
7. What assistance do you need from others? From whom?

Discuss your answers with the attending facilitator.

Attachment 5: Behavioral Anchored Rating Scales

Employees are given the opportunity to rate the behavior on a scale of 1-5, marking the number beside the most applicable behavior discussion.

Results are based on potential averaged score of 1-5.

Open & Collaborative Safety Conscious Work Environment Assessment Behavioral Anchored Rating Scales

Date: _____ Time: _____ Meeting/Field Location: _____

Groups/Crews Present: _____

Managers Present: _____

of Personnel in this observation area: _____

Management Engagement and Time in the Field: **Averaged Score: 4.12**

5. Maintaining operational awareness is a priority as evidenced by line managers being in close contact with the front line employees. They are seen in the field, listening and acting on real-time operational information. They are monitoring work in progress, placing eyes on the work, asking questions, reinforcing expected employee behaviors.
4. Line managers are not seen in field much but are present during shift turnovers, pre-start meetings/pre-job briefings, actively participating in conversations/assigning tasks/answering questions.
3. Management is readily available to employees and engaged in conversations, answering questions and ensuring they are knowledgeable of employee work status and tasks, but are not at meetings or in field.
2. Paperwork and management meetings or other needs consume 90% of time, so management is not readily available to employees.
1. Not apparent that management spends any time in field, or is engaged with employees.

Attention to Safety: **Averaged Score: 3.93**

Attention to Safety refers to the characteristics of the work environment such as the norms, rules, and common understandings that influence facility personnel's perceptions of the importance the organization places on safety. It includes the degree to which a critical, questioning attitude exists that is directed toward facility improvement.

5. Individuals in the facility believe safety is the number one priority and that perspective is reinforced by senior (high-level management) and clearly disseminated to all individuals in the facility. On an individual basis, individuals understand and demonstrate responsibility for safety. Safety and its ownership are apparent in everyone's actions and deeds.
4. Personnel make an effort to correct problems in a timely and effective manner to ensure that safety levels are not compromised with the facility. Individuals have a clear understanding that safety is a top priority.

3. Facility management reflects a delicate balance of emphasizing safety, while at the same time, making it clear that there is a need to keep the facility operating.
2. At times, the interests of the stakeholders seem to take priority over concerns regarding the safe operation of the facility and the lack of organization wide support for safe facility operations is clearly evident.
1. Questions regarding safe operations are not welcome or addressed. Management's attitude is to keep the facility operating regardless of evident safety issues.

Communication: **Averaged Score: 2.85**

Communication refers to the exchange of information, both formally and informally, primarily between different departments or units. It includes both the top-down (management to staff) and bottom-up (staff to management) communication networks.

5. Departments keep other departments constantly aware of information they need to know. Individuals within a department know where to go and who to talk to within other departments to obtain information. On an individual basis, individuals at all levels of the organization listen to each other and effectively engage in crucial conversations to ensure meaning, intent, and viewpoints are understood; and that differing points of view are acknowledged. Communication is open and respectful.
4. Individuals can readily gain information from other departments when the need arises.
3. Interdepartmental lines of communication are well defined and often used on both a formal and informal basis.
2. Many departments think it is unnecessary and intrusive to communicate with other departments unless absolutely necessary.
1. Departments only communicate with each other when reacting to problems. Most departments are uncommunicative with one or more other departments.

Mindful of Hazards and Controls: **Averaged Score: 4.37**

5. Individuals understand and proactively identify hazards and controls before beginning work activities. Pre-job briefings include discussion of the Job Hazard Analysis (JHA) which covers all hazards in the area associated with the work to be performed and that appropriate controls to prevent or mitigate accidents have been identified. Individuals demonstrate awareness of the potential impact of equipment and process failures and raise any related issues, accordingly.
4. Issues such as equipment problems are logged and appropriate action taken by individuals or the engineer. Questions are brought up if there are concerns related to the content of the JHA.
3. Pre-job briefings not really covering through discussion of hazards, no actions taken on potential equipment issues except to log it.
2. Personnel accept brief ineffective pre-job brief, no actions taken on equipment issues.

1. Employees do not demonstrate awareness of hazards, do not ensure controls in place (such as conducting pre-use inspections).

Problem Identification and Resolution: **Averaged Score: 3.59**

Problem Identification and Resolution refers to the extent to which the organization encourages facility personnel to draw upon knowledge, experience, and current information to identify and resolve problems.

5. Employees are equipped with the knowledge and are encouraged to proactively identify potential problems (e.g., equipment, personnel, scheduling). Employees are asked to notify management of potential problems which are then properly addressed.
4. Employees are encouraged to notify management of problems they observe. Problems identified by employees are funneled into a system that evaluates the problem and makes a determination regarding future action. Employees receive feedback about problems that were acted upon.
3. Employees have a system to report problems they identify. Employees are given inconsistent feedback about problems they identified or problems that were fixed.
2. Problems reported from the general employee group rarely receive considerations. Some employees lack the knowledge required to identify potential problems. In some situations, problem identification is met with extreme defensiveness.
1. Problems go undetected, or unreported, since most employees lack the knowledge, experience and information necessary and/or fear the consequences of identifying problems.

Participation in Improvement: **Averaged Score: 4.08**

5. Individuals are actively involved at all levels in identification, planning, and improvement of work practices as evidenced in meetings, in post-job briefings, etc. They stop unsafe work or when faced with unexpected conditions. Good news and bad news are both valued and shared.
4. Individuals follow approved work practices and procedures. When asked, they will contribute to conversation with ideas.
3. Individuals conduct work-arounds, take shortcuts, but tell management they had to because they could not perform the work package exactly as written.
2. Individuals do whatever it takes to get the job done, even if not according to approved processes.
1. Individuals do whatever it takes to get the job done at management direction. Employees accept it and go with the flow.

Questioning Attitude: **Averaged Score: 4.43**

5. Team members support one another through both awareness of each other's actions and constructive feedback, when necessary. Individuals question deviations, and pay keen attention to current operations and focus on identifying situations where conditions and/or actions are diverging from what was assumed, expected, or planned. Line managers encourage and work with them accordingly.
4. Work is conducted but personnel are not aware of each other's actions, minimal feedback, and not paying keen attention. But questions are asked as they arise and answered appropriately.
3. Questions are asked, and answered briefly, maybe not actually ensuring the question in mind.
2. Questions are asked, but peers or management do not act particularly respectful or the question is blown off without response.
1. Obvious questions need to be asked and are not.