


memorandum

DATE: September 12, 2104

SPRU14-057

REPLY TO

ATTN OF: S. FEINBERG, Federal Project Director, DOE Separations Process Research Unit SUBJECT: **SAFETY CULTURE SUSTAINMENT PLAN, REV. 0**

TO: Jim Owendoff, Acting Assistant Secretary for Environmental Management

This memorandum documents the combined DOE/URS Separations Process Research Unit Disposition Project (SPRU DP) Safety Culture Sustainment Plan (Plan). This plan has integrated DOE-SPRU roles and responsibilities into the URS SPRU DP Safety Culture Sustainment Plan submitted to DOE under URS Memorandum WGI-SPRU-14-061, dated September 4, 2014. The URS Plan was developed in response to DOE Memorandum for Distribution (David Huizenga), *Safety Culture Sustainment Plans*, dated June 27, 2014. DOE-SPRU reviewed and provided comments during the development of the URS Plan. An allowance for small sites to submit a combined plan of the two organizations was provided for.

The attached Plan addresses both the results of recent internal and external SCWE assessment efforts conducted at SPRU DP and those ISMS Safety Culture Focus Area attributes identified as attributes of safety culture excellence.

URS conducted an internal project-wide SCWE survey in June 2013. The assessment identified a noteworthy condition for SPRU DP associated with the promoting of differences of opinions. The assessment also identified an Opportunity for Improvement (OFI) that a better understanding of the Employee Concerns Program (ECP) should be fostered amongst Project staff. The same OFI was identified in the DOE EMCBC assessment of SPRU SCWE reported in Report 2013-07-SPRU-SCWE (September 5, 2013).

Since last year's assessments, both URS and DOE have included periodic discussions on the purpose of the Employee Concerns Program and ways to initiate an employee concern. While DOE has addressed this at various weekly staff meetings, URS has included these discussions during both, Plan of the Day (POD) and staff safety meetings. The locations of ECP contact information postings has been communicated to staff during these presentations. The Safety Culture Sustainment Plan includes ongoing efforts to communicate information on the ECP to Project Staff.

If there are any questions regarding the plan please contact Thomas Cochran at 518-395-7201 whom is the DOE SPRU Safety Conscious Work Environment point of contact for DOE SPRU.

Attachment: Safety Culture Sustainment Plan

cc: Jim Hutton, EM-40
Ralph Holland, EMCBC
T.J. Jackson, EMCBC
Tom Cochran, DOE SPRU
Bobby Smith, URS
Wayne Wentworth, URS
Molly Somwaru, URS

SPRU Safety Culture Sustainment Plan

The following measures are planned or ongoing, as indicated, and are considered elements of the overall SPRU DP Safety Culture Sustainment Plan. ISMS Safety Culture Focus Area Attributes corresponding to these elements are keyed as follows:

ISMS Safety Culture Focus Area Attribute Legend

Focus Area 1: Leadership

- (1a) Demonstrated Safety Leadership
- (1b) Risk-informed, conservative decision-making
- (1c) Management engagement and time in the field
- (1d) Staff recruitment, selection, training and development
- (1e) Open communication and fostering an environment free from retribution
- (1f) Clear expectations and accountability

Focus Area 2: Employee/Worker Engagement

- (2a) Personal commitment to everyone's safety
- (2b) Teamwork and mutual respect
- (2c) Participation in work planning and improvement
- (2d) Mindful of hazards and controls

Focus Area 3: Organizational Learning

- (3a) Credibility, trust and reporting errors and problems
- (3b) Effective resolution of reported problems
- (3c) Performance monitoring through multiple means
- (3d) Use of operational expertise
- (3e) Questioning attitude

Focus Area 4: Supplemental Information Topic: Performance Measures and Contract Measures

- (4a) Contract incentives achieve a reasonable balance between cost/schedule and safety pressures
- (4b) Performance metric insights into SCWE

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<p><u>Local SPRU SCWE Panel</u></p> <p>Establish a joint SPRU DOE/URS committee that functions much like the SPRU DP Project Safety Review Board, reviewing SPRU DP SCWE-related data and analysis in order to draw conclusions on the current health of the safety culture at SPRU DP and to verify that sustainability of this culture is being maintained. How this panel will be structured and roles/responsibilities of members will be defined in a charter to be jointly established by local DOE representatives and URS.</p>	(1a) (1e) (2b)	10/30/2014
<p><u>Publication of the SPRU DP Performance Assurance Weekly Bulletin</u></p> <p>This document provides a summary of the SPRU DP organization's performance on a weekly basis and is transmitted to senior project management and applicable supervisory-level staff. Inputs to this document include: Daily Reports; Post-Job Reviews; Management Observations; Problem Reports; Nonconformance Reports; Assessments; and DOE Daily Reports. Weekly analysis for good performance and areas of indicated improvement opportunity is included as a part of this bulletin. This could be best described as a summation of current indicators.</p> <p>The original intent of this document was to provide management a real-time synopsis of how the organization is performing in terms of working safely and in complying with relevant requirements, and to provide insights to help in determining the priority of areas requiring improvement. Since its inception in December 2012 in response to the Project's efforts to obtain a Notice to Proceed, the value of this document as a safety conscious work environment (SCWE) assessment tool has been realized. The following insights can be derived from the information summarized in the PA Weekly Bulletin:</p> <p>a) Are there patterns of at-risk behavior or of complacency? b) Do personnel exhibit a questioning attitude and do they consider "What is the worst thing that can happen?" c) Is there willingness by the workforce to both identify and address issues?</p>	<p>(1a) (1b) (1e) (1f)</p> <p>(2b) (2c) (2d) (3c)</p> <p>(3e)</p>	Ongoing - Weekly

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<p>d) Do personnel pause work when a question arises or when an unexpected result is obtained?</p> <p>This document has also evolved into a tool emphasizing model behaviors that support the safe performance of work and provides positive reinforcement for these behaviors on a weekly basis.</p> <p>An overall quarterly analysis of Project organization strengths and areas for improvement presented in the PA Weekly Bulletins are included as part of the Contractor Assurance System Quarterly Report.</p>		
<p><u>Weekly Lessons Learned and Operating Experience Bulletin</u></p> <p>This document captures lessons learned derived from incidents across the DOE Complex relevant to the SPRU DP scope of work. The intent is to present situations to the workforce that they may face and to illustrate potential error traps and proper responses to support mitigation. The general concept is basic – Learn from other’s mistakes.</p> <p>On a weekly basis, four incidents are provided and managers/supervisors review these incidents with the workforce during daily Plan of the Day meetings. This provides management and supervision an opportunity to not only discuss Project expectations, but to demonstrate the basis for these expectations. Copies of this bulletin are left in public areas as reading material so that workers have the opportunity to review the details of the incidents being presented.</p>	(2a) (2d) (3d)	Ongoing (Weekly)
<p><u>Daily Report</u></p> <p>As part of this report, observations made and timeouts (work pauses) taken to address questions and issues identified during the performance of work in the field are cited. This information is not only included to provide a status of field activities, but to demonstrate to the organization</p>	(1a) (1b) (1e)	Ongoing (Weekly)

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that identifying issues and taking the time to ask questions and to address issues are valued behaviors. It should be noted that this information is consolidated for each week and re-iterated through incorporation into the PA Weekly Bulletin, providing another opportunity to reinforce to the staff the noted desired behaviors.		
<p><u>Work Planning & Control Quarterly Trend Report</u></p> <p>This effort was the result of an initial independent Quality Assurance assessment of the Work Planning & Control function leading up to the SPRU DP Notice to Proceed. Follow-up assessments were performed to analyze progress in this area and evolved into a quarterly assessment as part of the SPRU DP Contractor Assurance System (CAS) improvement initiative. The results of this analysis are included as part of the Contractor Assurance System Quarterly Report.</p> <p>These assessments are based on Post-Job Review input from workers and provide insights that include: (1) The level of priority placed on safety during the performance of work; (2) Adequacy of communications between work groups and between functions; (3) Adequacy of work planning; and (4) The degree to which workers value lessons learned.</p>	(2c) (3c)	Ongoing (Quarterly)
<p><u>Contractor Assurance System Quarterly Report</u></p> <p>As required by DOE Order 226.1a, SPRU DP has established a Contractor Assurance System which supports the analysis of Project performance in terms of how well work is executed in a safe and secure manner while meeting both contractual and programmatic requirements. This analysis is documented in a quarterly report, with conclusions based on established performance indicators (leading and lagging) and analyses associated with quarterly Work Planning and Control assessments and the Performance Assurance Weekly Bulletin initiative.</p> <p>This report provides insights into the overall safety culture of the SPRU DP organization and is provided to senior Project management for</p>	(3b) (3c)	Ongoing (Quarterly)

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<p>review. Also, on a quarterly basis, a Project Safety Review Board is held to go over the results of the report with senior Project Management. Insights include: (1) how effective management is in managing their issues and commitments; (2) how often senior managers perform Management Observations, which is a measure of whether a given manager spends time in the field where the work is being performed; and (3) That care and attention is taken by workers during the performance of work – e.g., number of work pauses taken during the quarter, attention to radiological and safety postings, etc.; (4) The number of Employee Concerns and Differing Professional Opinions initiated during the course of a given quarter and during the year to date.</p> <p>Output from the Contractor Assurance System provides management with the opportunity to gain a perspective of the degree to which the overall organization and the manager's themselves holds safety as a priority and how well this is communicated to the work force.</p>		
<p><u>Project Safety Review Board</u></p> <p>One of the core functions of the Project Safety Review Board (PSRB) is to provide management the opportunity to sit down with their peers and discuss not only how well the organization is performing in terms of both safety and compliance, but also to consider how well the management team itself is performing in terms of supporting Integrated Safety Management. Following the issuance of the quarterly CAS Report, this report is reviewed at the PSRB by the senior management team, supporting this function.</p> <p>The PSRB also fulfills the function of a Hazard Review Board, where work judged to be complex or to be a high-hazard task is reviewed to verify that it is ready for field implementation with hazard identification and mitigation strategies integrated into the work plan strategy. With this function, personnel responsible for the planning and implementation of the work (e.g., work planner, work group supervisor, etc.) would typically be present to answer questions and to demonstrate their understanding of the scope of work to the senior management team. This participation</p>	<p>(1a) (1f) (3a) (3b)</p> <p>(3c) (3e)</p>	<p>Ongoing</p> <p>(At least Quarterly)</p>

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also imparts to those directly responsible for the work activity the importance of performing the work in a safe manner.		
<p><u>Safety Management Review Team</u></p> <p>The SMRT process provides a method for the review of work scopes that are considered by the SPRU DP senior management team to warrant additional review. For example, the scope of work may be non-routine or may present unique challenges. The SMRT is convened to provide assurance that work is performed both safely and efficiently in these cases.</p>	(1a) (1b) (2c) (2d) (3c) (3e)	Periodically
<p><u>Management Observation Program</u></p> <p>The purpose of the Management Observation Program is to document the management oversight being performed by SPRU DP to improve SPRU-DP performance. Management observations assess the knowledge of workers and compliance with SPRU DP policies and procedures, identify and correct unsafe conditions/behaviors, reinforce safe behaviors and promote two-way communication between management and the workers.</p> <p>Management engagement in the field is considered important by SPRU DP and this level of engagement is monitored via a performance indicator that is tracked both monthly and quarterly.</p> <p>These observations provide managers an opportunity to understand how their own organizations influence the conduct of field operations, maintenance, and D&D activities, and how organizational support might be improved.</p>	(1a) (1c) (3a) (3c)	Ongoing (minimum 2 required per month per senior manager)
<p><u>Management Self Assessments (MSAs)</u></p> <p>The intent of MSAs is to provide SPRU DP management team members a</p>	(3a) (3c)	Refer to current SPRU DP

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perspective on how well the programs and processes that they are responsible for are performing in terms of meeting management objectives. The scheduling and performance of these assessments is monitored via updates to the SPRU DP Integrated Assessment Schedule. This process is another means by which Project managers engage themselves with the work being performed in support of the project, although more formal than the Management Observation process.		Integrated Assessment Plan
<p><u>Work Group Supervisor's Safety Meeting</u></p> <p>This is a bi-weekly meeting to bring together the work group supervisors to discuss safety topics relevant to the work being performed by the work teams. Included in these meetings is a review of the Performance Assurance Weekly Bulletin, which provides insights into organizational strengths and areas of performance where improvement is needed, based on observations of recent work activities.</p> <p>Recent efforts have included working to build greater ownership of these meetings with the work group supervisors themselves by having them select and present topics related to the safe performance of work.</p>	(2a) (1e) (1f)	Ongoing (Bi-Weekly)
<p><u>Monthly All-Hands Safety Meeting</u></p> <p>This meeting is actually comprised of two meetings – One for workers at the SPRU Site and one for workers at the St. James office. Topics relevant to promoting the safe performance of work are presented and discussed. Both the workers and management attend, offering management the opportunity to reinforce good safety behaviors, recognize good performance, and answer questions and concerns that the staff may have. The completion of this meeting on a monthly basis is monitored by the Performance Assurance Function via a performance measure specifically established for the performance of this meeting.</p>	(1a) (1e) (1c) (2a)	Ongoing (Monthly)

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<p><u>Plan of the Day Meetings</u></p> <p>Plan of the Day Meetings are held to review work activities scheduled for the day in order that everyone understands what their assignments are. Just as important, these meetings are used to discuss safety and to reinforce the need to apply good safety behaviors in the implementation of work. Relevant lessons learned from around the DOE Complex are reviewed with the workers as a means to communicate Project expectations for how work is to be conducted.</p>	(1c) (1e) (3e)	Ongoing (Daily)
<p><u>Pre-Job Briefs</u></p> <p>At SPRU DP, field work is expected to begin with a Pre-Job Brief for the purpose of exchanging essential information about the work between the assigned workers and the task Supervisor/Work Leader.</p>	(1e) (2c) (2d) (3e)	Ongoing
<p><u>Post-Job Reviews</u></p> <p>The Post-Job Review process is a fundamental element for the Integrated Safety Management System (ISMS) core function of feedback and continuous improvement at the activity level. Formal and informal feedback is used to verify safe work performance, identify needed corrections, and communicate opportunities to improve the planning and safe execution of the work process.</p> <p>Those performing the work are required to attend and to provide input. Through this participation, workers are encouraged to bring forward issues. This participation also reinforces the expectation that everyone is responsible for the safe performance of work.</p> <p>Post-Job Review input is an element of the PA Weekly Bulletin and is the primary input for the quarterly Work Planning and Control Trend Report. This demonstrates that Post-Job Review input is being received and used by management.</p>	(1e) (2a) (2b) (2c) (3d) (3e)	Ongoing

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<p><u>Performance Indicators</u></p> <p>Both lagging and leading performance indicators are tracked by SPRU DP and results are used as part of the basis for the quarterly CAS Report. Many of these indicators are relevant to assessing the project's safety culture. Examples include the following:</p> <ul style="list-style-type: none"> a) # of MOPs performed b) # of personnel contaminations c) # of lost time accidents d) # of first aid cases e) # of violations of rad boundaries f) # of issues with rad postings and with safety postings g) CTS action timeliness of completion h) Timeliness of disposition of issues i) # of timeouts (work pauses) issued j) # of Employee Concerns k) # of Differing Professional Opinions <p>Established performance indicators are reviewed periodically for continued applicability and for value in establishing meaningful data for determining performance. Based on these reviews, some performance indicators may be deleted and others added.</p>	(1a) (3b) (3c) (4b)	Ongoing
<p><u>Issues Management</u></p> <p>The SPRU DP Issues Management System includes Problem Reports (PRs) for the reporting of programmatic and administrative issues and Nonconformance Reports (NCRs) for material and equipment issues. In previous efforts to make problem reporting more accessible to workers in the field and to support the anonymous reporting of issues, Problem Report drop boxes were located in locations on site with posted instructions.</p> <p>The QA/PA organization continues to encourage personnel to initiate PRs when issues are identified and have even helps individuals to write PRs as</p>	(1e) (3b)	Ongoing

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part of these efforts.		
<u>Safety Conscious Work Environment (SCWE) Surveys</u> With the inception of the improved Contractor Assurance System, current plans are to perform a SCWE survey once per year as a further means of assessing SPRU DP safety culture.	(1e) (3c) (3e)	Annual Due: 9/30/2014
<u>SCWE-Specific Training</u> Currently, SCWE Training is scheduled to be performed by the Department of Energy at the SPRU DP on 9.17.2014. (SAF-200 Safety Conscious Work Environment Training)	(1c) (2b)	9/17/2014
<u>Training – Recognizing Changing Conditions</u> This training was developed to increase awareness of the need to consider the potential for new hazards being introduced at the work site when conditions associated with the work (scope, environment, step sequence, etc.) change or are modified. This training consists of a review of various events that have occurred across the DOE Complex as a result of workers failing to recognize the hazards brought on by changing conditions. Each example illustrates a different aspect of how changing conditions can be introduced and how workers can fail to recognize these changing conditions. This training is planned for the September 2014 All-hands Safety Meeting.	(1a) (2d)	9/30/2014
<u>Training/Qualifications - General</u> <u>Staff selection:</u> qualified personnel with relevant background and experience are hired for positions. Many of these personnel have significant commercial nuclear and/or DOE Complex experience, and thus bring with them an understanding of the potential hazards associated	(1d) (2a) (3d)	Ongoing

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<p>with contaminated industrial facilities and the controls required to minimize potential impact on safety.</p> <p><u>General Employee Training:</u> SPRU GET includes expectations for reporting issues and for the safe performance of work.</p> <p><u>Lessons Learned:</u> As previously noted, incidents from around the DOE Complex facilities are presented to the workforce in the form of lessons learned. In some cases, an incident at SPRU may warrant an internal lessons learned be developed, which will also be presented and discussed with the workforce. The intent is to present situations to the workforce that they may face and to illustrate potential error traps and proper responses to support mitigation.</p> <p><u>Safety Meetings:</u> As previously noted, various training opportunities present themselves in the form of Plan of the Day Meetings, Work Group Supervisor Safety Meetings and Monthly All-hands Meetings. At these meetings, expectations are communicated on safe work practices and open dialogue is encouraged.</p>		