Department of Energy

Oak Ridge Office of Environmental Management
P.O. Box 2001
Oak Ridge, Tennessee 37831

September 15, 2014

MEMORANDUM FOR MARK WHITNEY
                          ACTING ASSISTANT SECRETARY FOR
                          ENVIRONMENTAL MANAGEMENT, EM-1

FROM: SUSAN M. CANGE
                       ACTING MANAGER

SUBJECT: OAK RIDGE OFFICE OF ENVIRONMENTAL MANAGEMENT SAFETY
                        CULTURE SUSTAINMENT PLANS

REFERENCE: Memorandum from David Huizenga to Distribution, *Safety Culture
                       Sustainment Plans,* dated June 27, 2014

As requested by the referenced memorandum, attached are the Safety Culture Sustainment Plans for the Oak Ridge Office of Environmental Management (OREM) and the three prime contractors performing the OREM work scope. Each of these plans reflects that the effort to achieve and maintain a healthy safety culture has been an ongoing process – and will continue to be an ongoing process. In each case, previous self-assessments have identified areas of strength, as well as opportunities for improvement. The ongoing actions reflected in each of these plans were derived both from initial efforts to establish a healthy safety culture, as well as steps taken to address opportunities for improvement to sustain a healthy safety culture.

Following the guidance that supplemented the referenced memorandum, each of the attached plans has been tailored by the responsible organization to address the particular focus areas and attributes most relevant to improvement of their safety culture. Upon examination of the individual plans it is noted that there are common attributes that will be areas for shared focus. Some of these correlate with the primary attributes for continuous improvement identified in the Consolidate Report attached to the referenced memorandum. For example, continued and enhanced management training will better equip managers for their leadership roles in sustaining the desired safety culture. Improving communications of the leadership with the employees, both verbal and non-verbal, will help to build credibility and trust. Focused efforts to engage employees in planning and problem solving will contribute to a teaming environment. OREM has established Partnering Agreements with each of its prime contractors and will use the routine Partnering Workshops as forums to continue to collaborate on safety culture improvement initiatives and to share lessons learned.

SUBJECT: OAK RIDGE OFFICE OF ENVIRONMENTAL MANAGEMENT SAFETY CULTURE
           SUSTAINMENT PLANS

Developing, maintaining, and improving the safety culture in Oak Ridge is a continuous process
and these plans are considered to be living documents that will be integrated with the
Integrated Safety Management Systems subject to routine review and revisions as needed for
continuous improvement.

If you have any questions or if we can be of further assistance, please contact me at
(865) 576-0334.

Attachments:
1. Oak Ridge Office of Environmental Management Safety Culture
    Sustainment Plan, September 2014
2. UCOR Safety Culture Sustainment Plan, Oak Ridge, Tennessee,
    September 2014
3. WAI-TRU Waste Processing Center Safety Conscious Work
    Environment Sustainment Plan, September 2014
4. Isotek Systems Safety Culture Sustainment Plan

cc w/attachment:
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ATTACHMENT 1

OAK RIDGE OFFICE OF ENVIRONMENTAL MANAGEMENT

SAFETY CULTURE SUSTAINMENT PLAN

SEPTEMBER 2014

Oak Ridge Office of Environmental Management

Safety Culture Sustainment Plan

September 2014

Background

The Oak Ridge Office of Environmental Management (OREM) conducted a self-assessment in May through July of 2013 as part of the Department-wide Extent of Condition Review in response to safety culture concerns raised by the Defense Nuclear Facility Safety Board (DNFSB) in *DNFSB Recommendation 2011-1*. That initial self-assessment was focused on determining whether safety culture weaknesses identified at other Department of Energy sites were also present at the OREM East Tennessee Technology Park site.

The OREM approach followed the Safety Conscious Work Environment (SCWE) self-assessment guidance using the "multi-team" approach where OREM conducted a self-assessment of the Federal operations and the prime contractor, URS|CH2M Oak Ridge LLC (UCOR), following directions from OREM, performed a self-assessment of their operations and provided a report to OREM. The OREM initiative was an initial "point-in-time" self-assessment, whereas the UCOR initiative represented a perspective on their safety culture from the beginning of their contract, covering the time period between August 1, 2011 and August 1, 2013. The results from both self-assessments were consolidated to identify areas of mutual focus for continuous improvement.

The fundamental question to be answered during these self-assessments was whether the work environment is one where workers feel free to raise safety concerns without fear of retaliation. In general, both self-assessments concluded that such an environment does exist within OREM and UCOR operations. Both organizations are committed to continuous improvement and have continued to monitor the work environment and its safety culture as part of the ongoing assessment and oversight programs.

With the dynamic nature of the work of the Environmental Management (EM) Program in Oak Ridge and the continuing budget uncertainties, both self-assessments identified the need for continued vigilance and focus on the areas of communication, maintaining heightened safety awareness, a visible presence of management in carrying the safety message, and engaging workers in the performance improvement process. These focus areas align with some of the attributes for continuous improvement identified in the EM complex-wide Consolidated Report provided to the DNFSB in May 2014.

Action Prioritization

The path forward to sustain and improve the OREM Safety Culture will continue to focus on the areas for improvement identified during the initial self-assessment. As stated previously, responses to the SCWE survey and interviews with the Federal staff and management during the self-assessment generally reflected an overall willingness to raise safety concerns without fear of retribution for raising those concerns. However, results from the broader examination of organizational culture driven by the original lines-of-inquiry revealed that poor communication and lack of trust were

themes that resonated to varying degrees in all three focus areas. It was recognized that failure to promptly deal with these fundamental issues could ultimately manifest into conditions where employees may be reluctant to raise safety concerns.

Analysis of the results from both the SCWE survey and interviews indicated that views of the staff generally differed from those of the managers/supervisors. For some attributes the differences were substantial. For example, highlighting the fundamental organizational communication issue, interviews with managers/ supervisors revealed an acknowledgement of some of the same organizational culture issues identified separately by the staff. However, interviews with the staff indicated a general lack of awareness or direct evidence of actions being taken by the management team to address the issues. General management safety leadership and improving communication between the Senior Management Team (SMT) and the staff remains a priority.

The original self-assessment also recognized that OREM had been in various stages of organizational transition since mid-2010 when a shift from a more traditional project/functional structure to a full matrix structure began. Also at that time there had been changes in virtually every position of the management team, including the Manager, Deputy Manager, and each Division Director. Because of further management changes since that time, several key positions are currently held by managers/supervisors in acting positions. Teamwork and internal communication have relied heavily on informal networks that have evolved over time among Federal staff and support contractors, as well as among Federal staff and prime contractor staff. Establishing clear expectations and accountability by finalizing the OREM Functions, Responsibilities, Accountabilities, and Authorities and completing full implementation of the EM Quality Assurance Program with a set of current operating procedures is another top priority.

The frequent management changes was acknowledged during the original self-assessment as a contributing factor to the issue of trust. Much like culture, trust is an attribute that must be developed over time and demonstrated by consistent behavior. A concerted effort to practice human performance improvement principles along with open and effective communication will be a priority.

Action Plan

Following completion of the initial OREM SCWE Self-Assessment Report, the results were presented by the self-assessment team to the OREM SMT followed by a presentation to OREM staff at an all-hands meeting. Subsequently the SMT developed a "SCWE Plan of Action" that identified specific actions to address identified issues with assignments to members of the SMT to facilitate completion of the actions.

The attached table, organized by the three Safety Culture Focus Areas and associated Attributes, reflects the actions that have been and are being taken associated with the initial action plan – identified as "current practice." The table also includes additional actions, identified as "planned," resulting from the review of the Consolidated Report that will help in our continuous improvement efforts and to sustain and build on the positive elements of safety culture found during the initial self-assessment. These actions are being entered into the OREM action tracking system with responsibility for completion assigned to members of the SMT.

Oak Ridge Office of Environmental Management

Safety Culture Sustainment Plan

Focus Area/Attribute	Sustainment Tools		Priority	Schedule
	Current Practice	Planned		
Leadership				
o *Demonstrated safety leadership*	• Safety Conscious Work Environment Policy Statement • Integrated Safety Management System Description • Emphasize Senior Management Team visibility in promoting the safety message at all-hands meetings and project team meetings.	• Complete Senior Technical Safety Manager Technical Qualification Program certification and Nuclear Executive Leadership Training for selected Managers, Portfolio Federal Project Directors, and Division Directors.	1	According to individual TQP assignment letter.
o Risk-informed, conservative decision making	• Twice weekly facility operations meetings with PMs, FRs, SMEs, and Management to discuss safety and operational issues. • Integrated Project Team Meetings • Independent Project Reviews	• Continue twice weekly facility operations meetings with documentation of issues discussed. • Annually review the "Stop Work Authority" Policy with OREM staff and update as necessary.	2 3	Ongoing Annually
o Management engagement and time in field	• OREM Manager and/or Deputy Manager attend Division staff meetings and other small group meetings with staff. • Monitor management time in the field in weekly Commitments Meeting • Include time in the field in individual performance plans.	• Review and update the "Time-in-the-Field" metric. • Publicize FR and SME walk-through schedules - coordinate with senior managers and project managers for operational awareness.	3	12/31/14 Quarterly
o Staff recruitment, selection, retention, and development	• Fill new staff and management positions. • Provide opportunities for staff to serve a detail as Acting Deputy Division Directors. • Provide opportunities for staff to support EM HQ, EMCBC, and other sites. • Complete a resource needs evaluation. • Ensure staff have current, approved Individual Development Plans	• Complete recruitment to fill vacant positions created by retirements. • Review, update, and build on the annual succession plans and share with employees. • Solidify the OREM Training & Qualification Program	2	11/30/14 10/30/14 6/30/15

o **Open communication and fostering an environment free from retribution**	• Monthly All-Hands meetings • Joint Division staff meetings • Ensure employees are notified quarterly of the DOE Differing Professional Opinion Process.	• Provide status briefing to OREM staff on the OREM SCWE Plan of Action • Provide a "State of the Program" address to update the workforce on progress toward objectives defined in the 10-Year Program Plan and the OREM Annual Performance Plan. • Appoint a liaison with the ORO Employee Concerns Office.	1	10/31/14 10/31/14 10/31/14
o *Clear expectations and accountability*	• Finalize the OREM 10-Year Program Plan and discuss with staff. • Develop individual performance plans that link staff roles to mission success. • Complete the OREM Management System Description. • Finalize the OREM Annual Performance Plan (APP).	• Finalize the OREM Functions, Responsibilities, Authorities, and Accountabilities (FRAA) document. • Implement the EM Quality Assurance Program following the OREM Quality Implementation Plan. • Include Safety Culture performance measures in the contractors' ISMS performance objectives, measures, and commitments. • Complete the annual evaluation of the OREM 10-Year Program Plan. • Complete the annual ISMS Declaration. • Annually update the APP	1	9/30/14 12/31/14 12/31/14 10/31/14 12/31/14 Annually (by start of each FY)

Safety Culture Sustainment Plan

Employee/Worker Engagement				
o Personal commitment to everyone's safety o Mindful of hazards and controls	• Individual Performance Plans include safety focused criteria. • Support contractors to DOE follow the DOE FEOSH Program. • OREM Management System Description • OREM ISM System Description	• Include safety expectations in new employee orientation. • Complete development of staff assignment and capabilities matrices.	2 2	9/30/14 & Ongoing 12/31/14
o *Teamwork and mutual respect* o Participation in work planning and improvement	• Integrated Project Teams are chartered to include project managers, facility representatives, and subject matter experts as well as contractor project and functional area representatives. • OREM Leadership Teamwork Commitment statement (signed by each member of the leadership team). • Establish Partnering Agreements with major prime contractors and conduct periodic Partnering Workshops.	• Evaluate the need for a local Differing Professional Opinion Process. • Annually review and update Integrated Project Team Charters.	 1	11/30/14 Annually
Organizational Learning				
o *Credibility, trust and reporting errors and problems*	• Issues and actions discussed in the Senior Staff Meeting are shared with the staff during weekly Division staff meetings and monthly All-Hands meetings. • Practice employee recognition at All-Hands Meetings.	• Reinforce behavior consistent with the Safety Culture principles through management actions and employee recognition. • Provide refresher training to management and staff on Human Performance Improvement Principles	1 2	Routinely 3/31/15
o *Effective resolution of reported problems*	• Focus on improving communications between the Senior Management Team and the staff. • Maintain the interface agreements between OREM and the ORO ISC and EMCBC.	• Continue focus on organizational weaknesses identified during the SCWE Self-Assessment and provide status during All-Hands Meetings. • Evaluate the OREM performance tracking and trending needs and the functionality and use of the current action tracking and trending system.	1 2	Monthly 6/30/15

o **Performance monitoring through multiple means**	• Assemble and distribute a quarterly trend report. • Conduct a Benchmarking Initiative including site visits and research on selected EM Field Office and private sector companies. (Completed June 2014 and presented to staff) • Conduct Integrated Project Team meetings with the contractors, many including regulator representatives. • Monthly OREM project reviews. • Independent Project Reviews. • Preparation and distribution of weekly Portfolio Status Charts.	• Balance the annual Integrated Assessment Schedule (IAS) utilizing a critical few formal assessments supported by an ongoing, robust surveillance program. • Include OREM focused self-assessments as part of the IAS. • Repeat the OREM Safety Culture/SCWE Self-Assessment.	2 2 1	9/30/14 9/30/14 7/31/15
o Use of operational experience	• Identify Division Lessons Learned coordinators to work with Integrated Project Teams to identify best practices and bring more consistency to Project Team operations. • Preparation and distribution of the Facility Operations Division Monthly Report. • Monthly meetings with DNFSB representatives.	• Conduct an Operating Experience/ Lessons Learned Self-Assessment	2	9/30/14
o **Questioning attitude**		• Utilize bi-weekly facility operations calls and weekly staff meetings as forums for constructive dialog and discussion on safety issues.	1	Weekly

Note: Attributes in **Bold** text reflect areas for improvement identified from the 2013 OREM SCWE Self-Assessment.

Attributes in *italicized* text reflect "Issues to Emphasize in Continuous Improvement Actions" identified in the complex wide EM Consolidated Report provided to DNFSB May 29, 2014.

Attributes in Regular black text are others included in DOE G 450.4-1c that were not part of the emphasis during the initial Self-Assessment initiative.

The Priority 1 attributes in *italicized* text are ones specifically identified for continuous improvement in the June 27, 2014 memo from EM-1

ATTACHMENT 2

URS|CH2M OAK RIDGE LLC

SAFETY CULTURE SUSTAINMENT PLAN

SEPTEMBER 2014

UCOR Safety Culture Sustainment Plan
Oak Ridge, Tennessee

Date Issued—September 2014

Prepared for the
U.S. Department of Energy
Office of Environmental Management

URS | CH2M Oak Ridge LLC
Managing and Safely Delivering the Department of Energy's Vision
for the East Tennessee Technology Park Mission
under contract DE-SC-0004645

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APPROVALS

UCOR Safety Culture Sustainment Plan Oak Ridge, Tennessee	UCOR-4625
	September 2014

USQD Review Determination	☐ USQD ☐ UCD ☒ CAT X ☐ Exempt (Select Criteria below.) USQD/UCD/CAT X No.: **USQD-MS-CX-REPORTS-1074, R3**
Exemption Criteria	☐ (1) Non-Intent Change ☐ (2) DOE-Approved Document ☐ (3) Clearly no impact on Nuclear Facilities ☐ (4) Chief Financial Officer, Internal Audit, Labor Relations, Legal, Public Affairs, or Project Controls Organization Document
USQD Preparer:	_G. W. Caldwell_ _9/4/2014_ Name Date
Exhibit L Mandatory Contractor Document	☒ No (No PCCB Reviewer Signature Required) ☐ Yes (Requires review by the Proforma Change Control Board.)
PCCB Reviewer:	_____ _____ Name Date

Prepared by: _Libby Gilley_   _9/4/2014_
Libby Gilley, Integrated Safety Management System Program Lead
URS | CH2M Oak Ridge LLC
Date

Concurred by: _Rodney Kingrea for_   _9/4/2014_
Fran Williams, Environment, Safety, Health and Quality Assurance Manager
URS | CH2M Oak Ridge LLC
Date

Approved by: _Ken Rueter_   _9/4/14_
Ken Rueter, President and Project Manager
URS | CH2M Oak Ridge LLC
Date

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REVISION LOG		
Revision Number	Description of Changes	Pages Affected
0	Initial issue of document.	All

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CONTENTS

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ACRONYMS

CAMS	Corrective Action Management System
CY	calendar year
DOE	U.S. Department of Energy
DPO	Differing Professional Opinion
ECP	Employee Concerns Program
EC&P	Environmental Compliance and Protection
ESH&QA	Environment, Safety, Health and Quality Assurance
ETTP	East Tennessee Technology Park
FY	fiscal year
HPI	Human Performance Improvement
IA	independent assessments
I/CARB	Issues/Corrective Action Review Board
IC/WC	I Care/We Care
ISMS	Integrated Safety Management System
IWCP	Integrated Work Control Program
LSIT	Local Safety Improvement Team
ORNL	Oak Ridge National Laboratory
PAPC	President's Accident Prevention Council
PEMP	Performance Evaluation Management Plan
POMC	Performance Objectives, Measures and Commitments
POD	Plan of the Day
QA	Quality Assurance
S&H	Safety and Health
SMP	Safety Management Program
SCWE	safety conscious work environment
SME	Subject Matter Expert
STARRT	Safety Task Analysis Risk Reduction Talk
UCOR	URS	CH2M Oak Ridge LLC
VPP	Voluntary Protection Program
Y-12	Y-12 National Security Complex

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1. PURPOSE AND SCOPE

URS | CH2M Oak Ridge LLC (UCOR) performs Environmental Management work in accordance with the terms and conditions of prime contract DE-SC-0004645 with the U.S. Department of Energy (DOE). The work scope of the UCOR prime contract includes activities at the East Tennessee Technology Park (ETTP), the Oak Ridge National Laboratory (ORNL), and the Y 12 National Security Complex (Y-12). This plan describes planned activities performed to sustain UCOR's safety culture and safety conscious work environment (SCWE) and will be reviewed and revised as needed for continuous improvement.

The scope of the plan encompasses all UCOR, staff augmentation personnel, and subcontractor personnel working at the ETTP, Y-12, and ORNL locations.

The primary responsibility for safety culture belongs to line management, and in particular, on the project leadership team. Resources dedicated to sustaining the UCOR safety culture include project execution managers for Deactivation and Demolition Project, Waste Disposition Project, Technical Services and Site Support Projects, Engineering/Nuclear Safety and Criticality Manager, and Reindustrialization Manager.

The goal of the project leadership team is to provide ongoing self-critical assessment and simple safety-focused processes, which uses information available (e.g., issues management, performance trends, self-assessment, external assessments, industry lessons learned, workforce issues and employee concerns) to provide an early indication of potential problems, develop effective corrective actions and monitor the effectiveness of the actions. Effective implementation of the safety culture attributes by line management enables and ensures mission delivery. Implementation occurs through:

- Policies
- Procedures
- Training
- Communications
- Observations

Additional resources dedicated to sustaining the UCOR safety culture include the UCOR President and Project Manager, Chief Operating Officer and Deputy Project Manager, and other members of the senior management team including the Environment, Safety, Health and Quality Assurance (ESH&QA) Manager and project execution managers. Other key contributors are the Employee Concerns Program (ECP) Manager and members of the ESH&QA functional group including managers of Quality Assurance (QA), Safety and Health (S&H), Environmental Compliance and Protection (EC&P), and both the Integrated Safety Management System (ISMS) Program Lead and Voluntary Protection Program (VPP) Coordinator.

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2. SAFETY CULTURE SUSTAINMENT TOOLS

UCOR POL-UCOR-020, *Integrated Safety Management System*, and the institutionalized safety programs defined in UCOR PPD-EH-1400, *Integrated Safety Management System Program Description*, serve as the programmatic foundation for the project safety culture. UCOR seeks to build on these existing programs so that workers and managers understand the connection between their individual commitments to enhancing the safety culture and maintaining a SCWE.

Attachment 1 titled "UCOR Safety Culture Sustainment Plan Matrix" is a crosswalk between the safety focus areas and associated attributes and the tools UCOR is currently using to sustain the safety culture. Previously completed actions and those actions that are ongoing are an integral part of the plan. The matrix also presents actions that are planned for the coming months to further strengthen and sustain safety culture.

Per DOE guidance, certain attributes require special emphasis. UCOR aligned and prioritized the safety culture sustainment tools to reflect the department's emphasis and to address areas for improvement noted in the UCOR SCWE self-assessment. These are presented in red text on the matrix.

2.1 FOCUS AREA – LEADERSHIP

2.1.1 Attribute of special emphasis: Demonstrated safety leadership

Planned Sustainment Tools:

- Formation of a UCOR Safety Culture Monitoring Panel – UCOR will convene a standing safety culture monitoring panel as an integral part of the VPP initiative. The panel will have the responsibility to monitor the timely and effective implementation of the tools noted in the safety culture sustainment plan. The plan is a living document, and the panel will review and revise it as needed for continuous improvement.

- Senior management team required reading Speed of Trust – This is a best practice for the UCOR management team.

2.1.2 Attribute: Open communication and fostering an environment free from retribution

Planned Sustainment Tools:

- Conduct SCWE Management Roundtables – ESH&QA is planning to hold a series of roundtable discussions to learn if employees think the SCWE policy is being effectively implemented at UCOR.

- Incorporation of safety culture and SCWE concepts and practices into training – Training modules and other informational company-wide communications will be reviewed and revised for inclusion of SCWE concepts and practices.

2.1.3 Attribute: Clear expectations and accountability

Planned Sustainment Tools:

- Monthly Senior Management Safety Checklist – UCOR safety culture survey results indicated a need to focus on management engagement and time in the field. The management team communicated to UCOR employees that it would be addressing this area for improvement. Managers were given the expectation to focus on increasing their time in the field and at the workface. In order to monitor performance to ensure that the desired results are achieved, a monthly performance metric for management field presence was incorporated in the UCOR Fiscal Year (FY) 2013 ISMS Performance Objectives, Measures and Commitments (POMCs). The metric measures the percentage of UCOR Level I and Level II managers making field visits, with a goal of 80 percent. This metric is reported on a monthly basis and published on the UCOR Intranet. Performance has consistently exceeded the goal.

  To enhance the effectiveness of senior management presence in the field, a Monthly Observation Checklist for Senior Managers is being implemented. Safety topics for the monthly checklists are communicated through the President's Accident Prevention Council (PAPC) and the company-wide monthly safety focus meetings. The checklist includes a review of both conditions and behaviors for the monthly topic. Feedback from the monthly checklists is used to initiate corrective actions in the field and to provide feedback to the respective subject matter expert (SME) for trending in their subject matter area.

2.1.4 Ongoing Sustainment Tools

UCOR has repeatedly demonstrated effective safety leadership through timely, clear, and consistent communications regarding expectations for establishing a SCWE. This communication is accomplished through various means including company-wide emails, UCOR Newsline, UCOR announcements, PAPC meetings, staff meetings, Plan of the Day (POD) meetings, monthly safety focus and return-to-work meetings, information on the company intranet, newsletters including the Safety Advocate, information monitors, and poster campaigns.

The organizational mission and operational goals clearly identify that production and safety goals are intertwined, as defined in the prime contract, the Performance Evaluation Management Plan (PEMP), and the ISMS POMCs. POMCs are established on a fiscal year basis and require DOE approval prior to implementation. Metrics are developed using trending information, incorporation of lessons learned, and assessment results.

To facilitate open communication, both UCOR and union leadership participate in the monthly UCOR President and Union Stewards/Safety Advocates and Representatives meeting. This meeting is held as a venue for raising and addressing concerns and to foster an environment free from retribution. Issues are identified, evaluated, assigned to appropriate personnel, tracked, and, depending upon complexity, are usually resolved before the next month's meeting. UCOR leadership proactively works to keep communications open by detecting situations that could result in retaliation and take effective actions to prevent a chilling effect.

A variety of methods are available for all UCOR and subcontractor/staff augmentation personnel to raise safety concerns, as noted on the SCWE lanyard card issued to employees and subcontractors. Employees are encouraged to communicate with their supervisor and/or use any of the avenues presented in Nuclear Safety Culture Training, which includes both UCOR internal processes [such as I Care/We Care (IC/WC), Employee Concerns, or the Differing Professional Opinion (DPO) process] and external processes

through DOE. As a best practice, beyond waiting for a phone call on the Employee Concerns hotline, the UCOR ECP Manager performs routine walkdowns to solicit feedback from employees.

UCOR management establishes clear expectations for a SCWE and accountability through the UCOR/DOE Oak Ridge Office of Environmental Management SCWE Policy Statement. This is communicated to all employees through required reading and Nuclear Safety Culture Training. The Policy Statement is also included in UCOR-4087, *Safety and Health Handbook*, in new employee training, and Consolidated Annual Training. UCOR plans to develop a company-level Safety Culture Policy to communicate expectations for all employees, staff augmentation, and subcontractor personnel on the broader subject of safety culture.

2.2 FOCUS AREA – EMPLOYEE/WORKER ENGAGEMENT

2.2.1 Attribute: Teamwork and mutual respect

Planned Sustainment Tools:

- Formation of Local Safety Improvement Teams (LSITs) and Implementation of Safety Observation Process – Five LSITs have been established and additional teams are standing up. LSITs are made up of facility/project employees, including bargaining unit, exempt, nonexempt, and management staff members. The teams generally meet at least monthly to share information, track progress on the resolution of issues/ideas, and review accident and injury data. The LSIT members are expected to solicit employee input regarding unsafe conditions and/or safety enhancements and present the input to the project. LSIT activities are passed on to project employees through the distribution of meeting minutes, safety meetings, POD meetings, staff meetings, and informal group discussions. Each LSIT's purpose is to create an environment that actively involves employees in the continuous enhancement of workplace safety. Participation in an LSIT is voluntary.

  The LSITs provide a means for interchange of safety-related ideas and issues and communicates this information back to the workforce. The teams maintain and track ideas and issues and are active in helping with the resolution of safety issues. The LSITs are relied upon to support VPP activities, including performance of the yearly assessment and dissemination of information.

  The worker-owned safety observation process is based on the premise of no name/no blame. Employees receive training that enables them to conduct effective observations (for safe and at-risk behaviors and conditions) and provide constructive feedback. LSITs review safety observation results and works with management to identify and implement required corrective actions.

- Implementation of VPP Attainment Plan – The UCOR safety culture sustainment plan includes a commitment to the VPP standards in addition to those requirements identified in UCOR's contract. UCOR senior management flows down resources, requirements, and recognition to all employees to reinforce the expectations of continuous improvement.

  The ultimate credit for UCOR's strong safety culture is a direct result of the involvement of employees, who implement new and innovative ways to incorporate VPP elements in their daily activities, both at work and at home. Through their involvement, UCOR employees improve work processes to reduce potential hazards and have assisted in identifying and resolving safety issues and concerns.

  UCOR's trade employees share its commitment to safety. Bargaining unit members are active parts of all safety committees and organizations. Employees and subcontractors are integral to UCOR's accident investigation teams and are valued contributors to the safety-related goals, objectives, plans, procedures, and training.

2.2.2 Ongoing Sustainment Tools

Employee involvement is the cornerstone of the UCOR SCWE and is essential for the successful accomplishment of the UCOR mission. Successful accomplishment of the UCOR mission depends upon the degree of employee engagement in work planning and execution. UCOR demonstrates that it promotes teamwork and mutual respect through the implementation of processes and activities to raise safety awareness. Various opportunities for employee feedback and active contribution to a healthy safety culture are in place and employees use an array of avenues to communicate safety issues.

UCOR and subcontractor employees are encouraged to approach work with a high degree of inquisitiveness and are empowered to refuse to perform work that is unsafe, even if directed to do so by supervisors, customers, or other prime contractors. Informal work pauses or step backs are common within UCOR projects.

The IC/WC process provides a venue by which employees and subcontractors submit safety-related concerns and suggestions. To facilitate the appropriate closure of the concern, inclusion of the name of the individual submitting is encouraged. However, the program is designed in a manner that accommodates anonymous submittals. "I Care" safety concern boxes that are monitored by craft safety advocates are strategically placed throughout the company. The "We Care" Committee, whose membership is comprised of craft and non-manual representatives, evaluates concerns and assigns them to the manager responsible for resolution.

The DPO process is available to all UCOR personnel and is flowed down to subcontractors through Procurement's Exhibit L. Information regarding the procedure is incorporated into UCOR training materials including Parkworker Training (Module 21221), Nuclear Safety Culture Training (Module 31238), and Consolidated Annual Training (Module 28307).

Other formal avenues of open communication used by employees include hotlines, the UCOR Ethics Helpline, and external processes, including DOE hotlines. While many of the formal venues that promote employee involvement have been discussed, the day-to-day interaction among employees at all levels exemplifies the essence of employee involvement. Employees openly communicate safety issues; therefore, facilitating teamwork is the norm. Workers are encouraged to communicate issues to their supervisors first. Other ways to communicate include speaking with a craft safety advocate, their project ES&H professional, or any other manager.

In addition, UCOR employees and subcontractors participate in the evaluation of the S&H Program in the following ways:

Employees are involved in pre-job planning, inspections, walkdowns, pre- and post-job briefings, and Safety Task Analysis Risk Reduction Talk (STARRT) Card briefings. POD meetings are conducted prior to the start of work each day to identify changed conditions and promote safe work performance and are part of the Integrated Work Control Program (IWCP.) This interactive meeting ensures that workers and support personnel understand the work to be performed that day. Employees review safety spotlights, periodically update POD questions to correlate with current work activities and conditions, share lessons learned, and coordinate activities between work groups. The STARRT Card is a tool used to:

- Ensure that employees are familiar with the hazards and environmental aspects associated with the work
- Ensure that everyone knows and is trained to procedures
- Ensure that the right personal protective equipment is available

6

- Discuss what could change

- Ensure that employees know what to do and whom to contact if there is a change

- State how employees plan to remain injury free and protect the environment

- Review and apply lessons learned

- Discuss the scope of work to be performed

UCOR employees and subcontractor personnel provided feedback via safety culture surveys administered in calendar year (CY) 2011 and CY 2012. Employees and subcontractors participate in formal and informal interviews conducted in conjunction with internal management assessments, as well as external assessments such as the DOE Phase I and II ISMS verification, VPP gap analysis assessment, radiological protection assessment, and security audits.

Employees at various levels throughout the organization are involved in the procedure development and review process, ensuring that procedures are accurate, address hazards, and can be performed as written.

Accident/incident investigations are used as a preventive tool to eliminate future occurrence of undesired outcomes. Employees participate in this process with assistance from individuals who have documented training in accident investigation techniques.

Employees and subcontractor personnel are involved in pre-job planning, including assessments to ensure that all hazards are identified and controlled. Pre-job planning allows early identification of hazards to allow changes in materials, processes, or work practices, to eliminate or better control potential hazards.

Employees and subcontractor/staff augmentation personnel participate in the completion of VPP Passports and other awareness-building endeavors, such as submittal of quizzes and puzzles from the Safety Advocate.

UCOR and local bargaining units work together to prepare employees for today's challenges and future opportunities. UCOR supports and embraces bargaining unit training programs and initiatives. UCOR relies on the following local bargaining units to provide training:

- International Brotherhood of Carpenters and Joiners of America, Local #50

- Laborers' International Union of North America, Local #818

- International Union of Operating Engineers, Local #917

- International Brotherhood of Teamsters, Local #519

- United Steel Workers (USW), Local 9-288

- Associated General Contractors

Monthly safety meetings, return-to-work safety presentations, and special emphasis focus meetings provide an opportunity for brainstorming and free-flowing interactive discussion. Employees and subcontractors/staff augmentation personnel also provide safety and health awareness topics for UCOR publications and newsletters.

Craft safety advocates/representatives from Atomic Trades and Labor Council, Knoxville Building and Construction Trades Council, and USW play an important role in ensuring our safety. The knowledge

and experience of these individuals enable them to support the resolution of safety and health-related concerns and issues. The roles of craft safety advocates/representatives are to:

- Work with employees and management to identify and resolve safety and health-related concerns
- Act as the voice of coworkers in decisions affecting safety and health of workers
- Mentor and act as leaders to facilitate the safety observation process
- Participate in accident/incident investigations, as necessary
- Monitor safety and personal behaviors to ensure work place safety
- Serve on the IC/WC Committee
- Participate in monthly safety steward meetings with the company President and Project Manager
- Support special initiatives, such as VPP

The instant recognition program "Caught Working Safely" is designed to reinforce positive behaviors. Individuals selected by their peers or management for going above and beyond to protect themselves, their coworkers, the environment, or government-owned assets/information could receive a "Caught Working Safely" award.

S&H committees are an integral part of the UCOR S&H Program. All UCOR S&H committees are chartered to provide safety leadership for all operations and project work across the ETTP Site. A fundamental premise of these charters is the belief in zero accidents/injuries, the five key elements of VPP, and the core functions and guiding principles of ISMS.

Both UCOR and subcontractor employees chair and participate in S&H committees. This level of participation enables employees at all levels to raise concerns and be involved in their work environment. Employees are encouraged to participate in and/or support the following UCOR S&H committees:

- VPP Safety Committee
- LSITs
- Electrical Safety Committee
- PAPC
- President and Union Stewards/Safety Advocates and Representatives Monthly Meeting

UCOR launched a Wellness Committee in 2013. The new committee held its first meeting on January 24, 2013. Its mission is to promote the health and wellness of UCOR and subcontractor employees through education and initiatives that:

- Encourage wellness habits
- Increase awareness of factors and resources that contribute to well-being
- Inspire and empower individuals to take responsibility for their own health
- Promote and support the culture of a wellness community

The Wellness Committee is sponsored by the ESH&QA Manager and is comprised of representatives from Health Services; Human Resources; ESH&QA; VPP; craft bargaining units; Strategic Planning,

Communications, Governmental Affairs, and administrative support. The committee serves in an advisory role to UCOR senior management, while promoting company-wide wellness initiatives designed to improve lifestyle behaviors and empower employees to take responsibility for their health. Examples include establishment of Wellness Rooms, a Wellness webpage, and Work on Wellness lunch and learn sessions, "The Biggest Loser" healthy weight loss competition, and "Walk Across Tennessee" exercise competition.

All UCOR S&H Program procedures, policies, plans, guidelines, and requirements documents are available on the UCOR Intranet. Additionally, a computer-based share drive to which facility-specific information, including committee meeting minutes and safety statistics (including injury rates), is posted to allow access by project employees. The following S&H data are readily accessible to and used by all UCOR S&H committees:

- Injury/illness summary reports

- VPP assessment(s)

- UCOR VPP employee surveys

Implementation of the UCOR ISMS, SCWE, and VPP tenets provides many opportunities for employees and subcontractors to be involved. Individuals at all levels of the organization attempt to 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.

2.3 FOCUS AREA – ORGANIZATIONAL LEARNING

2.3.1 Attribute: Credibility, trust, and reporting errors and problems

Planned Sustainment Tools:

- Questioning Attitude Recognition Program (Best Practice) – A Questioning Attitude Recognition Program was recently instituted to encourage people to question practices or conditions that could be improved. All UCOR employees including subcontractors are eligible to be nominated and anyone can make a nomination. Employees are encouraged to discuss good examples of when someone demonstrates having a questioning attitude during POD and staff meetings or with their supervisors. Examples can also be brought to any ES&H staff member, craft safety advocate/representative, or member of management.

  This program supports UCOR's SCWE - it is integrated and complementary with LSIT initiatives, the safety observation process, the IWCP Feedback Tool, and the IC/WC Program.

  A selection committee comprised of both senior managers and craft meets each month to select the best examples for recognition. These examples are shared at the PAPC meeting where the respective Area Project Manager recognizes the awardee with a token of appreciation such as a high-visibility safety vest with the "UCOR Questioning Attitude Leader" logo. In order to emphasize the importance of supervision in this process, supervisors of each awardee are also presented at PAPC. In addition, the winning examples are shared through various company-wide communiques including the Safety Advocate, the UCOR Newsline, and are posted on the UCOR Questioning Attitude Recognition Program webpage.

  Each quarter, the employees who are selected as having provided the "best of the best" input are recognized by being invited to lunch with the company President and Project Manager.

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- Perform employee survey – A written safety culture survey will be performed in the first Quarter of FY 2015. All UCOR, staff augmentation, and subcontractor personnel will be included in the survey.

- Establishment of Safety Culture Performance Measures – ISMS POMCs are developed to include leading indicators in safety culture.

2.3.2 Attribute: Effective resolution of reported problems

Planned Sustainment Tools:

- Integrate revisions contained in DOE O 442.1B - When Order revisions become effective, they will be incorporated into UCOR PROC-CN-2008, Employee Concerns Program upon modification to UCOR's contract.

2.3.3 Ongoing Sustainment Tools

UCOR demonstrates effective and continuous organizational learning through a variety of processes and mechanisms. These include formal mechanisms, such as assessments, causal analysis, event investigations, corrective actions, and lessons learned. However, the foundation for organizational learning is established through the leadership and worker-involvement activities described in Focus Areas 1 and 2, which establish an expectation for excellence through continuous improvement and a teaming partnership of credibility and trust between management and workers. It is recognized that open and frequent communication and credibility and trust are prerequisites to effective and continuous organizational learning.

The WIPP Accident Investigation Reports indicated a lack of effectiveness of Safety Management Programs (SMPs). UCOR performs an annual review and update of UCOR-4019, *Safety Management Program Descriptions for UCOR Nuclear and Non-Nuclear Facilities*. Management assessments of subject programs are conducted and issues are tracked to closure through the UCOR issues management program. UCOR has a broader commitment to sustainment of the SMP through parent corporate review.

The organizational mission and operational goals clearly identify that production and safety goals are intertwined, as defined in the prime contract, the PEMP, and the UCOR ISMS POMCs. POMCs are established on a fiscal year basis and require DOE approval prior to implementation. Metrics are developed using trending information, assessment results, and incorporation of operating experience and lessons learned. The ESH&QA Manager coordinates the annual development and monthly reporting of ISMS performance metrics to UCOR senior management and DOE. The ESH&QA Manager also coordinates the evaluation and documentation of ISMS implementation and integration, the annual ISMS Declaration, and the monthly POMCs report.

The ISMS performance measures dashboard includes a suite of POMCs including leading indicators that measure the overall well-being of the UCOR safety culture. Each performance objective below is supported by its own suite of metrics to measure performance:

- Work Toward an Injury Free Workplace

- Maintain Effective Control of Exposure to Energy, Chemicals, and Other Industrial Safety Hazards

- Maintain a Trained and Qualified Workforce

- Maintain Effective Control of Exposure to Radioactive Materials

- Maintain Requirements for Environmental Protection

- Maintain Effective Nuclear Safety Program

- Safety Culture Sustainment
- Maintain Effective Work Planning and Control Process
- Maintain Effective QA Program
- Maintain Requirements for Waste Management

UCOR integrates the concepts and principles of Human Performance Improvement (HPI) into ISM as a practical way to facilitate the establishment of a just safety culture. To reduce human error and latent organizational weaknesses, UCOR integrates the HPI tools for individuals, work teams, and management into work planning and execution. UCOR is continuing on the journey to improve human performance by focusing on the use of HPI tools at the workface and event investigation.

The Assessment Program provides input to the UCOR management team to assess whether UCOR operations are conducted safely, effectively, efficiently, and in accordance with applicable requirements. The QA Organization establishes and maintains the Assessment Program, while each functional and project organization has responsibility for scheduling and conducting assessments, providing useful feedback from work performed, and implementing appropriate improvement processes. The UCOR Assessment Program is implemented in accordance with the UCOR QA Program, as defined in UCOR-4141, *URS | CH2M Oak Ridge LLC Quality Assurance Program Plan Oak Ridge, Tennessee.* The UCOR Assessment Program includes independent assessments (IAs), management assessments, management walkthroughs, and surveillances.

IAs are performed to evaluate work performance compliance with environmental, health, safety, quality, and other regulatory requirements and to improve performance and process effectiveness. IAs are conducted by technically qualified and knowledgeable staff that is not responsible for supervising or performing the work being reviewed.

Self-assessments are performed by the organization/function having primary responsibility for the work, process, or system being assessed. Organizations and functions within the company plan and schedule self-assessments. Self-assessments encompass both formal assessments and informal assessments. The more formal self-assessments include management assessments (PROC-PQ-1420, *Management Assessment*) and subcontractor oversight. Informal self-assessments include inspections and walkthroughs conducted by subcontractor coordinators, safety representatives, project industrial hygienists, EC&P leads, and line managers.

Each functional and project organization is responsible for conducting management assessments that focus on areas that present the greatest consequences of failure and the greatest benefit from improvement. Results from internal and external evaluations, reviews, occurrences, performance metrics, and lessons learned are considered when planning management assessments.

The management assessment process is used to evaluate the adequacy and effectiveness of management control systems. While retaining overall responsibility for the assessment process, senior management requires management at all levels to assess the performance of the activities assigned to their organization. Periodically, senior management reviews and evaluates data from external and internal sources, including knowledge based on their own experience, to identify problems that hinder or may present obstacles within the organization's ability to achieve its mission-performance objectives.

Management walkthroughs are focused on behavioral observations, but also include a compliance component. The program creates a culture whereby safe behaviors are reinforced, while opportunities are identified to improve work effectiveness and safety. Managers performing walkthroughs have the

opportunity to evaluate activities and invoke required changes. The program is designed to improve organizational performance and safety by making line managers available to interact with employees, conduct meaningful discussions about workplace challenges/safety, observe work performance, reinforce safe work behaviors, and identify ways to help their staff improve work effectiveness and safety.

Field quality engineers perform surveillances of UCOR and subcontractor work in accordance with PROC-PQ-1480, *Quality Surveillance*. These short duration surveillances are conducted separately from other assessments, reviews, and investigations.

PPD-EH-5614, *Worker Safety and Health Assessment Program*, documents the process used to perform assessments of the programmatic (i.e., functional) areas described in Title 10 CFR Part 851 (Worker Safety and Health Program Rule) and PPD-¬EH-1745, *Worker Safety and Health Program*. The scope of this program description includes the requirements as they apply to the conduct of assessments performed by S&H personnel for self-performed and subcontracted work activities. This program includes the S&H programmatic areas of Industrial Hygiene, Occupational Medicine, and Occupational Safety, which includes Construction and Electrical Safety and other applicable Worker Safety and Health Plan elements.

Issues identified from the assessment process are managed in accordance with the Issues Management process defined in PROC-PQ-1210, *Issues Management Program*. The Issues Screening Team characterizes the issue for significance level, facilitates consistent categorization of issues, and identifies possible negative trends or leading indicators based upon recurring or similar issues. Issues are assigned to an issue owner who is held accountable for ensuring that the issue is appropriately resolved. Causal analysis and corrective actions are identified and tracked and trended through the Corrective Action Management System (CAMS). SMEs obtain and use trend information from CAMS and Occurrence Reporting and Processing System to initiate program improvements and establish focus areas for future review. SMEs are responsible for reviewing trend data and feedback information associated with their particular subject matter area, and providing periodic feedback to project, functional, and senior management. SMEs evaluate feedback to determine the effectiveness of safety management programs.

PROC-EH-5616, *Safety and Health Information*, and a database designed to implement 29 CFR 1910.120 and 10 CFR 851 address expectations for work-site inspections by individuals knowledgeable in safety and health requirements. A series of safety and health surveillance lines of inquiry are used that will serve to ensure adequate oversight and documentation of topical areas identified in PPD-EH-5614.

Another important element of organizational learning is the use of lessons learned. The UCOR Lessons Learned Program is implemented through PROC-PQ-1240, *Operating Experience/Lessons Learned*. Lessons learned from throughout the DOE Complex, as well as operating experiences from other industries, are shared throughout the UCOR Organization. In addition, UCOR initiates lessons learned information that is shared within UCOR and the DOE Complex. Lessons learned are incorporated into the work planning process and are shared with workers in safety meetings and POD meetings.

Benchmarking is used to compare UCOR's performance in a particular area against other organizations that may have exemplary performance in the same area and learning what the other organization does to achieve that performance. UCOR will continue to benchmark through the Oak Ridge Business Safety Partnership by communications with and visits to other DOE sites, and through corporate reachback.

The UCOR process for conducting reviews and investigations of issues is documented in PROC-FO-1063, *Issue Review and Investigation Process*. This process is consistent with site HPI initiatives, ISMS principles, and Conduct of Operations requirements. An initial investigation is conducted as soon as practical after personnel, facility, and affected equipment and systems are in safe/stable configuration; the issue has been evaluated for categorization; and required notifications are made as directed per

appropriate procedures. The information obtained during the issue investigation is used to identify failed/flawed defenses and understand precursors leading to the issue; identify and determine causal factors; support subsequent investigation and causal analysis efforts; develop corrective actions that effectively mitigate, minimize, or prevent recurrence; and provide an avenue for lessons learned as a natural outcome of the process.

The Issues/Corrective Action Review Board (I/CARB) also participates in trend analysis. Specifically the I/CARB is responsible for:

- Periodically reviewing the safety-management program performance through scheduled management presentations focused on demonstrating program status and health

- Reviewing and taking appropriate actions on situational topics (e.g., Significant Corrective Action Plans, cross-cutting issues, and other issues as identified by the I/CARB)

- Reviewing the causal analysis and corrective action plan development for significant issues

- Quarterly performance analysis performed by the Price Anderson Amendment Act/Occurrence Reporting and Processing System coordinator of reportable and non-reportable events/issues

- On an ongoing and as-needed basis, reviewing events, issues, and trends with programmatic implications

After completion of the 2011 and 2012 employee safety-survey results analyses, and taking into account results of the various assessments conducted since the beginning of the contract, UCOR began to bridge the gaps identified through a series of focused improvement initiatives. These include:

- Focus on management field presence

- Safety Trained Supervisor certifications

- Safety Observation Process pilot on Deactivation & Demolition Project

- Issued PROC-FO-1063, *Issue Review and Investigation Process*

- Enhanced IC/WC process

- Continue to provide SCWE Policy and Nuclear Safety Culture Training to all new-hires (direct hire and on-site subcontractor personnel)

- VPP Passports

- "Caught Working Safely" Recognition Program

UCOR and subcontractor employees are encouraged to approach work with a high degree of inquisitiveness and are empowered to refuse to perform work that is unsafe, even if directed to do so by supervisors, customers, or other prime contractors. A questioning attitude is encouraged and expected, as noted in the SCWE Policy Statement. Personnel interviews and focus group sessions repeatedly indicate that employees feel empowered to maintain a questioning attitude; as such, informal work pauses or step backs are common within UCOR projects.

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3. CONCLUSION

UCOR is taking deliberate action to effectively implement ISMS by communicating expectations regarding safety culture, actively engaging the workforce, and pursuing recognition for employee engagement. UCOR's approach for the sustainment of safety culture and SCWE was conceived in the context of DOE G 450.4-1C, *Integrated Safety Management System Guide*, Attachment 10 Safety Focus Areas and Associated Attributes and this plan follows in that context.

UCOR will convene a standing safety culture monitoring panel as an integral part of the VPP initiative. The panel will have the responsibility to monitor the timely and effective implementation of the tools noted in the safety culture sustainment plan. The plan is a living document, and the panel will review and revise it as needed for continuous improvement.

UCOR will continue to implement the safety culture sustainment tools currently in place and over the coming months plans to further enhance safety culture with implementation of the new tools and initiatives integrated into the VPP Attainment Plan as noted in Attachment 1 titled "UCOR Safety Culture Sustainment Plan Matrix."

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APPENDIX A.
UCOR SAFETY CULTURE SUSTAINMENT PLAN MATRIX

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SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
1. Leadership	a. Demonstrated Safety Leadership* (Red text denotes attributes to be emphasized as requested by DOE)	EM/UCOR SCWE Policy Statement issued January 2012; Reissued July 2014	Development of UCOR Corporate Safety Culture Policy
		Maintain and promote multiple processes for raising & closure of issues as noted below. As part of SCWE training, all personnel have been provided a lanyard card with information on how to raise issues through the following avenues: - Discussion with Supervisor or Manager - PROC-CN-2008, *Employee Concerns Program* - POL-UCOR-009, *I Care/We Care Safety Concerns Program* - PROC-EH-2018, *Stop Work Procedure* - PROC-PQ-1210, *Issues Management Program* - PROC-PQ-1481, *Reporting Conditions Adverse to Quality* - Safety Observation Cards - PROC-CT-1515, *Differing Professional Opinion Process* - UCOR Intranet Q&As (anonymous)	(1) Establish Safety Culture Monitoring Panel (2) Establish Required Reading requirement for senior management team based on the book, *Speed of Trust*. The training targets the management team in an effort to enhance open communications and foster an environment free from retribution Continue to anchor safety culture and SCWE into ISMS Support DOE in evaluation of contract language to incorporate clear reference to safety culture Support EFCOG in development of proposed revisions to SCWE Self-Assessment Guidance Support responsive revisions to the ECP through attendance and/or participation in National Association of Employee Concerns Professionals (NAECP) and quarterly Headquarters/Contractor ECP conference calls Implement Management Control Plans as needed
		EM/UCOR SCWE policy required reading assignment for all employees and subcontractors Employee Concerns Program procedure is required reading for all UCOR employees and is a mandatory subcontractor flow down procedure	
		Company-wide communications: *UCOR Newsline*; *Safety Advocate*; Information Monitors, Take 5s; Safety Pauses; Return-to-Work Focuses; UCOR Announcements; VPP Communications Plan; PAPC; Environmental Pagers	
		Management Support of Professional Certifications including Safety Trained Supervisors (STSs) - Training Module 31234 and National Registry of Radiation Protection Technologists (NRRPT)	
		Management field presence - Monthly Observation Checklist for Senior Managers	
		One-on-one weekly meetings between UCOR President and Project Manager and individual members of senior management team including ESH&QA manager and ECP manager	
		Employee Concerns Program Manager Field Walkdowns	
	b. Risk-informed, conservative decision making	Safety Culture Training - Module 31238	
		Safety Culture Surveys - December 2011 and December 2012	

SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
1. Leadership (cont'd)		Benchmarking - Savannah River Site, Uranium Processing Facility, Oak Ridge Business Safety Partnership, Energy Facilities Contractors Group	
	c. Management engagement in the field	Employee Concerns Program Manager Field Walkdowns	
		Positive employee recognition ("Caught Working Safely," VPP Passport)	
	d. Staff recruitment, selection, training, and development	• Safety is one of the topics covered during all New Employee Orientation (NEO) sessions conducted by HR for new employees. • HR works in concert with Health Services and ESH&QA to ensure that individuals are physically fit to perform the job duties of their assigned positions, prior to returning them to work as well as upon initial hire. • An individual's safety philosophy or attitude is a standard question in the HR retained databank of interview questions that is shared with management for use in conducting interviews with candidates for employment.	
	e. Open communications and fostering an environment free from retribution		(1) SCWE Management Roundtables (2) Incorporation of safety culture and SCWE concepts and practices into training

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SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
1. Leadership (cont'd)	f. Clear expectations and accountability	Initial Event Reports (prompt error reporting) Disciplinary Review Board Stop Work Authority • During NEO, new employees are provided the UCOR-4087 *Safety & Health Handbook* and UCOR-4088 *Environmental Compliance & Protection Awareness Handbook* that outline UCOR's safety, health and environmental expectations. HR retains a NEO checklist for each new hire which notes their receipt of the handbooks. • POL-HR-309, Progressive Discipline, Attachment A Employee Standards of Conduct lists specific safety related areas of conduct and the potential level of discipline for infractions in those areas. All employees must sign an acknowledgement of receipt of Attachment A upon hire, and the acknowledgment becomes a part of the employees personnel file.	(1) Monthly Senior Management Safety Checklist
2. Employee/Worker Engagement	a. Personal commitment to everyone's safety	Training Position Descriptions and Position Assignment Forms New Employee Training - Module 28179 Parkworker Training - Module 21221 Consolidated Annual Refresher Training - Module 28307 ISMS/EMS Leadership Workshop - Module 26930 Safety Culture Training - Module 31236 Site Safety Orientation for UCOR Visitors, Vendors, and Service Suppliers - Module 29162 SAF-200 SCWE DOE/NTC Workshop Informal coaching and mentoring	Implementation of VPP Attainment Plan
		Ongoing multiple methods to evaluate safety culture Multiple management processes to identify, resolve and trend issues Multiple avenues for gaining employee feedback Learning organization using lessons learned VPP Passports/Initiatives	
	b. Teamwork and mutual respect	Lunch with UCOR President and Project Manager	(1) Formation of LSITs and implementation of Safety Observation Process (2) Implementation of VPP Attainment Plan Implement methods for worker input to the Safety Culture Monitoring Panel & VPP Implementation Team
		Establishment of Local Safety Improvement Teams	
		UCOR/DOE OREM Safety and Health Interface Monthly Meeting	

SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
2. Employee/Worker Engagement (cont'd)	c. Participation in work planning and improvement		Engage employees through SCWE Focus Groups
	d. Mindful of hazards and controls	Job Hazard Analysis/tabletop reviews; Pre- and Post-Plan of the Day meetings; Work Package development/reviews; policy/procedure development/reviews	
		Training: New Employee Training - Module 28179 Parkworker Training - Module 21221 Consolidated Annual Refresher Training - Module 28307 ISMS/EMS Leadership Workshop - Module 26930 Safety Culture Training - Module 31236 Site Safety Orientation for UCOR Visitors, Vendors, and Service Supplier - Module 29162 Radiation Safety Orientation - Module 30895 SAF-200 SCWE DOE/NTC Workshop	
3. Organizational Learning	a. Credibility, trust and reporting errors and problems	UCOR President and Union Steward's Monthly Meeting President's Accident Prevention Council Monthly Meeting UCOR Intranet Q&As Operating Experience and Lessons Learned Local Safety Improvement Team Forums Weekly Meeting Between UCOR President and Project Manager and ESH&QA Manager to Discuss Issues Management PROC-PQ-1210, *Issues Management Program* PROC-PQ-1440, *Control of Nonconforming Items and Materials* PROC-PQ-1481, *Reporting Conditions Adverse to Quality*	(1) Questioning Attitude Recognition Program (2) 1st Qtr FY15 - Conduct written employee safety culture survey (3) FY2015 ISMS POMCs Development based on Continuous Improvement Focus on Safety Culture and Complacency Moving to lower tiers in order to develop more meaningful metrics Early collaboration with DOE Counterparts in development process Focus on use of Leading Indicators Benchmarking measures from Y-12, ORNL, SRR, and INEL LSIT participation in POMCs development

SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
3. Organizational Learning (cont'd)	b. Effective resolution of reported problems	Multiple avenues to communicate issues including: Internal Avenues • Through supervision • I Care/We Care Safety Concerns Program • ISMS Hotline: (865) 576-ISMS (4767) • Employee Concerns Program • Anonymous concerns: (865) 241-0931 or 1-888-584-8329 • UCOR Ethics Helpline: 1-888-584-8328 or 1-865-241-0290 • PROC-CT-1515, *Differing Professional Opinion Process* External Avenues • DOE Oak Ridge Office Employee Concerns Program Manager's Hotline: 1-800-676-3267 or 1-865-241-3267 • DOE O 442.2, Differing Professional Opinions for Technical Issues Involving Environment l, Safety, and Health Technical Concerns • DOE Office of Inspector Gener l: 1-800-541-1625	(1) Integrate revisions contained in DOE O 442 1B, when it becomes effective, into UCOR's ECP procedure (PROC-CN-2008) upon modification of UCOR's contract
		Safety Observation Pr cess	
		Issues Management Program including: Issues Screening Te m Issues/Corrective Action Review Board	
		Employee Concerns Tracking System	
		Internal Audit Tracking System	
		Fact Finding/Incident Investigations	
	c. Performance monitoring through multiple means	Safety Flash email/alerts	Document correlation of ssessments for repeat issues and deficiencies
		PROC-PQ-1420, *Management Assessment*	
		PROC-PQ-1401, *Independent Assessment*	
		PROC-PQ-1480, *Quality Surveillance*	URS Corporate Review of UCOR Safety Management Program (4th Qu rter Fiscal Year 2014)
		PROC-EH-5616, *Safety and Health Surveillances*	
		Monthly Safety Focus Presentations	

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SAFETY CULTURE FOCUS AREA	ASSOCIATED ATTRIBUTES	SUSTAINMENT TOOLS Implemented	SUSTAINMENT TOOLS FY 2015 Planned Implementation
3. Organizational Learning	d. Use of Operational Experience	Completed review of Accident Investigation Board Reports from the two WIPP events from February 2014 with a strong self-critical view to determine prompt actions and strategy for continuous improvement Monitor SCWE Best Practices PROC-PQ-1240, *Operating Experience / Lessons Learned Program* (OE/LL) Subject Matter Expert reviews of OE/LL Subject Matter Reviews of Corrective Actions Management System (CAMS) issues	Enhanced use of Human Performance Improvement (HPI) tools Benchmarking Volunteer to participate in the planned DOE provided Safety Culture Assessment training based on Institute of Nuclear Power Operations/USA methodology and DOE attributes.
	e. Questioning Attitude	DOE/UCOR SCWE Policy Statement	(1) Questioning Attitude Recognition Program

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ATTACHMENT 3

WASTREN ADVANTAGE, INC./TRU WASTE PROCESSING CENTER

SAFETY CONSCIOUS WORK ENVIRONMENT SUSTAINMENT PLAN

SEPTEMBER 2014

WAI

WASTREN ADVANTAGE INC

TRU Waste Processing Center

Safety Conscious Work Environment

Sustainment Plan

September 4, 2014

The TRU Waste Processing Center (TWPC) plan for Safety Conscious Work Environment (SCWE) sustainability is illustrated below providing a one-year cycle of feedback and improvement work done by a Safety Culture Improvement Panel (SCIP). Major surveys will be conducted every two years according to Energy Facility Contractors Group (EFCOG) guidance. The TWPC SCIP will conduct interim surveys; focus group interviews; and metrics evaluations as needed to ensure a sustained safety culture. It should be noted that TWPC completed one cycle of assessment in August 2014. This plan therefore is written using a completed assessment as a starting point to show an example sustainment cycle.

TWPC FY 2015 SCWE Maintenance Plan 09/02/2014

Note: Full SCWE Assessments Performed every Two Years. Next Full SCWE Assessment will be in 2016
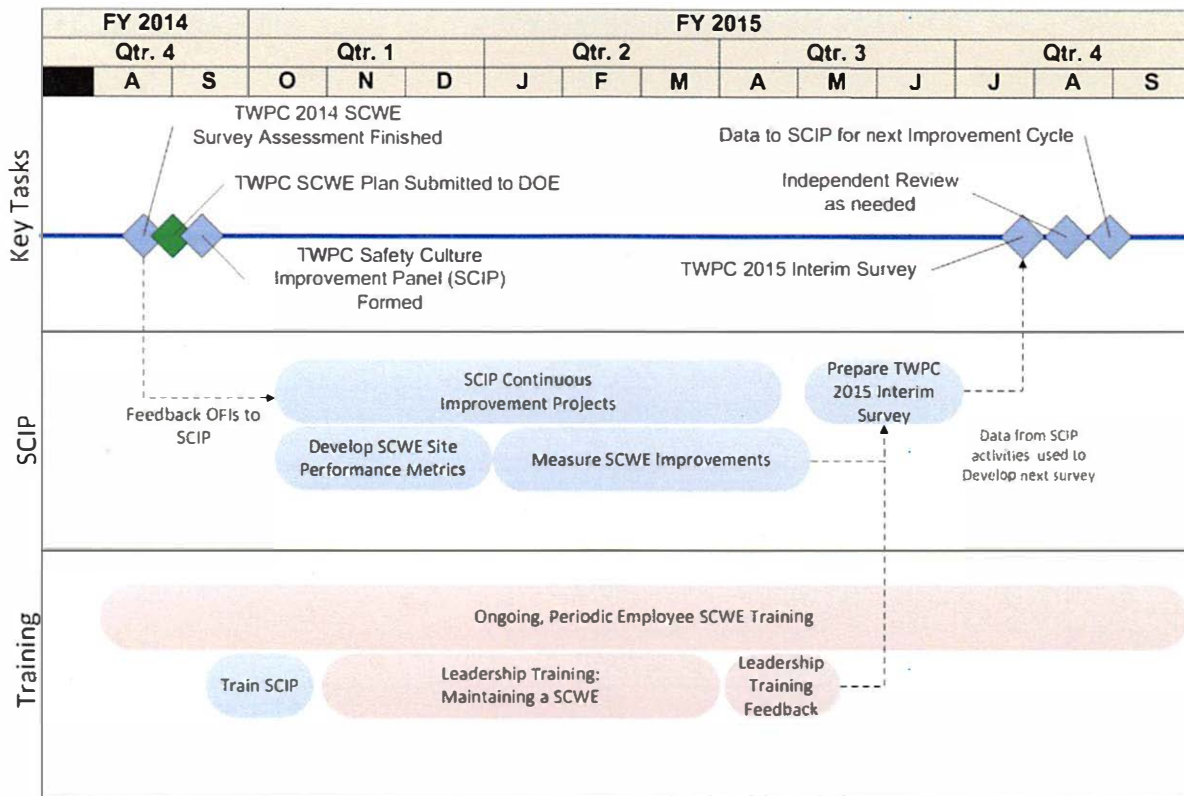
Metrics and Employee Feedback for SCWE Improvement Activities

Through periodic follow-on SCWE surveys, TWPC is able to identify changes in safety culture and can uncover issues that may impact this safety culture. These surveys started in 2008 so there is ample data to trend the SCWE and evaluate safety culture at TWPC. TWPC also conducts Voluntary Protection Program, Integrated Safety Management System, and other surveys that correlate well with the attributes of safety culture surveys. With several years of data available, TWPC has developed an initial set of metrics that provide the benchmark to measure improvements or deterioration in safety culture. These metrics are refined periodically and are derived from measurements of work, surveys, and other quantitative means.

The surveys also provide a valuable form of employee feedback. Employee comments provided in the survey help to identify areas of strength and help to formulate Opportunities for Improvement (OFIs). TWPC will conduct focus group interviews as necessary to understand the details of issues identified in order to properly define and scope improvement projects.

A major component of these improvement projects is to identify metrics that are appropriate for a given organization or task. If the metric proves to be effective, it will then appear in subsequent SCWE surveys and will be used to assist in decision making according to TWPC procedures CM-P-PA-001, *Performance Measures* and CM-P-PA-002, *Managing TWPC for Continuous Improvement.*

Culture Panel and Employee Engagement

The 2013 TWPC SCWE survey and focus groups indicated that employee involvement in investigations and development of corrective actions was less than adequate. The TWPC SCWE self-assessment recommendation was to assemble an empowered team that is comprised of TWPC employees from diverse organizational levels and functional groups. This team will be employee-led with a senior manager mentor. This mentor has organizational authority on the site to approve appropriate capital expenditures, empower employee availability and will champion decisions made that foster improvements. This team serves a similar purpose to the DOE "Culture Panel" concept and, to sustain and improve safety culture, emphasizes process improvements identified in internal surveys and focus groups. A major TWPC SCWE OFI was found to be that corrective actions were perceived to be formulated without ample employee engagement. The SCIP is comprised of floor and mid-level employees. This drives employee engagement in the sustainment of safety culture and addresses an OFI from the TWPC SCWE survey.

Organizational development literature indicates that improvement teams (such as the SCIP team) comprised of employees close to the work have very high levels of employee engagement in a given process. Further, these employees will spread the positive experiences from being on the team (engagement) by word of mouth to other employees who may become interested in improving processes in which they hold a stake. This enhances a questioning attitude and organizational learning to continuously improve the state of organizational and safety culture. These shifts in culture can be measured and trended by surveys. This team will address OFIs raised in focus groups, for example: (i) increase usage and effectiveness of ECP; (ii) easier/encouraged reporting of events and observations; and (iii) risk-aware decision making with respect to work associated new tasks.

Leadership Training and Organizational Learning

TWPC internal self-assessments indicate that managers at all levels need enhanced training to develop the skillset associated with the behavioral attributes of a SCWE. Equally importantly, they need to understand how to improve safety culture by being mindful of their own actions and interactions with employees. Managers and supervisors communicate daily with TWPC employees; demonstrating leadership at this level is critical for maintaining a SCWE.

Throughout the sustainment period, training modules will reinforce the basic attributes of a SCWE and will measure the understanding and response to these attributes. The SCIP will be specially trained in cross-functional team process improvement techniques as well as SCWE attributes and how they apply to TWPC operations. Once this team is trained they will assume a role as the group responsible to monitor SCWE and safety culture at TWPC and recommend improvements.

In addition to the training noted above, managers and supervisors will be trained in specific behaviors that increase the likelihood of improving TWPC culture. These behavioral type training modules include Listening for Understanding, Myers-Briggs Type Indicator, Group Problem–Solving, and Risk-based Decision-Making for Groups. Once managers begin to routinely employ the skills taught in this training, the organization as a whole will more easily learn from incidents or mistakes and understand the value that reporting plays in understanding and improving safety and organizational culture. This basic organizational learning is critical to a high reliability operation, a robust SCWE, and a continuously

improving organization. We must achieve these objectives to continue to reliably perform complex tasks in a hazardous environment.

Closing the Feedback Loop

Feedback from the SCIP and from the above interviews, assessments, and focus groups will inform the conduct of biennial Safety Culture Self-Assessments. The SCIP will also engage the appropriate functional managers and develop metrics that measure parameters indicating how well the improvements are working, what needs to be changed, and the overall effectiveness of safety culture improvements.

In this sense, TWPC will be able to measure both qualitatively and quantitatively the safety culture improvements and make real-time adjustments necessary to ensure the sustainment of an effective SCWE.

Summary of Plan

TWPC's plan to sustain or improve SCWE draws from a set of basic tools that have been benchmarked from other DOE sites or industries, developed by EFCOG and draw from principles of continually improving organizations. Beginning with the 2014 TWPC SCWE Self-Assessment Report, the TWPC will sustain an effective SCWE via the following mechanisms:

1. Periodic self-assessments that will enable the TWPC to measure the effectiveness of SCWE at the site and also, through the implementation and use of metrics, quantitatively trend safety culture and SCWE after improvements have been implemented. These self-assessments are performed using EFCOG and DOE guidance. Independent external assessments will be used as necessary.

2. A SCIP is being chartered to address lagging trends in safety culture and SCWE. This panel will oversee improvement projects and report to Wastren Advantage, Inc. directors the state of these projects and the SCWE. Topics addressed by the SCIP include visibility of business workflow on the site, and employee engagement. The SCIP will receive input from its members, employees, external assessments, surveys, and/or interviews. The SCIP will then use this data to brainstorm improvements and use metrics to measure the sustainment of an effective SCWE at TWPC. Leadership training provided will also be refined as data becomes available.

3. Ongoing SCWE training which will include Listening for Understanding, Myers-Briggs Type Indicator, Group Problem–Solving, and Risk-based Decision-Making for Groups will also be a part of the enhanced training.

4. Every other year, according to EFCOG guidance, a full SCWE Survey will be conducted to evaluate the then current SCWE. With this feedback, the SCIP can then begin the next period for reporting and repeat the cycle of improvement.

ATTACHMENT 4

ISOTEK SYSTEMS, LLC

SAFETY CULTURE SUSTAINMENT PLAN

SEPTEMBER 2014

a wholly owned subsidiary of ENERGY*SOLUTIONS*

ATTACHMENT

SAFETY CULTURE SUSTAINMENT PLAN

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ISOTEK SAFETY CULTURE PROGRAM DESCRIPTION

Isotek's Safety Culture produces an environment that positively reinforces worker rights and responsibilities to raise safety concerns and to stop/suspend work without fear of reprisal or any "chilling effect."

Isotek fosters an open and collaborative work environment in which project personnel feel free to raise safety concerns. Safety programs are woven into Isotek programs, policies, and procedures to provide management and personnel a framework for implementing the "Safety First" culture and safety practices throughout the Project. Isotek has further implemented programs to recognize project personnel for doing the right things.

Isotek management emphasizes the importance of a safety culture through the use of its day-to-day interface with the workforce, the processes and procedures developed with direct input from work force personnel and strict compliance with those processes and procedures, and consistent and fair enforcement of positive and negative behaviors.

At Isotek, there are multiple tools used to implement and reinforce a strong safety culture. These tools include:

- **ISO-MLD-102,** *Stop Work Policy* – gives the responsibility and authority for any project personnel or sub-contractor to stop or suspend work without fear of reprisal. The protocol and process to suspend or stop work is defined in ISO-OSH-253, *Stop Work (Safety-Related).*

- **ISO-MLD-148,** *Performance Expectations* – clearly spells out the expectations related to compliance with Isotek safety and security requirements.

- **ISO-MLD-149,** *U233 Disposition Project Goals* – defines Isotek's Project Goals for the current calendar year. The annual Goals include safety and project effectiveness improvement goals that all project personnel contribute to via their individual performance goals.

- **ISO-MLD-217,** *Differing Professional Opinions* – outlines a process to resolve safety related differing opinions beyond the normal management chain and other concern resolution systems. Project personnel have the right to report technical concerns through the DOE Differing Professional Opinions process.

- **ISO-MLD-218,** *Worker Concerns* – provides a mechanism to identify concerns related to environment, safety, health, and management issues. Project personnel are encouraged to seek resolution with their supervisor, but also have the option to use a written submittal of the concern on a "Worker Concern" or "Get Better" suggestion card. Each submitted concern is addressed with transparency and remains open until it is resolved. The suggestion card may be submitted anonymously based on the preference of the individual.

- **Speed of Trust Program** – This is a Franklin Covey program that provides an approach to building trust within an organization and with an organization's stakeholders. The program provides tools for individuals to build and maintain trust with co-workers and supervisors as well as customers. Project personnel have received the Inspiring Trust training and Isotek managers have received Leading Trust training.

- **Raise the Bar Program** – The Isotek "Raise the Bar" program is intended to show appreciation for an Isotek project person's achievements, behaviors and actions. The goal is to reinforce valued behaviors, maintain a safe and compliant work place and maintain high morale. Managers and supervisors hand out Isotek recognition tokens for valued actions and behaviors. Project personnel can then redeem their tokens for Isotek gear and clothing. Some examples of the behaviors and actions that are recognized include Speed of Trust behaviors, safety catches, suspend/stop work actions, superior/noteworthy performance, new processes or ideas, teamwork, positive attitude under particularly stressful circumstances, praise from other departments, peer nominations (with justification) and taking initiative.

- **Value Awareness Program** – This program exists to share cost savings with Isotek project personnel who identify and propose cost saving measures or ideas that are implemented and result in a true savings under the fixed price Option 2 of the U-233 Disposition contract. While not directly related to safety per se, this program reinforces the perspective that all project personnel have a voice at Isotek.

- **Top Contributor Program** – This is a program used to annually recognize the Top Contributors at Isotek. The Top Contributors are recognized for the following attributes:

  - Team player
  - Top quality work
  - Knows their customer and supports the customer
  - Goes above and beyond on assignments
  - Works well with others
  - Helps others
  - Accountable and responsible
  - Technically competent

  The Isotek management team recognizes the Top Contributors at a dinner with a guest of their choice. The Top Contributors also receive a recognition award

- **All Hands Meetings** – The President/Project Manager (PM) routinely stresses the importance of safety and compliance over cost and schedule. The PM conducts monthly All Hands Meetings to address project status and other topics of a general nature. The meeting generally begins with a safety topic and is designed to allow personnel to ask questions during any of the topics on the agenda. Status of "Get Better" suggestions or worker concerns is presented and project personnel are encouraged to submit new topics or address topics that have been closed. Also, the status of the Get Better program is posted on the Isotek SharePoint web site.

- **Bagel with the Boss** – The PM conducts routine meetings with small groups of project personnel to discuss Project status and give the participants the opportunity to ask questions or share concerns.

- **Management Training** - An awareness of any message and its transmission to the project, including the Isotek Safety Culture, has been one of the reasons the management team has gone through additional team and individual development training provided by the University of Tennessee Center for Executive Education and through the use of a private consulting firm. Isotek determined there are benefits with individual and senior management team development in maintaining a small, highly skilled workforce for the duration of the disposition activities. This has resulted in a coherent, consistent message to the project on the importance of a strong safety culture. Further this has reinforced the importance of looking and listening for and appropriately reacting to issues before they can become debilitating, which is directly connected to the Isotek Safety Culture.

Isotek utilizes a variety of feedback mechanisms to constantly monitor and assess the "health" of Isotek's Safety Culture. These mechanisms include:

- Feedback from Get Better suggestions.

- Feedback from small group meetings such as "Bagels with the Boss".

- Trends noted in the quarterly analysis of condition reports.

- Feedback from pre-job and post-job briefs.

- Findings and observations from Management Assessments.

- Real time observations by managers and supervisors.

- Formal Surveys – Isotek utilizes both paper and online worker surveys to allow project personnel to provide feedback on a number of issues. Surveys were conducted in June/July 2010, June 2011, July 2012, April 2013, August 2013 and August/September 2014. The surveys have covered a variety of topics, areas of concern, areas for improvement, management concerns, management involvement, and recommendations for improvement in all areas of operation. The results of the surveys are reviewed by the Isotek management team and areas for improvement are identified. The results are presented at an All Hands meeting along with planned actions stemming from the survey.

Table 1 provides two examples of questions from each survey.

Table 1: Survey Questions

Date of Survey	Example 1	Example 2
June 2010	What are my expectations of the PM in his new role?	What are some of the most important issues facing you in your role at Isotek?
July 2010	How would you like to see management improve accountability?	What are we NOT doing now that you think we should START doing?
June 2011	What improvements have been made on the Project that affect you?	What are two or three of the most important issues facing your functional area in the near term?
July 2012	(Senior Management Performance) Goals and expectations are adequately communicated.(Agree/Disagree)	(Direct Supervisor Performance) Work execution in my group is planned and organized. (Agree/Disagree)
April 2013	When I report issues or concerns, my motivation for doing so is not questioned. (True/False)	My concerns are respected and addressed. (Rate on Scale of 1 – 5)
August 2013	How often should the All Hands meeting be scheduled?	What are your recommendations to improve the presentations at All Hands?
August 2014	If I identified a potential safety issue or concern, I would inform my supervisor or utilize the alternative channels available to me if I wasn't comfortable reporting it through my management chain. (True / False)	Supervisors and managers demonstrate that safety is one of our top priorities by encouraging and expecting safe performance, work place observations, and exhibiting safe performance as they lead by example. (True / False)

Table 2: Isotek Safety Culture Sustainment Actions

Action	Owner	Expected Completion Date
LEADERSHIP		
Demonstrated Safety Leadership		
Hold "Bagels with the Boss" meeting with project personnel who have joined Isotek since last such meeting	President, Isotek	September 2014
Provide quarterly update of Project's 2014 Goals to All Isotek	President, Isotek	October All Hands
Review performance against 2014 Project Goals	Senior Management Team	January 2015
Establish 2015 Project Goals	Senior Management Team	December 2014
Brief All Isotek on 2014 goal performance and goals for 2015	President, Isotek	January 2015
Conduct "All Hands" briefings and cover project based and personal based safety topics	President, Isotek Safety and Quality Manager	On-going
Risk-informed, Conservative Decision Making		
Plan of the Day/Plan of the Week meetings are attended by Senior Management and decisions made take into account the input of workers, supervisors, and support personnel. Functional subject matter experts (safety, nuclear safety, electrical safety, engineering, etc.) are in attendance and provide input.	Facility Operations Manager	On-going
Pre-job briefs of most medium risk and all high risk activities are attended by Facility Operations Manager or representative. • Approaches and expected hazards are discussed at length with input from all levels	Facility Operations Manager	On-going
Management Engagement and Time in Field		
Senior managers perform assigned management assessments that include field observations.	Senior Managers	Per Management Assessment schedule
Medium and High risk activities are thoroughly pre-job and post job briefed.	Facility Operations Manager	On-going

Senior Supervisory Watch (SSW) is established and maintained until the SSW is convinced performers are sensitive to the risks and hazards of the work performed. A formal process is followed to make recommendations to the Senior Manager and to the President before the SSW is secured.	SSW and Facility Operations Manager	As needed
Activities for which Readiness has been declared and is being maintained, Senior Observer (Senior Management not involved with the specific work activity) takes a very critical review of the activities and the overall Conduct of Operations, Conduct of Radiological Controls, and attention to procedural compliance and safety. Senior Observer's grade and recommendation is formally recorded and made to the Facility Operations Manager and President.	Senior Observer	As needed
Staff Recruitment, Selection, Retention, and Development		
Evaluate and identify the Isotek "Top Contributors" for 2014	Senior Management Team	December 2014
Recognize 2014 "Top Contributors"	Senior Management Team	February 2015
Upgrade the "Raise the Bar" program awards	HR Manager	October 2014
Open Communication and Fostering an Environment Free from Retribution		
Update status of "Get Better" suggestions and "Worker Concerns" at All Hands meeting	President, Isotek	Monthly
Clear Expectations and Accountability		
Review ISO-MLD-148, Performance Expectations, (recently revised and issued on June 5, 2014) for currency and revise as necessary	President, Isotek	November 2014
EMPLOYEE/WORKER ENGAGEMENT		
Personal Commitment to Everyone's Safety		
Meet new project personnel, provide copy of ISO-MLD-148, and explain project philosophy of "Compliance trumps schedule and cost"	President, Isotek	As needed
Add question(s) to new hire interview process to assess interviewee's understanding of the importance of a strong safety culture	HR Manager	November 2014

Evaluate role and effectiveness of Isotek Safety Committee	Safety & Quality Manager	October 2014
Based on above action, assess viability of replacing or supplementing Isotek Safety Committee with a safety culture committee	President, Isotek	November 2014
Teamwork and Mutual Respect		
Conduct All Hands meetings to provide Project status updates	President, Isotek	Monthly
Participation in Work Planning and Improvement		
Pre-job briefs of most medium risk and all high risk activities are conducted; during which approaches to the performance and expected and potential hazards are openly and thoroughly discussed.	Facility Operations Manager or representative	On-going
Post-job briefs of high risk activities are conducted to ensure lessons learned are captured and fed back into the work packages for the next time it is conducted.	Facility Operations Manager or representative	On-going
ORGANIZATIONAL LEARNING		
Credibility, Trust and Reporting Errors and Problems		
President and HR Manager achieve certification as Speed of Trust training facilitators	President, Isotek HR Manager	October 2014
Conduct Speed of Trust Training for new project personnel	President, Isotek HR Manager	December 2014
Conduct Speed of Trust refresher with all project personnel	President, Isotek HR Manager	Monthly through March 2015
Performance Monitoring through Multiple Means		
Present trend analysis of condition reports to senior management team	QA Manager	Quarterly
Conduct annual All Isotek survey on safety culture and communications	HR Manager	September 2014
Use of Operational Experience		
Attend DNFSB public hearing on safety culture	Safety & Quality Manager	When scheduled
Identify potential benchmarking opportunities	Safety & Quality Manager	October 2014
Visit identified benchmark company	Senior Management	February / March 2015