United States Government **Department of Energy**

memorandum

Richland Operations Office

DATE: SEP 1 2 2014

REPLY TO ATTN OF: AMSE:JEP/14-AMSE-0031

SUBJECT: SAFETY CULTURE SUSTAINMENT PLANS

TO: M. Whitney, Acting Assistant Secretary
for Environmental Management
EM-1, HQ

In response to the June 27, 2014, memorandum from D. Huizenga, attached are the Safety Culture Sustainment Plans for the U.S. Department of Energy Richland Operations Office (RL), Washington Closure Hanford LLC, CH2M HILL Plateau and Remediation Company, and Mission Support Alliance, LLC.

As part of our continuing effort to improve our safety culture, each contractor has committed to continuous improvements within their respective annual Performance Objectives, Measures and Commitments (POMCs) submittals as per 48 CFR 970.5223-1; "Integration of environment, safety, and health into work planning and execution." Each set of POMCs is accepted by RL and each contractor's safety culture improvement actions are monitored by RL for completion and effectiveness.

Along with RL's contractor's actions to improve safety culture, RL has committed to its own improvement actions (Attachment 1). RL and its contractors will continue to tailor safety culture improvement items to each unique organizational culture. These organizations will continue to utilize the framework described in DOE G 450.4-1C, Attachment 10, "Safety Culture Focus Areas and Associated Attributes," as the guiding concept for defining and improving our safety cultures.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment, on (509) 376-7727.

Doug S. Shoop
Acting Manager

Attachments

cc w/attachs:
M. A. Gilbertson, EM-10
W. M. Levitan, EM-10
M. Zhu, EM-11

cc w/attachs:
M. A. Gilbertson, EM-10
W. M. Levitan, EM-10
M. Zhu, EM-11

(1) RL Safety Culture Sustainability Plan
(2) WCH Safety Culture Summary and Path Forward
(3) CHPRC Sustainment Plan
(4) MSA 2015 Safety Culture Sustainment Plan

Attachment 1

The U.S. Department of Energy Richland Operations Office (RL)
Safety Culture Sustainment Plan

RL will sustain its safety culture by adopting a two year cycle that evaluates and analyzes the state of our behavior towards safety one year and implements identified improvements the following year. This on-going, two year cycle will be focused on both providing improvement initiatives as well as the development of leadership behaviors that reflects RL's commitment to the continuous improvement of our organizational/safety culture.

RL recognizes that improving an organization's safety culture is a slow process. While efforts will be re-focused as our feedback mechanisms reveal new challenges, RL understands that only a long term approach to organizational/safety culture improvement will yield actual results. In time, the adaptation of behaviors that reflect DOE's safety culture expectations will be sustained within RL and reflected in the prime contractors' actions.

In 2014, safety culture training was conducted for all RL staff. This class both highlighted those areas that were brought forward from the previous analysis of RL's safety culture and gathered current feedback regarding RL's current efforts to improve its safety culture. The feedback collected from this training confirmed that RL's safety culture improvements are on track. Appendix A is the summary of the training feedback and Appendix B is RL's current action plan and its status as of September 1, 2014.

As a result of management's desire to clearly state its fundamental principles, RL established a set of Operating Principles that was developed with the support of the RL staff. This document provides a clear set of expectations for both the RL management as well as the staff members of the organization. Appendix C is the RL Operating Principles.

RL continues to be guided by the documents and analysis transmitted to Mr. Hutton in September of last year. RL is now preparing for our efforts in 2015, starting with the implementation of the survey tool described below.

Below are RL's tools and associated activities that will sustain our efforts to continuously improve our safety culture:

1. **Tools**
    a. Organizational/Safety Culture Measurement System
    b. Organizational/Safety Focus Group
    c. Bi-Annual RL Internal Communications Assessment

d. Employee Concern/Differing Opinion/Alternative Dispute Resolution Processes feedback
e. Continuous Development

2. Tool Descriptions

a. Organizational/Safety Culture Measurement System - (All Focus Areas)

RL will continue to rely upon a safety culture survey tool as our primary tool to measure the state of RL's safety culture and safety conscious work environment. RL is planning to adopt a safety culture survey tool currently in use on the Hanford Site. This survey tool is planned to be utilized by RL and its prime contractors with our support services contractor serving as the software administrator. RL and its prime contractors will form a steering committee that will guide the structure of the survey and ensure that the core components of the survey will be in alignment with the expectations of DOE G 450.4-1C, Attachment 10 criteria.

Analysis of the data collected will be the responsibility of each organization. However, it is expected that all four organizations will combine resources to provide independent objectiveness. If concerns are raised by the Hanford workforce regarding confidentiality, the steering committee may recommend that the survey process and analysis be transitioned to an independent contractor to instill trust in the process and results.

RL will continue to utilize the contractor's quarterly/monthly performance assurance (also known as the Contractor Assurance System; CAS-CAM) reports as a secondary measure of the contractor's safety culture. Indicators within these reports generally include performance trends in the areas of work controls, safety and health, environmental, performance assurance, as well as others. Each RL contractor's performance assurance reports also incorporate their Integrated Safety Management performance, objectives, measures and commitments (POMCs), of which the RL contractors have all committed to improving safety culture as a POMC improvement item.

b. Organizational/Safety Culture Focus Group - (Worker Engagement)

RL will use an organizational/safety culture focus group to provide RL leadership with a staff level viewpoint of the organization's safety culture. This focus group will review the results of the bi-annual survey (the safety culture survey tool),

gather peer-to-peer commentary of the focus groups conclusions, and incorporate observations into a report that will provide organizational/safety culture improvement recommendations to the Field Element Manager.

Along with the above activities, the RL focus group will evaluate the results of the annual Employee Viewpoint survey as an additional source of information to compare against the RL safety culture survey tool. This comparison will provide a cross check of the improvement issues brought forward from each survey.

The RL focus group will work with the RL leadership team to ensure that the analysis of the survey results are well understood and the focus group will support the RL leadership in applying improvement items. The RL focus group will also provide recommendations to RL's leadership in regards to selecting training curriculum that will focus on the issues brought forward by the focus group.

c. Bi-Annual RL Internal Communications Assessment - (Leadership)

The ability of the RL organization to clearly communicate internally is the keystone to maintaining and improving the organization's safety culture. As a minimum, every two years, RL will assess both the effectiveness of its internal communications as well as the effectiveness of the tools utilized by both the staff and leadership.

Current feedback from the recent communications assessment yielded insight into what the RL staff considered to be better approaches to communications. As a general commentary, the RL staff felt that smaller, more personal meetings were more effective than the traditional, monthly "all hands meetings." Smaller, more interactive meetings with RL leadership were thought to be a better method of two way communication. Also revealed by the recent communications survey was the recommendation to provide opportunities to get to know the other divisions and their leadership.

Given the success of the first communications assessment, and the insight provided by the survey, RL now considers this tool an important component for sustaining RL's safety culture.

d. Employee Concern/Differing Opinion/Alternative Dispute Resolution feedback - (Leadership)

In 2012, independent reviews by the Office of Health, Safety, & Security and Environmental Management identified weaknesses in the Hanford Site Employee Concerns Program(s) (ECP) processes and performance. In response to these reviews, RL established a new Hanford Sitewide Employee Concerns Program procedure, DOE-0400. This new procedure establishes a uniform, sitewide process that is now implemented by RL, U.S. Department of Energy Office of River Protection, and all Hanford contractors.

Additionally, improvements were made to RL's Differing Professional Opinion (DPO) process. Within the new procedure, an Alternative Professional Proposal Evaluation Process has been implemented to supplement the standard DPO by better defining the first step in the DPO process, "Attempt to resolve your concern(s) through existing processes designed to address concerns with the Line Manager." This new process was designed to ensure and encourage all employees to submit alternative professional opinion proposals in good faith, without fear of retribution, and have their views heard and addressed by RL management in an open manner.

As part of this new ECP process, the RL ECP office is committed to conduct an annual self-assessment. As part of this self-assessment, RL will gather information that may be a useful in improving the safety conscientious work environment process. Items gathered from this review will be incorporated into RL's overall safety culture improvement actions, if applicable.

e. Continuous Development - (Organizational Learning)

Consideration will be given to the improvement actions determined from the above safety culture sustainment tools in the selection and/or development of training that advances RL's organizational/safety culture. RL will utilize training sessions that focus on both behavioral improvements and specific leadership skill development.

Training may consist of traditional classroom environments, but may also include mentoring sessions, guided discussions and/or guest lectures. In addition, the training environment will also be utilized as a feedback mechanism regarding the effectiveness of the safety culture improvement items.

3. Schedule for sustainability

As described above, RL will utilize a two year cycle that evaluates and analyzes the state of our behavior towards safety one year and implements identified improvements the following year. The following is RL's basic schedule:

a. Odd Year (2015, etc.)
   i. Survey –2nd quarter
   ii. Analysis - 3rd and 4th quarter
   iii. Observations – continuous

b. Even Year (2016, etc.)
   c. Improvements - continuous
   d. Training – 2nd and 3rd quarter
   e. Feedback - continuous

Appendix A

RL 2014 Safety Culture Feedback Summary

In response to an RL management commitment to improve the safety culture of the organization, a series of classes were held to provide the RL staff with an introduction to organization culture concepts and provide individuals with several tools to improve behaviors.

The following information and observations were obtained during the RL Safety Culture Training, conducted in March 2014 and attended by approximately 85% of the RL employees. As a class exercise, participants were asked to express their own ideas on ways to improve RL's safety culture. After a peer review of the ideas, the upper ranked opportunities for improvement were collected and are presented below.

The majority of the participants felt that RL's safety culture was good; however, a notable percentage felt that RL's safety culture was not effective. Even though the majority of the participants were generally satisfied with the current state of the RL organizational/safety culture, most RL personnel felt that improvement is possible. It was also noted that the feedback from the class exercises were generally in alignment with the results of the RL safety culture focus group findings from last year.

The majority of the RL staff generated improvement ideas focused on the management decision process, specifically addressing the need to communicate the reasons/basis for a decision and consider involving RL staff in the decision process. It was the perception of the instructors that there is a common, but not overwhelming belief that decision making is made without full regard of the staff's expertise. This instructor perception was derived from class comments such as "walk the talk," "safety over production," "politically driven," "budget driven," and other equivalent statements that point to a less than desired communication and/or inclusion of the RL staff. RL staff also has the perception that outside organizations, i.e., U.S. Environmental Protection Agency, Defense Nuclear Facilities Safety Board, etc. have undue influence on RL decisions. This perception points to a potential improvement in the RL safety culture by increasing the awareness of the staff with regards to the complexity of the "outside" influences.

The participants expressed a desire for RL leadership to improve relationships and communication with staff. Additionally, RL personnel articulated the need for intra-organization communication, collaboration, and teaming. The RL staff also determined there is a need for enhanced process and personal feedback, with appropriate incentives for providing safety related information.

Below is a list of the improvement ideas that were considered noteworthy by the participants. The improvement ideas have been grouped into categories that align with the DOE key elements of a sound safety culture:

Leadership

Decision–making process

- Open communication surrounding decision-making
- Improve visibility and awareness of decision-making processes
- Feedback from upper management on facts used to make decisions
- Management should communicate rationale for decisions
- Management should explain decisions and involve expertise
- More trust of line staff to make good decisions
- Inclusion of employees in the decision process; at least a discussion

Outside influence on RL decisions

- Make decisions on safety values vs. politics
- Consistently make the right decision regardless of political sensitivities.
- Management engagement and involvement with staff rather than worrying about appearances (walk the talk)
- Review resources to ensure RL employees have time to lead / communicate
- All agencies involved with RL on same page
- Make the political appointees and HQ accountable for the result of their actions
- Fund asbestos, because covering up sends bad message

Leadership communication and relationship building

- Walk the talk; get out of office and develop relationships
- Build managerial trustworthiness by enhancing interpersonal and organizational communication and conflict management
- Leadership mentoring and coaching
- Leadership effectively communicate expectations
- Communicate expectations (personal and organizational)
- Integrity throughout RL
- Understand how attitudes affect safety
- Establish a just culture
- Develop RL employees' potential
- Appropriately incentivize safety
- Correct employee incentives

Organizational Learning

Communication

- Attend each other's staff meetings – increase cross organizational communication and understanding
- Improve communications and engagement between organizations
- Unified front, (mutual purpose) resulting from better integration between organizations
- Facilitate open discussion and communication of issues
- Focus on prevention in safety conversations and interactions

- Improve two-way communications (take time to understand perceptions and perspectives)
- Establish a more interactive and collaborative environment
- Create avenues to collaborate and team

Feedback

- Take credit for positive accomplishments. Communicate externally.
- Communicate positive safety contributions (successes and failures)
- Quarterly communicate safety and organization improvements
- Begin RL all hands meetings with meaningful, applicable, and interesting safety improvement message/issue
- Feedback/communicate issues and corrective actions
- Reward messengers
- Seek input from employees and when you get it, do something with it.
- Share success stories
- Learn from mistakes; listen to each other.
- Create one user-friendly RL corrective action management system
- Establish transparency expectations
- Resolve issues in timely manner
- Consider behaviors influenced by RL actions
- Employee run, management sponsored safety culture committee to address specific issues with feedback to all staff

Process related opportunities

- Active risk management program
- Separate risk register for safety, focusing on potential failures
- Graded approach to safety
- Process for making exceptions in lieu of absolute rules
- Develop a Federal Building hazard awareness
- Perform safety office walkthroughs endorsed by management
- Improve the Hanford General Employee Training Section on Safety Culture
- Ensure 2nd and 3rd tier subcontractors are knowledgeable and held accountable for safety and planning (Hanford culture)

Employee Engagement

- Value each employee as a leader
- Push empowerment to the lowest level
- Experts should participate in setting the rules
- Focus on improving morale – flexibility and fairness
- Empowerment – Rely/use staff expertise
- Focus on increasing trust
- Treat each other as people, regardless of position or role
- Understand and seek other's perspectives
- Interview process to ensure folks will fit into RL culture
- Improve accountability
- Brother's keeper (hold each other accountable)
- Engage and be part of the process your group is using
- Open to new ideas

Appendix B
RL Safety Culture Improvement Plan
Schedule of Actions

Action	Actionee	Due Date	Date Completed
Recommendation 1:			
Provide formal supervisory training	Greg Jones	11/30/13	****Completed 11/8/13****
Provide ongoing leadership training for management	Greg Jones	12/31/13	****Completed 12/19/13****
Provide voluntary leadership training opportunities for employees	Greg Jones	12/31/13	****Completed 3/26/14****
Implement common framework for conflict resolution	~~Ray Corey~~ Reassigned to Jeff Frey on 7/28/14	3/1/14	****Completed 8/18/14* MGR-0020**
Evaluate safety culture training for all employees	Ray Corey	9/15/13	****Completed 3/31/14****
Recommendation 2:			
Ensures RIMS captures "do work safely" philosophy	~~Ray Corey~~ Reassigned to Jeff Frey on 7/28/14	3/15/14	****Completed 8/11/14** MGR-0021**
Communicate RL's policy on safety vs. mission	Karen Lutz	12/15/13	***Completed 1/22/14 at All Hands***
Expand weekly open forum discussions with Deputy	Doug Shoop	1/1/14	****Completed** First meeting in series held 1/7/14**
Recommendation 3:			
Define process to document/communicate policy and strategic decisions	Janis Ward	3/1/14	**Completed **2/26/14** MGR-0022**
Reaffirm senior management commitment to provide timely/meaningful feedback on decisions	Janis Ward	12/15/13	****Completed 2/26/14****
Train employees on Ladder of Accountability	Ray Corey	12/31/13	****Completed 3/31/14****
Recommendation 4:			
Hold cross organizational partnering sessions	Charboneau, Corey, Flynn, Jones	3/31/14	****Completed 7/23/14** MGR-0023; 0024; 0025; 0026**

Organize Division Briefings on scope and responsibilities	Charboneau, Corey, Flynn, Jones	4/1/14	****Completed 7/23/14** MGR-0029; 0030; 0031; 0032**
Development interactive organizational chart with roles and responsibilities	Karen Lutz	~~12/31/13~~ ~~5/31/14~~ 9/15/14	**Action assigned MGR-0034**
Recommendation 5:			
Communicate the hiring process at All Employee Meeting	Greg Jones	1/31/14	****Completed 3/26/14****
Increase leadership training opportunities	Greg Jones	3/31/14	****Completed 2/5/14** MGR-0027**
Emphasize developmental training	Janis Ward	3/31/14	****Completed 4/22/14****
Assign an employee development advocate	Janis Ward	1/31/14	****Completed 3/26/14 ****
Follow-on Action:			
Submit safety culture sustainment tools to EM-1	~~Ray Corey~~ *Reassigned to Jeff Frey on 7/28/14*	9/15/14	****Completed 9/15/14** MGR-0028**

Appendix C

RL Operating Principles

As RL employees, we recognize that every member of our team plays a valuable role in the RL mission, cleaning up the River Corridor and Central Plateau, and protecting the Columbia River. Every employee contributes to our collective success. Consequently, we commit to the RL Operating Principles, which guides our actions and decisions as a whole:

- We consistently demonstrate a commitment to safety and quality while achieving our mission.
- We take ownership and pride in our areas of expertise and actively recognize the capability of others.
- We foster creativity and diversity through open communication, critical thinking, and treating others with professionalism and respect.
- We exemplify integrity by doing the right thing and utilizing taxpayer dollars responsibly.
- We contribute to the RL team effort by seeking solutions collaboratively, seizing initiative, and "making it happen."
- We lead and make decisions fairly by communicating effectively and standing by our decisions.

RL Core Values:

- Accessibility
- Accountability
- Communication
- Consistency
- Fairness
- Honesty
- Innovation
- Respect
- Responsiveness
- Sincerity

WCH-580
Rev. 1

River Corridor Closure Contract

Safety Culture Management Control and Sustainment Plan

August 2014

For Public Release

Washington Closure Hanford

Prepared for the U.S. Department of Energy, Richland Operations Office
Office of Assistant Manager for River Corridor

Washington Closure Hanford

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Title: Safety Culture Management Control and Sustainment Plan

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Signature

8/28/14
Date

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M. McNeel

Signature

8/26/2014
Date

The approval signatures on this page indicate that this document has been authorized for information release to the public through appropriate channels. No other forms or signatures are required to document this information release.

WCH-580
Rev. 1

River Corridor
Closure Contract

Safety Culture Management Control and Sustainment Plan

August 2014

Author:
G. M. Grant

For Public Release

Washington Closure Hanford
Prepared for the U.S. Department of Energy, Richland Operations Office
Office of Assistant Manager for River Corridor

EXECUTIVE SUMMARY

This management control plan was initially developed in July 2013 to address the results of a Performance Oversight and Evaluation Team (POET) evaluation that was conducted to review a series of performance improvement initiatives that had been implemented by Washington Closure Hanford (WCH). Included within the scope of the review was an evaluation of WCH's safety culture. Overall conclusions of the July 2013 POET were that the WCH safety culture was under stress due to a number of external factors acting on the workforce. Many of the actions defined in WCH-580, *Safety Culture Management Control Plan Fiscal Year 2014,* Rev. 0, have been completed along with many of the external factors affecting the workforce (e.g., the contract incentive [schedule performance incentive fee] and Hanford Atomic Metal Trades Council contract negotiations).

Recently, in response to a number of issues, the U.S. Department of Energy, Environmental Management (DOE-EM) promulgated a memo concerning "Safety Culture Sustainment Plans" (CCN 176859). Specific expectations identified in the memo included identification of safety culture tools, descriptions of the tools, and schedules for implementation. The memo provided examples of tools that should be considered and selected based on specific conditions at the WCH and in alignment with ongoing actions. This plan addresses the DOE-EM expectations.

It is important to recognize that over the life of the WCH contract, the WCH leadership team working with the U.S. Department of Energy, Richland Operations Office (DOE-RL) staff have developed and sustained a robust safety culture for the River Corridor Closure Project. This robust safety culture was developed over the previous 9 years of the WCH contract, as demonstrated by the following:

- Achieved Days Away, Restricted, or Transferred (DART) and Total Recordable Case Rates (TRCR) substantially below DOE-EM performance goals (example: July 2014 DART is 0.00 and TRCR is 0.09).
- Achieved over 4 million hours worked without a lost time injury.

- Received the U.S. Department of Energy (DOE) Voluntary Protection Program Legacy of Stars award for earning the DOE Voluntary Protection Program Star of Excellence for 4 consecutive years.

- Worked with DOE-RL staff to develop and deploy an improved Contractor Assurance System and associated metrics to monitor performance across a wide scope of management programs.

- Developed and deployed a significantly improved and robust integrated work control program based on the URS corporate work control standard.

- Worked with DOE-RL staff to develop and conduct a safety culture survey and site-wide best practices review that was commended by DOE-EM staff and provided to the Energy Facility Contractors Group as a best practices for dissemination across the DOE complex.

- Developed and deployed an improved issues management process that resulted in increased and sustained reporting and resolution of issues. Over 90% of the issues are self-identified through either routine work observations or planned self-assessments.

- Re-engineered the cause analysis process resulting in no rejected occurrence reports or repeat significant issues in over 2 years.

- Launched the POET process that provides an independent senior management evaluation of organizational and company performance.

- Developed and implemented a management walkthrough program that provides for continuing and ongoing reinforcement of senior leadership expectations for safe work performance. Routinely performed over 125 walkthroughs each month.

- Developed and implemented safety culture leadership training through WCH's Performance Excellence Training activity to reinforce leadership expectations for safety culture and management field presence.

- Developed and implemented the Disciplined Operations Plan (WCH-522) to improve overall performance and enhance formality across a wide range of programs and activities resulting in sustained project performance across WCH and many of its subcontractors.

The above actions and accomplishments are directly linked to and support many of the attributes defining safety culture imbedded within the Integrated Safety Management System (DOE G 450.4-1C, Attachment 10, *Safety Culture Focus Areas and Associated Attributes*).

Developing the processes and providing the leadership training on expectations and associated behaviors associated with a learning organization has enabled WCH to identity influences, trends, and stresses that could impact safe work performance. Through the use of the POET and the improved trending and cause analysis capability of the contractor assurance system, WCH was able to identify a trend in performance that was influencing worker and staff behaviors causing undesired performance that was driving a recent trend in near misses. An analysis was conducted of the WCH organizational environment in order to understand its potential impacts to the near misses and subsequent corrective actions. This review included the influences associated with completing schedule performance incentive fee milestones (contract incentive), staff dynamics, and the overall closure aspects of the WCH contract.

The results of the analysis identified an unappreciated aspect of a safety culture attributed relative to non-conservative decision making that affects the safe performance of work teams. In many cases reviewed, an individual made a less-than-conservative decision that affected the work team (others) while the individual remained unaffected. For example, a subject matter expert failed to check an electrical drawing to see if a light pole was electrically isolated, instead relying on memory and placing the work team that had to remove the energized light pole at risk. Another way to characterize this unappreciated safety culture attribute was that decisions were made by individuals without fully appreciating or recognizing possible adverse consequences to others affected by those decisions. While WCH has taken actions to improve performance by conducting extensive training for subject matter experts and management on at-risk behaviors and conservative decision making, this aspect of decision making adversely affecting others was not fully appreciated or communicated.

Coupled with this appreciation for decision making, affecting others was the focus of WCH's safety messages. A review of the WCH safety messaging revealed a tendency for the messaging to focus on individual work safety. This messaging could be strengthened by a balanced message that not only reinforces an individual's safe work performance but includes equal consideration of the downstream consequences one's decisions have on others. This balanced approach would capitalize on the current WCH safety culture and work to improve

overall project performance by alerting personnel to the potential downstream impacts of their seemingly low-risk decisions.

This management plan defines the tools and activities that will be used by WCH to sustain and maintain the current safety culture as the project moves through closure. The tools and activities take into account the proven processes and programs at WCH and the overall environment (e.g., dynamic staffing changes, contract uncertainty). It is important to highlight that the WCH contract ends in September 2015; however, negotiations are taking place for limited extension of the period of performance to complete some remaining workscope. Based on these considerations, the tools and activities focus on refreshing existing Performance Excellence training, providing balanced safety messaging about individual safe work performance and impacts to others, and monitoring/reinforcing performance relative to downstream adverse consequences.

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APPENDICES

REVISION HISTORY

Revision	Date	Reason for revision	Revision initiator
1	08/2014	This document has been rewritten to • Update the initial actions identified in Revision 0 • Update/rename the document to not be specific to fiscal year 2014 • Respond to safety culture sustainment expectations by a DOE memorandum issued June 27, 2014.	G. M. Grant
0	10/2013	Initial issuance	NA

1.0 INTRODUCTION

This management control plan was initially developed in July 2013 to address the results of a Performance Oversight and Evaluation Team (POET) evaluation that was conducted to review a series of performance improvement initiatives that had been implemented by Washington Closure Hanford (WCH). Included within the scope of the review was an evaluation of WCH's safety culture. Overall conclusions of the July 2013 POET were that the WCH safety culture was under stress due to a number of external factors acting on the workforce.

Many of the actions defined in WCH-580, *Safety Culture Management Control Plan Fiscal Year 2014,* Rev. 0, have been completed along with many of the external factors affecting the workforce (e.g., schedule performance incentive fee [SPIF] and Hanford Atomic Metal Trades Council contract negotiations). Given completion of many of the actions in WCH-580, Rev 0, along with completed workscope and other potential external influences, there still remains continued stresses or influences that could impact work team behaviors and subsequent safe work performance. Using the tools WCH has in place associated with a learning organization, WCH identified influences, trends, and stresses that could impact safe work performance. These tools showed that ongoing actions are necessary to sustain the current safety culture through contract completion.[1] This plan addresses the continued influences to behaviors that work teams face as WCH moves to contract completion.

In addition, this plan has been formatted and arranged to address expectations from the U.S. Department of Energy, Environmental Management (DOE-EM) promulgated in a memo concerning "Safety Culture Sustainment Plans" (CCN 176859). Specific expectations identified in the memo include identification of safety culture tools, descriptions of the tools, and schedules for implementation. The memo provides examples of tools that should be considered and selected based on specific conditions at the site and in alignment with ongoing actions.

2.0 PURPOSE AND SCOPE

The purpose of this plan is to define the tools and activities that will be used by WCH to sustain and maintain the current safety culture as the project moves through closure. The tools and activities take into account the proven processes and programs at WCH and the overall environment (e.g., dynamic staffing changes, contract uncertainty). Based on these considerations, the tools and activities focus on refreshing the existing Performance Excellence training, providing balanced safety messaging about individual safe work performance and impacts to others, and monitoring/reinforcing performance relative to downstream adverse consequences.

[1] It is important to highlight that the WCH contract ends in September 2015, however, negotiations are taking place for limited extension of the period of performance to complete some remaining workscope.

3.0 SAFETY CULTURE FOCUS AREAS

Per DOE G 450.4-1C, *Integrated Safety Management System Guide*, safety culture is defined as the following:

> *Safety culture is an organization's values and behaviors modeled by its leaders and internalized by its members, which serve to make safe performance of work the overriding priority to protect the workers, public, and the environment.*

DOE G 450.4-1C emphasizes that a positive safety culture is an integral aspect of an effective Integrated Safety Management System (ISMS). Safety culture focus areas and attributes defined in the DOE G 450.4-1C include the following:

- Leadership Focus Area
  - **Demonstrated safety leadership**
  - Risk-informed, conservative decision-making
  - **Management engagement and time in the field**
  - Staff recruitment, selection, training, and development
  - **Open Communication and fostering an environment free from retribution**
  - **Clear expectations and accountability**

- Employee Engagement Focus Area
  - Personal commitment to everyone's safety
  - **Teamwork and mutual respect**
  - Participation in work planning and improvement
  - Mindful of hazards and controls

- Organizational Learning Focus Area
  - **Credibility, trust, and reporting errors and problems**
  - **Effective resolution of reported problems**
  - **Performance monitoring through multiple means**
  - Use of operational experience
  - **Questioning attitude.**

The attributes in bold are associated with a safety conscious work environment (SCWE). Per DOE G 450.4-1C, SCWE is defined as the following:

> *A work environment where employees are encouraged to raise safety concerns and where concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback to the originator of the concerns and to other employees.*

The SCWE is a subset of the overall safety culture.

4.0 ASSESSMENT AND ANALYSIS RESULTS

The drivers for this plan are based on review of completed actions and activities developed at WCH that have safety culture implications, a common cause analysis (RCA-2014-0004) of recent near misses, future project workscope and associated staffing dynamics, and the results of POET evaluations.

4.1 SAFETY CULTURE RELATED OUTCOMES AND ACTIVITIES

It is important to recognize that over the life of the WCH contract, the WCH leadership team working with the U.S. Department of Energy, Richland Operations Office (DOE-RL) staff has developed and sustained a robust safety culture for the River Corridor Closure Project. This robust safety culture was developed over the previous 9 years of the WCH contract as demonstrated by the following:

- Achieved Days Away, Restricted, or Transferred (DART) and Total Recordable Case Rates (TRCR) substantially below DOE-EM performance goals (example: July 2014 DART is 0.00 and TRCR is 0.09).
- Achieved over 4 million hours worked without a lost time injury.
- Received the U.S. Department of Energy (DOE) Voluntary Protection Program (VPP) Legacy of Stars award for earning the DOE VPP Star of Excellence for 4 consecutive years.
- Worked with DOE-RL staff to develop and deploy an improved Contractor Assurance System and associated metrics to monitor performance across a wide scope of management programs.
- Developed and deployed a significantly improved and robust integrated work control program based on the URS corporate work control standard.
- Worked with DOE-RL staff to develop and conduct a safety culture survey and site-wide best practices review that was commended by DOE-EM staff and provided to the Energy Facility Contractors Group as a best practices for dissemination across the DOE complex.
- Developed and deployed an improved issues management process that resulted in increased and sustained reporting and resolution of issues. Over 90% of the issues are self-identified through either routine work observations or planned self-assessments.
- Re-engineered the cause analysis process resulting in no rejected occurrence reports or repeat significant issues in over 2 years.
- Launched the POET process that provides an independent senior management evaluation of organizational and company performance.

- Developed and implemented a management walkthrough program that provides for continuing and ongoing reinforcement of senior leadership expectations for safe work performance. Routinely performed over 125 walkthroughs each month.

- Developed and implemented safety culture leadership training through WCH's Performance Excellence activity to reinforce leadership expectations for safety culture and management field presence.

- Developed and implemented the Disciplined Operations Plan (WCH-522) to improve overall performance and enhanced formality across a wide range of programs and activities resulting in sustained project performance across WCH and many of its subcontractors.

The above actions and accomplishments are directly linked to and support many of the attributes defining safety culture imbedded within the ISMS (DOE G 450.4-1C, Attachment 10, *Safety Culture Focus Areas and Associated Attributes*).

4.2 COMMON CAUSE ANALYSIS (RCA-2014-0004)

Developing the processes and providing the leadership training on expectations and associated behaviors associated with a learning organization has enabled WCH to identity influences, trends, and stresses that could impact safe work performance. Through the use of improved trending and cause analysis capability of the contractor assurance system, WCH was able to identify a trend in performance that was influencing worker and staff behaviors causing undesired performance that was driving a recent trend in near misses. An analysis was conducted of the WCH organizational environment in order to understand its potential impacts to the near misses and subsequent corrective actions. This review included the influences associated with completing SPIF milestones (contract incentive), staff dynamics, and the overall closure aspects of the WCH contract.

The results of the analysis identified an unappreciated aspect of a safety culture attribute relative to non-conservative decision making that affects the safe performance of work teams. In many cases reviewed, an individual made a less-than-conservative decision that affected the work team (others) while the individual remained unaffected. For example, a subject matter expert failed to check an electrical drawing to see if a light pole was electrically isolated, instead relying on memory, placing the work team that had to remove the energized light pole at risk. Another way to characterize this unappreciated safety culture attribute was that decisions were made by individuals without fully appreciating or recognizing possible adverse consequences to others affected by those decisions. While WCH has taken actions to improve performance by conducting extensive training for subject matter experts and management on at-risk behaviors and conservative decision making, this aspect of decision making adversely affecting others was not fully appreciated or communicated.

Coupled with this appreciation for decision making, affecting others was the focus of WCH's safety messages. A review of the WCH safety messaging revealed a tendency for the messaging to focus on individual work safety. This messaging could be strengthened by a balanced message that not only reinforces an individual's safe work performance but includes equal consideration of the downstream consequences one's decisions have on others. This balanced approach would capitalize on the current WCH safety culture and work to improve

overall project performance by alerting personnel to the potential downstream impacts of their seemingly low-risk decisions.

The recommendations to address the conclusion of the common cause analysis focus on addressing non-conservative decision making relative to the downstream consequences. Additionally, the recommendations take into account existing corrective actions and processes at WCH and the overall environment (e.g., dynamic staffing changes, contract uncertainty). Based on these considerations and outcomes from the interviews conducted in this analysis, no new programs or processes will be developed. The recommendations to address the conclusions of this analysis focus on informing existing staff of the results of this analysis, providing balanced safety messaging about individual safe work performance and impacts to others, and monitoring/reinforcing performance relative to downstream adverse consequences. These recommendations are factored into the sustainment tools found in Section 5.0.

4.3 POET SAFETY CULTURE OBSERVATIONS

In July 2013 the POET conducted a review of a series of performance improvement initiatives that had been implemented by WCH. Included within the scope of the review was an evaluation of WCH's safety culture. Overall conclusions of the POET were that the WCH safety culture was under stress due to a number of external factors acting on the workforce. WCH-580, Rev.0 was developed to address the POET recommendations. In support of the POET recommendations a review was conducted of historical and upcoming activities in the Contractor Performance Plan (Appendix B)conducted to identify potential timeframes that could impact the safety culture of the River Corridor Closure Project in the future. The majority (more than 90%) of buildings and waste sites that remain after post-schedule, performance, and incentive fee are scheduled to be completed by the end of calendar year 2014. Based on evaluation of historical events, upcoming future Project deliverables and events, and the POET actions were developed and addressed.

Appendix A shows the remaining ongoing action through a management-level checklist to address potential distractions to the workforce from external or company-level influences or stressors. This checklist was designed to help management proactively address worker and staff distractions that could impact safe performance of work.

5.0 SAFETY CULTURE SUSTAINMENT

WCH utilizes many different tools to ensure the sustainment of safety culture. The key tools used include the following:

- ISMS
- VPP
- Periodic assessments
- Communications plan and employee feedback
- Continued training
- Performance measures.

5.1 ISMS

Each year an annual declaration regarding the effective implementation of ISMS is prepared. This declaration is based in part on an assessment of the health of the program and includes a narrative on activities completed to maintain the health and awareness of key components of ISMS (e.g., work control, safety programs, and quality assurance). Some of the key activities used to gauge the health of ISMS include the following:

- Local Safety Improvement Team meetings
- Performance objectives, measures, and commitments
- Safety tailgates
- Behavior-based safety initiatives
- Focus on the Fundamentals safety campaign
- Project-specific 90-day safety campaigns
- Increased management engagement and time in the field observing work.

5.2 VPP

The success of any safety and health (S&H) program is evident in the culture exhibited by employees who are responsible for and accountable to the program. As the WCH VPP program evolves, becomes more responsive to employees, and successfully decreases the number of injuries on the project, continuous improvement becomes the focus. Without continuous improvement, injuries and illnesses are still a possibility. Until the ultimate goal of zero injuries and illnesses is achieved, improvements are necessary and expected. For this reason, WCH continues to develop a rigorous improvement process to encourage employees to achieve the next level of safety excellence.

WCH's S&H program is supported by a strong employee safety culture that questions work environments and co-worker behavior. WCH employees are proactive by implementing innovative and lasting improvements in an effort to reach the overall WCH goal of zero injuries and illnesses for themselves and the entire WCH workforce. When a hazardous condition is observed, their questioning attitude even affects non-WCH employees. The WCH S&H program is successful because all WCH employees (from front-line staff and craft to mid-level supervisors, technical leads, and senior managers) own and believe in this program not only at work but also at home.

Nationally, WCH was recognized by the Voluntary Protection Programs Participants' Association with the VPP Outreach Award. This award was provided to WCH at the National Voluntary Protection Programs Participants' Association conference in August 2013 along with other Hanford Site contractors for outstanding outreach and mentoring to Hanford employees and general industry sites across the country. WCH also received the DOE VPP Legacy of Stars award for earning the DOE VPP Star of Excellence for 4 consecutive years.

5.3 PERIODIC ASSESSMENTS

The WCH assessment program includes independent assessments, management assessments, self-assessments, management walkthroughs, and subcontractor oversight.

Examples of assessments include corporate reviews on work planning and work control; safeguards and security; POET on deactivation, decontamination, decommissioning, and demolition; field remediation; waste operations; and performance improvement initiatives.

The POET reviews consisted of a senior, independent review team designed to improve the conduct of operations and compliance with nuclear and safety requirements for all WCH projects and programs. Topical areas reviewed included the following:

- Nuclear Safety
- Occupational/Industrial Safety
- Radiological Controls
- Operations/Maintenance
- Work Control/Conduct of Work
- Quality Assurance
- Training and Qualifications
- Environmental Management System
- Engineering
- Management Systems
- Performance Assurance
- Safety Culture (POET review of improvement initiatives only).

5.4 COMMUNICATIONS PLAN AND EMPLOYEE FEEDBACK

A tool that will be used to ensure alignment of expectations and associated safety culture-related information is an integrated communications plan. The plan integrates the following media to provide a balanced message that not only reinforces individual safe work performance but includes equal consideration of the downstream consequences one's decisions have on others:

- The Current
- Daily Bulletin
- Message from the President
- Safety Flash
- Just the Facts
- Safety Highlight
- Safety Roundup (including Focus on the Fundamentals).

This balanced approach would capitalize on the current WCH safety culture and work to improve overall project performance by alerting personnel to the potential downstream impacts of seemingly low-risk decisions on their part. In addition, the messaging will focus on specific project groups doing well and recognizing associated good performance. Additional focus could include how this success could be leveraged across the company as well as messaging about issues or events that focus on what happened and not how it could be prevented or how the event might affect others.

WCH uses several approaches to gage the overall safety culture by soliciting feedback from the workforce via the following:

- Employee exit interviews – During the exit process employees are interviewed by Human Resources and are provided the opportunity to document any issues or concerns employees may have upon exiting the company.
- WCH-specific annual Hanford General Employee Training – Employees are allowed the opportunity to leave feedback at the conclusion of this annual training.
- Local Safety Improvement Team logbook entries.
- Suggestion boxes at individual project locations.
- WCH Employee Concerns and DOE-RL Employee Concerns.
- WCH Legal Department.
- Hanford Employee Concerns Council.

This feedback will serve to address emerging issues, alert management to potential problems related to safe work performance, reinforce a questioning attitude, and serve as a vital tool that supports a safety conscious work environment.

5.5 CONTINUING TRAINING

Based on the results of a common cause analysis, WCH developed Performance Excellence training that is being provided to all managers and first-line supervisors. The objective of the training is to provide the leadership team with proven tools and associated knowledge to improve performance through the prevention of events, near misses, and occurrences that hinder effective work delivery. The training provides an overview of safety culture and safety conscious work environment attributes and the leadership principles that affect safety culture.

5.6 PERFORMANCE MEASURES

WCH implements a performance indicator process to identify trends for S&H, radiological and industrial hygiene, work control, environmental, transportation, and performance assurance. Leading and lagging indicators are a subset of the contractor assurance system performance indicators that are updated monthly and routinely analyzed for trends and opportunities to improve performance. Every month WCH participates in a Contractor Assurance Meeting with DOE-RL to review these performance indicators and discuss positive and/or negative trending.

5.7 CONTRACT INCENTIVES

In January 2014, the scope of work known as SPIF was achieved. The payment was distributed ahead of schedule.

5.8 PLANS AND SCHEDULES

Currently, WCH contract workscope will be completed in October 2015. The programs and processes in place are robust and mature enough to sustain WCH's safety culture to the anticipated end of the contract.

6.0 REFERENCES

CCN 176859, 2014, "Safety Culture Sustainment Plans," CCN 176859 to Distribution from D. Huizenga, U.S. Department of Energy, Washington, D.C., June 27.

DOE G 450.4-1C, *Integrated Safety Management System Guide*, as amended, U.S. Department of Energy, Washington, D.C.

RCA-2014-0004, 2014, *Increasing Negative Trend in Reportable and Non-Reportable Near Miss Events,* Rev. 0, Washington Closure Hanford, Richland, Washington.

WCH-580, 2013, *Safety Culture Management Control Plan Fiscal Year 2014,* Rev. 0, Washington Closure Hanford, Richland, Washington.

APPENDIX A

ACTIONS TO MITIGATE COMPANY AND PROJECT RISKS

Table A-1. Checklist for Company-Wide Impacting Issues. (3 Pages)

Example Impacting Activity	Impacting Activity	Impacting Activity	Impacting Activity	Impacting Activity
Bump and Roll or Scheduled Significant Workforce Reduction (as Determined by Management)		T-60	Job placement support (if appropriate).	Human Resources
		T-30	Communicate upcoming workforce reduction/restructuring and ask everyone to focus on tasks at hand.	Company President
		T-21	Hold a "Heads Up" meeting with Project Management Team to: • Briefly reference upcoming project activities including any recent errors. • Reinforce expectations and promote reporting of issues, technical inquisitiveness, management field presence, and focus on safety.	Project Director
		T-21	Prepare and communicate to the Management Team an oversight schedule for the affected Project that may include: • SSW • PSR • Targeted MWTs • PAE.	Project Performance Assurance Manager
		T-14	Prepare and issue memo communicating our accomplishments and thanking those on our team for their service.	Company President
		T-14	Brief Field Work Supervisors on: • Upcoming project activities, key risks, expectations for pre-ev briefings. • Reinforce expectations and promote reporting of issues, technical inquisitiveness, and focus on safety.	Project Director/Manager
		T-14	Hold a "Heads Up" meeting with affected personnel to: • Briefly reference upcoming project activities including any recent errors and events. • Reinforce key HPI principles (e.g., procedure compliance, peer checks). Reemphasize Management Expectations for questioning attitude, stopping and pausing work. • Re-emphasize Management Expectations for questioning attitude, stopping and pausing work, problem resolution and responsiveness.	Project Manager
		T-14	Identify additional measures and obtain resources, Project or site specific, needed before and after impacting activity.	Project Director

Table A-1. Checklist for Company-Wide Impacting Issues. (3 Pages)				
Example Impacting Activity	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**
		T-7	Communicate briefing on HPI related to distractions and prevention techniques and conduct oversight to: • Provide focus on coaching and mentoring from an event prevention framework using HPI tools. • Coach personnel on how to identify at-risk behaviors and appropriate actions to address behavior.	Conduct of Operations Coaches
		T-7	Strengthen management field presence through use of fulltime SSW emphasizing: • Procedure compliance • At-risk behaviors • Peer reviews • Self-checking • Disciplined communications.	Project Director
		T-7	Utilize PSRs, PAEs, and other SMEs to rotate through the Project to ensure procedure compliance, solve current and emerging issues.	Project Performance Assurance Managers
		T-7	Full time HAMTC Safety Rep, Building Trade Rep, or LSIT Crew Rep (stays thru +7)	Project Director
		T-7	Thank you breakfast or lunch.	Project Director
		T-0	Discuss in Daily Meeting any concerns; deliberate methods to conduct work.	Field Work Supervisor
		T-0	Deliberate release of work. This could include consciously thinking about work that is authorized or any work packages a special review might be needed prior to release.	Responsible Manager
		T+1	Discussion in Daily Meeting about expectations for safe work performance, deliberate methods to conduct work.	Field Work Supervisor
		T+1	Prepare and issue memo communicating welcome to our Project and reinforcement of commitment to safe work practices.	Company President
		T+7	Deliberate downgrading of oversight activities.	Project Director
		T+7	Management assessment of performance review	Project and Function Directors

HAMTC = Hanford Atomic Metal Trades Council
HPI = human performance improvement
LSIT = Local Safety Improvement Team

Table A-1. Checklist for Company-Wide Impacting Issues. (3 Pages)				
Example Impacting Activity	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**

MWT = Management Walkthrough
PAE = Performance Assurance Engineer
PSR = Project Safety Representative
SSW = Senior Supervisory Watch

Table A-2. Checklist for Company-Wide Impacting Issues. (3 Pages)				
Example Impacting Activity	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**
Completion of SPIF or Significant Area Closure		T-60	Prepare and issue communication of SPIF or Area completion, mindfulness to stay focused, commitment to communicate what that means to personnel (respect of their opinion).	Company President
		T-30	Prepare and issue communication on status of SPIF or Area completion, what to expect in terms of celebrations, layoffs, reinforcement of safe work practices.	Company President
		T-21	Hold a "Heads Up" meeting with Project Management Team to: • Briefly reference upcoming project activities given SPIF or Area completion. • Reinforce expectations and promote reporting of issues, technical inquisitiveness, management field presence, and focus on safety. • Reinforce Project Director expectations for coaching, mentoring, and leadership with Managers and Supervisors	Project Director
		T-21	Prepare and communicate to the Management Team an oversight schedule for the affected Project that may include: • SSW • PSR • Targeted MWTs • PAE.	Project Performance Assurance Manager
		T-14	Brief Field Work Supervisors on: • Upcoming pre- and post-SPIF or Area completion activities, project activities (if applicable), key risks, expectations for pre-ev briefings (if applicable). • Reinforce expectations and promote reporting of issues, technical inquisitiveness, and focus on safety.	Project Director/Manager

Table A-2. Checklist for Company-Wide Impacting Issues. (3 Pages)

Example Impacting Activity	Impacting Activity	Impacting Activity	Impacting Activity	Impacting Activity
		T-14	Hold a "Heads Up" meeting with affected personnel to: • Briefly discuss post-SPIF or Area completion activities (if any) including any recent errors and events. • Reinforce key HPI principles (e.g., procedure compliance, peer checks).	Project Manager
		T-14	Safety refocus emphasizing safe work practices and watching out for each other.	Each Project and Function
		T-7	Communicate briefing on HPI related to distractions and prevention techniques and conduct oversight to: • Provide focus on coaching and mentoring from an event prevention framework using HPI tools. • Coach personnel on how to identify at-risk behaviors and appropriate actions to address behavior.	Conduct of Operations Coaches
		T-7	Strengthen management field presence through use of fulltime SSW emphasizing: • Procedure compliance • At-risk behaviors • Peer reviews • Self-checking • Disciplined communications.	Project Director
		T-7	Utilize PSRs, PAEs, and other SMEs to rotate through the Project to ensure procedure compliance, solve current and emerging issues.	Project Performance Assurance Managers
		T-7	Fulltime HAMTC Safe Rep, Building Trade Rep, or LSIT/crew rep (stays thru T+7).	Project Director
		T-0	Prepare and issue communication on formal completion of SPIF or Area, planned celebration activities (if applicable), acknowledgement and thank you for service.	Company President
		T-0	Discuss in Daily Meeting any concerns; deliberate methods to conduct work.	Field Work Supervisor
		T-0	Deliberate release of work. This could include consciously thinking about work that is authorized or any work packages a special review might be needed prior to release.	Responsible Manager

Table A-2. Checklist for Company-Wide Impacting Issues. (3 Pages)				
Example Impacting Activity	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**	**Impacting Activity**
		T+1	Formal acknowledgement in newspaper and thank you to all current and former employees of WCH for their dedication and service.	Communications
		T+1	Safety refocus on deliberate operations and safe behaviors.	Project Directors

HAMTC = Hanford Atomic Metal Trades Council
HPI = human performance improvement
LSIT = Local Safety Improvement Team
MWT = Management Walkthrough
PAE = Performance Assurance Engineer
PSR = Project Safety Representative
SME = subject matter expert
SPIF = schedule performance incentive fee
SSW = Senior Supervisory Watch
WCH = Washington Closure Hanford

APPENDIX B

CONTRACTOR PERFORMANCE PLAN SCHEDULE THROUGH END OF CONTRACT

GWBS		Start	Finish
1.03.04.03.05	Fld. Rem.-Waste Sites-100-HR-2	14-Nov-11 A	11-Dec-13
1.03.04.03.06	Fld. Rem.-Burial Grounds-100-HR-2	31-Dec-13	31-Dec-13
1.03.04.04.01	Fld. Rem.-100 H Area Design	28-Jan-14	06-May-14
1.03.04.75.25	Fld. Rem.-100 H Non Site Specific Support	28-Jan-13 A	03-Nov-14
1.03.05.02.05	Fld. Rem.-Waste Sites-100-KR-1	17-Sep-13	26-Mar-14
1.03.05.03.05	Fld. Rem.-Waste Sites-100-KR-2	03-Jul-13 A	06-Mar-14
1.03.05.03.06	Fld. Rem.-Burial Grounds-100-KR-2	04-Dec-12 A	15-Jan-14
1.03.05.75.25	Fld. Rem.-100K Non Site Specific Support	04-Feb-13 A	14-Apr-14
1.03.06.02.05	Fld. Rem.-Waste Sites-100-NR-1	15-Oct-12 A	24-Nov-14
1.03.06.03.01	Fld. Rem.-100 N Area Design	30-Oct-12 A	01-Oct-13
1.03.06.75.25	Fld. Rem.-100N Non Site Specific Support	19-Dec-11 A	14-Jan-15
1.03.07.01.03	Fld. Rem.-Cont Sampling Sites-100 Remaining	19-Aug-13 A	02-Dec-14
1.03.07.02.05	Fld. Rem.-Waste Sites-100-IU-2	25-Mar-13 A	30-Sep-14
1.03.07.03.05	Fld. Rem.-Waste Sites-100-IU-6	26-Jun-13 A	17-Feb-15
1.03.07.04.01	Fld. Rem.-100 Area RS Design	30-Mar-11 A	14-Aug-14
1.03.07.05.04	100-IU Segment 4	04-Feb-13 A	22-Jan-15
1.03.07.75.25	Fld. Rem.-100 Area RS Non Site Specific Support	25-Feb-13 A	30-Sep-14
1.03.12.01.03	Fld. Rem.-Cont Sampling Sites Area 300	30-Oct-13	30-Sep-14
1.03.12.02.05	Fld. Rem.-Waste Sites 300 Area	10-Jan-12 A	15-Sep-16
1.03.12.03.01	Fld. Rem.-300 Area RS Design	03-Jan-13 A	21-Nov-13
1.03.12.75.25	Fld. Rem.-300 Area Non Site Specific Support	01-Oct-13	16-Oct-14
1.03.14.01.01	Fld. Rem.-Design 600 Area	07-Dec-11 A	23-Feb-15
1.03.14.01.23	Fld. Rem.-Remediation 618-10	01-Oct-12 A	09-Nov-15
1.03.14.01.24	Fld. Rem.-Remediation 618-11	01-Oct-13	31-Mar-15
1.03.14.75.25	Fld. Rem.-600 Area Non Site Specific Support	25-Sep-12 A	05-Oct-15
1.03.14.75.28	Fld. Rem.-618-11 Area Non Site Specific Support	03-Sep-13	11-Nov-14
1.03.15.01.05	Fld. Rem.-Preknown	19-May-11 A	02-Sep-14
1.03.15.75.26	Fld. Rem.-Misc Remediation Non Site Specific Spt	01-Oct-13	30-Sep-14
1.03.99.01.29	Fld. Rem.-Management and Support	01-Oct-13	30-Sep-14
1.04.01.02.31	Waste Ops-Disposal	01-Oct-13	30-Sep-14
1.04.01.02.32	Waste Ops-Waste Treatment	01-Oct-13	30-Sep-14
1.04.01.02.35	Waste Ops-618-10/11Disposal	01-Oct-13	30-Sep-14
1.04.01.02.36	Waste Ops-618-10/11 Treatment	01-Oct-13	30-Sep-14
1.04.01.0 .38	Waste Ops-Transportation	01-Oct-13	30-Sep-14
1.04.01.03.3A	Waste Ops-618-10/11 Transportation	01-Oct-13	30-Sep-14
1.04.99.01.29	Waste Ops-Management and Support	01-Oct-13	30-Sep-14
1.04.99.02.29	Waste Ops - Waste Services	01-Oct-13	30-Sep-14
1.05	ES/FC-End State/Final Closure	26-Sep-13	04-Mar-15
1.05.01.01.40	ES/FC-Risk Assessment	01-Oct-13	04-Mar-15
1.05.01.01.41	ES/FC-Long-Term Stewardship	26-Sep-13	30-Sep-14
1.05.01.01.42	ES/FC-Orphan Site Evaluations	01-Oct-13	30-Sep-14
1.05.99.01.29	ES/FC-Management and Support	01-Oct-13	30-Sep-14

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CHPRC-1403458A R1
CONTRACT NUMBER DE-AC06-08RL14788

SAFETY CULTURE SUSTAINMENT PLAN
CHPRC-02303, REV. 0
H. M. Hassell

Consisting of 10 pages,
including this cover page

CHPRC-02303, Rev. 0

Safety Culture Sustainment Plan

Prepared by: H. M. Hassell

CH2M HILL Plateau Remediation Company
Richland, Washington

August 2014

Contents

Tables

1.0 Purpose

The purpose of this plan is to document the efforts taken to monitor, improve, and sustain the safety culture at CH2M HILL Plateau Remediation Company (CHPRC). The activities below address the fundamental attributes of DOE Guide (G) 450.4-1C, *Integrated Safety Management System Guide*, Attachment 10. This plan implements the direction provided by letter 1403458A/14-AMSE-0022, "Contract No. DE-AC06-08RL14788 – Safety Culture Sustainment Plans."

2.0 Background

The fiscal year 2013 Integrated Safety Management System (ISMS) annual declaration in CHPRC-1300166, *ISMS and QA Effectiveness and Annual Declaration Input,* provided an overall response to addressing safety culture issues at CHPRC. The following is a response to two safety culture assessments performed in 2012 as discussed in CHPRC-1300166:

> *"A review of the data provided insight into developing an overarching improvement strategy with a focus on Leadership Development Framework across our management team, including a particular emphasis on Front Line Leadership. The framework will focus on core leadership principles and skill development designed to enhance managers' skills to more effectively engage with the work force. CHPRC is developing a Front Line Leadership Training course modeled from best practices used at another CH2MHill project that will be provided to first line supervisors and other managers as time progresses. CHPRC is committed to instilling best practices at every point of interface with the workforce and focusing on leadership development of supervisors and managers will be a significant investment in our people."*

As part of CHPRC's approach to an overall transitional leadership improvement effort and consistent with the above commitment, a Leadership Impact Initiative training module was developed for all managers. As of July 2014, 11 workshops have been completed with 242 participants. Once all supervisors, managers, and vice-presidents complete the training module, workshops will be offered to non-managerial employees, including "high potential" employees and personnel that reflect "leadership without a title." Additionally, a refresher course will be considered to reinforce the concepts and expectations established during the workshops.

Other components of the transitional leadership improvement effort include periodic "Senior Management" and "All Manager" meetings where concepts addressed in the workshop will be reinforced. As part of CHPRC's succession planning, efforts are being made to identify individual strengths and desires to help foster future growth and advancement.

Feedback from workshop participants has been highly favorable. While it is difficult to provide a clear correlation between the efforts taken to-date and performance, CHPRC is currently experiencing a very high productivity rate with the company's lowest to-date project injury and days-away restricted case rates.

3.0 Tools

The key tools included in the Safety Culture Sustainment Plan are summarized in Table 1.

Table 1. Implementation Schedule of Key Tools

Tool	Activity	Date/Frequency
Leadership Impact Initiative	Workshops Periodic Senior Management Meeting Periodic All Managers Meeting	Monthly[a] Semi-Annual[c] Semi Annual[c]
ISMS	Annual Declaration	January 2015
VPP	Continuation of Journey Plan	September 2014
Performance Indicators	Monthly	Monthly
Periodic Assessments	Annual Plan	November 2014
Periodic Surveys	Site Wide Survey	August 2015[b]
Senior Management Review	ECP and Stop Work Evaluation	August 2015

[a] Goal is ten per year, usually scheduled for one per month

[b] Pending U.S. Department of Energy, Richland Operations Office direction on approach and timing

[c] Goal is three per year with a minimum expectation of semi-annual

ECP Employee Concerns Program

VPP Voluntary Protection Program

3.1 Leadership Impact Initiative

CHPRC is committed to instilling best practices within the workforce. Focusing on leadership development of supervisors and managers has been a significant investment in the company and its employees.

The Leadership Impact Workshop was built on a model that recognizes that Safety Conscious Work Environment (SCWE) is embedded in an organization's safety culture and their organizational culture. The focus of the workshop is to ensure that CHPRC's beliefs, expectations, and values are effectively communicated and modeled by all managerial levels, from first line supervisors to the president's office. The workshop also provides leaders with varying perspectives and tools to broaden their understanding and capability for dealing with day-to-day issues so that the approach taken is in-line with corporate beliefs, expectations, and values. By taking this approach and instilling these skills and values in the company's leaders, the culture within CHPRC can be one that has the critical attributes necessary to allow a healthy SCWE to exist and thrive.

In addition to the Leadership Impact Workshop, other activities are implemented by CHPRC to strengthen the safety culture, including:

- Periodic executive manager retreats
- Periodic manager meetings

- Team development and training skills
- Additional supervisory training tools

Other key components of the leadership framework include focused working groups with key personnel, such as field work supervisors and development of CHPRC's people legacy program.

The overall strategy depicted above incorporates all three of the Focus Areas addressed in DOE G 450.4-1C. Future classes are generally scheduled on a monthly basis with the "All Managers" and "Senior Management" meetings occurring quarterly.

3.2 Integrated Safety Management System

One component of the implementation of ISMS is the expectation that an annual declaration regarding the effective implementation of ISMS is made. This declaration is based in part on an assessment of the health of the program and would also include a discussion on activities taken to maintain the health and awareness of key components of ISMS, such as work control, safety programs, quality assurance, etc. Some of the key activities used to assess the health of ISMS include:

- Presidents Zero Accident Council (PZAC) meetings – PZAC is a monthly safety meeting sponsored by the president's office where each project is represented and various programmatic topics (environmental, safety, human performance improvement, and safety culture) are presented. These meetings help set the tone for expectations from the senior leadership team.
- Employee Zero Accident Council (EZAC) meetings – EZAC is a monthly safety meeting sponsored by the individual projects, led by employee representatives, and attended by guest managers. A cross-section of the project is represented and various programmatic topics (environmental, safety, human performance improvement, and safety culture) are presented. These meetings help set the tone for expectations from the employee perspective, reinforcing the message from the senior leadership team.
- Performance Objective Measures and Commitments (POMCs) – As part of the annual declaration, POMCs are developed to address areas needing improvement. POMCs are endorsed by senior management, submitted to the U.S. Department of Energy (DOE) for approval, and are monitored and reported on a quarterly basis.
- Thinking Target Zero – Target Zero is a CH2M HILL initiative to foster a culture based on individual commitment to eliminating injuries, illnesses, environmental impacts, and errors/omissions. At CHPRC, Thinking Target Zero safety bulletins are issued weekly to support initiatives that target behavior, responsibility/ownership, and continued improvement with the intent of preventing:
  - Injuries
  - Illnesses
  - Environmental impacts
  - Errors/omissions

- Safety Tailgates – Weekly Safety Tailgates are used as a communications tool to provide employees with safety information that is shared on the first day back to work each week.
- Safety Analysis Center (SAC) – SAC is one of many business practices established by CHPRC with the goal of maintaining dedication and commitment to the safety of work, facilities, and employees. The intent of the SAC daily conference call is to openly discuss information and any arising issues with all projects and senior management. Topics discussed during the SAC daily conference call may include:
  - Data from events, assessments, and other safety issues
  - Selected Operational Awareness reports
  - Performance data or lessons learned

The very nature of the ISMS Program envelops all three of the Focus Areas addressed in DOE G 450.4-1C.

3.3 Voluntary Protection Program

CHPRC achieved recognition at the STAR level in the DOE-Headquarters Voluntary Protection Program (VPP) in 2014 for improvement efforts that engaged employees at all levels to be actively involved in safety and health programs. DOE expects Star participants to be on the leading edge of hazard prevention. A Star participant's program exceeds the minimum requirements of 10 CFR 851, *Worker Safety and Health Program,* Occupational Safety and Health Administration requirements, and industry safety and health consensus standards.

Consistent with VPP expectations, a strategy to continue the VPP journey is being developed (September 2014) and will address the following key activities:

- Establishment of new goals/visions
- Development of key activities and milestones to achieve the goal/vision
- Evaluate effectiveness of goals to determine level of improvements accomplished
- Participation in worksite surveys in areas of work planning and hazard identification
- Strive to continue CHPRC's partnership of trust among all employees
- Continue to focus on accident and injury reduction
- Continue to communicate the benefits of VPP
- Continue CHPRC's trusting relationship with the customer

The design of VPP includes elements that include all three of the Focus Areas addressed in DOE G 450.4-1C.

3.4 Performance Indicators

CHPRC implements a Contractor Assurance System (CAS) that uses performance indicators to identify negative trends for employees, processes, and equipment. Leading indicators are a subset of the CAS performance indicators, which are updated monthly and routinely analyzed for

trends and opportunities to improve performance, and are also discussed with DOE, Richland Operations Office at least quarterly. Leading indicators for CHPRC are specifically identified within the CAS performance indicators as well as in POMCs. Individual projects may maintain project-specific indicators to meet emerging as well as ongoing needs. While there are no discrete indicators for "safety culture," CHPRC considers that these leading indicators are reflective of the maturity of the organization, specifically to help discern the company's status in transitioning from a "Compliance Mentality" through a "Conduct of Operations Mentality" and into a "Performance Mentality."

The current set of leading indicators used by CHPRC in evaluating the company's overall maturity in this journey includes:

- First aid cases
- Hoisting and rigging issues
- Fall protection Issues
- Transportation (non-Occurrence Reporting & Processing System [ORPS])
- Criticality safety (non-ORPS)
- Hazardous energy control (non-ORPS)
- Radiological control skin/personal clothing contamination (non-ORPS)
- Operational radiological contamination spread (non-ORPS)
- Unplanned radiological dose/intakes (non-ORPS)
- Environmental spills (non-ORPS)
- Assessment performance condition reports initiated
- Assessment scheduling

CAS, in general, envelops all three of the Focus Areas addressed in DOE G 450.4-1C.

3.5 Periodic Assessments

Consistent with program drivers such as Quality Assurance, key management programs are periodically assessed to determine if they are being effectively implemented. These assessments employ the use of document reviews, observations, and interviews in determining the overall health of the process. Interviews with personnel at all levels can provide insight into the perceived value of the process, which is in part a reflection of the organizational culture. Some key processes in the area of safety culture include:

- Employee Concerns Program
- Corrective Action Management
- Assessment Program
- Work Management
- ISMS

The above programs and processes are assessed at least every three years, and in the case of the employee concerns program and ISMS, annually. The assessment program envelops all three Focus Areas addressed in DOE G 450.4-1C.

3.6 Periodic Surveys

CHPRC uses several approaches to assess the overall safety culture by soliciting feedback from the workforce through the following:

- Employee exit interviews – During the exiting process, employees are interviewed by Human Resource personnel and are also provided the opportunity to document any issues, providing a unique perspective that may not have been available using other avenues.
- Annual employee training processes uses a survey where the employee can provide feedback on various topics. As these surveys are administered over the year, they are less susceptible to influence from discrete events (layoffs, sequestration, abnormal events, contract negotiations, etc.).
- Periodic site-wide surveys are developed and administered by external agencies with specific skill sets in assessing the overall health of an organization. These surveys are performed every two or three years in coordination with the local field office and the results are evaluated in context and historically to help guide future efforts.

Periodic surveys are the key to monitoring the safety culture at CHPRC. The surveys envelope all elements of the three Focus Areas addressed in DOE G 450.4-1C.

3.7 Senior Management Review

All of the above "tools" are periodically presented or reviewed by the Senior Management team as a means to ensure the programs and processes are meeting expectations or to identify targeted areas for improvement. This is accomplished through staff meetings, off-site retreats, or specifically chartered boards, such as the Corrective Action Review Boards, the Executive Safety Review Board, or Board of Directors. In addition, other feedback information such as Stop Work initiation and Employee Concerns is reviewed.

- Stop Work Initiation – CHPRC specifically, and Hanford in general, applies the Stop Work policy very liberally. The Hanford work force has shown a historic willingness to invoke stop work authority at threshold levels that are arguably below the DOE directive intent. However, the willingness of the work force to invoke their stop work authority is an indirect indicator that provides feedback to the senior management team on the overall health of the SCWE. A low stop work initiation rate could be an indicator of a health issue in SCWE (reluctance to initiate if fear of retaliation exists). Alternatively, a low stop work initiation rate could indicate work being planned and performed safely and appropriately.
- Employee Concerns – While the rate of initiation of employee concerns is also an indirect indicator associated with the health of SCWE, the type of employee concerns (whether or not they are anonymous) is also an indirect indicator. Regardless of the health of an

organization's SCWE, use of the anonymous route for raising employee concerns will always be an option that some will take simply because the process provides the least amount of risk (real or perceived) to the individual. However, the rate and substance of anonymous concerns need to be monitored/evaluated to consider SCWE influence on use of the employee concerns process in general or the anonymous option specifically.

The Senior Management Review envelops all three Focus Areas addressed in DOE G 450.4-1C.

MISSION SUPPORT ALLIANCE, LLC (MSA)
2015 SAFETY CULTURE SUSTAINMENT PLAN

MSA Safety Culture Sustainment Tools, Description, and Due Dates

MSA safety culture sustainment tools, description of the tool, specific actions to be taken, and scheduled due date are provided in this attachment. These tools have been identified through a systematic review of formal, comprehensive, safety culture information obtained from results of the following processes:

- ✓ Continuous review and analysis of feedback information received from employees as a result of safety culture questions included in the annual Hanford General Employee Training (HGET) survey.
- ✓ Acquisition of MSA employee input derived from Voluntary Protection Plan (VPP) trimester assessments with discussions of results with individual MSA organizations.
- ✓ Field information/feedback received as a result of continued Integrated Safety Management System (ISMS) Surveillance Team mentoring and analysis activities.
- ✓ Feedback obtained from the September 2012 joint Hanford Prime Contractor and DOE-RL sponsored Safety Culture Good Practices Review.

- **Safety Culture/Safety Conscious Work Environment (SC/SCWE) Survey**
  MSA will perform a safety culture survey to measure the state of MSA's safety culture and safety conscious work environment.

- **Safety Culture Employee Team/Panel**
  MSA established a Safety Culture Employee Team/Panel in fiscal year (FY) 2013. The Team is comprised of Hanford Atomic Metal Trades Council (HAMTC) and Hanford Guards Union (HGU) representatives, executive management, and other designated MSA personnel with expertise in safety culture attributes. The Team was established to monitor all sources of input and data points that reflect the health of the safety culture within the MSA organization. Through this continued evaluation, MSA is better equipped to accurately and effectively address potential issues pertaining to safety culture in a timely manner.

- **Continuous Implementation, Monitoring, and Improvements**
  MSA conducts its work to the highest environmental, safety, health & quality standards, implementing a strong safety culture into all work activities. The programs, policies and processes that ensure the safety of the environment, the public, and the worker, are continually evaluated and assessed for feedback to determine opportunities for improvement. Additionally, MSA has established leading indicators that have been incorporated into its Contractor Assurance System (CAS) to monitor data-points that, in combination with monthly performance metrics on safety culture, provide a constant view of safety culture health of the organization.

- **ISMS Surveillance Team**

  An ISMS Surveillance Team comprised of bargaining unit members, managers, and exempt personnel was established to continuously monitor field activities, conduct focused assessments, and provide input to MSA management such that safety culture attributes, value added work activities and improvements can be effectively identified and implemented. Additionally, MSA has effectively implemented the ISMS Surveillance Team to provide input and raise management awareness of field status, pre-imminent issues, and worker attitudes toward the work environment. The input of the Team is combined with leading indicators to provide an indication of the health of MSA safety culture. While these actions have improved safety culture and work processes at MSA, management recognizes that a dynamic organization needs to be constantly monitored and minor adjustments implemented to ensure the safety of the environment, public, and worker.

- **Periodic Self-Assessments and Independent Reviews**

  MSA ensures programs regarding safety culture/SCWE (SC/SCWE) are assessed on a periodic basis for continuous improvement and to ensure safety culture information is current, up-to-date and is being used, as designed. Assessments and reviews include:

  - ✓ Follow-up safety culture self-assessments on Employee Engagement and Learning Organization attributes per the MSA Safety Culture Evaluation and Improvement Initiatives Plan.
  - ✓ Continuous monitoring of safety culture attributes obtained through MSA VPP trimester evaluation and interview results.
  - ✓ Continuous field observations conducted by the ISMS Surveillance Team.
  - ✓ Completion of Work Planning & Control and ISMS Assessment improvement action items.

- **Safety Culture/ Safety Conscious Work Environment Training**

  MSA is in the process of establishing formal SC/SCWE training. During fiscal year 2013, MSA initiated a review process to identify SC/SCWE attributes existing within current training programs. These results, in combination with National Training Center efforts to produce a uniform SC/SCWE training curriculum, will define MSA's path forward in developing company-level SC/SCWE training.

- **Employee Involvement in Safety Initiatives**

  MSA employees participate in a number of activities that ensure safety awareness is paramount in the organization. Employee involvement in the work control process ensures hazards in work areas are identified and effectively controlled. Participation in pre-job briefings and post job feedback is encouraged to enhance the safe performance of work, especially. Employees will continue to provide input in a number of areas, including:

  - ✓ Zero Accident Councils (ZACs)
  - ✓ Issue/accident review activities
  - ✓ Safety recognition events

- ✓ ISMS Surveillance Team
- ✓ VPP interviews
- ✓ Using "Stop Work" authority
- ✓ Worker engagement with HAMTC/HGU Safety Representatives
- ✓ Worker participation in the development/implementation of Sitewide Safety Standards

- **Continuous Safety Conscious Work Environment (SCWE) Focus**
  Continuous Safety Conscious Work Environment is a culture whereby all employees feel free to raise safety concerns without fear of retribution. MSA continues to emphasize the variety of alternative avenues available to employees to raise any workplace issue or concern. Regular communications from the MSA Employee Concern Program and Ethics Office inform employees of the various processes available for raising issues, and affirm MSA's commitment to zero tolerance for any act of retaliation for doing so. Multiple meetings are held where employee feedback is encouraged to share and address safety and other work related concerns. Safety concerns receive top priority and are reviewed, compiled, and shared on a monthly basis to ensure they are addressed in a timely manner and resolution feedback is provided to employees when possible. These processes and activities provide leading indicators of MSA safety culture and will continue to be an integral part of daily operations.

- **Disciplinary Process for the ISMS Behavioral Expectations**
  To ensure fair and consistent action is taken when disciplinary actions are required, and to support a strong SC/SCWE, the Human Resources department reviews the facts of disciplinary events to ensure actions do not adversely impact any of the following ISMS Behavioral Attributes:

  - ✓ Constitutes retaliation for raising a concern.
  - ✓ Could create the perception of retaliation.
  - ✓ Has the potential to create a "chilling effect."
  - ✓ Is inconsistent with past practices.
  - ✓ Violates any Price-Anderson Amendments Act (PAAA) considerations.

- **Actions in Response to Safety Culture Reviews and Self-Assessments**
  To strengthen the commitment to a strong organizational safety culture within MSA, several actions were initiated as a direct result of the 2012 Hanford Organizational Climate and Safety Culture Work Environment Survey conducted by EurekaFacts, LLC and the January 2013 ISMS SCWE Self-Assessment. Several identified actions have already been completed while others are pending completion in the near future. As part of the MSA commitment to a sustained safety culture environment, completed actions (shown below) will be constantly reviewed/evaluated for implementation effectiveness and open actions (shown in Attachment 2) will be tracked to completion.

Completed Actions:

- ✓ Emphasize expectations and accountability for safety – revise MSC-5053 to include safety culture language.
- ✓ Improve demonstrated safety leadership – participate in and support the DOE-wide Safety Culture Training – ongoing.
- ✓ Improve employee awareness of hazards and hazard controls – develop Safety Start on hazards awareness and hazard controls
- ✓ Increase employee awareness of acceptance of a questioning attitude without fear of retaliation – develop and distribute a general distribution message on the raising of safety concerns.
- ✓ Improve awareness of the alternative problem identification/resolution process – develop and distribute a general distribution message on the Differing Professional Opinions Process.
- ✓ Perform follow-up assessments of Safety Conscious Work Environment attributes – ongoing.

- **Performance Expectations**
  To improve accountability to culture related expectations, management maintains and effectively communicates a priority commitment to ISMS, with clear, formally documented expectations for the behaviors of all members of the organization regarding safe execution of work. The organization embraces the commitment, understands the expectations, and is dedicated to sustaining a safe work environment. These expectations are formally integrated into the company performance objectives, measurements, and commitments which is the formal mechanism for documenting and reporting SC/SCWE performance on a predefined schedule.

MSA SAFETY CULTURE SUSTAINMENT PLAN
SCHEDULE FOR IMPROVEMENT INITIATIVES

Action	Target Due Date
Safety Culture/Safety Conscious Work Environment (SC/SCWE) Survey MSA will perform a safety culture survey to measure the state of MSA's safety culture and safety conscious work environment.	2nd Quarter
Safety Culture Employee Team/Panel Action: Monthly monitoring of Safety Culture/ Safety Conscious Work Environment (SC/SCWE) data to identify any potential weaknesses and correct as necessary.	On-going
Continuous Implementation, Monitoring, and Improvements to the MSA ISMS Program Action: Evaluate the programs, policies and processes to ensure the safety of the environment, the public, and the worker, are continually examined and assessed for feedback to determine opportunities for improvement.	12/31/2014
ISMS Surveillance Team Action: Provide input and raise management awareness of field status, pre-imminent issues, and worker attitudes toward the work environment. The input of the Team is combined with leading indicators to provide indication of the health of MSA safety culture.	Quarterly
Periodic Self-Assessments and Independent Reviews Action: 1. Follow-up safety culture self-assessments on Employee Engagement and Learning Organization attributes per the MSA Safety Culture Evaluation and Improvement Initiatives Plan. 2. Continuous monitoring of safety culture attributes obtained through MSA VPP trimester evaluation and interview results. 3. Continuous field observations conducted by the ISMS Surveillance Team. 4. Completion of Work Planning & Control and ISMS Assessment improvement action items.	Integrated Evaluation Plan (IEP)
SC/SCWE Training Action: Determine path forward for development of a SC/SCWE training curriculum appropriate for MSA employees.	On-going

Action	Target Due Date
Employee Involvement in Safety Initiatives Action: Employees will continue to provide input in a number of areas, including: 1. Zero Accident Councils (ZACs). 2. Issue/accident review activities. 3. Safety recognition events. 4. ISMS Surveillance Team evaluations. 5. VPP interviews. 6. Using "Stop Work" authority. 7. Worker engagement with HAMTC/HGU Safety Representatives. 8. Worker participation in the development/implementation of Site Wide Safety Standards.	On-going
Continuous Safety Conscious Work Environment (SCWE) Focus Action: Continue to encourage employees to raise issues when necessary, and affirm MSA's commitment to a retaliation-free work environment.	Quarterly
Disciplinary Process for the ISMS Behavioral Expectations Action: The Human Resources department will review facts of disciplinary events to ensures the action does not adversely impact any of the following ISMS Behavioral Attributes: 1. Constitutes retaliation for raising a concern. 2. Could create the perception of retaliation. 3. Has the potential to create a "chilling effect." 4. Is inconsistent with past practices. 5. Violates any Price-Anderson Amendments Act (PAAA) considerations.	On-going

Action	Target Due Date
Actions in Response to Safety Culture and Self-Assessments Action: Completed actions (shown below) will be continuously reviewed and evaluated for implementation effectiveness and open actions will be tracked to completion. *Completed Actions:* 1. *Emphasize expectations and accountability for safety – revise MSC-5053 to include safety culture language.* 2. *Improve demonstrated safety leadership – participate in and support the DOE-wide Safety Culture Training – ongoing.* 3. *Improve employee awareness of hazards and hazard controls – develop Safety Start on hazards awareness and hazard controls.* 4. *Increase employee awareness of acceptance of a questioning attitude without fear of retaliation – develop and distribute a general distribution message on raising of safety concerns.* 5. *Improve awareness of the alternative problem identification/resolution process – develop and distribute a general distribution message on the Differing Professional Opinions Process.* 6. *Perform follow-up assessments of Safety Conscious Work Environment attributes.*	On-going
Performance Objectives, Measurements, and Commitments Action: Management maintains and effectively communicates a priority commitment to ISMS, with clear, formally documented expectations for the behaviors of all members of the organization regarding safe execution of work. POMCs will be developed, monitored, documented and reported on a predefined schedule.	Quarterly
Other MSA Actions	
Improve safety communications by completing actions in the MSA Safety Culture Communication Plan.	12/31/2014
Improve demonstrated safety leadership by developing a strategy for enhancing supervisor/subject matter expert field leadership and mentoring of the workforce. Assess implementation.	03/31/2015
Determine level of impacts due to reduced resources. Perform employee workload assessment to ensure assigned work is performed safely.	06/30/2015
Reduce fear of retaliation for reporting of safety concerns. Continue the MSA sensitivity training for employees.	On-Going