



U.S. Department of Energy
Office of Inspector General
Office of Audits and Inspections

Audit Report

Integrated Safety Management at Sandia National Laboratories



Department of Energy
Washington, DC 20585

May 31, 2012

MEMORANDUM FOR THE SECRETARY

FROM: 
Gregory H. Friedman
Inspector General

SUBJECT: INFORMATION: Audit Report on "Integrated Safety Management at Sandia National Laboratories"

INTRODUCTION AND OBJECTIVE

Historically, safety has been one of the Department of Energy's top priorities. In 1996, the Department established an Integrated Safety Management (ISM) system intended to prevent or reduce occupational injuries, illnesses and accidents by providing safe and healthy workplaces. As part of ISM, the Department requires its facility management contractors to define work processes, enhance safety, and hold managers responsible for implementing ISM. Sandia National Laboratories, with nearly 8,500 employees, are managed by a subsidiary of the Lockheed Martin Corporation for the Department's National Nuclear Security Administration (NNSA). Sandia's key mission is to ensure the safety, reliability and performance of the Nation's nuclear weapons stockpile and, as such, its workforce performs a wide variety of tasks, some of which place workers in hazardous conditions or near hazardous materials. For these reasons, Sandia is specifically charged with operating an effective ISM system.

The Office of Inspector General began this audit with the objective of determining whether Sandia had fully implemented ISM. However, it immediately became apparent that since 1997 and continuing into 2011, the Department had self-reported numerous deficiencies with Sandia's ISM implementation and execution; and, that these problems often occurred at the line manager level in the contractor's chain of command. Specifically, the Department found that Sandia had not always identified, analyzed and documented hazards and controls necessary to ensure that risks to workers were adequately managed. Since 1997, Sandia had taken numerous policy level ISM corrective actions. Yet, in 2011, the Department and Sandia identified problems with ISM at the line level similar to those identified in previous years. These included issues such as inadequate hazard analysis and work being performed outside existing safety controls. Due to the Department's emphasis on worker safety, including steps taken by the current senior leadership, we revised our audit objective to determine the underlying reasons for continued concerns with Sandia's ISM system.

RESULTS OF AUDIT

We found that Sandia had not fully addressed the root causes of weaknesses in ISM implementation. Specifically, Sandia had not always ensured that line managers:

- Performed effective self-assessments to identify ISM weaknesses within its organizations. In fact, we observed that self-assessments performed by line managers often failed to identify ISM weaknesses that were subsequently identified by independent evaluations; and,

- Were held accountable for ensuring implementation of ISM requirements. In particular, Sandia had not always included performance measures for correcting known ISM weaknesses in line managers' performance evaluation plans.

As to the underlying cause, we noted that Sandia had not always provided effective management and oversight of line managers' implementation of ISM. Sandia had not developed specific performance indicators to rate ISM line level implementation despite evaluation reports that identified weaknesses in that area. Further, Sandia had not always provided the line managers with adequate self-assessment tools and training. Finally, the Department's Sandia Site Office, the entity charged with day-to-day management of the contract, had not established performance goals sufficient to monitor and/or evaluate Sandia's progress in implementing needed ISM corrective measures.

Underscoring the importance of line management's roles and responsibilities concerning safety, in a December 5, 2011, memorandum on nuclear safety, the Department stated that line managers have the authority and the responsibility for establishing, achieving and maintaining stringent safety performance expectations and requirements. Improving Sandia's ISM system, including performing effective self-assessments and holding line level managers accountable for safety performance, should help reduce employee exposure to workplace injuries and illnesses. This is not a mere theoretical concern. In 2010, several workers were potentially exposed to beryllium at Sandia's Radioactive and Mixed Waste Management Facility. Sandia subsequently chartered an independent investigation of the beryllium event that identified an inadequate "...level of rigor in the execution of the [Facility] work planning and control processes," an integral ISM component. To avoid similar situations, we made several recommendations designed to improve ISM at Sandia.

MANAGEMENT REACTION

Management generally agreed with the report's findings and recommendations and indicated that it will use them to drive continued improvement of NNSA's implementation of ISM. Management stated that it has made improvements in establishing the framework for Work Planning and Control (WP&C), including establishing quarterly Executive Management Reviews intended for timely identification of issues for management action. Management also noted that line organizations are leading an effort to integrate WP&C processes with Engineered Safety principles. Finally, management noted that the extent to which line managers and Sandia officials are working together for the effective implementation of WP&C processes is being monitored and will be evaluated through Fiscal Year 2012 Performance Evaluation Plans.

Management's proposed and initiated corrective actions are responsive to our recommendations. We appreciate management's recognition that continued improvement of NNSA's implementation of ISM is needed and that corrective actions are underway. Management's comments are included in Appendix 3.

Attachment

cc: Deputy Secretary
Associate Deputy Secretary
Administrator, National Nuclear Security Administration
Chief of Staff

REPORT ON INTEGRATED SAFETY MANAGEMENT AT SANDIA NATIONAL LABORATORIES

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INTEGRATED SAFETY MANAGEMENT AT SANDIA NATIONAL LABORATORIES

OBSTACLES TO EFFECTIVE IMPLEMENTATION

Since 1997, the Department of Energy (Department) has identified numerous weaknesses in Sandia National Laboratories' (Sandia) implementation of its Integrated Safety Management (ISM) system at the line management level – the level where hazardous work takes place. Specifically, Department reports in 1997, 2003, 2005 and 2008 identified weaknesses including the inability to effectively analyze hazards and develop and implement appropriate hazard controls to minimize risks to the workers. While Sandia had taken numerous corrective actions over the past 13 years, the Department continued to identify similar deficiencies associated with ISM in 2011, including issues such as inadequate hazard analysis and failure to perform work within controls.

We found that Sandia had not fully addressed the root causes of weaknesses in its ISM implementation. Specifically, Sandia had not fully implemented ISM at the line level to help reduce or prevent occupational injuries, illnesses and accidental losses, and improve safety in the workplace. We identified two significant issues that we believe directly contributed to weaknesses in Sandia's implementation efforts. Particularly, Sandia had not always ensured that line managers:

- Performed effective self-assessments to identify ISM weaknesses within its organizations; and,
- Were held accountable for ensuring implementation of ISM requirements.

Self-Assessments

Sandia's line level managers often did not effectively perform self-assessments of their organizations, which are required activities designed to identify weaknesses in ISM implementation. Department Order 226.1A, *Implementation of Department of Energy Oversight Policy*, requires contractors to perform self-assessments to ensure that safety management system (i.e., ISM) deficiencies are being self-identified. The self-assessments are to focus on hands-on work and the implementation of administrative processes, and should involve workers, supervisors and managers to encourage the identification and resolution of deficiencies at the lowest level practicable¹. However, we found that the self-assessments performed were not comprehensive enough to identify

¹ On April 25, 2011, the Department replaced DOE Order 226.1A with DOE Order 226.1B. The revised Order contained similar assurances regarding ISM. Specifically, the Order requires contractors to develop rigorous, risk-informed, and credible self-assessments to help ensure work performance meets the applicable requirements for environment, safety and health.

deficiencies. Our finding in this area is reinforced by the consistent identification of weaknesses by oversight organizations that were not identified by line officials during the self-assessments.

In particular, we reviewed the 240 self-assessments of ISM implementation performed by Sandia line managers since 2006 and determined that, in most cases, the managers had not self-identified findings and weaknesses. Specifically, we found that only 3 of the 240 self-assessments identified "significant" findings that required a formal corrective action plan. In contrast, since 2005, both the Department and Sandia's Environment, Safety and Health and Emergency Management Center (ES&H) have identified numerous systemic, significant and repetitive findings on ISM implementation at the line level. For example, we compared the results of a 2010 assessment of 23 line organizations performed by Sandia's ES&H to the results of self-assessments performed by the organizations' line managers. We found that ES&H identified 46 weaknesses in comparison to 2 ISM weaknesses identified by line managers only 7 months earlier. While ES&H was able to identify line level implementation issues with ISM and develop a formal corrective action plan, the majority of Sandia's line level managers did not identify ISM weaknesses in their self-assessments.

We also noted that the April 2010 *National Nuclear Security Administration (NNSA) Validation Review of the Sandia National Laboratories Contractor Assurance System Self Assessment*, found that Sandia did not have a self-assessment process to ensure that workers performed job hazard walk-downs, pre-job briefs and post-job reviews, which are key elements of an effective ISM system. The Contractor Assurance System (CAS) is designed to provide feedback to Sandia and NNSA on the effectiveness of contractor activities and is a basis for identifying needed improvements in areas such as ISM. To help ensure effective implementation of safety management systems such as ISM, Department Order 226.1A requires that all NNSA contractors develop a rigorous and credible assessment program as part of the CAS. In August 2011, Sandia performed an analysis of problems identified by the validation review findings and corrective actions have been initiated.

Line Management Accountability

Sandia had also not held its line level managers accountable for ensuring the effective implementation of ISM at the line level. As specified in its Corporate Procedure, HR 100.3.8 *Manage and*

Evaluate Employee Performance, Sandia uses performance evaluations to measure employee performance by recognizing both positive and negative significant events that occur throughout the year, including adherence to corporate policies such as ISM. Sandia identified safety as a specific performance objective for every employee's performance evaluation.

However, we found Sandia did not always ensure line managers' performance plans and evaluations held managers accountable for correcting identified ISM weaknesses. We selected a sample of performance evaluations for line level managers whose organizations had findings on ISM implementation weaknesses identified by ES&H in its final Fiscal Year (FY) 2010 report to determine if the managers were held accountable for implementing Sandia's ISM. Our sample of 10 manager performance plans and evaluations disclosed that, although the majority of performance plans included performance measures related to ISM implementation, the performance evaluations for 8 of the managers did not address problems in correcting ISM weaknesses known to exist within the organizations. In fact, the managers generally received no comments, marks or ratings regarding effectiveness in safety-related areas. For example, one of the evaluations failed to mention 11 weaknesses identified by ES&H associated with an organization that conducts hazardous operations. One of the weaknesses involved the organization not identifying and controlling hazards at the line level.

Additionally, our analysis of Sandia's corrective actions from 1997 through 2011 showed that corrective actions were repeatedly focused on revising processes and procedures, and ineffective in preventing recurrence of ISM implementation deficiencies at the line level due to line managers not being held accountable for implementing the revisions. For example, the Department's 2008 safety report stated that Sandia revised the ES&H Manual to clarify safety requirements in order to address the problem of workers performing inadequate ladder inspections and being unfamiliar with ladder safety requirements, but did not address the performance deficiencies of the workers. In 2010, Sandia's ES&H corrective action effectiveness review of the finding identified in the Department's 2008 safety report determined that the majority of Sandia's line level organizations had not: (1) met corporate ISM line level requirements and/or fully implemented ISM requirements; (2) identified and controlled hazards at the line work level; (3) implemented Technical Work Document requirements that integrate safety into line level work processes; or, (4) effectively implemented a feedback and improvement process, including management oversight of line level work.

Management and Oversight

We concluded that the Sandia Site Office (Site Office) and Sandia had not always provided effective management and oversight of line managers' implementation of ISM. Specifically, neither the Site Office nor Sandia had developed specific performance indicators to rate ISM line level implementation despite evaluation reports that identified ISM line level implementation weaknesses. Further, Sandia had not always provided effective oversight of line managers' implementation and had not provided adequate self-assessment tools and training to line managers.

Line Managers' Performance and Oversight

Sandia implements ISM at the line level through a process called Work Planning and Control (WP&C). Our review of Sandia's Performance Evaluation Plans for 2005 through 2012 disclosed that prior to 2010; the Site Office had not developed specific performance indicators to rate WP&C line level implementation. In its FY 2009 Performance Evaluation Report (PER), the Site Office stated that, while Sandia had set the stage to establish effective activity level hazard identification, analysis and control with the issuance of corporate WP&C processes and procedures, line level implementation of WP&C needed to be improved. However, in subsequent years, the Site Office did not develop specific performance indicators to rate WP&C line level implementation. Instead, the Site Office developed a performance indicator in 2010 that continued to focus only on Sandia's WP&C process development.

During 2010, the Site Office and Sandia implemented a new system-based oversight model for all non-nuclear and medium risk work called the Governance Approach. As part of this approach, the Site Office developed a performance measure beginning with the 4th quarter of FY 2010 to hold Sandia accountable for implementing ES&H requirements at the line level, which would include WP&C. The new Governance Approach requires Sandia to be more accountable in the development of the specific performance indicators that would be used to measure WP&C line level implementation. As of January 2012, however, Sandia had not developed specific indicators despite the fact that in 2010 Sandia's ES&H reported that 61 percent of line organizations assessed had not identified and controlled safety hazards at the line level as required by the WP&C process.

To its credit, Sandia had established performance measures to evaluate overall worker safety. However, the worker safety performance measures were, for the most part, lagging indicators

such as the Total Recordable Case Rate (TRCR) that measures injuries reported in the past to help prevent future incidents. Further, lagging performance indicators, such as the TRCR, are not the best measures to assess and ensure workplace safety, the primary objective of an effective WP&C process. According to a majority staff report by the Committee on Education and Labor of the U.S. House of Representatives (*Hidden Tragedy: Underreporting of Workplace Injuries and Illnesses*), leading safety indicators, such as "near miss" reports and audit results, are much better predictors of safety performance.

Our review identified multiple leading indicators available to the Site Office for measuring Sandia's continuous improvement to ISM. For example, one leading indicator is Sandia's ISM effectiveness review results that have identified areas that need improvement, including WP&C implementation at the line level. Other leading indicators available to the Site Office include Sandia's Internal Audit Reports and Site Office reviews. Although the Site Office included a discussion of leading indicators in the FY 2010 PER narrative and stated that WP&C implementation results for some line organizations were less than fully effective, it did not use the indicators as specific performance measures to evaluate Sandia performance. To its credit, in FY 2011 the Site Office identified an opportunity for Sandia to improve safety operations by teaming with line level management to identify measures of line implementation of ES&H requirements, including WP&C. Site Office and Sandia officials stated that WP&C line level indicators will be developed during 2012.

Sandia Oversight

We also noted that Sandia had not always provided effective oversight of line managers' implementation of ISM. Specifically, we found that problems identified by Sandia's safety oversight organization were not properly reported or addressed. A draft 2010 corrective action validation report identified problems with line management's ability to perform self-assessments as a primary reason for the ISM line level implementation difficulties. A Sandia official told us that Sandia removed this finding from the report, as line management assessment performance was outside the purview of ES&H. However, we concluded that without effective line level self-assessments, Sandia's ability to ensure ISM implementation was limited.

Managers' Self-Assessment Tools

Finally, we found that line managers' ability to self-identify WP&C weaknesses was limited by inadequate assessment tools and training. We compared assessment tools used by Sandia's line managers to identify WP&C weaknesses with those used by Sandia's ES&H group and found a significant difference in the level of detail for assessing WP&C implementation. For example, a checklist was provided to Sandia's line managers to assess their organizations' implementation of WP&C that consisted of a series of questions to help measure the implementation of the five core functions of ISM. With regard to analyzing hazards, the checklist had a single question with no criteria or assessment methodology. The question required managers to determine whether their procedures effectively addressed the hazard analysis process at the line level and if the procedures were properly implemented. Sandia's internal self-assessment tracking system did not show whether line level managers used this checklist in their assessments. As noted previously, managers generally found no significant issues with WP&C implementation of hazards analysis in the 240 line level self-assessments performed by Sandia line managers since 2006.

In contrast to the checklist provided to Sandia's line managers, the assessment tool used by ES&H for hazard analysis identified seven criteria with multiple review methods that included, among other things, reviewing technical work documents, interviewing work planners, observing work activities and observing hazard analysis team meetings. By using a more rigorous and comprehensive assessment tool, an ES&H contractor in 2010 was able to determine that 61 percent of line organizations assessed had not identified and controlled hazards at the line level.

Finally, we noted that Sandia does not require self-assessment training for line level managers. Although Sandia developed three web-based training courses as part of the corrective actions to address the 2008 Department report finding that self-assessments were not effective, it did not require line managers to take the courses. According to ES&H management, there are at least 250 line managers that should perform self-assessments; however, our review found that only 45 managers (18 percent) had taken the assessment training. NNSA officials stated that the process to improve self-assessments has been an on-going effort and that Sandia continues to mature its self-assessment program as evidenced by implementing an Assurance Improvement Plan in July 2011, efforts that we believe are essential to address the continuing problems that we observed.

Increased Risk to Workers

Until Sandia effectively implements ISM requirements at the line level by performing effective self-assessments, holds line managers accountable and focuses corrective actions at the line level, there is increased risk that workers can suffer from illnesses and injuries that could be avoided. For example, in 2010, several workers were potentially exposed to beryllium at Sandia's Radioactive and Mixed Waste Management Facility (RMWMF). Sandia chartered an independent investigation of the beryllium event that identified an inadequate "...level of rigor in the execution of RMWMF work planning and control processes." The analysis also stated that line level manager self-assessments were not of the rigor to be effective in identifying discrepancies, issues and weaknesses to enable effective corrective actions and continuous improvement. In addition, in 2011, Sandia experienced two accidents involving lithium, including one that resulted in an injury to a worker. The occurrence report listed weaknesses in analyzing hazards and developing hazard controls as contributing factors in the accidents. Without effective self-assessments Sandia will continue to experience problems in identifying weaknesses and deficiencies in its ISM implementation. In addition, by not holding line managers accountable for correcting ISM WP&C findings, Sandia denies itself the opportunity to provide proactive and constructive feedback to prevent or correct issues and problems before becoming major occurrences. Underscoring the importance of line management's roles and responsibilities concerning safety, the Secretary of Energy stated, in a December 5, 2011, memorandum on nuclear safety, that line managers have the authority and the responsibility for establishing, achieving and maintaining stringent safety performance expectations and requirements.

The Governance Approach relies heavily on obtaining reliable information from the CAS and leveraging that information to make informed decisions on oversight. Past reviews indicate that Sandia has difficulty identifying ISM deficiencies through line level self-assessments, a key element of an effective CAS. Thus, this problem could also impact the Site Office's ability to perform its oversight function using the Governance Approach.

RECOMMENDATIONS

To improve the effectiveness of implementation of future ISM corrective actions at the line level and focus NNSA oversight on WP&C implementation, we recommend that the Manager, Sandia Site Office:

1. Ensure performance measures used to evaluate Sandia's ES&H performance include line level leading indicators (e.g., near miss reports and audit/assessment results, such as the Sandia ISM system effectiveness review).

To promote effective ISM line level implementation, we further recommend that the Manager, Sandia Site Office, direct Sandia to:

2. Continue to ensure line management and policy level officials work together to develop a comprehensive self-assessment program for WP&C, integrate WP&C with Engineered Safety concepts, and communicate issues at various management reviews;
3. Require personnel who perform organizational self-assessments and their managers to be trained in planning, performing and documenting self-assessments, and in developing corrective actions;
4. Ensure that WP&C corrective actions are directed to the level of management responsible for correcting implementation deficiencies; and,
5. Ensure that managers are accountable for line level implementation of the WP&C requirements by establishing and documenting specific accountability activities for line managers, and amending Sandia's policies and procedures to clearly identify the requirements of line level managers for WP&C implementation, as appropriate.

**MANAGEMENT REACTION
AND AUDITOR COMMENTS**

Management generally agreed with the report's findings and recommendations and stated that it will use them to drive continued improvement of NNSA's implementation of ISM. Management stated that it has made improvements in establishing the framework for WP&C, including establishing quarterly Executive Management Reviews intended for timely identification of issues for management action. Management also noted that line organizations are leading an effort to integrate WP&C processes with Engineered Safety principles and that the FY 2012 Performance Evaluation Plans are monitoring the extent of line managers and Sandia officials working together for the effective implementation of WP&C processes.

Management's proposed and initiated corrective actions are responsive to our recommendations. We appreciate management's recognition that continued improvement of NNSA's implementation of ISM is needed and that corrective actions are underway. Management's comments are included in Appendix 3.

Appendix 1

OBJECTIVE

To determine the reasons that Sandia National Laboratories (Sandia) was not effectively implementing Integrated Safety Management (ISM) at the line management level.

SCOPE

The audit was performed between June 2010 and May 2012, at Sandia, the Sandia Site Office (Site Office) and the National Nuclear Security Administration (NNSA) Albuquerque Complex (formerly NNSA Service Center), in Albuquerque, NM. Our scope encompassed Sandia's current ISM system.

METHODOLOGY

To accomplish our objective, we:

- Reviewed regulations, policies and procedures relevant to the Department of Energy's (Department) ISM;
- Reviewed Sandia's guidance, policies and procedures;
- Held discussions with Site Office and Sandia officials;
- Analyzed the Total Recordable Case Rate; and,
- Reviewed related reports on Sandia's ISM and associated corrective action plans.

We conducted this performance audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. Accordingly, we assessed significant internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the Department's implementation of the *GPR Modernization Act of 2010* and determined that it had established performance measures for the ISM system. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not rely upon computer-processed data to accomplish our audit objective.

Management waived an exit conference.

RELATED REPORTS

Office of Inspector General

- Audit Report on [*Implementation of Integrated Safety Management at Lawrence Livermore National Laboratory*](#) (DOE/IG-0797, July 2008). The report concluded that Lawrence Livermore National Laboratory (Livermore) had not fully implemented an Integrated Safety Management system. The Office of Inspector General examined three safety incidents and found that Livermore had not always: (1) developed and implemented controls to eliminate hazards; (2) performed work within defined controls; and, (3) provided feedback to managers about identified hazards or aggressively pursued continuous improvement in safety.

U.S. Government Accountability Office

- Report on [*Actions Needed to Determine the Effectiveness of Safety Improvement Efforts at NNSA's Weapons Laboratories*](#) (GAO-08-73, October 2007). The U.S. Government Accountability Office (GAO) found that nuclear weapons laboratories have experienced persistent safety problems, stemming largely from longstanding management weaknesses. From 2000 to 2007, nearly 60 serious accidents or near misses had occurred, including worker exposure to radiation, inhalation of toxic vapors and electrical shocks. A review of nearly 100 reports issued since 2000 disclosed that the contributing factors to these safety problems generally fall into three key areas: (1) relatively lax laboratory attitudes toward safety procedures; (2) weaknesses in identifying safety problems and taking appropriate corrective actions; and, (3) inadequate oversight by National Nuclear Security Administration site offices.
- Report on [*Department of Energy Needs to Strengthen Its Independent Oversight of Nuclear Facilities and Operations*](#) (GAO-09-61, October 2008) The report concluded that the Department of Energy's Office of Health, Safety and Security falls short of fully meeting GAO's elements of effective independent oversight of nuclear safety: independence; technical expertise; ability to perform reviews and have findings effectively addressed; enforcement; and, public access to facility information.

MANAGEMENT COMMENTS



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



April 16, 2012

MEMORANDUM FOR GREGORY H. FRIEDMAN
INSPECTOR GENERAL

FROM:  CYNTHIA A. LERSTEN
ACTING ASSOCIATE ADMINISTRATOR
FOR MANAGEMENT AND BUDGET

SUBJECT: NNSA's Comments on Inspector General Draft Report titled,
Integrated Safety Management at Sandia National Laboratories;
Project No. A10 AL004/IDRMS No. 2010-00832

The National Nuclear Security Administration (NNSA) appreciates the opportunity to review the Inspector General's (IG) draft report, "*Integrated Safety Management at Sandia National Laboratories*."

Based on our review, NNSA generally agrees with the IG findings and recommendations and will use them to drive continued improvement of NNSA's implementation of Integrated Safety Management (ISM). In addition, it is important to note that NNSA has made many improvements over the years in establishing the framework for work planning and control (WP&C) including establishing quarterly Executive Management Reviews intended for timely identification of issues for management action. Also, line organizations are leading an effort to integrate Work Planning and Control processes with Engineered Safety principles. I have attached our initial response to the recommendations which highlight planned actions and actions in progress; it also includes, for your consideration, technical comments to further improve the factual accuracy of the report.

If you have any questions concerning this response, please contact Dean Childs, Director, Management Control and Assurance, at 301-903-1341.

Attachment

cc: Geoffrey Beausoleil , Sandia Site Office, Manager
Richard Sena, Sandia Site Office, Deputy Manager



Printed with soy ink on recycled paper

Initial Response to the Report Recommendations

Recommendation 1: *Ensure performance measures used to evaluate Sandia's ES&H performance include line level leading indicators (e.g., near miss reports and audit/assessment results, such as the Sandia ISM system effectiveness review).*

Concur

Sandia Site Office (SSO) will ensure performance measures used to evaluate Sandia's ES&H performance include line level leading indicators. The estimated completion date is December 31, 2012.

Recommendation 2: *Require that line management and policy level officials work together to develop a rigorous and comprehensive self-assessment program for ISM areas such as WP&C, including specific and common criteria so that assessments are reliable and repeatable by all levels of organizational management.*

Agree/Concur in Principle

We agree that line management and policy level officials need to work together and that self-assessments are a cornerstone of an effective assurance system. However, the current wording does not recognize two important activities that are underway: The current SNL leadership has established quarterly Executive Management Reviews intended to bring issues to light early enough so management action can take place; and, line organizations are championing an effort to integrate Work Planning and Control processes with Engineered Safety principles. Furthermore, the FY 2012 Performance Evaluation Plans are monitoring the extent of Line Managers and Sandia Laboratory Officials working together for the effective implementation of the Work Planning and Control processes. Closure will be evidenced by issuance of the FY12 Performance Evaluation Report by December 31, 2012.

We further suggest the recommendation be reworded to "Continue to ensure line management and policy level officials work together to develop a comprehensive self-assessment program for WP&C, integrate WP&C with Engineered Safety concepts, and communicate issues at various management reviews." to reflect this information.

Recommendation 3: *Require personnel who perform organizational self-assessments and their managers to be trained in planning, performing and documenting self-assessments, and in developing corrective actions.*

Concur

SSO will require personnel who perform organizational self-assessments and their managers to be trained in planning, performing and documenting self-assessments, and in developing corrective actions. The estimated completion date is December 31, 2012.

Recommendation 4: *Ensure that WP&C corrective actions are directed to the level of management responsible for correcting implementation deficiencies.*

Concur

SSO will ensure that WP&C corrective actions are directed to the level of management responsible for correcting implementation deficiencies.

Recommendation 5: *Hold managers accountable for line level implementation of the WP&C requirements, including noting WP&C implementation assessment results in line managers' performance evaluations and amending Sandia's policies and procedures to clearly identify requirements of line level managers for WP&C implementation.*

Agree/Concur in Principle

SSO agrees that SNL needs to hold managers accountable. However, it should be at SNL's discretion whether to specifically include the wording stated in the recommendation in line managers performance evaluation. SSO will ensure specific accountability activities are established and documented for line managers, including requirements for implementation of WP&C.

In line with this comment, we suggest rewording the recommendation to read: "Ensure that managers are accountable for line level implementation of the WP&C requirements by establishing and documenting specific accountability activities for line managers, and amending Sandia's policies and procedures to clearly identify requirements of line level managers for WP&C implementation as appropriate."

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