

Security Walls, LLC

Waste Isolation Pilot Plant

Department of Energy Voluntary Protection Program

Onsite Review

March 3-4, 2009

The Department of Energy (DOE) Voluntary Protection Program (VPP) onsite assessment of Security Walls, LLC (Security Walls), at the Waste Isolation Pilot Plant (WIPP) was conducted from March 3-4, 2009. Security Walls was awarded the subcontract to Washington TRU Solutions (WTS), the management and operating contractor for WIPP, in February 2008 and assumed services previously provided by Santa Fe Protective Services. Santa Fe Protective Services had been recognized as a participating DOE-VPP Star site in August 2007.

In accordance with DOE-VPP policy, whenever significant organizational changes or changes of contractor are made at a participant site, Headquarters may conduct an onsite evaluation to determine continued participation in DOE-VPP. Security Walls managing personnel have been in place for a minimum of 1 year. The DOE Carlsbad Field Office provides direction to, and oversight of, WTS and Security Walls.

The Headquarters DOE-VPP Review Team's (Team) purpose was to reevaluate the site against VPP criteria to determine continued qualification in the Star program, reevaluate and document results of program participation versus program criteria, and identify problems that could adversely affect continued Star program qualification and determine whether those problems require additional evaluations.

The criteria to determine the effectiveness of the Security Walls Safety and Health Program and its continued participation in DOE-VPP included the site's continued compliance with the program requirements, satisfaction of the participants (including management and employees), the nature and validity of any complaints received by DOE (of which there were none), the nature and resolution of problems that may have come to DOE's attention since the transition, and the effectiveness of employee participation programs.

The WIPP site is located approximately 30 miles east of Carlsbad, New Mexico, and is the Nation's primary repository for Defense-generated transuranic (TRU) waste and TRU mixed waste. The repository is located in a geologically stable salt formation 2,150 feet below the surface. Surface operations involve receipt, inspection, transport, and final placement of contact and remote handled waste drums packed and certified throughout the DOE complex.

Security Walls, LLC, provides the security services for the site. Security services include both armed security police officers and unarmed security services. Security Police Officers and Security Officers are responsible for operating the access gates, including personnel badging and inspection, foot and vehicle patrols, security escort services for

special waste receipt, video and alarm system surveillance, and support for the onsite Fire Brigade. Unarmed security services include badging and personnel access, clearance processing, counterintelligence programs, operational security, classified matter protection and control, foreign national visits and assignments, K-9 coordination, lock and key programs, and security procedure maintenance and development. Security Walls currently employs approximately 36 people (*29 uniformed and 7 nonuniformed*). The Security Walls employees are not represented by any organized union.

The Team evaluated Security Walls' safety programs against the provisions of DOE-VPP as mentioned above. During the site visit, the Team observed security activities, evaluated relevant safety documents and procedures, and conducted interviews to assess the strength and effectiveness of Security Walls' health and safety programs.

The Team interviewed a cross sample of the employees, managers, and supervisors either formally or during observation of field activities. Hazards associated with Security Walls activities included potential radiological contamination; chemical exposure associated with cleaning weapons, firearms, thermal stress, and dehydration; noise; heavy equipment, and other standard industrial hazards associated with waste handling and disposal. Security Walls personnel are also potentially exposed to a range of mining hazards associated with underground work, including underground heavy equipment, dust, and high-voltage electrical utilities. Work observed included foot and vehicle security patrols, weapon issue demonstration, loading and unloading demonstrations, vehicle inspections, and personnel access. There were no underground security operations during this assessment.

Interviews with key management personnel indicated that Security Walls managers and supervisors are in full support of DOE-VPP, have maintained a high level of visibility among all workers, have demonstrated a strong commitment to the safety and well-being of all workers, and have encouraged all workers to remain vigilant in conducting all work and training exercises in as safe a manner as possible and expected. Managers have encouraged all workers to think of safety not only at work but in their daily lives. Both managers and workers spoke highly of activities, such as the safety movie day that took place last year that allowed workers to view safety-related movies in a "movie theater" setting in the company auditorium.

Employee interviews were conducted in both formal and informal settings and included questions based on the five DOE-VPP tenets. One hundred percent of the interviewees indicated that, although safety had always been a top priority with the previous contractor, Security Walls has "stepped it up"; referencing the Chief Manager's individual commitment to the workers, a greater emphasis on working safely, better utilizing resources to improve working conditions for Security Patrols and Security Patrol Officers, and creating an environment that encourages career building. The Team observed that employees are strongly involved in the Security Walls Safety and Health Program. Programs remain in place to notify employees of new job hazards and procedural changes. Once procedural changes have gone through a review process and

employees have had the opportunity to provide feedback, it is then placed in the required reading book. Security Captains, Captains and officers are all involved in the review process at varied levels. Captains review each procedure relating to the performance of officer duties and provide changes and feedback.

Interviewees who have worked in WIPP security for 5 or more years and those who have been with the company for less than a year indicated the “new” company has demonstrated its commitment to them in the form of communicating its goals and expectations. Employees indicated they were comfortable bringing safety-related issues and concerns to their supervisors and other managers. They also noted managers have demonstrated their commitment to safety by making a number of improvements that have enhanced the safety program. Such improvements included reworking a number of procedures to reduce redundancy and improve accessibility and ease of use, adding officers at the Skeen Whitlock Building and creating an office area for weapons loading and unloading, selecting a more appropriate respirator for officer use, adding safety briefing content for each shift each month, holding safety meetings on each rotating shift to add employee involvement, and enacted the use of the first aid card for range use to ensure accurate accounting for offsite activities. Additionally, physical improvements have been made to the city-owned firing range used by Security Walls personnel. Security Walls has continued the use of incentives to promote safety and recognize safe behavior and has also continued the support of the executive safety committee with an increased level of training.

Employees were knowledgeable about the significance of working at a VPP Star site. Several adequately explained that DOE-VPP meant that their safety program is recognized as an excellent program within the DOE complex. Newer employees were aware and knowledgeable of DOE-VPP and were also impressed with the amount of positive attention Security Walls places on safety; they often mentioned this level of attention was very different and superseded that of their previous employers and occupations.

Work continues to be conducted safely at Security Walls. Management commitment is evident, employees continue to receive adequate safety and health training, and are aware of the hazards that exist in their work environment. Employees remain actively involved in daily safety inspections of their work areas and equipment and are comfortable raising safety concerns to the appropriate personnel. The Team has concluded Security Walls continues to build upon the strong safety culture that was recognized by the previous contractor and has determined the company operates at a DOE-VPP Star site level.