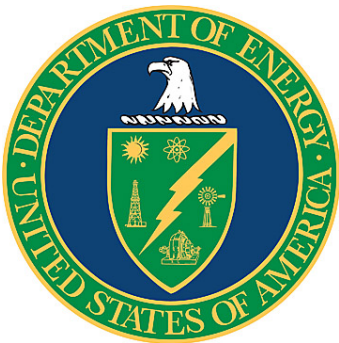


Centerra-Nevada Nevada National Security Site

**Report from the Department of Energy
Voluntary Protection Program
Onsite Conditional Review Addendum
May 17-26, 2016**



U.S. Department of Energy
Office of Environment, Health, Safety and Security
Office of Health and Safety
Office of Worker Safety and Health Assistance
Washington, DC 20585

Introduction

The Department of Energy's (DOE) Office of Environment, Health, Safety and Security's (AU) Voluntary Protection Program (VPP) Team (Team) is recommending that Centerra-Nevada, continue to participate "unconditionally" as a Star site in DOE-VPP. In May 2015, the Team recommended that Centerra-Nevada continue in DOE-VPP as a "conditional" Star participant as it worked to address significant issues affecting the relationship between Centerra-Nevada managers and Security Police Officers (SPO). The original report identified 21 opportunities for improvement, seven of which used the word "need" or "must" and reflected those conditions that led to the conditional recommendation. The remaining 14 opportunities for improvement used the word "should" and reflected recommendations from the Team, but did not contribute to the conditional recommendation. In May 2016, the Team performed a followup assessment to determine whether Centerra-Nevada effectively addressed the identified conditions and recommend whether Centerra-Nevada should continue unconditionally in DOE-VPP. The Team evaluated Centerra-Nevada's actions to address identified needs, and performed work observations and interviewed workers to determine the effectiveness of the actions. The following addendum to the original assessment report from May 2015 documents the Team's observations and conclusions.

Observations

2015 Opportunity for Improvement: Centerra-Nevada needs to change its approach to the annual survey results and recognize that if an employee is not sure they can report safety issues to managers without fear of retaliation, retribution, or reprisal, there is a significant safety culture issue.

Summary from 2015: During its 2014 self-assessment, Centerra-Nevada identified a decrease from 78 percent in 2013 to 70 percent in 2014, of employees that felt they could raise safety issues without fear of reprisal, retribution, or retaliation. Centerra-Nevada attributed that drop to an increase in the number of survey participants that selected neutral responses. Centerra-Nevada did not recognize that trend as a growing safety culture problem, and did not identify actions to address that trend in its 2015 actions.

Centerra-Nevada Actions:

Centerra-Nevada restructured its 2015 Safety Summit to increase worker input. After that summit, Centerra-Nevada restructured its safety committee and combined three committees into a single committee.

Centerra-Nevada empowered the single Centerra-Nevada Safety Committee with broad authority to make decisions, provide recommendations, and take action on many issues previously raised to the Manager level for resolution.

Centerra-Nevada now has two safety committee co-chairs (one uniformed, one non-uniformed) to run the committee. The new committee has eight participants from the Independent Guard Association of Nevada (IGAN), the protective force (PROFORCE) bargaining unit.

Centerra-Nevada hired a new PROFORCE director and put a new PROFORCE manager in place that have significantly altered the leadership style within the PROFORCE.

Team Evaluation:

The survey results reported in the 2015 annual report reflect attitudes and perceptions before Centerra-Nevada implemented many of the current changes, or before some changes had demonstrated effectiveness. The 2015 annual survey showed movement in a positive direction, with 77 percent of respondents reporting they can raise issues regarding safety and health concerns to management without fear of reprisal, retribution or retaliation. Seventeen percent remained neutral, with comments indicating both positive and negative implications.

The Team's interactions with PROFORCE members demonstrated to the Team a significant shift in the safety culture is occurring. PROFORCE members are demonstrating a stronger belief that managers are addressing issues, not glossing over or ignoring them. They see safety improvements implemented both due to their suggestions and due to Centerra-Nevada initiative. For example, at one post at the Device Assembly Facility (DAF), SPOs use portable toilets since they cannot leave their post. SPOs have access to hand sanitizers, but requested a hand-washing station in the past year for better hygiene. Centerra-Nevada responded to the SPOs' concerns and installed a new hand-washing station at the post so the SPOs can wash their hands with soap and water.

Centerra-Nevada has invested significant resources to make safety improvements to firing ranges. On one range, Centerra-Nevada obtained funds to reposition an electrical box, clearing the range master's view of the firing line. Additionally, Centerra-Nevada replaced the range master's control room with a modern metal structure that can withstand adverse weather conditions and reduce future maintenance cost.

The restructuring of the safety committees into a single committee with significant PROFORCE representation gives PROFORCE members a strong voice in addressing longstanding issues. Most PROFORCE members expressed satisfaction with the changes and were optimistic about the long-term prospects. A few PROFORCE members expressed a belief that the current changes were only going to last until the end of this assessment. Longstanding issues that Centerra-Nevada was finally addressing included stair chairs for evacuating injured personnel from the DAF, an Automated External Defibrillator in DAF, and new obstacle courses that are safer and more challenging.

PROFORCE members are reporting safety issues and are willing to report minor injuries. Centerra-Nevada has implemented a safety hotline number that members of the safety committee check at least daily. Any employee can access the safety hotline to report a concern, anonymously, if desired. Several people have already reported concerns since the inception of the hotline in April 2016.

Centerra-Nevada managers have demonstrated their willingness to listen to and address safety concerns, questions, or issues. They are working to improve communications about safety issues. For the past several months, Centerra-Nevada has focused on placing a single computer kiosk in the muster area that SPOs can access to find information about issue resolution. Most personnel interviewed identified this kiosk as the best method for SPOs to seek information regarding issue status and resolution. Although Centerra-Nevada expects to identify future kiosk locations, it has not yet developed plans. Although the kiosk will be a means for SPOs to find

information, the Team believes the planned location of the single kiosk may be too inconvenient for PROFORCE members to use.

Centerra-Nevada has other communication tools available, including a bi-monthly newsletter, but few SPOs read it. Centerra-Nevada continues to use the muster area signboard, but PROFORCE members pay little attention to that board. Centerra-Nevada is also developing new safety campaigns around its “Boris the Bull” branding. As it implements the safety kiosk, Centerra-Nevada should continue working to expand its communication repertoire, find means to encourage PROFORCE members to read or listen to those messages, and encourage PROFORCE members to ask their supervisors about issues that are pending and have not been resolved. For example, Centerra-Nevada could begin including messages in newsletter safety articles that readers could identify for a small prize, such as a candy bar. PROFORCE lieutenants could maintain a written list of safety issues at each security post and include a review of that list as a turnover item at each shift.

Perhaps the single most effective action addressing the trust issue between PROFORCE members and managers has been the change in the PROFORCE leadership style. PROFORCE members spoke highly of the new PROFORCE manager, and the PROFORCE director has established expectations that PROFORCE leaders avoid “knee-jerk” reactions. The PROFORCE director and manager are encouraging PROFORCE members to identify issues regarding post orders, standing orders, procedures, and policies and seek agreeable solutions. These actions are encouraging dialogue and PROFORCE members are responding positively when they see results from their recommendations.

Although trust is rising among the PROFORCE members, Centerra-Nevada must remain vigilant to avoid damaging that trust. The current relationship remains fragile, and a single overreaction or misstep could undo recent progress. Centerra-Nevada reportedly self-identified that many of its corrective actions need time to mature and demonstrate effectiveness.

2015 Opportunity for Improvement: Centerra-Nevada needs to revise its policies to remove the threat of insubordination from its stop-work policy.

Summary from 2015: The Centerra-Nevada *Stop Work Policy, Employee Standards of Conduct, and Worker Safety and Health Plan*, established and defined the process to implement all employees’ right to stop work. Policies and procedures also contained restrictions on an employees’ right to stop work and allowed a manager to determine that a worker was insubordinate by their refusal to perform a task or follow orders. This limitation created an internal conflict in the procedures that discouraged SPOs from raising questions or stopping work. Under Centerra-Nevada procedures, insubordination carries a threat of termination. Many PROFORCE members interviewed cited a single case where a manager notified a SPO of potential discipline after the SPO took action to reduce his exposure to a hazard without first notifying his lieutenant. Although Centerra-Nevada did not discipline the SPO, the effect on the PROFORCE was significant.

Centerra-Nevada Actions: Centerra-Nevada reworded its stop-work policy to eliminate any perception that insubordination could result from an employee invoking a safety work stoppage. The PROFORCE director and manager have both established expectations that supervisors avoid “knee-jerk” reactions, and support SPOs when orders are ambiguous or procedures are incorrect.

Team Evaluation:

The stop-work policy no longer identifies insubordination as a threat to an SPO that stops work for safety. Centerra-Nevada revised P1-03, *Employee Standards of Conduct Policy*, in March 2016 to separate the criteria defining insubordination for not following an order from the stop-work rights and responsibilities. The revision added a new paragraph that defined the stop-work policy and clearly identified that managers must honor the stop-work and ensure the affected employees understand resolutions of the concerns. Further, employee interviews demonstrated that PROFORCE managers are responsive to safety concerns. Although most PROFORCE members interviewed no longer considered stopping work as carrying a threat of retaliation, many others were not aware of the new stop-work policy, and several remained concerned. Interviews suggest that perhaps 50 percent of the PROFORCE are not aware of the details in the new policy. Those that remained concerned stated they would not raise a safety concern or issue. The Team understands that Centerra-Nevada recently revised the policy and that changes sometimes take time to filter down through the organization. Most PROFORCE members do not read the written policies and simply rely on word-of-mouth and their own experiences. The communication difficulties discussed previously contribute to the lack of awareness of the revised stop-work policy. Centerra-Nevada posted the revision in the muster room, but did not specifically identify or address it during the PROFORCE Annual Training (PFAT). Although Centerra-Nevada notified SPOs that it had revised the policy, it did not brief them on the actual revisions.

The Centerra-Nevada practice of posting revised policies and expecting SPOs to read them contributes to some of the communication difficulties and accounts for the lack of awareness among the PROFORCE for the change in the stop-work policy. Centerra-Nevada managers are trying to maintain a balance regarding information put out at muster. In the future, Centerra-Nevada should develop more specific communication plans for revised policies and orders and ensure those plans include multiple, reliable pathways of informing personnel of the changes, and not simply telling them the changed policy is posted. This approach should help Centerra-Nevada move toward a more intentional communication approach that helps prevent miscommunication and ensures it effectively disseminates important information.

2015 Opportunity for Improvement: Centerra-Nevada needs to review its suggestion system and work with employees to establish an effective process that ensures the employee making the suggestion agrees with, and accepts, the final resolution.

Summary from 2015: Centerra-Nevada had several ways for employees to suggest improvements, but SPOs were not using them. The system advised employees to contact their manager or a safety committee member for a concern or suggestion or submit a written suggestion form. The Team noted that the employee safety committee (ESC) tracked items identified by ESC members, but no similar tracking existed for suggestions outside of the ESC, such as through supervisors. Centerra-Nevada had a suggestion system whereby an employee could submit a concern anonymously. Centerra-Nevada reviewed every suggestion and provided feedback if a suggestion included a name. Despite this process, several personnel interviewed by the Team did not believe Centerra-Nevada effectively involved them in the review and resolution of their concerns. In some cases, the same concern was raised multiple times without personnel knowing or understanding the previous resolution.

Centerra-Nevada Actions: The safety kiosk and Centerra-Nevada Safety Hotline empower employees to participate directly in the safety program by submitting suggestions for improvement. A part of this process is ensuring employees understand there may be times when implementing suggestions is not feasible or the information provided is not accurate, causing unintended consequences. Through the safety kiosk and safety hotline, the company will be able to better communicate results and provide explanations for decisions being made. Centerra-Nevada will update Standard Practice SP11-003, *Suggestion Program*, to reflect these procedures.

Team Evaluation

Centerra-Nevada has not yet implemented the safety kiosk, and previous sections in this report discuss the potential issues. The system will not be available until after this assessment, although the system designer demonstrated it during a safety committee meeting. The demonstrated version does have a simple user interface, but the success of the system will ultimately depend on the willingness of personnel to take time to sit down and use it.

In addition to the safety kiosk, Centerra-Nevada initiated the safety hotline in April 2016. As previously discussed, some people have already used the system to identify potential safety issues. Daily monitoring by safety committee members should help Centerra-Nevada to meet its goal of providing feedback to the concerned individual within 24 business hours if a concerned individual provides their name.

Most importantly, the Team observed that more PROFORCE members are willing to raise issues, engage in discussions about resolution of those issues, and work to achieve adequate solutions. This was particularly apparent during the safety committee meeting where both uniformed and non-uniformed members of the committee engaged with senior managers about issues. Although the issues were not resolved during the meeting, the Centerra-Nevada managers did not dismiss or drop the issues. This open dialogue about issues demonstrates the willingness of workers to raise issues and participate in solutions.

SPOs have identified and communicated numerous safety issues to managers in the past year without the fear of retribution that was evident in 2015. For example, SPOs identified that a trench near Building 12-910 presented a hazard for nightly rounds because there were no barricades around the trench. National Security Technologies, LLC (NSTec), the management and operations contractor at the Nevada National Security Site (NNSS), put barricades in place until it covered the trench a week later. SPOs stationed at the North Las Vegas 840 Gate requested a change in the signs and pathway for pedestrians leaving the site because the pedestrians were approaching from behind the guardhouse and walking into the path of oncoming traffic entering the site. After accepting the suggestion, Centerra-Nevada was working with NSTec to correct the condition. Also at Gate 840, Centerra-Nevada corrected a pinch point the SPOs identified when opening the door of the guardhouse. SPOs asked the general manager about choice of footwear while qualifying, because some SPOs were using safety footwear (not designed for running) that could potentially cause injury while running the qualification course. The general manager informed them that the safety footwear was optional and specifically required only in certain restricted areas.

The SPOs asked about the policy of loading firearms in the headquarters building, then transporting them to the firing range where they unloaded the firearms again. Centerra-Nevada could avoid the potential for mishap by loading firearms only after arriving at the firing range. Centerra-Nevada agreed and immediately implemented a change in the policy.

Managers have also supported SPO suggestions for issues not identified as safety. For example, managers supported a change that allowed SPOs to wear the Centerra-Nevada T-shirt on duty during summer months to help alleviate heat stress. SPOs received managers' support to eliminate the twice per-shift, gear-accountability radio calls. SPOs stationed in the Centerra-Nevada headquarters requested hand sanitizer for their work areas. Managers also relaxed the requirement for wearing the tactical equipment inside Centerra-Nevada headquarters at the SPOs' request.

Managers have supported other requests by SPOs to facilitate their additional duties. For example, the safety committee co-chair requested a safety day to work safety committee issues and was immediately granted time to work on committee issues. This would not have occurred a year ago according to SPOs. After many years of pursuing corrective action on DAF trapdoors, management supported the SPOs by tagging out the doors and only using them in emergencies. In addition, the general manager sends a personal letter to any SPO at their home address if they ask him a question at PFAT, with the resolution or actions taken.

Finally, Centerra-Nevada has increased the visibility and availability of senior managers to the PROFORCE. Managers are spending more time at muster, visiting with SPOs on their posts, and asking them about issues or problems. This action is helping reinforce SPOs' willingness to talk to senior managers.

2015 Opportunity for Improvement: IGAN members need to reevaluate their commitment to the process and determine internally if VPP meets their needs. If IGAN decides to continue supporting VPP, the IGAN membership needs to accept its roles and responsibilities in establishing and maintaining effective communications.

Summary from 2015: The IGAN members did not agree among themselves about their desired direction and involvement in VPP. The ESC chair and the IGAN president, according to both parties, rarely agreed about the significance of member-raised issues. Many SPOs were frustrated that their efforts to raise issues did not receive attention. Other SPOs simply quit offering suggestions or raising issues. This attitude was contributing to the communications problems between SPOs and managers.

IGAN Response: Communication has been a major issue for the IGAN in regards to both VPP and safety issues. The IGAN is fully committed to fixing this issue and to supporting VPP. Steps have already been taken within the Centerra-Nevada safety program to improve communications and to engage participation by the IGAN membership.

Team Evaluation:

Since the last assessment, there have been some changes in the IGAN Leadership, with a new president and vice-president. Both these individuals are working closely with Centerra-Nevada and the IGAN membership to improve communications and restore trust. The IGAN leaders

have accepted their role in DOE-VPP, are encouraging IGAN members to engage with the safety program, and believe Centerra-Nevada allows IGAN to play a significant part in the safety program, although some members remain unconvinced of Centerra-Nevada's long-term commitment to current improvements. With eight positions on the new safety committee being committed to IGAN members, IGAN has access to the information discussed in the meetings, and is communicating that information to its members. IGAN is helping its members separate issues related to bargaining, pay, or overtime from safety concerns and issues.

The Team interviewed over 100 IGAN members during this assessment. Almost all voiced support for VPP and recognized the improvements in communications, actions, and support from new union leadership. The new union leadership voiced optimism with the open lines of communication with the PROFORCE managers. Additionally, almost all SPOs interviewed were encouraged by the change in management and the ability to approach managers and believe that the new managers were sincerely interested in them and valued their input.

2015 Opportunity for Improvement: SPOs must accept their responsibility and accountability to continually work at improving their work environment.

2015 Summary: SPOs had raised several issues repeatedly over the years and had not agreed with or accepted the responses. Some issues raised by SPOs reflected issues created by SPOs themselves. For example, SPOs legitimately complained about cleanliness of water dispensers placed in stations. Centerra-Nevada attempted to solve the problem by providing cleaning supplies and procedures and assigned cleaning responsibility to the B shift (night shift). Some SPOs on the A shift (day shift) did not trust the B shift SPOs to perform that responsibility, but refused to clean the water dispensers themselves. SPOs have also raised station and vehicle cleanliness as issues, but refused to hold their fellow SPOs accountable for those conditions or contribute to the solution. Finally, SPOs had complained about not having cargo netting in security vehicles for loose gear, but did not properly store the gear inside the vehicles.

IGAN Response: Most SPOs do accept their responsibility to work to improve their work environment. The company will continue to work with all employees to encourage employee participation in our safety program, including employee accountability and responsibility.

Team Evaluation

SPOs are beginning to recognize the importance of their contribution to effective communications. When asked about raising issues, most SPOs stated they now prefer to raise issues to the lieutenants as a first choice. Additionally, with the new safety committee and safety issues hotline, other avenues are available to raise issues.

During discussions with the Team, the Centerra-Nevada leaders (both IGAN and managers) demonstrated a sincere effort to solicit IGAN members for ideas and input. The Team observed leaders' requests to SPOs to review and suggest improvements for task orders, procedures, and policies that may improve clarity, understanding, or implementation. During interviews, workers told the Team that although the answer to their questions might be different from what they wanted, managers were taking the time to listen and act on suggestions or issues.

2015 Opportunity for Improvement: Centerra-Nevada needs to revise SP2-016 to include SPOs as part of the RAR development team and include SPO input on the identification of hazards, the analysis of hazards, and the development of hazard controls in RARs and orders.

Summary from 2015: SPOs were not involved in the development of the risk analysis report (RAR) and the evaluation of the hazards. This limited the SPOs' ability to contribute their experience and interpretation of the controls in the final product. Several cases had occurred where SPOs acted in accordance with their interpretation of orders resulting in disciplinary actions or investigations.

Centerra-Nevada Actions

Centerra-Nevada has begun including SPOs as members of the risk analysis team during the development of RARs involving SPO work. The draft SP2-016, *Risk Analysis Program*, specifies the inclusion of SPOs from the safety committee to assist the RAR developer identify and analyze hazards, and develop hazard controls.

Team Evaluation

Centerra-Nevada is revising the SP2-016, *Risk Analysis Program*, to include the use of SPOs in the development and review of RARs. In addition, the new PROFORCE manager and director are asking PROFORCE members to review shift and post orders for ambiguity or conflicting requirements in the orders. As a result, Centerra-Nevada has revised many post orders and procedures, and is revising others. PROFORCE members are pleased that they have the opportunity to offer suggestions. Similarly, PROFORCE members are engaged in testing and providing feedback on new obstacle courses and stress courses for SPO 2 and SPO 3 qualification. The feedback is constructive, and the Training manager is including the SPO feedback and adjusting the training and qualification courses when warranted. In some cases, feedback from PROFORCE members demonstrated they did not understand the purpose of some obstacles or tasks. In those cases, the Training manager should consider writing an article for the bi-monthly newsletter discussing the comments and disseminating an explanation regarding the design of the particular obstacle or task.

In another example, a recent incident occurred at one station where an SPO was not operating his station in accordance with Station Orders and Policies. Historically, Centerra-Nevada would have responded by issuing a Notice of Pending Disciplinary Action that may have resulted in some level of disciplinary action. This particular incident came soon after several other incidents not related to this incident, but they did occur at the same station. Because of these incidents, Centerra-Nevada took deliberate steps to look at orders, policies, and procedures and scheduled SPOs to participate in the orders' review process. Using SPOs as the subject matter experts helped Centerra-Nevada make the revised orders both executable and unambiguous, reducing the need for a SPO to make a decision contrary to existing orders as a matter of operational necessity. The reaction to this incident helped Centerra-Nevada reinforce its desire to become a more proactive and empowering organization by demonstrating its motto "Better, Safer, Smarter." In addition, Centerra-Nevada is eliminating the use of the term "Notices of Pending Disciplinary Action" and replacing it with a "Notice of Incident Review." This change is

intended to remove the negative connotation, reinforce the investigative nature of the action, and reduce worker anxiety.

2015 Opportunity for Improvement: Centerra-Nevada must correct the contradicting stop-work requirement to reflect expectations within the Integrated Safety Management System, VPP, and 10 CFR 851 and review all procedures for confusing and inconsistent directions.

Summary from 2015: SPOs were not involved in the development of the RAR and the evaluation of the hazards. This limited the SPOs' ability to contribute their experience and interpretation of the controls in the final product. In several cases, the lack of SPO involvement in the development of the RAR and order led to unidentified and unanalyzed hazards, which led to inadequate or ambiguous hazard controls. In order to ensure Centerra-Nevada includes the SPOs' perspective in identifying, analyzing, and controlling hazards, Centerra-Nevada needed to revise SP2-016, *Risk Analysis Program*, to include SPOs as part of the RAR development team and include SPO input on the identification of hazards, the analysis of hazards, and the development of hazard controls in RARs and orders.

Centerra Actions

Centerra-Nevada Policy P1-03, *Employee Standards of Conduct*, and P1-07, *Work Control*, are updated to reflect the revised stop-work policy. Standard Practice SP2-015, *ES&H Inspection, Assessment, and Employee Involvement Program*, and Security General Order SGO 10, *Safety*, need to be revised to reflect the new policy.

Team Evaluation

As previously discussed, Centerra-Nevada revised the Policy P1-03, *Employee Standards of Conduct*, but has not yet revised other standard practices related to hazard and risk analysis. It has provided opportunities for PROFORCE members to participate in hazard analysis activities. Centerra-Nevada is using SPOs to evaluate hazards and provide recommended controls in conjunction with the new training and qualification ranges. The PROFORCE manager and director have repeatedly asked SPOs to review their post orders and procedures to identify ambiguous or incorrect directions and recommend solutions. Centerra-Nevada has prepared revisions to the various procedures, but is waiting to determine if the results of this review warrant additional changes before issuing the final documents.

Other Observations

In 2012, the Team recommended that the contractor devote more attention to refining its hazard analysis methods by assuring that it validated control selection, avoided the use of generic descriptors, and document the rationale for control selection, quantitatively, if practical. Similarly, in 2015 the Team recommended that Centerra-Nevada should include an analysis column in the RAR table and provide instructions in SP2-016, *Risk Analysis Program*, defining the analysis and rationale information to include in the analysis column.

Centerra-Nevada's response to the 2015 Opportunity for Improvement was "RARs are written specifically to identify and mitigate hazards for those employees performing the task. The

information from the RARs is incorporated into station orders, standard practices (SP), and scopes of work, as necessary. The specific subject matter expert(s) perform the analysis piece in that particular area based on the Occupational Safety and Health Administration regulations. Permissible Exposure Limits, complex calculations, and other detailed analysis may not be fully understood by employees and would not necessarily provide additional benefit to the reader. Existing station orders, SPs, and SOPs incorporate safety mitigation requirements from applicable RARs, which employees performing the work are required to follow.”

The Centerra-Nevada response to the recommendation fails to recognize the future benefit of capturing the detailed hazard analysis associated with controls. The existing system relies on “tribal knowledge” to understand the basis behind control selection and does not provide an effective method to ensure the selected control methods adequately address assumptions associated with controls. For example, during the 2015 assessment, there was significant anger among the PROFORCE regarding station 110 at the entrance to NNSS from Highway 95. After the assessment, Centerra-Nevada instituted several new controls for the post. Centerra-Nevada did not capture the details of the hazard analysis associated with the new controls. Important analytical details might have included: number of vehicles expected to pass the post, both entering and exiting the site; speed of traffic approaching the post from either direction; type or size of vehicles; expected weather conditions; specific regulations or standards that applied; types of barriers available; and the lead time and material costs associated with installing such barriers. These details need not be included in the specific orders, practices, or procedures, but Centerra-Nevada should document and retain those analysis details with the RAR so it can properly evaluate any future recommendations or changes against initial analysis and assumptions.

One possible method to document those details might be the job hazard analysis (JHA) associated with RARs. Several years ago, Centerra-Nevada adopted a JHA form from NSTec. Centerra-Nevada did not adopt the associated procedures with the form and did not develop its own detailed instructions or procedures for using the form. The form uses a three-column format that identifies activity, hazards, and controls. As the Team has observed at every other DOE-VPP participant site that uses the three-column format, the details of the hazard analysis that justify the control selection are not documented and are eventually lost or forgotten. Centerra-Nevada safety professional provided details of how the JHA form is completed, but the process described is not in the procedure. Centerra-Nevada should include details in the RAR procedure that describe how to properly support and complete the JHA form, including the review team size and expertise, capturing analytical details, review and approval signature requirements, and any activities that may require additional hazard review.

Opportunity for Improvement: Centerra-Nevada should revise its RAR process to provide detailed instructions for the JHA form and document analytical details and assumptions that support the selected controls.

Conclusions

Since May 2015, Centerra-Nevada has made significant progress regaining trust of the PROFORCE, engaging employees in the safety program, and removing barriers to communication. Volunteers on the new safety committee are fully engaged and eager to

continue making improvements. IGAN leaders have encouraged their members to raise safety issues and proactively address issues within their ranks that were creating friction. Managers are working with PROFORCE members to identify and correct ambiguity or errors in orders and procedures. Additionally, they are working to avoid “knee-jerk” reactions to errors. Several Centerra-Nevada actions responding to the May 2015 assessment remain open, but other actions have effectively addressed the conditions that lead to the Team’s concerns. The Team recommends that Centerra-Nevada continue in DOE-VPP as a Star participant without condition.

II. INJURY INCIDENCE/LOST WORKDAYS CASE RATE

Injury Incidence/Lost Workdays Case Rate (Centerra-Nevada and staff augments)					
Calendar Year	Hours Worked	Total Recordable Cases (TRC)	TRC Incidence Rate	DART* Cases	DART* Case Rate
2013	610,298	13	4.26	10	3.27
2014	613,007	8	2.61	7	2.28
2015	656,813	7	2.13	5	1.52
3-Year Total	1,880,118	28	2.98	22	2.34
Bureau of Labor Statistics (BLS-2014) average for NAICS** Code #92212 (Local: police protection)			10.6		5.0
Injury Incidence/Lost Workdays Case Rate (Subcontractors)					
Calendar Year	Hours Worked	TRC	TRC Incidence Rate	DART* Cases	DART* Case Rate
2013	71,893	0	0	0	0
2014	68,058	1	2.93	0	0
2015	68,436	0	0	0	0
3-Year Total	208,387	1	0.96	0	0
Bureau of Labor Statistics (BLS-2014) average for NAICS** Code #8112 (Electronic and precision equipment repair and maintenance)			1.4		0.7

* Days Away, Restricted or Transferred

** North American Industry Classification System

3-year TRC Incidence Rate, including subcontractors: 2.78

3-year DART Case Rate, including subcontractors: 2.11

Conclusion

Centerra-Nevada continues to emphasize safe work practices at daily muster and at the annual PFAT. The injury rates decreased 50 percent since 2013, and DART rates are down 50 percent. Since the majority of subcontract work performed by Lockheed Martin is repairing electronic surveillance equipment and some electronic installation, Centerra-Nevada revised the subcontractor BLS comparative industry from police protection to electronic and precision equipment repair and maintenance (NAICS code 8112). The Lockheed Martin project manager confirmed it uses NAICS code 8112 for similar work it performs for other customers. The Team did not find any incentives to discourage the reporting of injuries, illnesses, or safety concerns by

workers. The Centerra-Nevada injury/illness and DART rates meet the expectations for continued participation in DOE-VPP.