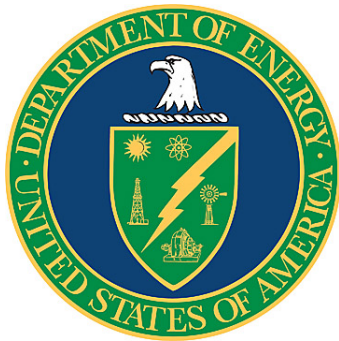




Portsmouth Mission Alliance, LLC Infrastructure Support Services

**Report from the Department of Energy
Voluntary Protection Program
Onsite Review
March 13-22, 2018**



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

Foreword

The Department of Energy (DOE) recognizes that excellence can be encouraged and guided, but not standardized. On January 26, 1994, the Department initiated the DOE Voluntary Protection Program (VPP) to encourage and recognize excellence in occupational safety and health protection. This program closely parallels the Occupational Safety and Health Administration's (OSHA) VPP. Since its creation by OSHA in 1982 and implementation by DOE in 1994, VPP has demonstrated that cooperative action among Government, industry, and labor can achieve excellence in worker safety and health.

DOE-VPP outlines areas where DOE contractors and subcontractors can surpass compliance with DOE Orders and OSHA standards. The program encourages a *stretch for excellence* through systematic approaches, which emphasize creative solutions through cooperative efforts by managers and employees. Requirements for the DOE-VPP participation are based on comprehensive management systems with employees actively involved in assessing, preventing, and controlling potential health and safety hazards at their sites. All contractors in the DOE complex, including production facilities, laboratories, and various subcontractors and support organizations may participate in DOE-VPP.

However, in keeping with OSHA and DOE-VPP philosophy, *participation is strictly voluntary*. Additionally, any participant may withdraw from the program at any time. DOE-VPP consists of three programs with names and functions similar to those in OSHA's VPP: Star, Merit, and Demonstration. The Star program is the core of DOE-VPP. This program is aimed at outstanding protectors of employee safety and health. The Merit program is a steppingstone for participants that have good safety and health programs, but need time and DOE guidance to achieve true Star status. The Demonstration program, expected to be used rarely, allows DOE to recognize achievements in unusual situations about which DOE needs to learn more before determining approval requirements for the Merit or Star program.

By approving an applicant for participation in DOE-VPP, DOE recognizes that the applicant exceeds the basic elements of ongoing, systematic protection of employees at the site. The symbols of this recognition are certificates of approval and the right to use flags showing the program in which the site is participating. The participant may also choose to use the DOE-VPP logo on letterhead or on award items for employee incentive programs.

This report summarizes the results from the evaluation of Portsmouth Mission Alliance, LLC (PMA), conducted March 13-22, 2018, and provides the Associate Under Secretary for Environment, Health, Safety and Security with the necessary information to make the final decision regarding PMA's continued participation as a DOE-VPP Star site.

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ABBREVIATIONS AND ACRONYMS

ABC	Above and Beyond Compliance
AHA	Activity Hazard Analysis
AHJ	Authority Having Jurisdiction
AQL	Acceptable Quality Level
AU	Office of Environment, Health, Safety and Security
BLS	Bureau of Labor Statistics
CAS	Contractor Assurance System
CIH	Certified Industrial Hygienist
CSP	Certified Safety Professional
DART	Days Away, Restricted or Transferred
DOE	Department of Energy
ESH	Environment, Safety, and Health
FBP	Fluor-Babcock & Wilcox Portsmouth LLC
FMCS	Federal Mediation and Conciliation Service
FSS	Facility Support Services
GET	General Employee Training
IH	Industrial Hygiene
IOP	Integrated Oversight Plan
ISS	Infrastructure Support Services
ISMS	Integrated Safety Management System
IT	Information Technology
LEARN	Local Education Administration Requirements Network
MAC	Modular Access Control
NAICS	North American Industry Classification System
NFPA	National Fire Protection Association
OSHA	Occupational Safety and Health Administration
PMA	Portsmouth Mission Alliance, LLC
PPE	Personal Protective Equipment
PORTS	Portsmouth Gaseous Diffusion Plant
PPPO	Portsmouth Paducah Project Office
QASP	Quality Assurance Surveillance Plan
RMDC	Records Management and Document Control
RSI	Restoration Services Inc.
SAA	Satellite Accumulation Area
SME	Subject Matter Expert
SOMC	Southern Ohio Medical Center
STS	Safety-Trained Supervisor
Team	Office of Environment, Health, Safety and Security DOE-VPP Assessment Team
TPMC	Theta Pro2Serve Management Company, LLC
TRC	Total Recordable Case
USW	United Steel Workers
VNS-FS	Veolia Nuclear Solutions – Federal Services
VPP	Voluntary Protection Program
WEMS	Wastren-EnergX Mission Support, LLC
WIN	Worker Involvement Network

EXECUTIVE SUMMARY

The Department of Energy's (DOE) Voluntary Protection Program (VPP) Team (Team) from the Office of Environment, Health, Safety and Security (AU) recommends that Portsmouth Mission Alliance (PMA) LLC, continue participating in DOE-VPP as a Star site. PMA is the Infrastructure Support Services (ISS) contractor for the DOE Portsmouth Paducah Project Office (PPPO) at the formerly operating Portsmouth Gaseous Diffusion Plant (PORTS) in Piketon, Ohio. PMA is a joint venture between North Wind Solutions, LLC, and Swift and Staley, Inc., with subcontractor support from Veolia Nuclear Solutions - Federal Services (VNS-FS). The PMA ISS contract replaced the Wastren-EnergX Mission Support, LLC (WEMS) Facility Support Services (FSS) contract in April 2016.

PMA is continuing a tradition of strong and involved leaders that are committed to mission effectiveness and safety. The managers demonstrate that commitment daily through regular presence in work areas; frequent communication; and ensuring workers have the correct tools, training, procedures, processes, or other resources. PMA listens to workers' concerns, identifies viable solutions using workers' opinions, and follows up on commitments to the workforce.

Employee ownership of the safety program is strongly rooted across the PMA organization while retaining the strong manager/employee relationship. The PMA worker involvement network (WIN) committee is an employee-driven, management-supported safety committee empowered to promote and continuously improve workplace safety with excellent management support. The WIN committee is effective in closing most employee-raised safety concerns, but continues to face challenges closing safety concerns regarding issues shared between Fluor-Babcock & Wilcox Portsmouth LLC (FBP), the deactivation and decommissioning contractor at the site, and PMA. PMA employees had no fear of raising safety concerns or pausing work. In fact, most employees stated their supervisor would never ask them to perform unsafe work.

PMA's work planning process is an efficient method to ensure proper identification and analysis of hazards in the workplace. A mature safety and health program that includes procedures, such as activity hazards analysis and workplace inspections, provides a safe workplace that has resulted in no recordable injuries. PMA should revise its chemical management procedure to establish thresholds, based on the chemical hazard labeling data, and require environment, safety, and health (ESH) review prior to purchase.

PMA uses the hierarchy of controls to protect workers, prevent injuries, and minimize workplace hazards. Because flame- and arc-flash rated protective clothing can degrade with repeated laundering, PMA should work with FBP to remove arc-rated and fire-resistant clothing issued to electricians and welders from service when the number of wash cycles exceeds the manufacturer's recommended limits. Unique hazards from some of the work performed by PMA are adequately mitigated or controlled. Standard personal protective equipment (PPE) from FBP is readily available for the workers and PMA provides specialized equipment when needed. An Occupational Medical Program provides comprehensive services.

The PMA Safety and Health Training Program continues its tradition to include shared training between PMA, FBP, and United Steel Workers (USW). The training program ensures managers, supervisors, and employees know and understand the policies, rules, and procedures established to prevent exposure to hazards. PMA implemented access control at the Modular Access Control (MAC) portals to ensure employees whose training has expired do access the site.

Like its predecessors, PMA has established safety as a prerequisite for any task. The fixed-price contract presents some challenges to PMA's pursuit of safety excellence, but PMA has demonstrated that it will succeed on this contract if it performs the work safely. Most of PMA's work is routine, but workers can be exposed to a variety of hazards, and PMA does not take routine work for granted. Instead, it continuously encourages both workers and managers to be alert to changes. Its success is demonstrated by its low accident and injury rates, the degree of worker involvement, and the enthusiastic support of the USW local.

TABLE 1
OPPORTUNITIES FOR IMPROVEMENT

Opportunity for Improvement	Page
PMA should consider looking for other noncash-based awards, such as challenge coins, that managers could use for immediate recognition.	5
PMA should work with DOE-PPPO to try and identify a more efficient method of monitoring contract performance, reduce the number of scheduled evaluations, and reduce its overhead burden so it can better use its resources to provide services rather than support audits and evaluations.	6
PMA should consider establishing more specific goals related to actions, such as STS certifications, percentage of personnel participating in safety walkdowns, and percentage of personnel participating in the ABC program.	6
PMA should review its chemical management process to establish thresholds based on the chemical hazard labeling data, and require ESH review prior to purchase.	12
PMA should work with FBP to remove arc-rated/ fire-retardant clothing issued to electricians and welders from service when the number of wash cycles exceeds the manufacturer's recommended limits.	14
PMA should revise 2018-0040 Rev 1, <i>Records Management and Document Control</i> , to document the dust and mold hazard, record the analysis, and capture the relevant controls.	15
PMA should consider providing workers in the vault area with a frisker so they can perform a self-check after handling old records.	15

I. INTRODUCTION

PMA is the ISS contractor for DOE PPPO at the formerly operating PORTS plant in Piketon, Ohio. PMA is a joint venture between North Wind Solutions, LLC, and Swift and Staley, Inc., with subcontractor support from VNS-FS. The PMA ISS contract replaced the WEMS FSS contract on April 25, 2016.

Beginning with Theta Pro2Serve Management Company, LLC (TPMC), and continuing through WEMS, the facility or infrastructure support contractor at PORTS has participated in DOE-VPP since 2009. Although the parent company ownership of the contract has changed three times, there have been only minor personnel changes. PMA requested to continue in DOE-VPP as a transition participant and that request had strong support from the USW Local 1-689. AU received PMA's DOE-VPP application in December 2016. After reviewing that application, the Team scheduled an onsite review for March 2018.

PMA currently employs approximately 170 people, with about 70 of those represented by USW. The personnel are a mix of skilled crafts, information technology (IT), safety, administrative, and management personnel. Many of the skilled crafts and administrative personnel have worked at PORTS for many years and have a wealth of experience and knowledge about the plant and its history. Four primary locations onsite house the majority of PMA personnel. Administrative, security, and IT functions are in the X-1000 building at the south end of the site. Craft and maintenance personnel are in the X-700 building and the X-751 building. Records management, and shipping and receiving personnel are in the X-720 warehouse.

The scope of work is essentially the same between the ISS and FSS contracts; however, the PMA contract is firm-fixed price, whereas the WEMS contract was cost plus-award fee. Key elements of the scope of work include: Environmental, Safety, Health, and Quality Program; Engineering; Project Management; Property Management; Safeguards and Security; Computing, Telecommunications, and Cyber Security; Operations and Management of Assets (e.g., Maintenance Management); Facility Services (e.g., Grounds Maintenance); Records Management and Document Control; Mail, Shipping, and Receiving Services; Environmental Information Center Operations; and Training Services. Work performed under this contract is low risk.

II. INJURY INCIDENCE/LOST WORKDAYS CASE RATE

Injury Incidence/Lost Workdays Case Rate (PMA Portsmouth)					
Calendar Year	Hours Worked	Total Recordable Cases (TRC)	TRC Incidence Rate per 200,000 hours	DART* Cases	DART* Case Rate per 200,000 hours
2015 (WEMS)	285,258	1	0.7	0	0
2016	248,924	0	0	0	0
2017	209,225	0	0	0	0
3-Year Total	743,407	1	0.27	0	0
Bureau of Labor Statistics (BLS-2016) average for NAICS** 5612 (Facility Support Services)			3.2		1.8
Injury Incidence/Lost Workdays Case Rate (PMA Portsmouth Subcontractors)					
Calendar Year	Hours Worked	TRC	TRC Incidence Rate per 200,000 hours	DART* Cases	DART* Case Rate per 200,000 hours
2015	11,955	0	0	0	0
2016	67,447	0	0	0	0
2017	92,780	0	0	0	0
3-Year Total	172,182	0	0	0	0
Bureau of Labor Statistics (BLS-2016) average for NAICS** 5612 (Facility Support Services)			3.2		1.8

* Days Away, Restricted or Transferred

** North American Industry Classification System

TRC Incidence Rate (PMA and subcontractors): 0.22

DART Case Rate (PMA and subcontractors): 0.0

Discussion

The ISS contractor has experienced only one recordable injury in the previous 3 years and none since PMA took over operations. The TRC rate of 0.27 and 0 DART rate is similar to the rates presented in the 2013 VPP report. The injury and illness log, first-aid cases, recordkeeping policies and procedures were consistent with the Occupational Safety and Health Administration (OSHA) or DOE recordkeeping requirements. The PMA injury and illness record-keeper indicated that PMA managers supported the recordkeeping decisions made for the few cases experienced and did not attempt to influence those decisions. All workers interviewed felt

comfortable reporting injuries and illnesses, and the Team did not identify any incentives tied to injury or illness rates that would suppress or discourage reporting. PMA's injury incidence rates remain significantly below its comparison industry average and meet expectations for DOE-VPP participation.

III. MANAGEMENT LEADERSHIP

Management leadership is a key element of obtaining and sustaining an effective safety culture. The contractor must demonstrate senior-level management commitment to exceeding occupational safety and health requirements and meeting the expectations of DOE-VPP. Management systems for comprehensive planning must address health and safety requirements and initiatives. Elements of the management system include: (1) clearly communicated policies and goals; (2) clearly defined and assigned responsibilities and authority; (3) adequate resources; (4) accountability for both managers and workers; and (5) managers must be visible, accessible, and credible to employees. Authority and responsibility for employee health and safety must be integrated with the management system and must involve employees at all levels.

The ISS contractor at PORTS has participated in DOE-VPP since 2009, first under TPMC and then WEMS. In 2013, WEMS had successfully transitioned the safety and health program from its predecessor and continued to build on a solid foundation of management leadership and commitment. It managed resources to achieve contract objectives and ensure a safe and healthy workplace. Managers recognized and valued employee participation in all aspects of the safety and health program. Managers were visible, accessible, and credible to workers.

PMA won the contract in 2016. Through each of these transitions, there has been very little change in management personnel, organizational structure, written programs, or the relationship with the USW Local 1-689. Consequently, the change from WEMS to PMA has been relatively seamless, although there have been some fundamental contractual changes that had the potential to affect the safety culture of the workforce. The most significant change has been the change from a cost-reimbursement contract to a fixed-price contract. One challenge has been a contractual requirement to obtain all PPE, industrial hygiene (IH) equipment and services, and radiological control support from FBP (see Hazard Prevention and Control).

PMA also faces challenges providing adequate work areas for PMA personnel. FBP is reclaiming some space currently occupied by PMA, and PMA is uncertain where it will house the displaced workers, equipment, and stored material. PMA is working to ensure that the final work locations will have proper lighting, environmental controls, and sufficient space. In some cases, this may require additional investments by DOE in temporary structures, such as trailers or converted warehouses.

PMA has made its scheduling function more accurate. The work control manager expects supervisors to adhere to scheduled work, with exceptions limited to safety. The new work control manager has also implemented a “rainy day” contingency schedule that maintains work packages for alternative activities when weather makes work outside unsafe or impractical.

PMA supports the reward and recognition processes started by its predecessors. The *Above and Beyond Compliance* (ABC) program continues to reward workers with “Safety Bucks” that they can collect and redeem for various awards. Most workers redeem their safety bucks for gift cards. Statistics for the ABC program showed that over the 6 months preceding this assessment, approximately 40 percent of the workforce received safety bucks. As a means of supplementing the ABC program, PMA may want to consider other types of recognition that managers can provide directly to employees. Many employees knew that the project manager often tours work areas and carries with him a variety of gift cards that he will hand out immediately for recognition of worker performance. Lower and middle managers do not have similar recognition

tools. PMA should consider looking for other noncash-based awards, such as challenge coins, that managers could use for immediate recognition.

Opportunity for Improvement: PMA should consider looking for other noncash-based awards, such as challenge coins, that managers could use for immediate recognition.

During the assessment, PMA was involved in negotiations with the USW Local. The current contract expired 2 years ago, and PMA is trying to finalize negotiations. In preparation for implementing the new contract, PMA trained supervisors and managers on how to manage the bargaining unit agreement using the Federal Mediation and Conciliation Service (FMCS). FMCS is a Federal Agency established in 1947 to provide mediation services to industry, community, and government agencies worldwide. FMCS helps mediate labor disputes around the country. FMCS provides mediation training free of charge to help companies properly manage workers within the confines of their contracts and help supervisors avoid common labor management errors.

PMA is carefully managing its workforce size and ensuring it has the correct skills available to accomplish its work. It is using part-time and subcontractor employees to supplement knowledge and skills that it cannot afford to retain full time. For example, PMA performs electrical work a few times each month, typically on systems using 480 volts or lower. Planning this work requires some specialized knowledge and interpretation of electrical codes and standards, normally provided by an electrical Authority Having Jurisdiction (AHJ). PMA does not need such a person on a full-time basis, so PMA uses a contractor that is available one day per week to review electrical work packages and help address electrical issues.

PMA managers have provided resources that support safety excellence beyond compliance. For example, PMA recognizes the benefits of professional certifications and encourages its workers to pursue professional certifications that provide them with better career opportunities. Certifications encouraged by PMA include Certified Industrial Hygienist (CIH), Certified Safety Professional (CSP), Safety-Trained Supervisors (STS), Certified Work Planners, and others. In a unique approach to promote healthier eating habits, PMA provides a variety of healthy snack options in the workplace. Choices include fresh fruit and nuts to give employees healthier options for snacks, which PMA provides at no cost.

PMA meets weekly with PPPO to discuss status of issues, concerns, deliverable actions, and agree on paths forward. There is a specific section of the meeting focused on concerns from the PMA WIN committee. Issues identified and discussed during the weekly meeting include the dates the WIN committee initiated the concern, the responsible contractor, the status of the concern, and the PMA advocate for the concern. The weekly meeting during this assessment included discussion of 11 issues from the WIN committee.

One challenging aspect of the PMA contract has been DOE's means of monitoring PMA's performance. The contract is a fixed-price contract with specific performance targets. As a fixed-price contract, DOE is primarily concerned with verifying that PMA provides all the contracted services. Contract performance requirements are contained in the Quality Assurance Surveillance Plans (QASP). Each performance target has acceptable quality levels (AQL), and failures to meet those AQLs result in a "deduction" from the contract. Conceptually, this is a good construct, but the QASPs are, in some cases, written at a very low level (and perhaps too specific) without consideration for the total level of effort required to report performance when

DOE awarded the contract. These performance expectations may present additional challenges to managers and may degrade morale if workers and managers feel disempowered to manage their work. This approach results in a large number of assessments, placing additional overhead burden on PMA. For example, in January 2018 there were 43 separate evaluations scheduled for Restoration Services Inc. (RSI) (a DOE-PPPO support contractor) evaluators, along with DOE personnel to evaluate different areas of the QASP. RSI only performed 10 of the scheduled evaluations, but identified 3 deficiencies with a proposed \$500 withholding. Deficiencies included more than two customer complaints related to IT services and a walking path that had ice after a storm. Managing a small contract at this level of detail by DOE and its support contractor places a very heavy burden on PMA. PMA should work with DOE-PPPO to try and identify a more efficient method of monitoring contract performance, reduce the number of scheduled evaluations, and reduce its overhead burden so it can better use its resources to provide services rather than support audits and evaluations.

Opportunity for Improvement: PMA should work with DOE-PPPO to try and identify a more efficient method of monitoring contract performance, reduce the number of scheduled evaluations, and reduce its overhead burden so it can better use its resources to provide services rather than support audits and evaluations.

A significant portion of the contract fee is associated with IT services (over \$11 million). This area also has many potential deductions associated with customer complaints or system outages. Personnel in the IT department may, in some cases, be “afraid to make a mistake” because of the potential deductions from fee. This condition may discourage workers from reporting errors, which could lead to greater consequences. PMA should ensure it shields workers from pressures related to errors and assure workers that honest errors can be safely reported and will not lead to discipline or other negative consequences as long as the error is reported quickly.

The annual report for 2017 primarily discusses accomplishments in 2017, but does not reflect challenging programmatic goals regarding its safety program. Identified goals in the report are just restatements of some of the AQLs in the QASP. To help drive additional safety excellence, PMA should consider establishing more specific goals related to actions. Goals that PMA could consider include STS certifications, percentage of personnel participating in safety walkdowns, and percentage of personnel participating in the ABC program.

Opportunity for Improvement: PMA should consider establishing more specific goals related to actions, such as STS certifications, percentage of personnel participating in safety walkdowns, and percentage of personnel participating in the ABC program.

Conclusion

PMA is continuing a tradition of strong and involved leaders that are committed to mission effectiveness and safety. They demonstrate that commitment daily through regular presence in work areas, frequent communications, ensuring workers have the correct tools, training, procedures, processes, or other resources. PMA listens to workers’ concerns, identifies viable solutions using workers’ opinions, and follows up on commitments to the workforce. Despite some challenges resulting from the contract structure, PMA continues to demonstrate the expectations for continued participation in DOE-VPP.

IV. EMPLOYEE INVOLVEMENT

Employees at all levels must continue to be involved in structuring and operating the safety and health program and in decision-making that affects employee health and safety. Employee involvement is a major pillar of a strong safety culture. Employee participation is in addition to the right to notify managers of hazardous conditions and practices. Managers and employees must work together to establish an environment of trust where employees understand that their participation adds value, is crucial, and is welcome. Managers must be proactive in recognizing and rewarding workers for their participation and contributions. Employees and managers must communicate and collaborate in open forums to discuss continuing improvements, to recognize and resolve issues, and to learn from their experiences.

In 2013, WEMS employees were actively engaged in taking charge of their own safety and seeking improvements. WEMS employees were involved, motivated, and displayed a sense of ownership for their safety, as well as the safety of their coworkers. Employees expressed interest and support for VPP and were well-versed in its attributes and tenets. Employees participated in many activities and assisted the VPP Steering Committee with safety events.

The WEMS to PMA contract transition did not result in significant manager and employee turnover, retaining the strong manager/employee relationship. The successes identified in the 2013 review have continued to strengthen and improve. Managers and employees' still work together to keep lines of communication open and identify potentially hazardous conditions. Employees are involved, motivated, and display a sense of ownership for their safety, as well as the safety of their coworkers.

PMA uses the VPP Steering Committee and the WIN committee to implement its employee involvement commitment. The VPP Steering Committee Charter, *PMA EQ SH CHA 1751*, defines the VPP Committee's role as advocating a safety culture focused on exceeding basic compliance with safety and health laws and DOE Orders. The charter empowers the committee to promote and continuously improve workplace safety by establishing a forum to exchange information concerning issues pertaining to worker safety and health and program sustainability. The committee also coordinates and conducts educational sessions, promotional events, and ensures implementation of the five tenets of DOE-VPP. The VPP Steering Committee members include managers, staff personnel, and hourly workers. With the exception of the chair and cochair, membership is voluntary.

The PMA WIN Committee Charter, *PMA EQ SH CHA 1750*, defines the WIN committee as an employee-driven, management-supported safety committee empowered to promote and continuously improve workplace safety. The WIN committee promotes the Integrated Safety Management System (ISMS), employee safety interests, and safety inspection participation. It serves as the vehicle to elevate safety concerns and as the point of contact for employees to raise concerns; supports committee initiatives, such as safety fairs; investigates minor accidents and incidents under the guidance of a safety professional; and provides feedback for continuous improvement.

The WIN committee charter documents the responsibilities of the project manager, line manager, committee chairperson, cochair, committee members, and secretary. As a result of the 2013 review, the chairman of the WIN committee is no longer a member of the management team, but a member of the bargaining unit who is appointed by the project manager. The project manager

provides management leadership to the WIN Committee through a supporting role. The charter also documents the committee protocol for approval of the charter, amendments, meeting minutes, and subcommittee actions. It also establishes monthly meetings.

The Team attended a WIN committee meeting during this assessment. The current chair of the committee has over 40 years' experience at the site and has a personal relationship with most of the Portsmouth workforce. The project manager, safety manager, and senior safety engineer attended, along with representatives from various elements of the PMA workforce.

All WIN committee participants had sufficient representation of their individual groups and impressive interaction and participation. The company's functional elements were well represented. The project manager's input provided essential details about issues the committee was trying to resolve (particularly related to FBP shared issues/concerns). The project manager's interaction with the committee helped managers and employees resolve ongoing safety concerns.

The WIN committee meeting discussed several employee-raised safety concerns and their status. The WIN committee is a forum for raising and discussing issues. Although the committee closed most issues, WIN continues to face challenges closing safety concerns regarding issues shared between FBP and PMA. The project manager has assisted with the closure of shared issues by working with FBP managers and DOE to identify necessary funding. WIN committee members demonstrated a sincere commitment to safety and volunteered to take responsibility for championing newly identified safety issues.

A recent issue demonstrated the value of the WIN committee. A committee member shared their experience during a Tree Trimming and Chain Saw safety class. The training class identified potential safety concerns related to the use of chaps during chainsaw operations, particularly in relation to loading tree cuttings into chippers. Workers often use chaps to protect them from chain saw hazards, but the chaps present additional hazards due to snagging when loading chippers. The training identified PPE that is more form fitting and provides the same protection as the chaps, but reduces the snagging hazard. The project manager supported submitting the PPE request to FBP, but also committed that PMA would procure the PPE if FBP could not. The safety and health subject matter expert (SME) also committed to update the activity hazard analysis (AHA) for chipper operations to include the potential for "snagging" and identify controls. The actions by the project manager and the safety and health SME exceeded current requirements and addressed the newly recognized hazard.

Workers continue to participate in the development of AHAs and prejob walkdowns. PMA conducts a monthly facility inspection using hourly and non-bargaining unit workers. The Team observed the facility inspection of the X-700 Building during this assessment. The inspection included workers from multiple groups (IT, administrative, safety, RSI, crafts, etc.) working together using a questioning attitude to identify safety concerns. All participants provided input during the walkdown. Many workers raised questions about potential concerns and discussed their concerns with other participants before documenting those concerns on their inspection sheet. The safety representative collected the information, screened it and entered it into the hazard tracking system pending corrective measures.

Interviewed workers were comfortable discussing activities with the Team and no employees indicated any concerns about stopping work or raising questions prior to performing work activities. Interviews with the Services Group (laborers) demonstrated excellent support from their supervisors and coworkers. Workers cited several examples of stopping or pausing work

with the full support of their managers. The workers were adamant that in no circumstance would their supervisors ask them to perform unsafe work.

PMA issues the monthly “Pulse” newsletter to all employees. The newsletter includes messages from senior managers to the workforce and often includes articles submitted by employees. The newsletter also includes sections related to “spotlight on security,” education incentive opportunity reminders, welcome message to new hires, safety promotion events, wellness corner initiatives, and discussions of other ongoing safety initiatives related to the VPP or WIN committee initiatives. The Pulse newsletter reinforces PMA’s commitment to maintain and reinforce communications between the senior managers, the safety committees, and the workforce.

PMA uses the “ABC” recognition program as the employee recognition program. ABC awards “safety bucks” to employees that actively engage in safety activities onsite or for participating in safety training or conference activities. The safety bucks recognize employees for safety activities performed above and beyond their normal duties and expectations. For example, community involvement or participating in a safety course earns 50 safety bucks; presenting a safety topic at an All Hands Meeting earns 25 safety bucks; and submitting a safety-related photo earns 10 safety bucks. PMA provides a catalog of items that the employees can purchase with their safety bucks. The items in the catalog include jackets, gift cards, flashlights, and first-aid kits. Several employees interviewed by the Team had earned several hundred “Safety Bucks” and had specific goals for items they wished to purchase that would improve safety either at home or in their workspace.

Conclusion

Employee ownership is strongly rooted across the PMA organization while retaining the strong manager/employee relationship. The PMA WIN committee is an employee-driven, management-supported safety committee empowered to promote and continuously improve workplace safety with excellent management support. The WIN committee is effective in closing most employee raised safety concerns, but continues to face challenges closing safety concerns regarding issues shared between FBP and PMA. PMA employees had no fear of raising safety concerns or pausing work. In fact, most employees stated their supervisor would never ask them to perform unsafe work. PMA meets the Employee Involvement expectations for continued participation in DOE-VPP.

V. WORKSITE ANALYSIS

Management of health and safety programs must begin with a thorough understanding of hazards that might be encountered during the course of work and the ability to recognize and control any new hazards. Implementation of the first two core functions of an ISMS, defining the scope of work and identifying and analyzing hazards, form the basis for a systematic approach to identifying and analyzing all hazards encountered during the course of work. The results of the analysis must be used in subsequent work planning efforts. Strong safety programs also integrate feedback from workers regarding additional hazards that are encountered and include a system to ensure that new or newly recognized hazards are properly addressed. Successful worksite analysis also involves implementing preventive and/or mitigating measures during work planning to anticipate and minimize the impact of hazards.

In 2013, the previous contractor demonstrated an effective process to ensure proper identification and analysis of hazards in the workplace. The development of the new hazard mapping process could provide significant improvement to the worksite analysis process if WEMS was successful in integrating all identified hazards into the system. WEMS still had not developed a process to document its hazard analysis. With this one exception, the WEMS baseline process was well maintained and effective.

PMA's work planning and control is essentially unchanged from the previous contractor's process. Work is initiated, planned, coordinated and performed using PMA PI WC PRO 3703, *Project Management*, and PMA's procedure PMA PI WC PRO 3700, *Integrated Work Control*. These procedures incorporate PMA's integrated safety management program, documented in PMA/PORTS-0055/R2, *Integrated Safety Management System Plan (Including Environmental Management Systems and Worker Safety and Health Program) for Infrastructure Support Services Contract at the Formerly Operating Portsmouth Gaseous Diffusion Plant – Piketon Ohio*. Work planners use a risk-based graded approach, based on the complexity of the work and the potential hazards involved. PMA EQ QM PRO 1215, *Graded Approach Application*, documents that approach.

PMA requires a hazard review for all work to be performed, except for routine, low-hazard administrative work or repetitive work. Routine, low-hazard administrative work and repetitive tasks, such as snow removal and custodial work, are analyzed in AHA 2018-0018, *General Hazard Controls*. The hazard review process, documented in PMA EQ SH PRO 1506, *Hazard Review*, provides detailed hazard identification and analysis guidance to work planners. Walkdown teams use checklist form PMA EQ SH FOR 1621, *Pre-Task Hazard Review*, and PMA PI WC FOR 3736, *Walkdown Sheet*, to identify and document hazards. These forms aid in the identification of hazards and earmark those hazards that are considered moderate or high risk, requiring additional action. Work identified as moderate or high hazard risk is further analyzed using form PMA EQ SH FOR 1622, *Activity Hazard Analysis*. PMA ESH and line managers review and approve the resulting analysis and prescribed controls for identified hazards for incorporation/integration into the work planning package. Overall, the process demonstrated a beneficial hazard identification and analysis approach.

The Team reviewed a select sample of work packages and AHAs. Most AHAs contained appropriate identification and analysis of hazards associated with the task. One AHA, AHA 2018-0083, *Working on Live and De-Energized Electrical Systems*, addresses one of the greater hazards to workers. The scope of this AHA included work over 50 volts in facilities listed, as

well as “other PMA contracted facilities.” PMA’s electrical work is normally limited to 480 volts because this is the highest voltage available in facilities under PMA’s purview. AHA 2018-0083 analyzes work on equipment or systems up to 600 volts, consistent with normal industry practice for low-voltage electrical work, but only after consultation with the PMA electrical AHJ to determine the PPE requirements. The AHA identifies and prescribes PPE for electrical work based on incident energies for locations typically worked on by PMA electricians. A table in the AHA delineates the National Fire Protection Association (NFPA) 70E, *Standard for Electrical Safety in the Workplace*®, required category of arc-flash PPE by facility, voltage level, and fault current for both alternating current and direct current. The AHA refers the worker to Table 130.7C (16) of NFPA 70E, 2015 edition. Although the AHA identifies the category of arc-flash PPE expected to be worn (Categories 0 through 3), it does not provide specific, detailed information about what NFPA 70E requires for each category, rather it leaves it to the individual worker to know the category ensemble requirements or seek out the NFPA 70E reference. PMA’s work planning supervisor agreed that including the NFPA 70E PPE requirements for each category would improve the AHA and revised the AHA.

PMA conducts regular workplace inspections. Inspection teams include a safety representative, bargaining unit personnel, SMEs, line managers, and a DOE representative. The workplace safety inspection program is included as part of PMA’s annual *Integrated Oversight Plan* (IOP) (PMA-PORTS-18-6265/R0 for FY 2018). The DOE-approved IOP combines the requirements of PMA (EQ QM PLA) PORTS 16 6077, *Quality Assurance Program Plan* and *Quality Implementation Plan* (QAP/QIP), PMA (EQ SH PLA) PORTS 0055, *Integrated Safety Management System Plan*, and PMA (EQ QM PLA) PORTS 17 6106, *Contractor Assurance System* (CAS), into an annual document that includes an activities matrix of assessments by functional area. These documents are in alignment with the DOE-VPP tenets. The integration of these documents and the VPP tenets is accomplished through the CAS. The purpose of the IOP is to provide reasonable assurance that the CAS is effectively implemented and that PMA and its subcontractors perform work in a safe and compliant manner. Deficiencies identified during workplace inspections are classified as serious or other than serious. The serious issues are entered into the Commitment Tracking System and may require a nonconformance report, depending on the severity of the issue. Minor deficiencies are entered into the WIN tracker and assigned an advocate. The advocate then monitors that issue and provides closure details to the WIN committee. All major facilities receive a comprehensive inspection at least three times a year. Anyone can volunteer to participate in these inspections and it is beneficial to have “fresh eyes” for walkdowns so that overlooked hazards can be identified. The Team observed a workplace inspection in building 700 and was impressed that, in some cases, personnel normally assigned to administrative duties identified potential issues by recognizing that something “did not look right” and asked questions. They discussed the potential issues with other team members to better understand the condition.

PMA provides a monthly report to DOE as a CAS deliverable. The report provides tracking information for ISMS goals that includes general health and safety goals, as well as programmatic goals. Incident tracking and trending information is also included. Some of the health and safety goals tracked are rates for TRC, DART, and Near-Misses. Other programmatic goals include Safety Bucks awarded, management walkdowns conducted, and safety communications circulated.

PMA’s chemical management program is documented in PMA EQ SH PRO 1517, *Hazard Communication*, and has a stated purpose of ensuring that the potential hazards of all chemicals

used in PMA facilities are communicated to the workers. PMA performs regular chemical inventories that confirm proper chemical storage, labeling, and disposal. The chemical management program requires an IH evaluation for new chemical purchases. PMA, by contract, relies on FBP for IH services and equipment. The PMA safety manager is a CIH, but the procedure does not clearly identify that PMA can perform this IH review. If the safety manager determines that use of the chemical requires additional monitoring, PMA must request that monitoring from FBP. PMA should review its chemical management process, revise its procedure to establish thresholds based on the chemical hazard labeling data, and require ESH review new chemicals prior to purchase.

Opportunity for Improvement: PMA should review its chemical management process to establish thresholds based on the chemical hazard labeling data and require ESH review prior to purchase.

PMA continues to use the hazard mapping process as a method to inform workers of hazards in their work areas. The Safety Hazard Mapping System, developed by USW provides a customized visual reference for work areas that identifies the potential for injuries or near-misses. This hazard mapping tool is used to redirect workers' focus towards the identification of workplace hazards and raising safety awareness. Using the maps allows workers, supervisors, and managers to consider strategies to mitigate or eliminate identified or potential hazards. The maps are also useful in briefing visitors and serve as a safety briefing aid.

PMA uses a formal process to investigate incidents and accidents. PMA evaluates emerging events using PMA EQ QM PRO 1218, *Event Investigations and Critiques*. The procedure provides guidance on what level of investigation is appropriate for an adverse event, as well as guidance on how to conduct an investigation. Appendices to the procedure describe detailed steps to preserve accident scenes, conduct critiques, and categorize events for Occurrence Reporting. Injuries and illnesses are evaluated and processed for OSHA recordkeeping using PMA EQ SH PRO 1520, *Accident/Incident Reporting and Record Keeping*.

Conclusion

PMA's work planning process demonstrates an effective method to ensure proper identification and analysis of hazards in the workplace. A mature, written safety and health program that includes procedures, such as AHAs and workplace inspections, provides a safe workplace that has resulted in no recordable injuries. PMA should review its chemical management procedure to establish thresholds based on the chemical hazard labeling data and require ESH review prior to purchase. PMA satisfies the necessary elements for Worksite Analysis for continued participation in DOE-VPP.

VI. HAZARD PREVENTION AND CONTROL

The third and fourth core functions of an ISMS, identify and implement controls and perform work in accordance with controls, ensure that once hazards have been identified and analyzed, they are eliminated (by substitution or changing work methods) or controlled using engineered controls, administrative controls, or PPE. Equipment maintenance processes must ensure compliance with requirements and emergency preparedness. Safety rules and work procedures must be developed, communicated, and understood by supervisors and employees. These rules and procedures must also be followed by everyone in the workplace to prevent, reduce the frequency of, and reduce the severity of mishaps.

In 2013, the previous contractor demonstrated a good hierarchy of controls, including several good examples of engineered controls. The innovative approach using the global positioning system to identify known hazards during mowing operations and the detailed machine shop postings represented excellent examples of good hazard controls. PPE was readily available to the workers, and the Occupational Medical Program provided comprehensive services.

PMA has successfully implemented the use of the hierarchy of controls. The work planning procedure specifically requires the use of the hierarchy of controls, and workers are actively using that approach. PMA provided multiple examples of controls, and the Team identified others during workplace walkdowns. For example, workers recognized the ergonomic and physical hazards related to moving equipment, such as copy machines and file cabinets, in and out of office trailers. In many cases, access to office trailers was up a set of stairs with a 90-degree turn to enter the space. PMA identified manual lifting and carrying the heavy equipment as an unnecessary risk. Using a telescoping forklift with an attached platform, workers were able to securely move heavy equipment into trailers, minimizing manual handling and reducing the risk of injury to workers.

Workers identified another situation where safety could be improved. The situation involved repeatedly unbolting a 55-gallon lid-attaching-ring on a drum used as Satellite Accumulation Area (SAA) containers. Workers had to remove a drum lid every time an aerosol can needed to be placed in an SAA drum. PMA workers modified a drum lid by attaching a small, lockable access hatch that eliminated the need to unbolt the lid-retaining ring. Still another worker identified a concern involving the difficulty of avoiding obstructions obscured by tall grass and weeds during cutting and mowing operations. Workers suggested, and supervisors procured, 10-foot markers that equipment operators could see from their cabs to mark obstacles, reducing the number of incidents where cutting equipment struck obstacles. Other examples included an electrician that identified a lighter, light fixture that one employee could lift where previously two workers were required, and a groundskeeper that identified an attachment to existing equipment for spreading ice melt that eliminated slipping hazards from walking behind manual spreaders.

In addition to PMA workers using their talents to implement the hierarchy of controls, PMA provided examples where workers used a questioning attitude to identify and eliminate hazards. In one instance, two workers noticed that the anchor point for their fall protection on a manlift was close to the emergency stop button. The arrangement concerned the workers because they thought their fall protection lanyard could impede access to the stop button. Immediate actions taken included temporarily removing the equipment from service and contacting the equipment manufacturer. The Safety Department discovered that the manufacturer had recognized this

issue years before but had not changed its user's manual. PMA modified the training for the manlift to instruct workers to discontinue the use of that anchor point, and the anchor point was tagged with a "Do Not Use Tag." Also, during a quality assurance inspection of ratcheting tie-down straps, workers identified that the mechanism contained suspect/counterfeit bolts. After removing the straps from service, PMA produced a DOE complex-wide Operational Experiences Lessons Learned. In another example, an electrician identified a defective lead on his voltage tester when inspecting the tester prior to use. The tester was removed from service.

PMA uses hazard elimination as its primary method to protect workers from hazards; however, some work requires the use of PPE. By contract, FBP procures, stocks, and maintains PPE for the site/plant. When performing electrical or hot work, PMA electricians and welders are required to wear a category of arc-rated/fire-retardant clothing based on the type of work being performed and the potential incident energy associated with the equipment. Because arc-rated/fire-retardant clothing protection can degrade when laundered, manufacturers establish the maximum number of times PPE clothing can be washed. PMA electricians, welders, and safety and health staff did not know how FBP managed arc-rated/fire-retardant PPE to ensure that the number of wash cycles has not been exceeded. Since PMA electricians can perform work that requires NFPA 70E Category 2 PPE, it is important that their arc-rated clothing perform as designed to protect the worker in the event of an arc flash. PMA should work with FBP to remove arc-rated/ fire-retardant clothing issued to electrician and welders from service when the number of wash cycles exceeds the manufacturer's recommended limits.

Opportunity for Improvement: PMA should work with FBP to remove arc-rated/ fire-retardant clothing issued to electricians and welders from service when the number of wash cycles exceeds the manufacturer's recommended limits.

The Team confirmed that certified professionals are available and are used in a manner and frequency consistent with the size of the contractor operations and the risks of the work. The structure of the contract makes PMA dependent on FBP for some services, which presents some challenges to PMA. Even though the PMA Safety and Health manager has dual certifications as a CSP and a CIH, PMA's contract requires that IH services be obtained from FBP.

PMA cannot directly fill worker requests for specialized equipment or PPE that will improve safety and work productivity. Instead, PMA must request that equipment through FBP. FBP may not have the resources to fulfill that request. In some cases, PMA has purchased specialized equipment or PPE out of its own corporate funds.

Similarly, PMA must rely on FBP for radiological control services. PMA has some contaminated or potentially contaminated records maintained in the contaminated storage area inside a vault and controlled by the Radiological Control group. Records are surveyed by radiological control technicians if the history of use is unknown or personnel have any potential contamination concerns before records management and document control (RMDC) personnel handle the records. Contaminated records are controlled as required in the contaminated vault by the FBP Radiological Control department and destroyed by offsite incineration once clean copies are available.

Workers wear rubber gloves when handling records dated prior to 1998, or when those records have dust or mold evident; however, this hazard and its control is not included in the AHA for

RMDC. Workers remove and dispose of the gloves in a segregated container at FBP's request. FBP is responsible for all waste handling and disposal from the site. Because there are different rubber gloves used on site, FBP evaluates and determines the proper disposal path for those gloves. RMDC handles records without gloves if the history of use is known and there is no potential for contamination concerns.

Workers in the vault do not perform any self-frisking after removing the rubber gloves because PMA and FBP believe the surveys performed on records make the risk of contamination negligible. PMA should revise 2018-0040 Rev 1, *Records Management and Document Control*, to document the dust and mold hazard, record the analysis, and capture the relevant controls. As an extra precaution, PMA should consider providing workers in the vault area with a frisker so they can perform a self-check after handling old records.

Opportunity for Improvement: PMA should revise 2018-0040 Rev 1, *Records Management and Document Control*, to document the dust and mold hazard, record the analysis, and capture the relevant controls.

Opportunity for Improvement: PMA should consider providing workers in the vault area with a frisker so they can perform a self-check after handling old records.

FBP maintains the emergency preparedness program for the site. PMA performs various emergency management actions within its contract requirements and assists the FBP site lead for Emergency Management in the implementation of programmatic requirements. PMA chose to follow the FBP Emergency Plan Implementing Procedures to meet programmatic requirements. PMA EQ EM PRO 1100, *Emergency Management Program Description*, documents PMA's emergency preparedness program. It provides roles and responsibilities and details the expected interface with FBP's program.

PMA EQ SH POL 1722, *Occupational Medicine Program*, documents the PMA occupational medicine program and indicates that services provided through the program include emergency care, medical evaluations, wellness programs, and health education. Like the previous site services contractor, PMA contracts with the Southern Ohio Medical Center (SOMC) to be its occupational medical provider. FBP's fire department responds to onsite emergency situations involving serious injury to PMA employees and provides transport to SOMC emergency room. Interviews with PMA safety and health staff confirmed that occupational medicine personnel periodically visit PMA worksites to be familiar with workplace hazards and the industrial environment.

As previously stated in the 2013 VPP report, PMA continues to use a commercially available software system called SOMAX[®] to track, schedule, and control corrective and preventative maintenance activities. The software streamlines worker scheduling and optimizes costs and safety by appropriately staffing work to ensure timely maintenance.

PMA's site services contract involves some unusual work activities. These activities involve unique hazards, which PMA has recognized, analyzed, and developed hazard specific controls to protect workers. Three such work procedures reviewed by the Team included AHAs for: (1) Trapping Beavers and Groundhogs; (2) Remove Deer from Razor Wire; and (3) Debris Removal

from Beaver Dams. The AHAs analyzed the hazards and prescribed PPE that will protect workers.

Employees interviewed indicated that they were familiar with PMA's positive reinforcement program where workers are rewarded with Safety Bucks for going above and beyond expectations for safety. Employees also indicated that they believed PMA's discipline process, documented in PMA PI HR POL 3360, *Progressive Discipline*, is fair and consistent.

Conclusion

PMA uses the hierarchy of controls to protect workers, prevent injuries, and minimize workplace hazards. Because fire-retardant and arc flash-rated protective clothing can degrade with repeated laundering, PMA should work with FBP to remove arc-rated/ fire-retardant clothing issued to electricians and welders from service when the number of wash cycles exceeds the manufacturer's recommended limits. Unique hazards from some of the work performed by PMA are adequately mitigated or controlled. Standard PPE from FBP is readily available to the workers and PMA provides specialized equipment when needed. An Occupational Medical Program provides comprehensive services. PMA continues to pursue additional improvements and meets the Hazard Prevention and Control expectations for continued participation in DOE-VPP.

VII. SAFETY AND HEALTH TRAINING

Managers, supervisors, and employees must know and understand the policies, rules, and procedures that prevent or reduce exposure to hazards. Training for health and safety must ensure that responsibilities are understood, personnel recognize hazards they may encounter, and employees are capable of acting in accordance with managers' expectations and approved procedures.

In 2013, the previous contractors had a good training program. The program ensured managers, supervisors, and employees knew and understood the policies, rules, and procedures established to prevent exposure to hazards. Training for health and safety ensured that employees understood their responsibilities, recognized hazards they may encounter, and were capable of acting in accordance with managers' expectations and approved procedures.

PMA EQ TR PRO 1801, *Conduct of Training*, establishes the requirements for the consistent implementation of training, exceptions, equivalencies, and remediation for personnel in accordance with a systematic approach to training. The procedure establishes and provides direction to ensure consistent and effective training. The Team interviews demonstrated that PMA maintains its experienced and motivated staff that implement the program using a dedicated training room, classroom training courses, and computer-based training.

PMA continues the training agreements (previously shared by WEMS) with FBP and USW. Under those agreements, each organization provides specific training, and each group accepts the training from the other groups. For example, PMA provides the general employee training (GET) for all personnel working at the site. PMA records GET training directly to the workers' site badge daily. Employees scan their badges at the MAC portals to gain access to the site facilities across the site. If an employee's GET training is expired, the MAC portals deny them access to the facilities. PMA also provides radiation worker, first aid, and cardio pulmonary resuscitation training. The USW provides the Hazardous Waste Operations and Emergency Response training.

PMA employee training and reading requirements are maintained and tracked for all employees in the training software program, Local Education Administration Requirements Network (LEARN). Once an employee completes the initial required training, LEARN automatically tracks the person's annual requirements. The LEARN system notifies both the employee and supervisor via e-mail prior to the training expiration date, starting at 90 days prior to expiration, then again at 60 days and 30 days. Additionally, the database manager manually queries LEARN for all employee training delinquencies and notifies both the individual and the individual's supervisor by e-mail. When an employee's required training certification has expired, PMA requires the supervisor to restrict the employee's duties. The employee and supervisor prepare and sign the "Work Restriction Acknowledgement Form" stating that the employee is restricted from performing work related to the delinquent training, and the signed form is sent to the LEARN database manager, who records the employee's work restriction in LEARN. Once the expired training is completed, LEARN releases the employee's work restriction in their training record.

In 2009, the Team recommended TPMC (predecessor to WEMS) consider adding the STS certification program to its catalog of voluntary training programs as a means to foster greater worker knowledge and participation in safety excellence. The STS certification provides a means for individuals and employers to verify safety and health knowledge important for first

line supervisors, managers, and any person with safety responsibilities. As a result of the 2009 recommendation, PMA and its predecessor (WEMS) accepted and supported that recommendation and added the STS program to its available training catalog. Team interviews during the review identified three PMA employees were “in the queue” for qualifying in the STS program. One employee is awaiting STS testing while two others are in training preparing for the exam. PMA’s support of the STS program is another indicator of its commitment to continuous improvement in the safety and health program.

Conclusion

The PMA safety and health training program continues its tradition to include shared training between PMA, FBP, and USW. The training program ensures managers, supervisors, and employees know and understand the policies, rules, and procedures established to prevent exposure to hazards. PMA implemented access control at the MAC portals to ensure employees without proper training are denied access to the site facilities. PMA continues to meet the expectations for continued participation in DOE-VPP.

VIII. CONCLUSIONS

Like its predecessors, PMA has established safety as a prerequisite for any task. The fixed-price contract presents some challenges to PMA's pursuit of safety excellence, but PMA has demonstrated that its success on this contract depends on performing work safely. Most of PMA's work is routine, but workers can be exposed to a variety of hazards; and PMA does not take routine work for granted. Instead, it continuously encourages both workers and managers to be alert to changes. Its success is demonstrated by its low accident and injury rates, the degree of worker involvement, and the enthusiastic support of the USW Local. The Team recommends that PMA continue participating in DOE-VPP as a Star Site.

1 **Appendix A: Onsite VPP Assessment Team Roster**

2 **Management**

3 Matthew B. Moury
 4 Associate Under Secretary for
 5 Environment, Health, Safety and Security
 6

7 Joseph Olencz
 8 Acting Deputy Associate Under Secretary for
 9 Environment, Health and Safety
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11 Patricia R. Worthington, PhD
 12 Director
 13 Office of Health and Safety
 14 Office of Environment, Health, Safety and Security
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16 Bradley K. Davy
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