



**U.S. Department of Energy
Voluntary Protection Program
Transitional Certification Review of
RSI EnTech, LLC
Legacy Management Support**



**Office of Environment, Health, Safety and Security
Office of Health and Safety**

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ABBREVIATIONS AND ACRONYMS

10 CFR 851	Title 10, Code of Federal Regulations, Part 851
AIMS	Assessment and Issue Management System
BLS	Bureau of Labor and Statistics
CAIRS	Computerized Accident Incident Reporting System
CAST	Community Action Safety Team
D-	Deficiency
DART	Days Away, Restricted and Transfer
DOE	Department of Energy
DRUM	Defense-Related Uranium Mine
E2SH&Q	Emergency Management, Environmental Compliance, Safety and Health, and Quality Assurance
EHSS	Office of Environment, Health, Safety and Security
EST	Employee Safety Team
G-	Goal
ISM	Integrated Safety Management
IWCP	Integrated Work Control Process
JATR	Job Analysis and Training Review
JSA	Job Safety Analysis
LM	Office of Legacy Management
LMS	Legacy Management Support
NAICS	North American Industry Classification System
OFI	Opportunity for Improvement
OSHA	Occupational Safety and Health Administration
PMO	Program Management Office
POL	Policy
PPE	Personal Protective Equipment
RSI	RSI EnTech, LLC
SERI	Supplemental Emergency Response Information
SAFE	Safety and Fellowship Engagement
SCIT	Safety Culture Improvement Team
SCSP	Safety Culture Sustainment Plan
SME	Subject Matter Expert
STD	Standard
Team	Office of Environment, Health, Safety and Security DOE-VPP Team
TLP	Technical Leadership Program
TRC	Total Recordable Case
VPP	Voluntary Protection Program

EXECUTIVE SUMMARY

The Department of Energy (DOE) Voluntary Protection Program (VPP) Assessment Team (Team) from the Office of Environment, Health, Safety and Security (EHSS) conducted the transitional certification review of RSI EnTech, LLC (RSI), the DOE Office of Legacy Management Support (LMS) contractor, from July 29 to September 25, 2024.

The LMS contractor workforce has participated in DOE-VPP since 2012. RSI requested to continue in DOE-VPP as a transitional participant after contract transition from Navarro Research and Engineering, Inc. to RSI in 2021. The Team conducted the virtual and onsite assessment, including observations and interviews as necessary to review the five tenets of DOE-VPP and ensure that RSI continues to meet DOE-STD-1232-2019, *U.S. Department of Energy Voluntary Protection Program, Vol. 1-4*, requirements.

The DOE Office of Legacy Management (LM) oversees the LMS contract. Contract activities are performed across multiple primary locations: Grand Junction, CO; Westminster, CO; Morgantown, WV; Monticello, UT; Pinellas, FL; Weldon Spring, MO; Fernald, OH; and Washington, D.C. RSI took over contract services in 2021 at Legacy Management sites where active DOE environmental remediation has ended, including monitoring, maintenance, and outreach.

RSI performed recent activities in several notable areas: defense-related uranium mine (DRUM) characterization requiring rigorous hazard controls in remote areas; Piqua, OH, Decommissioned Reactor Site building demolition; and Weldon Spring, MO, Interpretive Center opening and operation including post-pandemic in-person public outreach.

Injury Incidence Case Rates

The RSI recordkeeper is adequately trained, posts the OSHA 300A Summary as required, and complies with applicable recordkeeping rules and regulations. RSI's 3-year rates are 85.6 and 94.2 percent, respectively, lower than the comparison industry average and meet the expectations for continued DOE-VPP participation. (*See 3-Year Injury and Incidence Rates chart in full report for details.*)

Management Leadership

RSI leaders recognize the unique challenges faced by the LM complex, including geographically dispersed worksites, new addition of complex project work scope, and travel of employees to remote and potentially harsh work environments. RSI managers maintain continuity and alignment with DOE LM leaders and staff using a "One Team, One Mission" approach to policy. RSI sets goals to successfully execute the LM mission. Newly implemented management initiatives to improve organizational safety culture have been positively received by the workforce. RSI has adapted its organizational structure to respond to recent work scope changes and encourages managers to maintain visibility and engagement with workers across the LM complex. RSI prepares employees and subcontractors for safe work execution in all LM work environments.

RSI has opportunities to improve the connection of safety expectations to performance goals and institutionalization of key management safety and culture initiatives. RSI must address deficiencies and goals identified in other tenet sections of this report to fully meet the expectations for Management Leadership and continued unconditional recognition in DOE-VPP.

Employee Involvement

Employees take an active role in implementing RSI's safety and health program and contribute to decisions affecting their safety. RSI uses an Employee Safety Team (EST) model as a key engagement activity with sites, and also encourages the development of local safety efforts. The annual Safety Summit provides an excellent opportunity for team-building while fortifying the connections among groups that may not have many opportunities to interact. The Safety Summit is used to plan the safety focus topics for the coming year and also fosters better communication and an ongoing effort to make safety more engaging. The RSI "Why I Work Safely" bulletin board is a low cost, high value approach to encourage safety participation and mindfulness on all levels.

RSI has an opportunity to improve incorporation of worker perspective into Safety Culture Improvement Team and Safety Culture Sustainment Plan priorities. RSI must address deficiencies and goals identified in other tenet sections of this report to meet the expectations for Employee Involvement and continued unconditional DOE-VPP recognition.

Worksite Analysis

RSI's workforce is knowledgeable of the hazards they face and are confident they can perform work safely. Leadership conveys the message that safety is paramount and provides resources to ensure employees work in an environment free from known hazards. The contractor has an effective work planning and control system to ensure thorough understanding, control, and mitigation of hazards encountered during work using tools and processes like safety pause or stop, appropriate training, morning stand ups, weekly wrap-ups, pre-use and pre-startup analysis, pre- and post-job briefings, and JSA. RSI has established multiple avenues for employees to notify management about hazards.

Field observations, document reviews, and formal and informal interviews confirmed RSI facilities personnel are conducting workplace inspections, but the Team identified deficiencies associated with consistency of hazard identification, tracking, and trending and associated goals to improve compliance with DOE-VPP hazard tracking and trending requirements. RSI must address deficiencies and goals identified in the Worksite Analysis tenet section of this report to fully meet the expectations for continued unconditional participation in DOE-VPP.

Hazard Prevention and Control

RSI has developed processes and work procedures to identify and control hazards and communicates those processes via training, staff meetings, and facility postings. Managers and workers understand the Hierarchy of Controls applied to their various work area hazards and continuously work to achieve a workplace free of recognized hazards. RSI utilizes various methods within the Hierarchy of Controls to help mitigate identified hazards and reduce employee exposure. Managers and safety professionals ensure that employees have proper access

to adequate personal protective equipment. Employees are confident in their ability to talk to certified safety professionals when needed, and RSI possesses an adequate numbers of safety staff tasked with providing subject matter expertise and overseeing safety programs. RSI has implemented adequate maintenance, positive reinforcement, disciplinary, and occupational medicine programs.

The Team identified that RSI is not fully compliant with DOE Order 151.1 (current contracted revision) emergency management requirements related to Emergency Operating Systems, which does not align with DOE-VPP participation expectations and an associated goal to attain compliance. RSI should consider proactive application of ergonomic evaluations by an ergonomic specialist during initial workstation set-up to help prevent chronic ergonomic injuries. RSI must address deficiencies and goals identified in the Hazard Prevention and Control section of this report to meet the expectations for continued unconditional participation in DOE-VPP.

Safety and Health Training

The training department makes use of feedback and case studies to update and improve courses. Adoption of safety culture training sessions aids employees in fostering an environment of trust and a willingness to raise issues. Inclusion of the Safety Trained Supervisor program will help ensure RSI supervisors better understand regulatory compliance, how to train others in safe practices, and hazard identification. The creation of the Leadership Development Community of Practice mentoring program will help bolster the RSI senior leader cohort and ensure they are growing future managers from within.

RSI has an opportunity to improve hazard recognition capabilities of EST “Get Out and Look” participants through training. RSI must address deficiencies and goals identified in other tenet sections of this report to meet the expectations for Safety and Health Training and continued participation in DOE-VPP.

Conclusion

The DOE-VPP Team recognizes the commitment of RSI leaders and workers to maintain a safe work environment for themselves and each other. RSI managers are adapting an organizational structure geared towards long-term site stewardship and monitoring into a workforce capable of safely managing larger-scale construction and remote mine characterization projects. RSI has an effective Integrated Work Control Process that drives work planning efforts via hazard analysis and subject matter expert reviews to assess employee risks. RSI employees feel comfortable raising concerns and seeking the support of managers or qualified safety professionals when needed. Managers and employees have multiple training resources available to support their pursuit of a strong organizational safety culture and safe work practices, including an emphasis on DOE safety culture training.

The Team observed two deficiencies in some RSI program aspects which do not align with DOE-VPP requirements. The DOE-VPP Team identified five additional opportunities for improvement which may benefit RSI’s pursuit of safety and health excellence.

Recommendation

The Team recommends that RSI address conditions adverse to DOE-VPP Star recognition while continuing DOE-VPP participation for up to one year under *Conditional* Status at the Star Level.

The Team will reassess RSI status upon completion of *Conditional* Status goals to determine a recommendation towards continued DOE-VPP recognition. The Team will prepare an additional report outlining observations made during the goal validation period and submit the program status recommendation.

The full report summarizes the DOE-VPP review results supporting the Team's recommendation, including the deficiencies precluding full DOE-VPP Star recognition, and goals intended to guide RSI towards addressing the identified deficiencies.

DEFICIENCIES, GOALS, AND OPPORTUNITIES FOR IMPROVEMENT

Deficiencies (D-) and Goals (G-) [2 Total]	Page
<p>[D-1] LMS AIMS entries do not consistently include issues corrected on the spot, facility inspection results, and EST walkdowns, creating potential for isolated issues to be overlooked for thorough evaluation and trending.</p> <p>[G-1] LMS shall institutionalize a consistent and comprehensive method to identify, track, and trend safety issues and hazards raised by employees using all available reporting tools (e.g., AIMS issue entry, Facility Manager or Lead inspection findings, work order feedback, EST “Get Out and Look” walkdowns, etc.)</p>	16
<p>[D-2] The RSI emergency management program is still not fully compliant with DOE Order 151.1 (current contracted revision), particularly regarding Emergency Operations System establishment, Emergency Operations System participant training covering roles and responsibilities, and implementation of emergency management exercises.</p> <p>[G-2] RSI shall prioritize and achieve timely DOE Order 151.1 (current contracted revision) compliance by applying, training, and exercising interim Emergency Operating Systems or aligning resources towards timely implementation, training, and exercise of a full-scale Emergency Operating System.</p>	19
Opportunities for Improvement (OFI) [5 Total]	Page
[OFI-1] RSI should reinforce safety culture and safe work practice expectations for its managers and workers by tying those priorities to performance management expectations.	6
[OFI-2] RSI should prioritize institutionalization of key management safety and culture initiatives to increase process resiliency and reinforce worker expectations of the long-term commitment to safety improvement.	7
[OFI-3] LMS should consider opportunities to integrate workers into the SCIT or otherwise leverage worker perspective when setting SCSP priorities. Considerations may include flowing up EST Chairs or other key contributors.	11
[OFI-4] RSI should consider proactive application of ergonomic evaluations by encouraging upfront consultation with an ergonomic specialist during initial workstation set-up to help prevent chronic ergonomic injuries.	20
[OFI-5] RSI should consider providing employees involved in EST walkdowns with additional training in the recognition of safety and health hazards to improve the effectiveness of this initiative.	24

I. INTRODUCTION

The Department of Energy (DOE) Voluntary Protection Program (VPP) Assessment Team (Team) from the Office of Environment, Health, Safety and Security (EHSS) conducted a transitional certification review of RSI EnTech, LLC (RSI), the DOE Office of Legacy Management Support (LMS) contractor, from July 29 to September 25, 2024.

The LMS contractor workforce has participated in DOE-VPP since 2012. RSI requested to continue in DOE-VPP as a transitional participant after contract transition from Navarro Research and Engineering, Inc. in 2021. The Team conducted the virtual and onsite assessment, including observations and interviews as necessary to review the five tenets of DOE-VPP to verify safety programs and ensure that RSI continues to meet DOE-STD-1232-2019, *U.S. Department of Energy Voluntary Protection Program, Vol. 1-4*, requirements.

RSI employs two primary subcontractors, Amentum Technical Services, LLC and TFE, Inc., which each provide key manager and worker contributors to the LMS effort. Throughout this report, reference to RSI generally includes LMS contract activities and may include Amentum Technical Services, LLC and TFE, Inc. personnel activities, unless otherwise specified.

The DOE Office of Legacy Management (LM) oversees the LMS contract. Contract activities are performed across multiple primary locations: Grand Junction, CO; Westminster, CO; Morgantown, WV; Monticello, UT; Pinellas, FL; Weldon Spring, MO; Fernald, OH; and Washington, D.C. RSI performs contract services at Legacy Management sites where active DOE environmental remediation has ended, including the following monitoring, maintenance, and outreach activities:

- Operating and maintaining dynamic containment remediation systems
- Performing routine inspections of dynamic and passive containment systems
- Maintaining soil and groundwater treatment systems
- Monitoring groundwater and waste disposal
- Beneficial reuse of remediated real property
- Communicating with regulators
- Preparing compliance reports
- Engaging the public
- Evaluating new technologies

RSI performed recent activities in several notable areas: defense-related uranium mine (DRUM) characterization requiring rigorous hazard controls in remote areas; Piqua, OH, Decommissioned Reactor Site building demolition; and Weldon Spring, MO, Interpretive Center opening and operation including post-pandemic in-person public outreach.

The DOE-VPP Team recognizes the commitment of RSI leaders and workers to maintain a safe work environment for themselves and each other. However, the Team observed two deficiencies in some RSI program aspects which do not align with DOE-VPP requirements. The DOE-VPP Team identified five additional opportunities for improvement which may benefit RSI's pursuit of safety and health excellence. Each deficiency and opportunity for improvement is addressed in their respective sections of this full report.

Note: Throughout this report, the word "shall" is used to denote a requirement of DOE-VPP participation, and the word "should" is used to denote a recommendation to be considered for incorporation by the participant.

II. INJURY INCIDENCE CASE RATES

To maintain DOE-VPP Star status, the contractor's average for both Total Recordable Case (TRC) rates and Days Away, Restricted, and Transfer (DART) case rates for the most recent 3-year period shall be at or below the most recent specific industry national average North American Industry Classification System (NAICS) code published by the Bureau of Labor Statistics (BLS). The NAICS code for RSI and its subcontractors is 562910, *Remediation Services*. DOE-STD-1232-2019, *U.S. Department of Energy Voluntary Protection Program, Vol. 1-4*, requires BLS data comparison at the 3-digit level. The NAICS code comparison used for RSI and its subcontractors is 562, *Waste Management and Remediation Services*, using 2022 data (most recently published).

The following table presents the most recent 3-year period data validated by the Team using RSI Occupational Safety and Health Administration (OSHA) 300 Logs, the DOE Computerized Accident Incident Reporting System (CAIRS), the Team's calculation of the TRC and DART rates, and the specific industry national average for the comparison industry.

3-Year Injury and Incidence Rates

Calendar Year	Hours Worked	TRC	TRC Incidence Rate per 200,000 hours	DART	DART Case Rate per 200,000 hours
Contractor Employees (RSI CAIRS Org. Code 3260715)					
2021	654,620	0	0	0	0
2022	935,356	5	1.07	1	0.21
2023	958,338	2	0.42	1	0.21
3-Year	2,548,314	7	0.55	2	0.16
(BLS-2022) industry average for NAICS 562 Waste Management and Remediation Services			3.7		2.6
Subcontractor Employees (CAIRS Org Code 3260716)					
2021	20,992	0	0	0	0
2022	28,835	0	0	0	0
2023	37,288	0	0	0	0
3-Year	87,115	0	0	0	0
(BLS-2022) industry average for NAICS 562 Waste Management and Remediation Services			3.7		2.6

3-Year *TRC Incidence Rates, including subcontractors: 0.53

3-Year **DART Case Rates, including subcontractors: 0.15

Discussion

As of September 2024, RSI employs approximately 569 workers and 144 subcontractors. RSI has 2 TRC and 0 DART cases for the current year-to-date. The Team did not identify any incentives that would discourage workers from reporting injuries. Interviews with workers acknowledge that managers encourage the reporting of injuries, incidents, near-misses, or first aid cases and indicate that workers do not fear reprisal for reporting.

The Team conducted a random sampling of RSI DOE CAIRS database cases, and the results indicate the recordkeeper is documenting all injuries and illnesses in the database. The contractor is maintaining complete and accurate recordkeeping logs including the OSHA 300 Log Excel spreadsheet, OSHA 300A Summary, and comparable OSHA 301s. The recordkeeper posted the OSHA 300A Summary according to the recordkeeping standard during the required periods, and it remains accessible to all personnel throughout the calendar year. The logs reflect the safety and health conditions under this contractor's control. The RSI recordkeeper has completed CAIRS training and the OSHA 7845, *Recordkeeping Seminar*, and is knowledgeable of the recordkeeping requirements.

Conclusion

RSI's recordkeeper is adequately trained, posts the OSHA 300A Summary as required, and complies with applicable recordkeeping rules and regulations. RSI's 3-year TRC and DART rates are 85.6 and 94.2 percent, respectively, lower than the BLS comparison industry average for its NAICS code and meet the expectations for continued DOE-VPP participation.

III. MANAGEMENT LEADERSHIP

Management Leadership is a key element in obtaining and sustaining an effective safety culture and implementing the guiding principles of integrated safety management (ISM). The contractor shall demonstrate senior level management commitment to ISM, occupational safety and health, and meeting the requirements of the DOE-VPP. Management systems for comprehensive planning shall address safety and health requirements and initiatives. Elements of that management system shall include: (1) clearly communicated policies and goals, (2) clear definition and appropriate assignment of responsibility and authority, (3) adequate resources, (4) accountability for both managers and workers, and (5) managers shall be visible, accessible, and credible to employees. The organization shall integrate authority and responsibility for employee safety and health with its management system and shall involve employees at all levels of the organization.

Since the 2019 DOE-VPP assessment, RSI has taken over the LMS contract and experienced significant changes including senior manager turnover or reassignment and the introduction of extensive site rehabilitation projects beyond the site maintenance and monitoring efforts historically within LM work scope. Examples of key leadership personnel changes in the 2 years prior to the 2024 DOE-VPP assessment include the seniormost Program Manager and other senior leaders in the Emergency Management, Environmental Compliance, Safety and Health, and Quality Assurance (E2SH&Q), Program Management Office (PMO), and Site Operations organizations. Long-term LM monitoring efforts have identified instances of early waste mitigation system latent defects resulting in recent extensive remediation project scope additions, including an ongoing uranium mill tailings disposal cell extraction pore water extraction project in Rifle, CO. RSI leaders manage a geographically dispersed enterprise with multiple occupied or frequently visited sites and diverse work environments. RSI must institutionalize practices to maintain cohesion, management visibility, and employee engagement throughout the organization.

DOE LM and RSI leaders emphasize and strongly support the “One Team, One Mission” philosophy as a method to align LMS policies with their DOE partners and promote cooperation and collaboration between federal and contractor staff towards a strong organizational safety culture and safe LM mission execution. The Team received feedback from managers and workers contrasting the current positive atmosphere promoted by the organizational philosophy versus past misalignment between federal and contractor counterparts. RSI outlines policy compliance with Title 10, Code of Federal Regulations, Part 851, *Worker Safety and Health Program* (10 CFR 851), through LMS/POL/S20043, *LMS Safety and Health Program*. In addition, RSI follows DOE Policy 450.4A, *Integrated Safety Management Policy*, through implementation of LMS/POL/S14463, *Integrated Safety Management System Description for LMS in Support of DOE Legacy Management Sites*. RSI uses additional documented efforts, such as LMS/POL/S28528, *Safety Culture Sustainment Plan*, to guide more specific goal-setting and action planning for safety. RSI uses these policies to emphasize continuous improvement through feedback and data-driven decision-making, using inputs such as prior DOE-VPP assessment results, Oak Ridge Associated Universities (ORAU) safety culture survey responses, and even DOE LM data from Federal Employee Viewpoint Surveys to inform leadership directions.

RSI leaders establish personnel performance goals aligned with LM priorities for employees at all levels of the organization. LM goal examples include providing direction and leadership towards activities that protect human health, the environment, legacy records, former worker benefits, sustainable land management, and cooperative communication and outreach. Although some LM goals address general public health, current RSI performance objectives do not flow down expectations for contributions towards organizational safety culture or a safe working environment. Leaders may encounter challenges or conflicting priorities when pursuing the ISM guiding principle of line management safety responsibility when basic performance objectives, and by extension pay incentives, have no direct connection to safe work execution or encouragement of safety culture.

Opportunity for Improvement:

[OFI-1] RSI should reinforce safety culture and safe work practice expectations for its managers and workers by tying those priorities to performance management expectations.

The LMS management team has implemented multiple recent new initiatives or improvements to existing programs (e.g., rotating senior leaders' summit sites, conducting Safety Stewardship meetings concurrently, emphasizing safety culture through DOE Technical Leadership Program (TLP) training). Some of these practices address challenges identified under the previous LMS contract or during transition to the current LMS contract, and the Team received positive feedback about the initiatives from multiple managers and employees. Although some of these positive management efforts are documented in various ways, the Team did not identify widespread methods of institutionalizing them as workforce expectations. For example:

- Holding concurrent monthly meetings across the LM complex is a key component of current Safety Stewardship efforts. Because the same hour is occupied with this safety-focused meeting across all LM-populated time zones, employees at all work sites and remote workspaces are allowed to reduce distraction, eliminate other pressures, and participate as a collective organization. The nuance of timing to minimize distractions is as important to Safety Stewardship meeting success as the meeting contents. A document-controlled management directive or other lasting procedural instruction recognizing and documenting this reasoning basis would make Safety Stewardship meeting timing protocol more resilient against unintended change.
- RSI (and earlier LMS predecessors) incorporate DOE TLP safety culture training for individual contributors and managers as a valuable tool towards instilling and promoting safety culture throughout its organization. Although the Team confirmed extensive completion of TLP training courses by current RSI employees and managers, the valued practice has not been institutionalized in Job Analysis and Training Review (JATR) documents which constitute the training basis for each job position.

Opportunity for Improvement:

[OFI-2] RSI should prioritize institutionalization of key management safety and culture initiatives to increase process resiliency and reinforce worker expectations of the long-term commitment to safety improvement.

RSI has adapted the LMS organization to respond to extensive maintenance projects which historically have not been part of the LM stewardship mission of long-term surveillance and maintenance. RSI executed an extensive demolition project of a decommissioned reactor in Piqua, OH, without any first aid or recordable injuries which many RSI leaders praised as a successful application of hazard analysis and control principles and a strong example of project communication and efficiency attributed to positive safety culture. RSI is also in various stages of planning, execution, and project closeout for disposal cell or groundwater treatment system improvement efforts in Tuba City, AZ; Rifle, CO; and Shiprock, NM. One organizational addition praised by RSI leadership was implementation of a PMO to oversee major LM site projects in conjunction with the site managers and leads. The PMO responds to the LMS scope shift towards major projects by consolidating subject matter expertise in pertinent fields like project controls, construction management, and project oversight. RSI is using the PMO to implement an integrated schedule for more effective resource planning across LM sites. The PMO is able to identify specialty hiring or subcontracting needs for non-maintenance activities like drilling and excavation and to stimulate the flow of lessons learned between projects and to the larger DOE community through operating experience publications. RSI leaders' efforts to ready its organization to safely and effectively support new scope opportunities are examples of ISM core functions (e.g., provide feedback and continuous improvement) and guiding principles (e.g., competence commensurate with responsibilities, balanced priorities).

RSI faces a unique challenge to visible manager involvement due to the large geographic range of staffed LM sites. The Team discussed past missed opportunities for senior leaders to proactively engage with workers not located at their primary workplace. Not only do RSI employees share the same benefits from firsthand leadership visibility and positive, constructive interaction as any other workers, but intentional manager interaction is more critical for RSI because leaders may not live and work regularly in regions included in their functional areas.

RSI senior leaders have taken steps to encourage manager visibility with efforts such as rotating senior leadership summit meetings and documenting manager site visits. Although RSI could leverage teleconferencing technologies to conduct senior leadership meetings, the Program Manager holds in-person meetings at each site throughout the year. This rotating meeting practice helps senior leaders overcome schedule and physical barriers to interacting with their staff on location and is an example of a positive practice the Team recommends institutionalizing as noted in OFI-2 above.

The Team also discussed RSI efforts to track manager site visits and document their observations for trending and potential corrective actions. Some leaders were newly familiar with this initiative and had not yet submitted any feedback. The Team noted the value of documenting manager site visits as an avenue for routine hazard verification, but the process had not reached

full potential at the time of the assessment. RSI recognizes that maintaining manager visibility requires consistent effort across regions and time zones, and leaders leverage a resourceful and creative Education, Communication, History, and Outreach team to further bolster worker familiarity with managers through recorded video briefings and regular email communications. RSI leaders have taken past lessons learned and applied intentional efforts towards manager workplace visibility.

RSI has standardized its approach to site orientation across the broad range of staffed and unstaffed sites under LM jurisdiction. Supplemental emergency response information (SERI) packages for each site include a general overview of local facilities and hazards with details such as emergency contact numbers, cellular phone signal availability, and healthcare facility locations. Visitors with business at LM sites must review the applicable SERI as an introduction before any additional task-specific briefings. The Team reviewed multiple SERI packages and observed SERI briefings being completed by safety SMEs or project leads with strong technical knowledge and consideration of hazards. Although RSI employees also receive general employee training and other task-specific instruction, the concise SERI approach gives key hazard and emergency response information in a readily accessible way for those stationed on location and visitors.

Subcontractors supporting RSI at LM sites receive thorough upfront evaluation of safe work practices and strong encouragement during contracted task execution to ensure they contribute to a safe work environment. RSI staff facilitate safety evaluations of potential subcontractors using LMS/PRO/S5325, *Safety and Health Review of Candidate Subcontractor – LMS 1980 and LMS 2079 Instructions*, which directs completion of form LMS 2079, *Safety and Health Worksheet*, to capture subcontractor safety data and form LMS 1980, *Safety and Health Review of Potential Subcontractor*, to guide the candidate review. RSI meets with subcontractors to review safety expectations for assigned work scope and everyone's ability to stop or pause work without repercussion.

Safety representatives and Construction Safety Supervisors provide upfront expectations and oversee subcontractor performance. The Team observed subcontractor laydown areas and project closure at the Rifle, CO, disposal cell site and heard RSI staff describe valuable contributions toward continuous improvements and safety discussions from subcontractors. RSI recognizes the potential impact of subcontractors on safe work execution and has implemented processes to maintain successful partnerships, particularly as more complex projects are planned and executed across the LM complex.

Conclusion

RSI leaders recognize the unique challenges faced by the LM complex, including geographically dispersed worksites, new addition of complex project work scope, and travel of employees to remote and potentially harsh work environments. RSI managers maintain continuity and alignment with DOE LM leaders and staff using a “One Team, One Mission” approach to policy. RSI sets goals to successfully execute the LM mission. Newly implemented management initiatives to improve organizational safety culture have been positively received by the workforce. RSI has adapted its organizational structure to respond to recent work scope changes and encourages managers to maintain visibility and engagement with workers across the LM complex. RSI prepares employees and subcontractors for safe work execution in all LM work environments. RSI has opportunities to improve the connection of safety expectations to performance goals (OFI-1) and institutionalization of key management safety and culture initiatives (OFI-2). RSI must address deficiencies and goals identified in other tenet sections of this report to fully meet the expectations for Management Leadership and continued unconditional recognition in DOE-VPP.

IV. EMPLOYEE INVOLVEMENT

Employees at all levels shall 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 shall work together to establish an environment of trust where employees understand that their participation adds value, is crucial, and is welcome. Managers shall be proactive in recognizing and rewarding workers for their participation and contributions. Employees and managers shall communicate and collaborate in open forums to discuss continuing improvements, to recognize and resolve issues, and to learn from their experiences.

Since the last LMS contract workforce DOE-VPP assessment under Navarro Research and Engineering, Inc. in 2019, RSI employees have built a significant record of safe work. RSI leveraged worker experience, both in its E2SH&Q support organization and its operations organizations, to maintain a high standard of safe work practices. RSI workers consistently share lessons learned and employee engagement opportunities. The Team observed an example of an employee engagement best practice on a bulletin board located in a main hallway in the Grand Junction office. Employees headed the bulletin board with an eye-catching banner stating, “Why I Work Safely.” The rest of the board displayed a variety of photos and illustrations of spouses, children, grandchildren, and pets illustrating some of the reasons they work safely. This effort contributes to the familial atmosphere in the workplace and illustrates RSI’s commitment to employee engagement.

RSI encourages employee participation in all aspects of the safety program, and every employee interviewed spoke of both their ability and responsibility to call a pause or stop work for any reason. RSI employs an Employee Safety Team (EST) model as a major form of employee involvement and as an approach to identifying and correcting hazardous conditions. The LMS EST meets virtually and supports the LMS commitment to safety, integrity, responsiveness, concern for people, efficiency, and work quality. According to its committee charter, the EST drives an integrated safety culture of excellence and engagement among employees while supporting the ISM System. EST membership represents all staffed sites and every 100 percent remote employee. Although the Team was unable to attend a meeting, the employees mentioned the EST in interviews and conversations, highlighting the influence and engagement of the committee. Additionally, RSI uses local safety teams, such as Safety and Fellowship Engagement (SAFE) at Grand Junction and Community Action Safety Team (CAST) at Westminster, to engage employees in workplace and home safety and gather support for community projects. For example:

- The SAFE team actively supports a local food bank by collecting donations and by providing volunteers to work at the food bank monthly.
- The EST and local safety teams use an observation process called “Get Out and Look” for identification of hazards. This observation process uses a worksheet that includes sections for office safety, fire safety, industrial hygiene, occupational, and electrical safety. Commonly found issues are listed under each section (e.g., cables exposed from cubicle walls, items placed on top of cubicle walls, engineering table drawer that would

not close). Employees review previous observation sheets for the area prior to conducting a new observation, looking for previous issues and recording the status of those past issues identified in the “Issues Found” section of the form.

RSI’s E2SH&Q organization pursues additional employee involvement by conducting an annual Safety Summit meeting to establish the safety and health campaigns for the upcoming calendar year and plan VPP activities associated with the campaigns. Agenda items for the upcoming meeting include status updates and future planning for the EST and local safety teams, redesign of the “Get Out and Look” form, setting the quarterly safety focus subjects for the coming year, and brainstorming concepts to make safety more engaging. Attendance at the summit includes at least one member of the EST from each occupied site when possible.

RSI encourages and supports employee involvement through numerous opportunities, such as the use of the Jostle intranet platform for informal employee communications and direct employee involvement in pre-job briefs and SERI reviews. RSI also communicates with employees via its safety committees, newsletters, and other media. Employees interviewed during the virtual and onsite portions of the assessment were eager to speak and share their work experiences. Management ensured employee availability and allowed full access to employees. Nearly every employee interviewed spoke with pride and a sense of ownership about the safety and health program, stressing that the “safety is a responsibility” mindset carries over from work to their personal lives.

LMS has a Safety Culture Improvement Team (SCIT) comprised of senior leaders and safety program staff which is also attended by DOE LM leadership and safety staff. A primary role of the SCIT is to develop and continuously adapt the LMS Safety Culture Sustainment Plan (SCSP), a living document intended to align safety culture focus areas described in DOE Guide 450.4-1C, *Integrated Safety Management System Guide*, with LM’s strategy for safety culture improvement and sustainability. The SCIT updates the SCSP annually and was preparing upcoming fiscal year updates at the time of the DOE-VPP assessment. Although management championship and support is critical to effective safety culture sustainment, employee engagement on safety culture priorities is equally important in right-sizing goals for the whole organization.

Opportunity for Improvement:

[OFI-3] LMS should consider opportunities to integrate workers into the SCIT or otherwise leverage worker perspective when setting SCSP priorities. Considerations may include flowing up EST Chairs or other key contributors.

Conclusion

Employees take an active role in implementing RSI's safety and health program and contribute to decisions affecting their safety. RSI uses an EST model as a key engagement activity with sites, and also encourages the development of local safety efforts such as SAFE and the CAST. The annual Safety Summit provides an excellent opportunity for team-building while fortifying the connections among groups that may not have many opportunities to interact. The Safety Summit is used to plan the safety focus topics for the coming year and also fosters better communication and an ongoing effort to make safety more engaging. The RSI "Why I Work Safely" bulletin board is a low cost, high value approach to encourage safety participation and mindfulness on all levels. RSI has an opportunity to improve incorporation of worker perspective into SCIT and SCSP priorities (OFI-3). RSI must address deficiencies and goals identified in other tenet sections of this report to meet the expectations for Employee Involvement and continued unconditional DOE-VPP recognition.

V. WORKSITE ANALYSIS

Management of safety and health programs begins with a thorough understanding of all hazards that workers might encounter during work, and the ability to recognize and correct new hazards. The first two core functions of ISM, *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 work as work planners use the results of the analysis in subsequent work planning efforts. Effective safety programs integrate feedback from workers regarding hazards and include a system to address newly recognized hazards. Successful worksite analysis also involves implementing mitigating measures during work planning to anticipate and minimize the impact of hazards.

RSI has created an environment where employees conduct work in areas free from recognized hazards as required by LMS/POL/S20043, *Safety and Health Program*; LMS/POL/S14463, *LMS Integrated Safety Management System Description for LMS in Support of DOE Legacy Management Sites*; and LMS/POL/S14697, *LMS Worker Safety and Health Program* (10 CFR 851). These documents provide the necessary policies and procedures to ensure hazards are identified, analyzed, and mitigated, and that workers are empowered to raise health, safety, and quality concerns without fear of harassment, intimidation, retaliation, and discrimination. RSI has developed and provided procedures and processes available to employees to identify hazards e.g., the integrated work control process (IWCP), safety pause/stop, appropriate training, morning stand ups, weekly wrap-ups, pre-use analysis, pre-startup analysis, pre- and post-job briefings, and job safety analysis (JSA).

RSI has integrated the use of JSA into all aspects of hazard analysis and work control processes including pre-use and pre-startup analysis. Use of the JSA supports implementation of the LMS/POL/S11763, *Integrated Work Control Process Manual (IWCP)*, which describes the LMS IWCP used for planning and conducting work for the LMS contract. The JSA is used by the LMS contractor to identify hazards associated with each task and identify appropriate controls for the hazards using the Hierarchy of Controls. Staff also conduct the following: risk management; all hazard surveys; hazard risk assessments; industrial hygiene exposure assessments; pre-use and pre-startup analysis of planned, new, or newly acquired facilities, equipment, materials; and processes to identify hazards, assess risks, and plan for prevention and control. The risk management process includes assessing and screening risk to determine a risk level based on the impact level of the job or task.

The IWCP defines LMS work types, provides guidance for determining when each work type is applicable, and defines the work planning and control requirements for each work type. The IWCP is applicable to all work activities managed and performed by the LMS contractor and subcontractors at LM sites and facilities. The scope of the work defines the level of planning associated with the activity. LMS contractor personnel consider the hazards, risks, and potential impacts during work categorization and planning. Early in the work planning stage, SMEs address applicable policies and regulations. For example, when preparing the activity of cutting brush and trees to clear areas for security purposes, one may need to ensure that migratory birds, nests, and eggs will not be affected during the work activities. This could result in planning the work during seasons when nesting is complete.

There are five main work types in the IWCP, graded on the scale and scope of work starting at Type (0) work (lower hazards, environmental concerns, complexity, and risk) and increasing to Type (4) work (higher hazards, environmental concerns, complexity, and risk). RSI Project Leads evaluate and make an initial determination on the work and associated risk:

- Type (0) – Minimal Work Control Required Tasks
- Type (1) – Skill-based Activities
- Type (2) – Minor Work Tasks
- Type (3) – Procedure-based Activities
- Type (4) – Project or Activity Evaluation Work Activities

The project team members, including the site lead, task manager, person in charge, client, and other SMEs, make the final categorization of the work type. Line management encourages feedback for IWCP and safe performance improvement from workers at all levels. In addition, improvements can be suggested by all personnel involved in the task development during all steps of the IWCP. Projects Leads document operating experiences (lessons learned) as required by the LMS/POL/S28783, *Operating Experience (OpEx) Procedure*.

RSI industrial hygienists maintain baseline survey data for LM facilities. Qualified industrial hygienists conduct quantitative and qualitative exposure assessments for all RSI sites and facilities. Reassessments occur when prompted by changes in activities, JSA, IWCP documents, and when required for regulatory compliance. Professionals qualified in industrial hygiene, occupational safety, occupational medicine, radiological safety, and other disciplines are involved in exposure assessments depending on the identified activity hazard. Industrial Hygiene Exposure Assessment policy requires industrial hygienists to use LMS Form 1091, *Industrial Hygiene Exposure Assessment*, prior to conducting work activities and to brief site personnel on results. In addition to industrial hygiene exposure assessments, qualified professionals conduct site-specific Chemical Hygiene Plans, Chemical Management Plans, and Industrial Hygiene Sampling Plans following recognized exposure assessment strategies and protocols and analyzing samples in accredited and certified laboratories. Onsite safety and health surveys play a significant role in identifying, analyzing, and controlling hazards.

RSI personnel document and track issues in the Assessment and Issue Management System (AIMS). All personnel (LM, LMS, teaming partners, and subcontractors) can report issues in AIMS. Employees report an issue by selecting the “Submit an Issue” button, which is available in various places on the LM intranet Portal. The Issue Report Form can be downloaded and printed for use in documenting information until the report is submitted electronically. The Issue Reporting system includes written procedures and guidance, written reports of findings and hazard correction tracking, identification of causes, and provisions for preventive or corrective actions. The system provides provisions for a narrative report suitable for dissemination to all employees containing root causes, analysis, and lessons learned. A wide variety of issues may be reported, including issues identified as an event/incident, accident or injury, real or perceived emergency, security concern, correctable deficiency, nonconformance, observation,

opportunity for improvement, best management practice, or other item of interest that would benefit from management attention or potentially benefit the organization. Prompt notification of an issue is essential to ensure appropriate response actions are taken to minimize consequences on the safety and health of workers or the public, impact on the environment, or damages to infrastructure.

Field observations, documents, and interviews confirmed that RSI conducts workplace inspections. Quality Assurance tracks inspection completions and reports results in Performance Assurance and Measures. DOE-STD-1232-2019/4, *U.S. Department of Energy Voluntary Protection Program*, requires participant sites to conduct trend analysis for all data accumulated under the health and safety program (including injury and illness experience, inspections, hazards identified during inspection, and employee reports of hazards) to identify patterns which may lead to the identification of systematic problems not perceived when looking at isolated incidents. RSI has capabilities via AIMS to track issues, including hazards and safety program issues, and trend the corresponding data for patterns. However, the Team identified challenges with the consistency of RSI issue identification and tracking practices which limit the effectiveness of evaluation and trending capabilities as discussed in the following examples:

- LMS Facilities and the Site Support team has the primary role in performing facility inspections, with LMS safety and health personnel and other LMS SMEs supporting these inspections as outlined by LMS/POL/S05299, *Facility Management Plan*. The Facility Manager or Lead conducts all inspections for their designated facilities. On an annual basis, the Safety Manager or other safety and health personnel, as well as other available personnel, participate with the Facility Manager or Lead in completing the facility work area inspections. The Facility Manager or Lead documents inspections using the LMS Form 2114, *Monthly/Semiannual/Annual Facility/Office Site Inspection Checklist*. Upon completion of the inspection, the Facility Manager or Lead scans the LMS Form 2114 and uploads into the Archibus Maintenance Management System (Archibus). The Facility Manager or Lead is able to create a work order in the Archibus system if a serious deficiency is noted during the inspection. The Team found through discussions and system reviews with SMEs that not all Facility Managers or Leads generate work orders at each site and in most cases the Form 2114 was just scanned and uploaded to Asset Management as a completed inspection. Also, not all deficiencies were uploaded in AIMS. RSI employees are not able to effectively trend facility inspection data from scanned forms, particularly if hazards and issues are not consistently tracked in AIMS.
- In addition to the facility inspections completed as required by the safety and health program, additional opportunities to identify hazards include annual site visits by the Safety Manager, safety walkdowns accompanied by DOE field office representatives, and EST “Get Out and Look” walkdowns. The Team discussed these inspection processes with applicable RSI employees and noted inconsistency with how employees documented and tracked results of these inspections, particularly regarding identified hazards and issues. For example, RSI employees do not typically enter issues corrected on the spot in AIMS or any other mechanism, preventing the ability to analyze underlying causes or trends for systematic issues. “Get Out and Look” observations are also not consistently documented or tracked in AIMS.

- RSI tracks and trends some general data in AIMS related to safety as part of its contractor assurance reporting to LM, including TRC and DART case rates, Work Area Inspections completed, Noncompliance Tracking System and Occurrence Reporting and Processing System reports, safety walkdowns, Manager Site Visits, and Monthly Safety Meeting participation. Discussions with safety and health leaders revealed they did not separately capture safety and health data outside of AIMS-documented issues. Once an issue is submitted, the Issue Review Team ensures the correct point of contact, category, and subcategory is assigned. However, AIMS does not have a specific “issue type” available for employee reports of hazards or hazards identified during inspection. As a result, RSI consistently analyzes trends for safety and health hazards even when they are reported by employees in AIMS.
- Interviews with personnel and Team observations of RSI meeting discussions revealed some inconsistency in understanding when an issue should be entered into AIMS. RSI has promoted a “zero threshold” for AIMS entries, but managers also direct employees to other processes such as Facility Manager or Lead reporting for facility-specific issues. Although managers intend the “zero threshold” policy to prevent any discouragement from entering issues in AIMS, there is inconsistent employee understanding about what observations or concerns AIMS should consistently capture. Although employees understand their ability to report concerns and their ability to use AIMS without negative repercussions, hesitation in using it for even minor issues or facility fixes limits the system’s ability to adequately address issues, particularly hazards, and analyze trends.

Deficiency:

[D-1] LMS AIMS entries do not consistently include issues corrected on the spot, facility inspection results, and EST walkdowns, creating potential for isolated issues to be overlooked for thorough evaluation and trending.

Goal:

[G-1] LMS shall institutionalize a consistent and comprehensive method to identify, track, and trend safety issues and hazards raised by employees using all available reporting tools (e.g., AIMS issue entry, Facility Manager or Lead inspection findings, work order feedback, EST “Get Out and Look” walkdowns, etc.).

Despite inconsistency of AIMS tracking and trending for safety issues previously mentioned in this report section, employees at visited RSI facilities verified they were familiar with options for reporting hazards. Workers report hazards using any of the following methods: management open door policy, telling their supervisor or a safety and health representative, Monthly Safety Meeting, Facility Manager or Lead, Suggestion Box, Employee Concerns Program, Emergency Watch Program, and the “Submit an Issue” button on the AIMS or Facilities RSI SharePoint Portal home pages. If anonymity is required, the worker follows LMS/POL/S28158, *Employee Concerns Program*, procedure by contacting their Human Resources organization to report any

confidential issues, or submits anonymously via phone or suggestion boxes. Interviews with employees validate that workers feel they can report concerns without fear of reprisal.

Conclusion

RSI's workforce is knowledgeable of the hazards they face and are confident they can perform work safely. Leadership conveys the message that safety is paramount and provides resources to ensure employees work in an environment free from known hazards. The contractor has an effective work planning and control system to ensure thorough understanding, control, and mitigation of hazards encountered during work using tools and processes like safety pause or stop, appropriate training, morning stand ups, weekly wrap-ups, pre-use and pre-startup analysis, pre- and post-job briefings, and JSA. RSI has established multiple avenues for employees to notify management about hazards. Field observations, document reviews, and formal and informal interviews confirmed RSI facilities personnel are conducting workplace inspections, but the Team identified deficiencies associated with consistency of hazard identification, tracking, and trending (D-1) and associated goals to improve compliance with DOE-VPP hazard tracking and trending requirements (G-1). RSI must address deficiencies and goals identified in the Worksite Analysis tenet section of this report to fully meet the expectations for continued unconditional participation in DOE-VPP.

VI. HAZARD PREVENTION AND CONTROL

The third and fourth core functions of ISM, identify and implement controls and perform work in accordance with controls, ensure that hazards are eliminated by substitution or changing work methods once identified and analyzed or addressed by the implementation of engineering and administrative controls, or personal protective equipment (PPE). Equipment maintenance processes are also considered to ensure requirement compliance. Additionally, emergency preparedness plans must be implemented to respond to and mitigate the impact of incidents. Safety rules and work procedures must be developed, communicated, and understood by supervisors and employees. These rules and procedures must be followed by everyone in the workplace to prevent, control the frequency of, and reduce the severity of mishaps.

RSI maintains access to qualified professionals as resources to workers for safety and health needs. The Team confirmed an adequate number of qualified professionals are currently employed for the scope of work and size of the RSI workforce. Interviews with RSI managers and workers did not raise any concerns about understaffed areas or safety initiatives due to a lack of qualified resources. RSI has created a culture where most hazards are promptly addressed, and employees understand their responsibilities to maintain a safe work environment. Interviews with workers confirmed qualified safety professionals regularly performed safety and health walkdowns of facilities. Additionally, employees know how to contact their safety and health representatives or the occupational medicine services as needed to manage any occupational work-related hazards, injuries, or questions.

RSI employees have access to occupational medicine services via One Source, the subcontracted medical provider responsible for scheduling employee drug testing and for performing general occupational health services. RSI does not currently have any employees enrolled in a medical surveillance program. However, RSI Industrial Hygiene staff periodically evaluate work activities to mitigate new hazards that might require employee enrollment. One Source also performs routine physicals and fit-for-duty evaluations to confirm that employees can perform their assigned work tasks. There are no in-house clinics at RSI facilities. However, One Source contracts the services of local medical providers wherever RSI employees perform work as needed. RSI managers routinely hold meetings with One Source representatives to discuss employee work operations and to ensure that One Source has complete awareness of the potential work hazards encountered by RSI employees.

The Team was able to travel to one of the DRUM sites during the onsite portion of the assessment and observed the rigorous work planning that takes place prior to executing work at a remote location. During the pre-job brief, the DRUM team members discussed potential hazards that workers and visitors might encounter, and the mitigation plan needed in the event of an emergency. This discussion included verifying the contact information of local authorities and emergency first responders to contact in the event of an emergency. RSI DRUM team members also discussed the pause or stop work authority which allows for anyone, including visitors, to call a time out if questions or doubts arise at any time during the site visit. RSI provides employees engaged in DRUM operations with Wilderness First Aid Training, automated external defibrillator, and a vehicle fire extinguisher to ensure that workers are self-sufficient when working in remote locations. In addition, RSI provides a field trauma first aid kit, including a tablet style computer which guides workers through the steps needed to medically stabilize an

injured employee based on the type of emergency and symptoms while waiting for first responders to arrive. RSI also provides employees performing work for DRUM with smartwatches to monitor their metabolic rates. RSI utilizes this data to help set parameters as part of its heat stress monitoring program to ensure that employees are safe when performing work during harsh environmental conditions. RSI also utilizes a fatigue management program in conjunction with heat stress monitoring to help prevent employee overstraining during DRUM-related work activities. The above combination of technological tools clearly illustrates RSI commitment to employee safety and constitutes a best practice for a DOE site tasked with deploying employees to a remote work location.

The RSI emergency management program has made significant progress since a 2018 needs assessment identified gaps between compliance with DOE Order 151.1 (current contracted revision), *Comprehensive Emergency Management System*, and *LM-Procedure-3-20-21.0-2.0, S37549-2.0, LM/LMS Worker Emergency Response Procedure*. The Team held multiple discussions with SMEs and managers regarding the status of the RSI Emergency Operating System, which is required by the DOE Order. The Team determined that RSI is not fully implementing an established Emergency Operating System and by extension has not fully trained expected participants in planned Emergency Operations System roles. Additionally, the DOE Order requires exercises to be conducted using the established Emergency Operating System. Without a fully established system, RSI has not yet implemented an exercise to fulfill the DOE Order requirements. The Team noted that RSI is currently working with LM to complete the overhaul of its emergency management program to ensure compliance with all aspects of DOE Order 151.1 (current contracted revision).

Deficiency:

[D-2] The RSI emergency management program is still not fully compliant with DOE Order 151.1 (current contracted revision), particularly regarding Emergency Operations System establishment, Emergency Operations System participant training covering roles and responsibilities, and implementation of emergency management exercises.

Goal:

[G-2] RSI shall prioritize and achieve timely DOE Order 151.1 (current contracted revision) compliance by applying, training, and exercising interim Emergency Operating Systems or aligning resources towards timely implementation, training, and exercise of a full-scale Emergency Operating System.

As part of the onboarding process, RSI provides a 1-hour training video to employees on how to set up their workstations in accordance with best ergonomic practices and methods. RSI has an ergonomic specialist available upon request to advise staff, both onsite and remote, who are setting up workstations. Employees can also request an ergonomic evaluation after experiencing pain or discomfort at any time during the year. While the workstation ergonomics training video is a valuable benefit, it does not prevent workers from inadvertently applying unfavorable

ergonomic practices or identify issues likely to cause discomfort before workers actually experience it.

Opportunity for Improvement:

[OFI-4] RSI should consider proactive application of ergonomic evaluations by encouraging upfront consultation with an ergonomic specialist during initial workstation set-up to help prevent chronic ergonomic injuries.

During facility walkdowns, the Team observed the implementation of the Hierarchy of Controls and multiple good practices designed to mitigate hazards at different RSI locations. The following examples illustrate RSI's commitment to continuous improvement and its dedication to providing employees with a place of employment free of recognized hazards:

- Sit/stand desk for improved ergonomic workstation setup
- Velcro® strips utilized to route/hide power cords to mitigate tripping hazards
- Building warden evacuation checklist placed by exit doors to facilitate drills and evacuation during an emergency
- Self-retractable doors used on flammable cabinets
- Motion sensors installed to monitor employee movement and automatically close a warehouse rolling door if unused
- Mobile lifting vehicles used for safely maneuvering and handling boxed records
- Multiple tornado shelter options established for staff and public

PPE is readily available to RSI workers. RSI takes employee feedback into consideration prior to purchasing specific types of PPE which reduces the potential for employees not wearing the assigned PPE due to discomfort or improper fit. RSI annually provides employees \$275 for safety shoes and \$50 for a safety vest. In addition, RSI provides employees with \$350 biennially for the purchase of prescription safety glasses, if applicable. RSI also provides other safety equipment such as gloves, hearing protection, and hardhats to employees free of charge which are widely available throughout the facilities.

RSI utilizes the Archibus system to schedule maintenance activities, create on demand work orders, and generate emails to inform employees of such work activities. Employees impacted by ongoing maintenance activities are also informed via Employee News and the LM Aware software which sends emails and texts messages to registered employees providing information of activities that might impact normal work operations. The Team did not observe any apparent deficiencies related to maintenance activities during the assessment.

RSI provides a wellness program to employees which issues an electronic monthly newsletter where employees' accomplishments are celebrated and shared alongside other relevant news and current events. Also, different wellness-related topics and events take place throughout the year such as the sleep challenge during the month of March 2024. This sleep challenge encouraged employees to track their sleeping habits, such as how many times they woke up during the night, to help them identify health concerns and plan for a healthier lifestyle. Challenge participants were entered into a drawing for prizes such as gift cards, reusable water bottles, and other items. In addition, RSI employees have access to the Jostle intranet platform which promotes employee engagement by posting wellness-related information (e.g., water safety, allergy awareness, safe driving tips) alongside birthday wishes and other team building engagements.

RSI utilizes a combination of programs to highlight employee accomplishments ranging from on-the-spot awards (gift cards ranging in value from \$10 to \$25 depending on the recommendation of the submitter) to a "Program Manager Coin of Excellence" (recognition by senior leadership after thorough review of the nominee's merits). The RSI Program Manager presents the coins during all-hands meetings or via Teams if the employee is not physically present. The Team observed a "Program Manager Coin of Excellence" ceremony during the assessment, and employees appeared enthusiastic and proud of such recognition, thus illustrating its impact on the workforce morale.

RSI has a fair disciplinary system which applies guidelines objectively. To ensure its fair application, the disciplinary process is only used after thorough fact-finding investigations to determine the circumstances leading up to incidents. Employees must annually review RSI procedure *HRP 105, Disciplinary Policy Overview*, which covers progressive disciplinary policy of first a verbal warning, followed by a written warning, then employment termination if merited. The Team did not observe any issues with the implementation of the RSI disciplinary system during the assessment.

Conclusion

RSI has developed processes and work procedures to identify and control hazards and communicates those processes via training, staff meetings, and facility postings. Managers and workers understand the Hierarchy of Controls applied to their various work area hazards and continuously work to achieve a workplace free of recognized hazards. RSI utilizes various methods within the Hierarchy of Controls to help mitigate identified hazards and reduce employee exposure. Managers and safety professionals ensure that employees have proper access to adequate PPE. Employees are confident in their ability to talk to certified safety professionals when needed, and RSI possesses an adequate numbers of safety staff tasked with providing subject matter expertise and overseeing safety programs. RSI has implemented adequate maintenance, positive reinforcement, disciplinary, and occupational medicine programs. The Team identified that RSI is not fully compliant with DOE Order 151.1 (current contracted revision) emergency management requirements related to Emergency Operating Systems, which does not align with DOE-VPP participation expectations (D-2) and an associated goal to attain compliance (G-1). RSI should consider proactive application of ergonomic evaluations by an ergonomic specialist during initial workstation set-up to help prevent chronic ergonomic injuries (OFI-4). RSI must address deficiencies and goals identified in the Hazard Prevention and Control

section of this report to meet the expectations for continued unconditional participation in DOE-VPP.

VII. SAFETY AND HEALTH TRAINING

Managers, supervisors, and employees shall know and understand the policies, rules, and procedures established to prevent exposure to hazards. Training for health and safety shall ensure that personnel understand their responsibilities, recognize hazards they may encounter, and are capable of acting in accordance with management expectations and approved procedures.

During the last review of LMS under Navarro Research and Engineering, Inc., the Team spoke of the JATR approach to training. In addition to using this approach to identify training requirements for revised safety and health procedures, Managers and training staff worked to complete JATRs for each employee position. RSI also employs the JATR method and finds it efficiently defines training and qualification requirements for all personnel. Since taking over the contract, RSI has continued honing the JATR approach and broadened the scope of safety and health training, adding additional classes for workers, supervisors, and managers ranging from eLearning classes on lock-out/tag-out examination, trailer towing, cargo loading, and general employee electrical safety. New instructor-led courses include OSHA excavation and trenching competent persons and Utility Terrain Vehicle Basic Maintenance. RSI Safety and Health Training supports the belief that every employee is responsible and accountable for supporting a learning organization that demonstrates the core value of safety in every action.

RSI Training Specialists recently transitioned from Learning Nucleus to the Absorb Legacy Management Learning Center and use the new process to create training matrices for RSI. The matrices are living documents with updates and reviews occurring every 3 years or as required to account for procedural changes or to include lessons learned. Recognizing that feedback helps improve the course content and overall training process, the training department employs three different methods. In-person training involves completing a one-page class evaluation and placing it in a central location in the classroom. Instructors ask students not to identify themselves unless they desire a personal response to an issue raised. Computer-based training has a built-in survey at the end of the course with students emailing feedback directly to the training department email address. The training department may also provide surveys on specific topics at any time. All feedback received through printed or emailed evaluations or surveys is reviewed and validated, ensuring feedback is recognized and discussed with the submitter, as appropriate.

The training department also incorporates lessons learned from case studies into training updates. For example, confined space training was modified to include the case study of the Xcel Energy Cabin Creek Fire in Georgetown, CO. The case study laid out a “perfect storm” of circumstances and hazards that caught the responders off guard, leading to multiple fatalities. The RSI training for confined spaces includes a requirement to perform air monitoring prior to entry and the entire time the space is occupied. The training department consistently seeks and incorporates feedback and lessons learned to ensure the best end product.

RSI employs various methods of leadership training and development. RSI uses DOE TLP safety culture training courses towards its efforts to establish and maintain a trusting and collaborative safety culture where all employees feel free to raise concerns. The TLP courses also help employees to foster an environment of trust, a questioning attitude, and willingness to raise

issues. RSI also instituted training initiatives such as the Safety Trained Supervisor (STS) certification via the Board of Certified Safety Professionals. The participants attend a self-paced, fully online course where they learn about regulatory compliance, how to train others in safe practices, and identification of safety hazards. RSI had nine employees enrolled in STS at the time of the assessment. RSI recently created a Leadership Development Community of Practice mentoring program to help bolster the senior leader team and ensure they are growing future managers from within and piloted the concept with a small cohort of current and potential manager candidates. The company nominated future attendees, but participants had not been selected at the time of the assessment. These examples illustrate RSI's commitment to growing future leaders and ensuring senior managers continue their professional development.

The Team met with RSI employees to discuss the "Get Out and Look" walkdowns discussed previously in this report. Volunteer workers at varying levels from EST and other local safety teams came together to perform safety and health walkdowns of their workspace using a checklist for guidance. This initiative was one that promoted employee engagement and ownership of work areas crucial in creating a safe work environment. However, the employees performing such walkdowns had not received supplementary safety and health training to improve their hazard recognition. Employees trained in hazard recognition and the use of checklists and other hazard inspection tools have more potential to effectively identify hazards during walkdowns they volunteer to perform.

Opportunity for Improvement:

[OFI-5] RSI should consider providing employees involved in EST walkdowns with additional training in the recognition of safety and health hazards to improve the effectiveness of this initiative.

Conclusion

The training department makes use of feedback and case studies to update and improve courses. Adoption of TLP safety culture training sessions aids employees in fostering an environment of trust and a willingness to raise issues. Inclusion of the STS program will help ensure RSI supervisors better understand regulatory compliance, how to train others in safe practices, and hazard identification. The creation of the Leadership Development Community of Practice mentoring program will help bolster the RSI senior leader cohort and ensure they are growing future managers from within. RSI has an opportunity to improve hazard recognition capabilities of EST "Get Out and Look" participants through training. RSI must address deficiencies and goals identified in other tenet sections of this report to meet the expectations for Safety and Health Training and continued participation in DOE-VPP.

VIII. CONCLUSIONS

RSI leaders prioritize alignment with LM counterparts under a “One Team, One Mission” policy approach. RSI managers are adapting an organizational structure geared towards long-term site stewardship and monitoring into a workforce capable of safely managing larger-scale maintenance projects. RSI workers actively contribute to their safety, and company-wide and local ESTs foster a safety focus and offer employees opportunities to collaborate towards safety efforts. RSI has an effective IWCP that drives work planning efforts via hazard analysis and SME reviews to assess employee risks. The Team observed multiple instances of RSI workers applying the Hierarchy of Controls to mitigate hazards. RSI employees feel comfortable raising concerns and seeking the support of managers or qualified safety professionals when needed. Managers and employees have multiple training resources available to support their pursuit of a strong organizational safety culture and safe work practices, including an emphasis on DOE TLP safety culture training.

The Team identified five opportunities for improvement which may benefit RSI’s pursuit of safety and health excellence, but addressing these opportunities for improvement is not required for the Team’s final DOE-VPP assessment recommendation at the conclusion of the *Conditional* Status timeframe. Opportunities for improvement include institutionalizing key management safety and culture initiatives, tying safety culture and safe work practice expectations to performance management, integrating workers into the SCIT and SCSP preparation upfront, proactively applying ergonomic consultation to initial workstation setup, and providing hazard recognition training to safety team walkdown participants.

The assessment found two deficient areas including emergency management requirement compliance and consistency of hazard identification, tracking, and trending. RSI is provided up to 1 year to complete the provided goals under *Conditional* Star status. Earlier completion is encouraged. Upon RSI goal completion, the Team will return to validate deficiency correction. The DOE-VPP Team will document goal validation and formally submit the program status recommendation.

APPENDIX: DOE-VPP Assessment Team and EHSS Leadership

DOE-VPP Assessment Team

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