Department of Energy
Under Secretary for Nuclear Security
Administrator, National Nuclear Security Administration
Washington, DC 20585

August 25, 2026

Dr. Jeffrey Griffin
President and Chief Executive Officer
Savannah River Nuclear Solutions, LLC
730-1B, 333
Aiken, South Carolina 29808

WEA-2026-01

Dear Dr. Griffin:

This letter refers to the Department of Energy's (DOE) investigation into the facts and circumstances associated with the August 6, 2025, thumb amputation at the Savannah River Site (SRS). The Office of Enforcement used the final Accident Investigation Board (AIB) report as the basis to complete this Preliminary Notice of Violation (PNOV). The Office of Enforcement did not issue an investigation summary report to Savannah River Nuclear Solutions, LLC (SRNS), and an enforcement conference was not convened for this matter. The Office of Enforcement discussed the AIB report and the incident with the Savannah River Field Office (SRFO) and agreed that issuing a PNOV based on the information gathered through the AIB investigation is appropriate.

The DOE National Nuclear Security Administration (DOE/NNSA) considers the thumb amputation to be of high safety significance. A first-year apprentice ironworker at the SRS K-Area Complex was manually guiding a hollow core drill bit into a concrete wall. The drill bit was oriented horizontally, approximately three-foot long, and unguarded, with a second ironworker operating the drill. The injured ironworker's right-gloved hand became entangled with the unguarded bit, resulting in traumatic amputation of the right thumb. This event revealed deficiencies in: (1) Management Responsibilities, (2) Hazard Identification and Assessment, and (3) Safety and Health Standards (Personal Protective Equipment).

Based on an evaluation of the evidence in this matter, DOE/NNSA concludes that SRNS violated requirements prescribed under 10 Code of Federal Regulations (C.F.R.) Part 851, *Worker Safety and Health Program*. Accordingly, DOE/NNSA hereby issues the enclosed PNOV which cites one Severity Level I violation. DOE/NNSA withheld $203,270.48 in Fiscal Year 2025 contract award fee for safety and health performance deficiencies that included the August 6, 2025, thumb amputation event. Therefore, in accordance with 10 C.F.R. § 851.5(c), DOE/NNSA proposes no civil penalties for the Part 851 violations cited in this PNOV.

SRNS initiated a root cause analysis in response to the August 6, 2025, thumb amputation event. This analysis was temporarily paused to allow for the completion of the AIB investigation.

Upon resumption, SRNS's findings closely mirrored those of the AIB report, confirming the underlying issues identified in both investigations. In addition to the analysis, SRNS developed corrective actions to address deficiencies that contributed to the event.

However, there are notable similarities between the August 6, 2025, thumb amputation and a worker hand injury on December 1, 2022, that resulted in the amputation of two fingertips and the issuance of a PNOV on April 3, 2024. Both incidents involved unguarded rotating equipment and demonstrated an over-reliance on worker "skill-of-the-craft," coupled with insufficient planning and management oversight. While DOE/NNSA recognizes these events took place within different organizations, both are part of the SRNS umbrella. The recurring nature of these issues suggests a need for a thorough evaluation of the corrective actions implemented for each event. DOE/NNSA recommends assessing whether these corrective actions are comprehensive and effective in addressing the underlying programmatic deficiencies.

Pursuant to 10 C.F.R. § 851.42, *Preliminary Notice of Violation*, you are obligated to submit a written reply within 30 calendar days of receipt of the enclosed PNOV and to follow the instructions specified in the PNOV when preparing your response. If you fail to submit a reply within the 30 calendar days, then in accordance with 10 C.F.R. § 851.42(d), you relinquish any right to appeal any matter in the PNOV, and the PNOV will constitute a final order.

After reviewing your reply to the PNOV, including any proposed additional corrective actions entered into DOE's Noncompliance Tracking System, DOE/NNSA will determine whether any further activity is necessary to ensure compliance with DOE worker safety and health requirements. DOE/NNSA will continue to monitor the completion of corrective actions until this matter is fully resolved.

Sincerely,

Brandon M. Williams
Under Secretary for Nuclear Security
Administrator, NNSA

Enclosure: Preliminary Notice of Violation (WEA-2026-01)

cc: Michael Mikolanis, NA-SV-1
Tamara Baldwin, Savannah River Nuclear Solutions, LLC

Enclosure

Preliminary Notice of Violation

Savannah River Nuclear Solutions, LLC
Savannah River Site

WEA-2026-01

A U.S. Department of Energy (DOE) investigation into the facts and circumstances associated with the August 6, 2025, thumb amputation at the Savannah River Site revealed violations of DOE worker safety and health requirements by Savannah River Nuclear Solutions, LLC (SRNS). The event occurred at the K-Area construction site when an SRNS apprentice ironworker was guiding a drill bit and their right gloved hand got entangled in the rotating bit, resulting in the amputation of the right thumb.

Pursuant to Section 234C of the Atomic Energy Act (AEA) of 1954, as amended, and DOE regulations set forth at 10 Code of Federal Regulations (C.F.R.) Part 851 (Part 851), *Worker Safety and Health Program*, the Department of Energy's National Nuclear Security Administration (DOE/NNSA) hereby issues this Preliminary Notice of Violation (PNOV) to SRNS. The violations included deficiencies in: (1) management responsibilities, (2) hazard identification and assessment, and (3) safety and health standards. DOE/NNSA has grouped and categorized the violations as one Severity Level I violation.

Severity Levels are explained in Part 851, Appendix B, *General Statement of Enforcement Policy*. Subparagraph VI(b)(1) states that "[a] Severity Level I violation is a serious violation. A serious violation shall be deemed to exist in a place of employment if there is a potential that death or serious physical harm could result from a condition which exists, or from one or more practices, means, methods, operations, or processes which have been adopted or are in use, in such place of employment."

DOE withheld from SRNS $203,270.48 of earned fee in Fiscal Year 2025 for safety and health performance deficiencies that included the thumb amputation event. Therefore, in accordance with 10 C.F.R. § 851.5, *Enforcement*, subsection (c) and DOE Acquisition Regulation 48 C.F.R. § 970.5215-3, *Conditional Payment of Fee Clause*, DOE proposes no civil penalty for the violation cited in this PNOV.

As required by 10 C.F.R. § 851.42(b) and consistent with Part 851, appendix B, the violation is listed below. If this PNOV becomes a final order, SRNS must prominently post a copy of this PNOV at or near the location where the violation occurred until the violation is corrected in accordance with 10 C.F.R. § 851.42(e).

I. VIOLATION

A. Management Responsibilities, Hazard Identification and Assessment, and Safety and Health Standards

Title 10 C.F.R. § 851.10, *General requirements*, subsection (a), states that "[w]ith respect to a covered workplace for which a contractor is responsible, the contractor must: (1) [p]rovide a place of employment that is free from recognized hazards that are causing or have the potential to cause death or serious physical harm to workers; and (2) [e]nsure that work is performed in accordance with: (i) [a]ll applicable requirements of [Part 851]; and (ii) [t]he worker safety and health program for that workplace."

Title 10 C.F.R. § 851.20, *Management responsibilities*, subsection (a), states that "[c]ontractors are responsible for the safety and health of their workforce and must ensure that contractor management at a covered workplace:... (4) [p]rovide mechanisms to involve workers and their elected representatives... in the identification and control of hazards in the workplace..."

Title 10 C.F.R. § 851.21, *Hazard identification and assessment*, subsection (c), states that "[c]ontractors must perform the activities in paragraph (a) of the section [specifically (5) [e]valuate operations, procedures, and facilities to identify workplace hazards; (6) [p]erform routine job activity-level hazard analyses], initially to obtain baseline information and as often thereafter as necessary to ensure compliance with the requirements in this Subpart."

Title 10 C.F.R. § 851.22, *Hazard prevention and abatement*, subsection (b), states that "[c]ontractors must select hazard controls based on the following hierarchy: (1) [e]limination or substitution of the hazards where feasible and appropriate; (2) [e]ngineering controls where feasible and appropriate;... and (4) [p]ersonal protective equipment."

Title 10 C.F.R. § 851.23, *Safety and health standards*, subsection (a), states that "[c]ontractors must comply with the following safety and health standards that are applicable to the hazards at their covered workplace:... (7) Title 29 CFR, part 1926, 'Safety and Health Regulations for Construction.'"

Title 29 C.F.R. § 1926 Subpart E, *Personal Protective and Life Saving Equipment*, subsection 1926.95(c), *Design and selection*, states that "[e]mployers must ensure that all personal protective equipment: (1) [i]s of safe design and construction for the work to be performed."

SRNS Integrated Safety Management System Description (U) FY2026, SRNS-RP-2008-00087, Revision 17, July 31, 2025, section II, subsection E, states that "Line Management has primary responsibility for safely operating facilities and conducting activities." Section III, subsection J(2), states that "[p]rogrammatic WSHP implementation is driven by the following implementing mechanisms: Manual 1-01, Policy 4.28, Health and Safety Programs...[o]verall policy to conduct all work in compliance with 10 CFR 851 requirements and programs."

SRNS Worker Safety and Health Program (WSHP), S-SHP-B-00005, Revision 14, July 30, 2024, states that "ISMS [Integrated Safety Management System] is the mechanism by which SRNS fulfills its responsibilities to provide a place of employment that is free from recognized hazards that cause or have the potential to cause death or serious physical harm to workers, and ensures that work is performed in accordance with applicable requirements of Title 10 CFR 851, Worker Safety and Health Program."

SRNS Surplus Plutonium Disposition (SPD) Project Y-744, Project Specific Integrated Safety Management Plan, G-PRP-K-00014, Rev. 1, October 29, 2024, section 1, Introduction, states that "[t]he key directive[s]... for ISMS... implementation [is]... 10 CFR 851, Worker Safety and Health Program." Section 2.0 Scope, states "[t]his plan flows from and is consistent with the... (SRNS) ISMS Description (SRNS-RP-2008-0008); however, the plan is not intended to supersede ISMS programs and requirements that are in place." Section 3.2, Guiding Principles, 1. Line Management Responsibilities for Safety, states "[l]ine management is directly responsible for the protection of the workers." Section 3.2, Guiding Principles, 5. Identification of Safety Standards and Requirements, states "[b]efore work is performed, the associated hazards are evaluated, and an agreed-upon set of safety standards and requirements is established which... will provide adequate assurance that the workers... are protected from unsafe conditions or adverse consequences." Further, 6. Hazard Controls Tailored to Work Being Performed, states that "[a] hierarchy of controls... is applied for each identified hazard. Hazard controls are designed with an understanding of the potential for human error."

SRNS Employee Safety Manual 8Q, Procedure 1, Safety Principles and Program Responsibilities, Revision 19, September 13, 2023, section 2.0 Scope, states that "Integrated Safety Management System (ISMS) serves as the framework for performing work safely by analyzing and mitigating hazards based on the defined scope of work...." Section 4.2 Management, states that "[m]anagement is responsible for... [p]roviding mechanisms to involve workers in the development of... identification and control of hazards in the workplace." Further, Section 4.2, states "[m]anagement is responsible for... [r]egularly and routinely inspecting and ensuring routine safety surveys of activities... in their areas of responsibility."

SRNS Employee Safety Manual 8Q, Procedure 122, Hazard Analysis Process, Revision 18, December 9, 2024, Section 5.3.3 Team/Formal Hazard Analysis 5., states that "[t]he team and formal approach allow for an activity to be fully evaluated by the appropriate SMEs [subject matter experts], line management, and workers to assist work planning in development of the hazard analysis. This includes participation in the walkdowns to define the scope of work and identify hazards. The information from the walkdowns is essential to establish a hierarchy of controls ranging from elimination of the hazard to the use of personal protective equipment (PPE) and determining the appropriate set of controls to be used for that specific activity."

Contrary to the above requirements and as evidenced by the following, SRNS did not comply with applicable requirements of Part 851 and the DOE approved WSHP. Specifically, SRNS failed to protect workers from an entanglement hazard when drilling horizontal boreholes at the K-Area construction site. Examples include the following:

1. SRNS failed to adequately involve workers in the planning process for the horizontal drilling activity, resulting in an inadequate job hazard analysis. SRNS considered the drilling task to be low risk and skill-of-the-craft, leading to an over-reliance on workers' field experience. By not seeking worker input during the development of the job hazard analysis, project managers, work planners, and subject matter experts had a different expectation of how the horizontal drilling operation would be completed. This resulted in a work package that did not adequately identify and assess critical hazards related to horizontal drilling operations with extra-long drill bits, which present an increased entanglement hazard due to the extended rotating shaft.

2. SRNS failed to effectively implement the hierarchy of controls, including providing appropriate personal protective equipment. SRNS did not:

    a. Eliminate the hazards by ensuring workers had the appropriate equipment to use a "two-bit" or "two-drill" method (using a shorter drill bit to create a pilot hole before using a longer bit for full depth, thereby avoiding prolonged manual guidance of a long rotating shaft). This would have eliminated the hazard of direct contact with the rotating bit.

    b. Provide appropriate personal protective equipment. SRNS initially provided leather gloves that allowed the bit to turn with minimal friction when a worker guided the bit. During a drilling hiatus, the workers' leather gloves were exchanged for gloves with rubberized palms to address a different task with a different hazard. When the task returned to drilling operations, SRNS did not evaluate the rubberized gloves for use in the horizontal drilling operation. As a result, SRNS failed to identify that the gloves with rubberized palms had greater friction with the rotating drill bit, thereby increasing the likelihood of hand entanglement; and

    c. Implement engineering controls by providing either a guard (a physical barrier to keep hands away from the rotating drill bit) or a bit placement jig (a device affixed to the surface to hold and guide the drill bit during initial placement), thereby preventing a worker from direct contact with the rotating bit.

3. SRNS failed to provide adequate oversight during the horizontal drilling activity. SRNS considered the drilling activity to be low risk, which led to less rigorous oversight of skill-of-the-craft construction activities. SRNS did not observe the horizontal drilling operation in the field despite hundreds of holes being drilled, missing the opportunity to identify, assess, and ultimately prevent or abate the hazards that led to the amputation event.

Collectively, these noncompliances constitute a Severity Level I violation.

II. REPLY

Pursuant to 10 C.F.R. § 851.42(b)(4), SRNS is hereby obligated to submit a written reply within 30 calendar days of receipt of this PNOV. The reply should be clearly marked as a "Reply to the Preliminary Notice of Violation."

If SRNS chooses not to contest the violations set forth in this PNOV, then the reply should clearly state that SRNS waives the right to contest any aspect of this PNOV. In such case, this PNOV will constitute a final order upon the filing of the reply.

If SRNS disagrees with any aspect of this PNOV, then as applicable and in accordance with 10 C.F.R. § 851.42(c)(1), the reply must: (1) state any facts, explanations, and arguments that support a denial of an alleged violation; and (2) discuss the relevant authorities that support the position asserted, including rulings, regulations, interpretations, and previous decisions issued by DOE. In addition, 10 C.F.R. § 851.42(c)(2) requires that the reply include copies of all relevant documents.

If SRNS fails to submit a written reply within 30 calendar days of receipt of this PNOV, then pursuant to 10 C.F.R. § 851.42(d), SRNS relinquishes any right to appeal any matter in this PNOV and this PNOV will constitute a final order.

Please submit your reply to the Director, Office of Enforcement by email to enforcementdocketclerk@hq.doe.gov.

A copy of the reply should also be sent to the Manager of the Savannah River Field Office.

III. CORRECTIVE ACTIONS

Corrective actions that have been or will be taken to avoid further violations should be delineated with target and completion dates in DOE's Noncompliance Tracking System.

Brandon Williams
Under Secretary for Nuclear Security
Administrator, NNSA

Washington, D.C.
This 25 day of Apr 2026