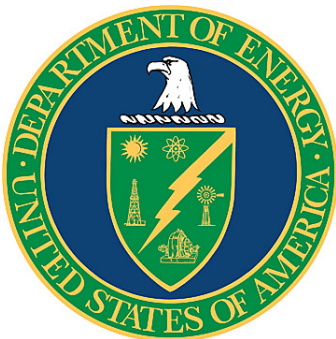


Mission Support Alliance, LLC Hanford Mission Support Contract

**Report from the Department of Energy
Voluntary Protection Program
Onsite Conditional Review Addendum
February 23-March 4, 2016**



U.S. Department of Energy
Office of Environment, Health, Safety and Security
Office of Health and Safety
Office of Worker Safety and Health Assistance
Washington, DC 20585
March 2016

Introduction

The Department of Energy (DOE) Office of Environment, Health, Safety and Security (AU) Voluntary Protection Program (VPP) Team (Team) is recommending that Mission Support Alliance, LLC (MSA)/Mission Support Contract (MSC), continue *unconditionally* as a Star participant in the DOE-VPP. In September 2014, the Team recommended that MSA continue in the DOE-VPP as a *conditional* Star participant as it worked to address significant issues affecting the relationship between MSA managers and its workers. In February 2016, the Team performed a followup assessment to determine whether MSA effectively addressed the identified conditions and recommend whether MSA should continue unconditionally in DOE-VPP. MSA needed to address six specific opportunities for improvement. The Team evaluated MSA actions to address those needs, and performed work observations and interviewed workers to determine the effectiveness of the actions. The following addendum to the original assessment report from September 2014 documents the Team's observations and conclusions.

Observations

2014 Opportunity for Improvement: MSA managers need to find ways to spend significantly more time in the field to help counter rumors, ensure the correct basis for decisions is widely understood, and develop a relationship with the workforce based on mutual trust and respect.

Summary from 2014: In 2014, most managers were not visible to employees. Meetings with DOE, tense relationships with the bargaining unit president, inadequate administrative support, too few field work supervisors, and a lack of knowledge were identified as the key reasons managers were not spending time in the field. The lack of manager presence, combined with other issues, allowed rumors to spread unchecked, and those rumors contributed to a distrust by workers of managers' methods and motives. The loss of trust and respect had significantly hampered communication. Workers' issues went unresolved for long periods further contributing to the loss of trust.

MSA Actions:

- MSA's Office of the President established expectations for field visibility for all levels of management.
- The MSA President, and the Chief Operating Officer (COO) committed to increased senior leaders' visibility in the field through field visits, attendance in safety start/back-to-work meetings, Employee Zero Accident Council (EZAC), President's Zero Accident Council (PZAC), etc.
- The Integrated Safety Management System (ISMS) Team suggested that MSA senior leaders, the MSA President, and MSA senior managers participate in field visits/safety start/back-to-work meetings, EZAC, PZAC.
- The MSA President and the COO reaffirmed their open-door policies to the workforce.
- MSA is providing the status of opportunities for improvement, and demonstrating its commitment to open doors at PZAC, Steward's meetings, PZAC meetings, senior leadership meetings, All-Hands meetings, and MSA leadership meetings.

Team Evaluation:

In March 2015, MSA appointed/hired a new President and a new COO. This new team brought a significant focus on gaining and maintaining workers' trust. Those efforts, included clear expectations for all managers to spend more time in contact with workers through field visits, safety start/back-to-work meetings, and zero accident council meetings. The MSA President is encouraging managers to reduce the number of senior level meetings, and ensure those meetings hold to scheduled times and agendas. MSA also expects joint participation between mid, and lower level managers and workers in identifying and resolving issues. Managers are using the increased field visits and "face time" with employees to communicate with the workforce. Managers now support employees, and in turn, many employees are now supportive of managers' efforts. A benefit of this improved visibility and understanding has been an increase in employee suggestions that have resulted in improved operations and customer support.

Managers have also improved interactions with the Chief Stewards. Both the President and COO attend monthly meetings with the Chief Stewards, who are senior union members for each craft represented in the bargaining unit. Both these managers reported that initially these meetings were tense with little communication from the Chief Stewards. Over the past 12 months, those meetings have developed into a lively exchange of ideas and opinions. Although these meetings do not always result in the resolution of issues, they do lead to greater understanding of those issues, and a commitment to continue working towards a resolution.

In some cases, MSA continues to face communication challenges between managers and workers. Several workers voiced their lack of understanding on some issues. For example, the MSA paint shop has a spray booth that has been out of commission for a few years. Painters have raised the status of that spray booth, and want it returned to operation to support their capabilities, but they have not received any updated information. Welders for MSA had expressed concern that they were not performing welding services for another Hanford contractor as required by the site contracts. In both of these cases, MSA managers were aware of the issue, but had not effectively communicated to the workers MSA actions and plans to resolve those issues. Although MSA had addressed both these issues in past employee meetings, managers understood that the message was not making it to the concerned workers, and they would work to improve communication.

2014 Opportunity for Improvement: MSA managers need to regain the full trust and confidence of the HAMTC safety representatives by actively seeking HAMTC safety representatives' opinions and ideas, continually creating opportunities for dialogue, and not waiting for the HAMTC safety representatives to come to the managers with issues.

Summary from 2014: MSA manager's relationship with the Hanford Atomic Metal Trades Council (HAMTC) safety representatives had suffered due to many issues and misunderstandings. Some senior managers had reduced the amount of time they spent with the HAMTC safety representatives, citing a belief that some of the HAMTC safety representatives focused more on personal agendas. In some cases, managers had held fact-finding meetings for events without inviting the HAMTC safety representatives to attend. While those cases may have arisen from a simple oversight, the HAMTC safety representatives believed MSA managers intentionally excluded them.

MSA Actions:

- MSA reinstituted the HAMTC safety representatives' job description in full, to include meeting attendance at high-level staff meetings.
- MSA granted safety representatives unconditional access to the executive offices, and safety representatives accompany senior managers during routine field visits.
- HAMTC safety representatives meet weekly with the MSA vice president for Environment, Safety and Health.
- MSA has ensured the HAMTC safety representatives are fully engaged in all safety issues.

Team Evaluation:

Over the past 12 months, MSA senior managers have reinstated the full responsibilities of the HAMTC safety representatives. Managers now recognize and respect the role the safety representatives play in helping workers identify and resolve safety issues. MSA managers have supported the safety representatives when they raised safety issues at other Hanford contractor worksites (MSA loaned labor). Safety representatives regularly attend senior manager meetings, and serve as an effective conduit for communication between senior managers and workers. Senior managers regularly accompany safety representatives on worksite visits, and encourage safety representatives to raise worker concerns. Safety representatives are an essential participant in critiques and fact-finding meetings. MSA has recognized the value of active safety representatives and is adding an additional safety representative. All the current safety representatives acknowledged the improved relationship and were satisfied that they could stop any work activity for safety issues. During this reevaluation, the Team observed several cases where the HAMTC safety representatives were involved with calling for, resolving, and lifting stop-work orders. Two cases involved site-wide stop works. The first case occurred when three construction workers in the tank farms detected bad odors in their supplied-air respirators. MSA fills the compressed air tanks for these respirators, and an MSA HAMTC safety representative stopped all work at Hanford using supplied-air respirators while MSA and the other Hanford contractors investigated the issue. In another case, the HAMTC safety representatives have been concerned about public access and associated radiological controls at the B-Reactor. A HAMTC safety representative issued a stop-work order on tours at the B-Reactor until DOE and MSA could evaluate and address the issues despite potential political sensitivity. MSA supported the safety representatives regarding the stop-work order. Many other workers reported they were comfortable reporting safety issues, asking safety questions, or calling for stop-work. MSA managers praised the HAMTC safety representatives for their ability to address issues and problems before more serious situations developed, and help MSA implement workable solutions that address worker concerns.

2014 Opportunity for Improvement: MSA needs to establish a specific list of actions that it is taking to address the HAMTC concerns, share that list with HAMTC, and ensure it does not back away from those commitments in the coming months.

Summary from 2014: Prior to the 2014 assessment, MSA recognized it had a significant issue with workforce trust. Managers focused on high response rates to the post-Hanford General Employee Training (HGET) survey and on the percentage of positive responses to interview questions about safety culture during Integrated Safety Management (ISM) implementation assessments. However, managers did not consider negative comments or ratings. The ISM

implementation assessments contained many comments by workers that indicated the trust issues, but MSA did not address these comments in its safety improvement plans (SIP) or the VPP trimester evaluations. In February, 2014, the DOE's former Office of Health, Safety and Security conducted an outreach and awareness visit to establish a better understanding of worker awareness and knowledge of their rights under title 10, Code of Federal Regulations, part 851, *Worker Safety and Health Program*, (10 CFR 851). During that visit, workers from MSA were very vocal about these issues. Afterwards, MSA began to act on the safety conscious work environment (SCWE), and it made commitments that included listening to the HAMTC safety representatives about managers' and supervisors' inappropriate reaction to stop-work, job shopping, attendance at fact-finding meetings or critiques, and worker concerns about exercising stop-work authority. Immediately prior to the 2014 assessment, the HAMTC President believed MSA was taking appropriate actions to address identified issues, but was skeptical of MSA's commitment to continuing those actions after the Team's assessment.

MSA Actions:

- MSA created additional forums to discuss all issues with the HAMTC President and HAMTC safety representatives in a full and equal partnership.
- MSA senior managers meet monthly with the HAMTC President and union stewards to discuss issues.

Team Evaluation:

For the past 12 months, MSA managers have met regularly with the HAMTC President and safety representatives to discuss and resolve HAMTC safety concerns. The HAMTC President was complimentary of the current MSA President's and COO's willingness to discuss and resolve issues. MSA has also trained managers and workers on the corrective action management system and the use of the issue identification forms. The regular use and review of safety logs is addressing safety issues. All levels of management regularly review the status of issues and zero accident councils discuss corrective actions at meetings. The President and COO hold the senior management team accountable for addressing issues.

2014 Opportunity for Improvement: MSA needs to provide additional visibility and support for the EZAC process at the working level.

Summary from 2014: Meeting attendance at mid-level EZAC meetings was consistently low, with almost half the members missing meetings on a regular basis. EZAC chairs were frequently absent from the All-Chair EZAC meetings and the PZAC meetings. Interviews had demonstrated that workers were not being provided time to attend meetings, were prohibited from attending meetings, or did not believe the meetings were worth attending because MSA did not act on EZAC issues or safety log concerns.

MSA Actions:

- The MSA President sent an e-mail to all employees with his expectations for support of the zero accident councils.
- MSA used EZACs to create SIP information posters for workspaces.
- MSA began using the All-Chair EZAC to compile issues from workspace EZACs through safety logbook entries, EZACs, or safety representatives that may crosscut divisions.

- MSA gave EZACs latitude to address company-wide issues.
- MSA revised PZAC meetings to utilize time efficiently for workers coming from the site.
- MSA gave EZACs authority to manage an MSA reward store.

Team Evaluation:

EZAC chairs and members are being permitted time to attend the meetings. For example, the crane and rigging EZAC chair attends the All-Chair EZAC and the PZAC meetings now, but was absent from those meeting in 2014. The rosters from the All-Chair EZAC and PZACs since 2014 demonstrate significant increases in attendance by both EZAC members and managers. During the PZAC meeting observed by the Team, updates on company-wide concerns were discussed, as were updates on company injury/illness rates. Interviews with safety professionals, managers, supervisors, and workers indicate that the EZAC's involvement is resolving bigger company-wide issues. The PZAC meeting observed by the Team was efficient and kept within the time constraints. The PZAC meeting closed with a message from the MSA President encouraging workers to keep asking the question until they received an acceptable answer and a decision, and to keep using the safety logs. Managers and supervisors interviewed by the Team recognized the value of the safety logs and fully supported their use.

The MSA reward system run by EZACs is very popular. Most workers interviewed are aware of the opportunity to participate in the rewards program. The Team observed numerous workers visiting the Safety Store to redeem their rewards. The most recent activity-based rewards focused on the workers completing a two-page safety quiz that reinforced various safety issues identified by the VPP committee. The quiz questions challenged workers' knowledge and effectively helped to reinforce the expectations for employees to work safely and correctly.

EZACs have funding for prizes and contests funded in part from nonallowable funds from the company. MSA recognizes employees for their outstanding contributions to the company mission via a "Breakfast of Champions" and "Honors Night." Several employees interviewed mentioned that these events are an important way for the company to recognize workers for doing a good job and also to show the company's interest in the workers.

2014 Opportunity for Improvement: MSA needs to continue to evaluate the hazard analysis process to ensure that all hazards are analyzed and that the intent of the hazard analysis is effectively defined.

Summary from 2014:

In both the 2014 and 2011 DOE-VPP reports, the Team identified opportunities to improve elements of MSC-PRO-079, *Job Hazard Analysis*. Specifically, the Team identified some examples where a lack of hazard analysis could result in potential worker exposure to hazards. In the first case, the Craft-Specific Hazard Analysis (CSHA) for the fleet maintenance mechanics recommended that for chemical use, mechanics should refer to the manufacturer's material safety data sheets (MSDS). This is a common reference in hazard analysis; however, referring the craft worker to the MSDS to determine the appropriate hazard control for the hazard placed the responsibility on that worker to perform the adequate hazard analysis rather than on the subject matter expert (SME) trained to make that determination based on the chemicals' composition and quantity. In a second example, MSA had not adequately analyzed the impact of

noise exposure to workers during work at a welding shop. Finally, MSA had not adequately analyzed the hazards associated with stacking and storing empty drums in a warehouse

MSA Actions:

In response to the 2014 VPP opportunity for improvement and recommendations from two additional external reviews, MSA is rewriting MSC-PRO-079, *Job Hazard Analysis*, while performing a job hazard analysis (JHA) pilot evaluation. Management Directive (MD) MSC-MD-WKM-60546, *Conduct of JHA Pilot*, dated 10/27/2015, describes the expectations and outcomes of the pilot.

Team Evaluation:

The MD authorizes the conduct of a JHA pilot within four MSA organizations. The MD summarizes the plan for the JHA pilot for the identified organizations and authorizes the conduct of the pilot, i.e., authorizes for selected workscope, the use of an alternate JHA process, utilizing this approved MD and the following draft documents. The resulting documents include a draft MSC-PRO-079, rev. 11, a draft MSA JHA checklist to replace the Automated Job Hazard Analysis (AJHA) tool, and an approved revision to MSA-1200369, *MSA General Hazard Analysis (GHA)*. In addition, MSA has scheduled all CSHAs for review and revision and implemented CSHAs in some organizations for the first time. The MD also provides for any additional changes to the MSA *Work Management Program* documents, as required.

MSA has completed the initial rewrite of the JHA process; however, the work control group is still in the process of preparing a report describing the result of the pilot work activities performed under the new JHA process. MSA expects to complete and implement the revised JHA process by the fourth quarter of calendar year 2016.

The new JHA procedure focuses on aligning the screening criteria in Appendix B, MSC-PRO-079, with the hazard analysis methods (GHA, CSHA, forms and permits, and the new JHA checklist). Specifically, if the GHA or CSHA properly identifies and analyzes a hazard, the new JHA does not need to include new analysis. This approach will permit work packages to credit the workers' knowledge of the skill-based work and training (i.e., GHA, CSHA) and focus on the hazards and controls beyond the skill of the craft. This should result in less cumbersome work packages that focus on the work rather than repeating known hazards and controls throughout the work document.

In addition, MSA is eliminating the computerized AJHA tool from the JHA process and using the newly created JHA checklist. During its review, MSA recognized that the development of the AJHA tool preceded the implementation of the GHA or CSHA processes. The AJHA tool, initially designed to be a comprehensive hazard analysis tool, did not incorporate GHAs and CSHAs when MSA implemented those processes. As a result, the AJHA tool often "recreated the wheel" by reanalyzing skill-based work (GHA, CSHA) for each job. This overlap made the AJHA tool cumbersome and resource-intensive, which in turn, resulted in planners and supervisors defaulting to standing AJHAs in lieu of activity-specific analysis for work activities.

The new JHA checklist integrates GHA and CSHA and guides work planners and SMEs to identify and analyze the unique hazards associated with a specific work activity. MSA developed the JHA checklist using safety and health requirements from 10 CFR 851 and the Occupational Safety and Health Administration's standards and guides. Although MSA has not completed revising the JHA process, the Team believes MSA's approach will improve the hazard analysis process.

2014 Opportunity for Improvement: MSA needs to walk down all work areas and inventory any PM or CM work that is affecting the work environment, prioritize the work, and ensure workers understand the priorities and schedule. Further, it needs to train managers and supervisors to recognize and eliminate, rather than tolerate, these workarounds.

Summary from 2014:

During the walkdown of the work and break areas, the 2014 Team found several workarounds that were safety hazards or quality of life issues. In a dark hallway in building 2101M, an extension cord connected to a four-foot fluorescent bulb was leaning against the wall. The extension cord ran through the ceiling tile and plugged into an outlet on the other side. Although this extension light helped workers see the posted facility maps, people could knock it over easily, creating a safety hazard. In another case, the 2014 Team found that in Building 2101M warehouse a kitchen sink was inoperable and had a metal cover placed over it. Someone had disconnected the water supply lines but the sewer line was intact. Starting around 2005, the warehouse supervisor requested an investigation of the inoperable sink, and for several years afterwards. Not receiving an answer, the supervisor quit asking for the investigation, and washed plates under the bottled drinking water dispenser or in the bathroom. When the warehouse workers tried using kitchens in other work areas, the occupants of those areas tried to discourage the warehouse workers. Based on these observations, MSA needed to review all its work and break areas for workarounds and fix them.

MSA Actions:

- A HAMTC safety representative takes the MSA President and COO to a randomly chosen work area every week to meet the workers and discuss workers' issues. The VPs also walk down their respective areas to meet workers and discuss issues. These walkdowns have been occurring over the past year. In building 2101M, the extension cord and fluorescent bulb in the hallway are gone.
- All the hallway light fixtures have fluorescent bulbs making the hallway bright and easy to walk through.
- A restroom near the high voltage lineman work and break areas recently received a new restroom fan that was broken for many years.
- Several shops in 2101M are planning a move to a vacant 5-wide trailer which will improve the work conditions with office space and restrooms.

Team Evaluation:

MSA did not completely understand the 2014 opportunity for improvement, and only considered specific conditions identified by the Team rather than the underlying causes. Specifically, that

conditions existed with which workers had become frustrated, and were either accepting the condition, or working around the issue using improper equipment installations. The improvement in communication, and trust between managers and workers in the past 12 months has created an atmosphere where workers are once again willing to raise issues. However, MSA has not identified or prioritized other existing conditions, including one item identified in the 2014 assessment. The inoperable sink in Building 2101M remained unresolved; however, during this assessment, the HAMTC safety representative took the MSA President and the COO to the warehouse where they listened to issues raised by the workers and evaluated the inoperable sink. During that visit, workers identified several additional issues including: the need for more shelf space to store the increasing amount of materials coming from Washing River Protection Solutions, another contractor at the Hanford site; the need for more personnel to inventory the materials in the full receiving area; the need for more personnel to do required inventory checks and reconfiguration of the existing storage shelves as the inventory changes; and the need for radiological surveys of used items, such as lift station pumps, before receiving those items into the warehouse. The President agreed to look into these issues and provide feedback to the workers.

These conditions identified by the warehouse workers indicate MSA should actively continue seeking workers' concerns, particularly for conditions that have existed for several years. MSA should continue to encourage workers to bring issues occurring in their work environments to their leaders, EZAC, or use other means of communications, and persist until they are resolved.

Opportunity for Improvement: MSA should continue to encourage workers to bring issues occurring in their work environments to their leaders, EZAC, or use other means of communications, and persist until those issues are resolved.

Conclusions:

MSA has made excellent efforts to reach out to workers, regain trust, improve communications between managers and workers, and ensure it addresses identified issues in a timely manner. Many workers were openly complimentary toward managers' and supervisors' efforts to reach out and listen to workers issues, and ensure safety. MSA still has additional opportunities to identify and address longstanding issues or conditions. Fortunately, the relationship between workers and managers has created an atmosphere that is conducive to the effective resolution of issues. MSA managers believe the current relationship helps MSA perform its fundamental mission, and achieve long-term success. The Team recommends that MSA continue participating in DOE-VPP at the Star level, without condition.

Injury Incidence/Lost Workdays Case Rate (MSS and Teaming Partners)					
Calendar Year	Hours Worked	Total Recordable Cases (TRC)	TRC Incidence Rate	DART* Cases	DART* Case Rate
2013	3,132,749	14	0.89	11	0.70
2014	2,981,889	14	0.94	8	0.54
2015	2,965,517	9	0.61	7	0.47
3-Year Total	9,080,155	37	0.81	26	0.57
Bureau of Labor Statistics (BLS-2014) average for NAICS** Code #561 (Administrative and support services)			2.4		1.4
Injury Incidence/Lost Workdays Case Rate (Subcontractors)					
Calendar Year	Hours Worked	TRC	TRC Incidence Rate	DART* Cases	DART* Case Rate
2013	33,648	0	0	0	0
2014	31,318	0	0	0	0
2015	20,155	0	0	0	0
3-Year Total	85,121	0	0	0	0
Bureau of Labor Statistics (BLS-2014) average for NAICS** Code #561 (Administrative and support services)			2.4		1.4

* Days Away, Restricted or Transferred

** North American Industry Classification System

3-year TRC Incidence Rate, including subcontractors: 0.81

3-year DART Case Rate, including subcontractors: 0.57

Discussion

The injury rates at MSA decreased 35 percent in 2015 from the previous year, and the DART rates are decreasing yearly. MSA recorded nine injuries in the last 6 months, with three occurring in January 2016. MSA addressed the injuries and preventative measures at safety meetings, morning meetings, and the EZACs. MSA began the “Walking Through Life” safety awareness campaign in the past year to emphasize hazards of the workplace and good safety behaviors as the injury rates began to increase. Additionally, MSA started the Monday morning back-to-work meetings on safety topics to focus attention on the work environment after a three-day weekend. The Team did not find any incentives to discourage the reporting of injuries, illnesses, or safety concerns by workers. The MSA injury/illness and DART rates meet the expectations for continued participation in DOE-VPP.