



**Rocky Mountain
Remediation Services, L.L.C**
protecting the environment

Rocky Flats Environmental Technology Site
P O Box 464
Golden Colorado 80402-0464
Phone (303) 966 7000



May 12, 1999

Joseph F Cirelli
Manager Contracts and Procurement
Kaiser-Hill Company, L L C
Building 850

CORRES CONTROL
LTR NO

Originator Ltr Log #

JAK-031-99

99 - RF - 02024

RMRS ACTIONS TO ENHANCE WORK CONTROL-JAK-031-99

DIST LT ENK

CARMEAN C H

CRAWFORD A C

GUINN L A

HUGHES F P

LAW J E

OVERLID Y W

PATTERSON J

TRICE K

WHEELER M

Wolf, K A

Kasner, J. L.

CRONIN K D

ELLIS S K

REED A B

STACHOWIAK, R

SWANSON D R

Farrell, REXX

Adams, David

RMRS RECORDS

FILE

RF CORRES

CONTROL

TRAFFIC

PATS/T130G

CLASSIFICATION

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER

SIGNATURE

NA

Date

IN REPLY TO RF CC NO

ACTION ITEM STATUS

PARTIAL/OPEN

CLOSED

LTR APPROVALS

ORIG & TYPIST INTRACS

Ref JFC-069-99, PRELIMINARY NOTIFICATION OF NON-COMPLIANCE

Purpose

Purpose of this correspondence is to provide Kaiser-Hill Company, L L C (Kaiser-Hill) with information regarding actions by Rocky Mountain Remediation Services, L L C (RMRS) to correct the problems identified in the referenced Preliminary Notification of Non-Compliance

Discussion

RMRS management has reviewed the Preliminary Notification of Non-Compliance forwarded by Kaiser-Hill. Our response includes a brief summary of our operating philosophy regarding work practices, a description of actions already taken regarding Lockout/Tagout issues and other work control issues, and a description of on-going work monitoring. RMRS is continuously monitoring the effectiveness of work control measures in place. We plan to identify and make necessary adjustments on a continuing basis to prevent recurrence of unsafe practices.

On behalf of all RMRS management and employees, I want to stress that non-tolerance of unsafe or insufficiently controlled work is a gross under statement of our corporate philosophy. RMRS provides "Remediation Services," i.e. risk reduction. Unsafe work practices are the antithesis of our corporate mission. All RMRS employees have been repeatedly briefed and continue to receive information and training stressing our complete dedication to performing work safely in a controlled manner. Emphasizing safety is a permanent on-going task at RMRS.

As a company, RMRS endeavors to take positive actions to improve safety performance. We routinely conduct all hands training, tool box meetings, and actively practice Conduct of Operations including Pre - Evolution Briefings. Our supervisors at all levels receive additional training emphasizing the RMRS commitment to safe work practices. We do take disciplinary action when appropriate. Such actions range up to and include termination of employment in severe cases.

RMRS routinely pauses to evaluate work with identified control problems. This is mandated by RMRS Operations Directive OPS-DIR- 001, "Safety and Environmental Stewardship Directive". Additionally, RMRS has interrupted work company wide 3 times in the last 7 months to conduct all hands training and seek input from all employees on measures required to maintain a safe work environment.

Our actions to correct Lockout/Tagout and other work control problems include the following:

- **Company wide pause in operations**

10/1/98 – Prior to October 1, all RMRS operations managers were briefed on the Accident Investigation Report covering a fatal incident at the Advanced Test Reactor. Emphasis was placed on causal factors including work control. On October 1, all RMRS operations managers conducted employee briefings and discussions on the INEEL fatality. Employee feedback was solicited to improve safety performance – See attachment 1, FPH -129-98

12/1/98 – All RMRS work was paused to conduct all hands briefings on work control, COOP, and LO/TO. Recent Rocky Flats events were emphasized and a video on the INEEL fatality was shown to re-enforce the need for work control, COOP, and LO/TO – See attachment 2, FPH-020-99, dated November 24, 1998

3/9/99 – All RMRS third tier contractor D&D and construction stopped until 100% oversight of work control by RMRS operations managers was guaranteed. Restart of each activity required review by the Chief Operating Officer of the specific activity's work controls. See attachment 3, FPH-050-99 & attachments dated March 10, 1999 (total of 22 pages), and attachment 4, Slide from RMRS Board of Directors Meeting of April 27, 1999 and slides from All-Managers Meeting on LO/TO held March 25, 1999 (total of 14 pages).

- **Work suspensions**

10/27/98 – Work was stopped on all standard work packages following a near miss due to improper rigging. Each work package was reviewed and managers and performance level employees retrained prior to work restart – See attachment 5, FPH-01-99 & attachments dated November 4, 1998 (total of 10 pages), and attachment 6, 98-RF-05545 dated November 12, 1998 (total of 4 pages)

- **Employee communications**

10/1/98 – All RMRS operations managers conducted employee briefings and discussions on the INEEL fatality. Employee feedback was solicited to improve safety performance – See attachment 1 listed above

12/1/98 – All RMRS work was paused to conduct all hands briefings on work control, COOP, and LO/TO. Recent Rocky Flats events were emphasized and a video on the INEEL fatality was shown to re-enforce the need for work control, COOP, and LO/TO – See attachment 2 listed above

3/22/99 – RMRS held an all managers/supervisors meeting to emphasize safety and work control Training was conducted to highlight recent adverse performance trends and re-enforce management expectations, - See attachment 4 listed above

3/25/99 – Again RMRS conducted all managers/supervisors training This training concentrated on LO/TO – See attachment 4 listed above

4/21/99 – Routine communications from RMRS senior management continue to emphasize safety culture within RMRS – Attachment 7, E-Mail from Fred Hughes dated April 21, 1999

- **Lockout/Tagout Training**

11/4 - 11/11/98 – Tool box meetings for hourly employees Staff meetings and cascade training were conducted for salaried employees Attendance was taken to assure that all employees received the training - See attachment 5 listed above

3/25/99 – An all managers/supervisors meeting was conducted to re-emphasize LO/TO and management expectations of safety culture - See attachment 4 listed above

In addition to the positive actions enumerated above, RMRS, when necessary, utilizes punitive measures Disciplinary actions taken in response to work control problems have included written reprimands, time off without pay, and termination of employment. We neither take these actions lightly, nor avoid them when they are appropriate

Our Chief Operating Officer has directed the Nuclear Safety Department to routinely monitor work control performance to identify developing adverse trends. Work control problems will trigger an immediate, in depth review and corrective actions by management In the absence of adverse indicators; the collective effectiveness of Lockout/Tagout and other work control measures will be evaluated annually

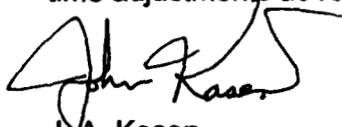
Attachment 8 to this correspondence is a chart of LO/TO events from the 3rd Quarter of FY97 through the current day We have reported B771, B774, and B779 events separately from other RMRS facilities since RMRS assumed responsibility for these buildings late in the 1st Quarter of FY99

Required Response

No response is requested, however I look forward to discussing these actions with you and welcome your comments We are monitoring the effectiveness of our programs to make real

J A Kasen
JAK-031-99
May 12, 1999
Page 4

time adjustments as required to continuously increase program effectiveness



J A Kasen
Director, Procurement/Subcontracts
Rocky Mountain Remediation Services, L L C

REF/ref

Attachments
As Stated (8)

cc
F A Casella
S K Crowe
W A. Harding
A M Parker



**INTEROFFICE
CORRESPONDENCE**

DATE September 24, 1998
TO Operation Directors
FROM F P Hughes, Operations, Building T893A, X5841 *Fred*
SUBJECT OPERATIONAL PAUSE ON OCTOBER 1, 1998 - FPH-129-98

Attached is the INEEL Accident Investigation Report covering the incident at the Advanced Test Reactor where one employee lost his life and several others were severely injured. I'd like each of you to review this report with your managers prior to October 1, 1998. There are several lessons in the report we should take on board and review how we conduct business.

Some of the causal factors identified include lack of a systematic method for identifying, institutionalizing, or implementing requirements, acceptance of unstructured work, faulty design and installation, failure to use physical barriers, level of knowledge of staff, failure to apply lessons learned from earlier events, and failure to assess impact of incremental cost cutting on worker safety. All these to some degree can be identified within RMRS.

On October 1 I am directing that each group conduct a short pause in work activities. During the pause I want the following items discussed:

- This report and its findings will be discussed in detail with all employees
- Feedback from employees on what we can do better in FY99 based on our performance in FY98. I'm interested in suggestions to improve in safety, compliance, conduct of operations, employee communication, etc (don't give me feedback similar to the FY97 review that included items like we need bigger offices)
- Discussion of what's expected of us in FY99 for performance measures and activities
- Congratulate everyone on an outstanding FY98. The bar was raised and we met it!

Include your safety, quality assurance, and environmental compliance support in your meetings. I encourage you and your managers to use this pause as an opportunity to get us going in FY99, talk to the employees, provide refreshments for them, listen to their comments, and start gearing up for an even better FY99. If you have questions or need information to help with the pause call me at 966-5841.

lff

Attachment
As Stated

cc
C H Carmean - w/o Attach
A C Crawford - w/o Attach
M E Findley - w/o Attach
S R Sutton - w/o Attach
K Z Wolf - w/o Attach



**INTEROFFICE
CORRESPONDENCE**

DATE November 24, 1998
 TO Operation Directors
 FROM F P Hughes, Operations, Building T893A, X5841 *FPH*
 SUBJECT PAUSE IN OPERATIONS - FPH-020-99

We just had an incident in Building 444 involving a forklift delivering a roll of plastic hitting an overhead 440V bus bar. From what I understand the pathway was not walked down, there was no spotter, and they delivered the load prior to stopping and telling someone.

This is on top of the Building 881 LO/TO incident where some workers cut a 5 inch section of pre-heat coil out of 15# steam system without a LO/TO. They had asked for one, the paperwork was checked requiring a LO/TO, yet because there was already a system breach and the system was drained through a strainer, they felt it was safe to cut the section out for measurements.

And if this wasn't enough we have had two recent crane incidents with DWRC where an outrigger lifted 3-4 inches off the ground, the load was secured, and the crane repositioned. The second one involved conducting a lift without the use of a mouse or latch on the hook.

As a result and in order to get every RMRS employees' attention as well as the subcontractors supporting us I am instituting a pause in Operations on 12/1/98. The timing coincides with the transfer of B771/776/779 to RMRS so they can attend too. On 12/1/98 Kelly Trice will conduct briefings inside the PA and I will conduct them outside the PA. The briefings will cover the incidents in B881, B444, and the two crane events. We will also show the tape of the INEEL fatality to re-enforce the need to work control, COOP, and LO/TO compliance.

This pause is not optional and attendance will be documented. It is imperative that every employee at all levels take this seriously and review how we conduct work. The lesson plan/outline will be available on 11/30/98 for others across the Site to use.

llf

cc
 C H Carmean
 A C Crawford
 S K Ellis
 M E Findley
 W R Sproles



Rocky Mountain
Remediation Services, L L C
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INTEROFFICE MEMORANDUM

DATE March 10, 1999

TO Distribution

FROM Fred Hughes, Chief Ops Officer & Deputy General Mgr , T-893-A, X5841 *F.Hughes*

SUBJECT SUSPENSION OF 3rd TIER SUBCONTRACTOR CONSTRUCTION/FIELD
WORK ACTIVITIES - FPH-050-99

Effective immediately all field activities involving 3rd tier subcontractors, primarily construction and D&D are suspended. This is due to a recent rash of incidents which indicate a lack of control of the work being performed by our subcontractors. If this trend continues the potential exists to severely injure someone or cause damage to property.

Prior to restart, each of you and your key project managers must meet with me and identify the controls you have implemented to ensure 100% oversight of your 3rd tier subcontractor work. These controls may include checking in with your field supervision, describing the tasks to be completed, the area to be worked in, the length of time expected in the area, and the controls implemented to ensure safety, radiological and compliant work practices.

An overview of the recent incidents will be provided to you early this afternoon to aid you in your discussions with your project team and subcontractors.

jbd

Distribution

Rick Dunn
John Law
Wayne Sproles
Kelly Trice
Martin Wheeler
Charlie Wolf

cc

Kaiser-Hill
Lane Butler
Steve Crowe
Wynn Harding
Tim Hedahl
Brian Mathis
Alan Parker
Steve Poulston
Alan Rodgers

Rocky Mountain Remediation
Clegg Crawford
Jim Patterson



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MEMORANDUM

DATE March 10, 1999
TO Fred Hughes
FROM Roland Bannister 
SUBJECT OHM MANAGEMENT CONTACT

OHM Energy Services manager on site is Jay Green (5834/pg 212-2521) OHM is part of an IT team headquartered in Pittsburg Normally they are teamed with Parsons in the DTC, but no engineering services are required for the B440 project so Jay's boss (Tom Dillon) in Pittsburg is the manager you'll want to speak to He can be reached at (412) 858-3947 He wants to talk to you, so if you haven't contacted him by the end of the day he should be trying to get you

I've spoken to Jay at length over yesterday's events as well as corrective actions arising from the fact-finding meeting held this morning He is aware that you want Tom Dillon's personal assurance that the continuation of these safety/quality/work control deficiencies will not be tolerated any more, and what controls have been put into place to prevent recurrence

cc Martin Wheeler

Decker, Janet

From Dieter, Thomas
Sent Wednesday, March 10, 1999 3 01 PM
To Hughes, Fred
Subject Safety Stand Down

Mr Fred Hughes,

The following items have been covered with the two AECCM Contractor working at B779 (DWRC & FWEC), to increase awareness of numerous Radiological Safety Violations and Several Safety Events

- All workers and staff briefed on Building 771 & 779s Radiological Safety Violations
- All workers and staff briefed on Safety Events & "Near Misses"
- AECCM's briefed on RMRS's policies for Radiological Violations Warranting Disciplinary Action
- Potential Disciplinary Actions were covered and who they would apply to
- Input from all personnel were discussed and suggestions recorded
- All personnel attendance were recorded

To insure that we have positive controls for the AECCM Subcontractors work, RMRS Management at B779 will use the following methods

- Subcontractors must attend and have work listed on the POD (Plan of the Day)
- Subcontractors must attend and have work listed on the POW (Plan of the Week)
- EO's and IWCP's must be approved by the Contractor and PRC
- All work must be approved through the CCA'S
- Continuous oversight will be provided through Contractor's Construction Coordinators
- Industrial Health and Safety oversight will be provided by the Contractor
- All Radiation Protection will be provided by the Contractor for positive coverage

The 779 project is requesting that a release to resume work can be obtained with the above listed briefings and positive controls mentioned that are in place

Deputy Project Manager
Thomas Dieter

Decker, Janet

From: Barroso, Jeff
Sent: Wednesday, March 10, 1999 10 30 AM
To: Decker, Janet
Cc: Vaughn, Terry, Spears, Mark, Trnce, Kelly, Wolf, Charlie
Subject: Safety Stand-Down Schedule

3/10/99

Stand-Down Schedule:

B779 Steelworkers, RCTs and Salary

Presenter: Kelly Trnce

Location: B779 Break Trailer

Time: 12 00 - 12 30
12 45 - 1 15
1 30 - 2 00

B779 DWRC and Foster Wheeler

Presenter: Tom Dieter

Location: DWRC Trailer

Time: 12 00 - 12 15 (DWRC Personnel)
12 15 - 12 30 (DWRC Personnel)
12 30 - 12 45 (FW Personnel)

B771 Personnel

Presenter: Charlie Wolf

Location: B771 Cafeteria

Time: 1:00 - 1:30 (?)

Stand
Down
today
771 / 779

Topics

- **Numerous Radiological Safety Violations**
- **Several Industrial Safety Events & "Near Misses"**
- **Consequence of Radiological Violations**

B771 Radiological Violations

- 1/6/99 - An individual acting as the guide for an orientation, forgot to wear his TLD.
- 1/28/99 - Individual exited RBA through a posted door without performing the required hand & foot survey.
- 1/28/99 - Tour guide failed to assure that escortee was wearing the proper PPE.

B771 Radiological Violations

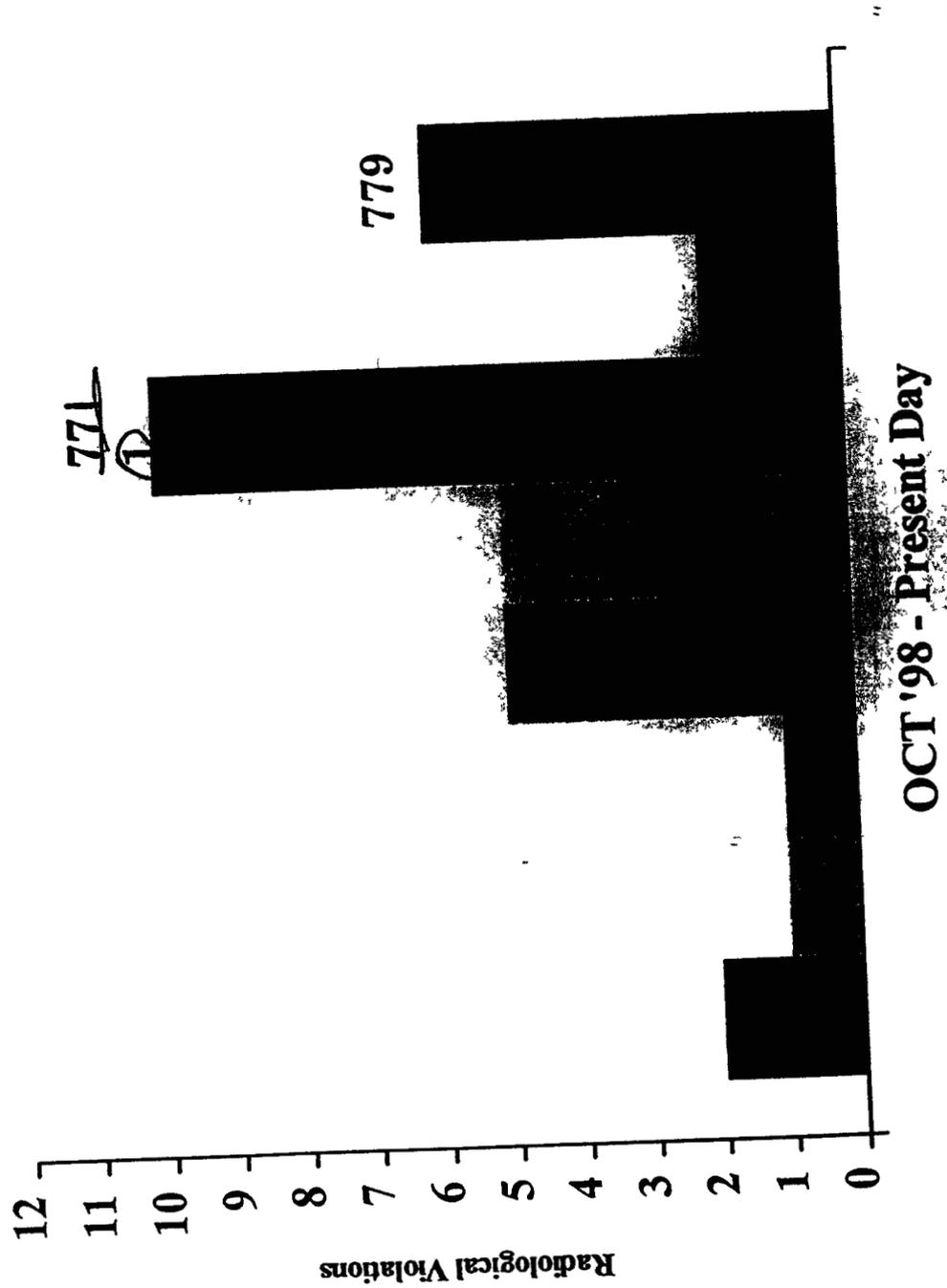
- **2/23/99 - Employee used the PCM-2 to self monitor, instrument alarmed, employee acknowledged the alarm, but then proceeded to exit the RBA without notifying an RCT.**
- **3/4/99 - Worker entered Room 114 without full face respirator; room was posted ARA**

B779 Radiological Violations

- **1/27/99 - Individual walked into a posted ARA (B729) without full face respirator.**
- **2/1/99 - Worker entered Room 137/140 without wearing a full face respirator, room was posted as an ARA.**
- **3/8/99 - Worker not wearing TLD while inside the RBA as required by posting.**

Site Radiological Violation Distribution By Building

- 440
- 460
- 883
- 371
- 707
- 771/774
- 776/777
- 779/729



Safety Events & "Near Misses"

- Worker on roof with out Fall Protection Plan.
- Individual was smoking while fueling a diesel tank.
- Worker cut finger while staging lockers. (Injury not reported to the CCA.)
- Improper check-in or no check-in with CCAs for Work Control.
- Worker smashed finger while performing ventilation removal.

Safety Events & "Near Misses"

- Utilizing lifts without proper barricading.
- Not wearing prescribed PPE on numerous occasions.

March 10, 1999

Radiological Violations Warranting Disciplinary Action

- Working Outside of RWP/Procedure Requirements
- TLD Not Worn in Dosimetry Required Area
- Violating a Posting Requirement
- Note: Most Radiological Improvement Reports (RIRs) are not considered violations.

Potential Disciplinary Action

- **Consequence of Radiological Violation:**

First Offense - TLD Pulled and Documented Written Reprimand

Second Offense - Time-off without pay

Note: These disciplinary actions apply to Salary, Steelworker and Sub-contractor Personnel. Management and Union will work with Labor Relations on mitigating circumstances.





INTEROFFICE MEMORANDUM

DATE March 12, 1999
TO John Law, SS & ER Projects, T893B, X4842
FROM Vern Guthrie, SS & ER Projects, T891C, X7647
SUBJECT RESTART OF BUILDING 788 DECOMMISSIONING - CLG-005-99

PURPOSE.

The purpose of this correspondence is to convey information to begin restart activities at Building 788

DISCUSSION

In response to the recent "Stop Work" initiated in B788 and the Fred Hughes memo (FPH-050-99) regarding suspension of third tier subcontractor work activities, the project has taken the following steps to ensure 100% oversight of all subcontractors

- Modifications to site access and a visitor log for all individuals entering the work areas has been established (see Attachment 1) An accountability board has been erected Field supervision will verify that the log and accountability board is consistent.
- Pre-Evolutionary briefing checklists have been expanded to include project specific items for daily discussion (see Attachment 2).
- Project Management and Engineering performed a walk down of B788 to ensure all mechanical and electrical systems are in a safe configuration All other identified deficiencies within the facility are on the attached list (Attachment 3)

An evaluation of current work scope has been performed and it has been determined that Mike Nelson will be on site at least 75% of the time during the remaining debris removal activities to assist the present Construction Superintendent If a major evolution is planned (electrical work, heavy equipment lift, etc), Mike will be present During the demolition/removal activities, Mike will be at the B788 site at all times

APPROVED

John Law, Vice President
SS & ER Projects

CONCURRENCE FOR RESTART

3/12/99
Frederick P. Hughes, Chief Operating Officer & Deputy General Manager
RFETS Operations

Upon correction of deficiencies in Attachment (3)

rcg

cc
M Nelson
T Humiston

STOP!

**You must have the following to
gain access to this work site:**

- Approval from facility manager
- Building Indoctrination
- Accountability Tag
- Visitor Log Sign-In
- Accountability Board and Visitors Log located at B788 South Entrance

ATTENTION!

Authorized Entrance ONLY!

Contact Facility Manager: Mike Nelson

For Site Access Approval

Extension: 7647

Radio: 4541

Digital: 212-6334

alternate extension 4225, radio 4514 or dp 212-5986

Work Control Number MA78EG21

APPENDIX 3
Page 2 1 of 2

B788 Decommissioning
Project Specific Addendum to

PRE-EVOLUTION BRIEFING RECORD

Evolution Description _____
Evolution Supervisor. _____
Date/Time: _____

<u>Briefing Check Off List</u>	<u>Initials</u>
A1.. Supervision and project chain of command clearly established and understood.	_____
A2. Escort Requirements Discussed (Escort shall not leave escortee at any time)	_____
A3 Reminder that all workers have the authority to stop work if they see an unsafe condition.	_____
A4. All personnel understand that in the event that any abnormal condition is encountered, that has not been discussed in the pre-evolutionary meeting, they must immediately STOP the evolution and contact field supervision	_____
A5 Verify all personnel have received building indoctrination training	_____
A6 No maintenance work on RFETS property or systems shall be performed by subcontractor	_____
A7 All personnel are aware of accountability board and visitor log locations	_____
A8 Verify sufficient field supervision is available to cover all work evolutions	_____
A9 Verify that Radiological Operations has attended briefing and that all personnel are aware of site radiological postings and conditions	_____
A10 Verify that all craft participating in evolution are on the List of Qualified Individuals	_____
A11. Ensure that all personnel are aware of the work location and understand the scope of work to be performed	_____
A12 Ensure that all personnel understand current radiological and general health and safety controls in place	_____

Building 788 Walk down
Identified Deficiencies

- 1 Emergency eyewash stations need inspections
- 2 All building fire extinguishers need updated inspections
- 3 Electrical outlet box cover on North wall (interior of B788) is broken
- 4 Crate in front of disconnect box on Southeast wall needs to be moved to obtain 36" minimum distance
- 5 Unprotected light bulb (cove/globe needed) at Southwest side (exterior) of B788



Rocky Mountain
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INTEROFFICE MEMORANDUM

DATE March 10, 1999

TO Distribution

FROM Fred Hughes, Chief Ops Officer & Deputy General Mgr , T-893-A, X5841 *FH Hughes*

SUBJECT INCIDENTS LEADING TO SUBCONTRACTOR CONSTRUCTION/FIELD WORK
ACTIVITIES - FPH-052-99

Attached is the list of recent subcontractor incidents that has led to the suspension of work for all 3rd tier subcontractors involved in construction or D&D activities on March 3, 1999

Please review this list and use these incidents as examples of what NOT TO DO, in your discussions with your project teams and subcontractors. Please refer to my previous memo, FPH-050-99 for the other steps necessary before restart will be approved.

jbd

Distribution

Rick Dunn
John Law
Wayne Sproles
Kelly Trice
Martin Wheeler
Charlie Wolf

RECENT SUBCONTRACTOR INCIDENTS

DATE	FACILITY	CONTRACT	DESCRIPTION
02/09/99	776?	DWRC	Telecommunications Technicians were installing telephone lines into a new trailer for DWRC when they drilled into two energized 120 volt power lines which caused two electrical circuit breakers to trip (Ref RFO—KHLL-779OPS-1999-0007)
2/17/99	440	OHM E/S	Delivery person walked into Rm 114, a Rad Buffer Area (RBA) without TLD Ref JEP-011-99, IR written
2/22/99	440	OHM	Track blasting of potentially lead paint without appropriate PPE (although at the time personnel believed all necessary precautions had been taken) Samples taken In addition, in violation of contract, the waste was removed from the site (IR event 99-0152) The waste has been recovered OHM removed safety rep due to ineffectiveness
03/08/99	776?	DWRC	IR – A DWRC worker was observed in an RBA without his dosimeter Total time in the RBA prior to his discovery was less than fifteen minutes
3/2/99	440	OHM	NCR violation, scabbling started on repair of concrete without NCR approval Electrician ignored direction from building management to cease activity
3/9/99	440	OHM	Electrician enters RM 106 without TLD (RIR issued). IR 99-0151
3/9/99	440	OHM	Incident with live bare wires leading from portable generator arcing IR 99-0153
3/10/99	788	DWRC	11 00 AM, Electrician requested to determine if charging unit for fork truck was operational utilized equipment set to the correct voltage and an arc was seen
3/10/99	788	DWRC	12 30 AM, Electrician walked through/stepped into a CA to look at panel box

(Reported from B776) In the past few weeks there have been several incidents that were not reportable under ADM 16 01

- RFCSS employee smoking while filling the generator with gasoline
- DWRC employee had minor finger injury DWRC took him to Medical, did not notify Facility Management
- Two Independent Verification Team members (DOE) entered Building 729 without building indoctrination or checking in with Facility Management

From:
FRED HUGHES

Rick Dunn / Cathy Smiley - fax 5716 x7729

John Law / Marcia Nivens - fax 5198 x4842

Wayne Sproles / Noreen Suniga - fax 7326 x5790

Kelly Trice / Janet Decker - fax 8027 x6383

Martin Wheeler / Virginia Bargas - fax 2623 x9878

Charlie Wolf / Grace Hall - fax 4942 x7184

Please see attached.

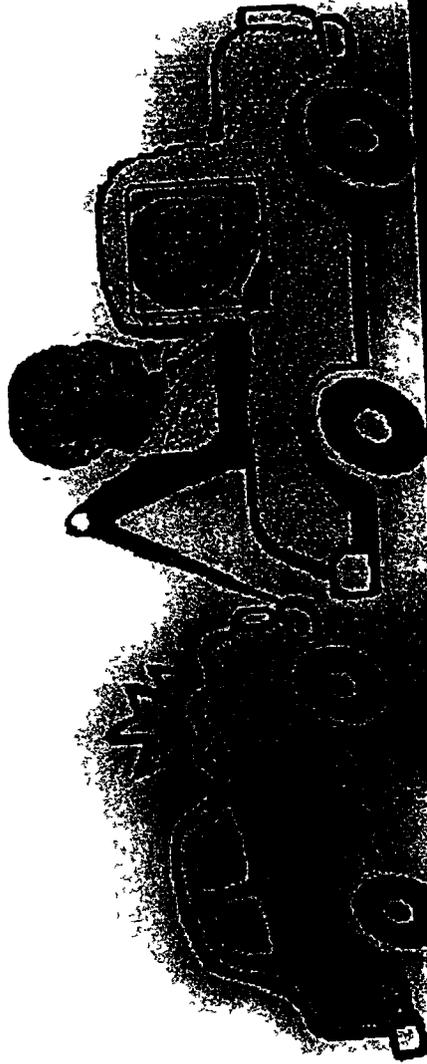
This is the list of incidents for review with your folks before restart will be approved.

#of pages - including this cover page 3

**Thank You,
Janet Decker
X4162 or pager 212-4659**

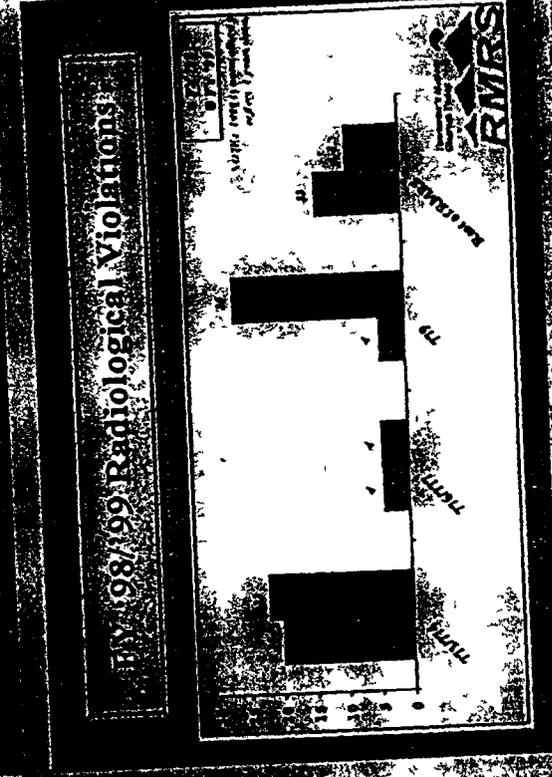
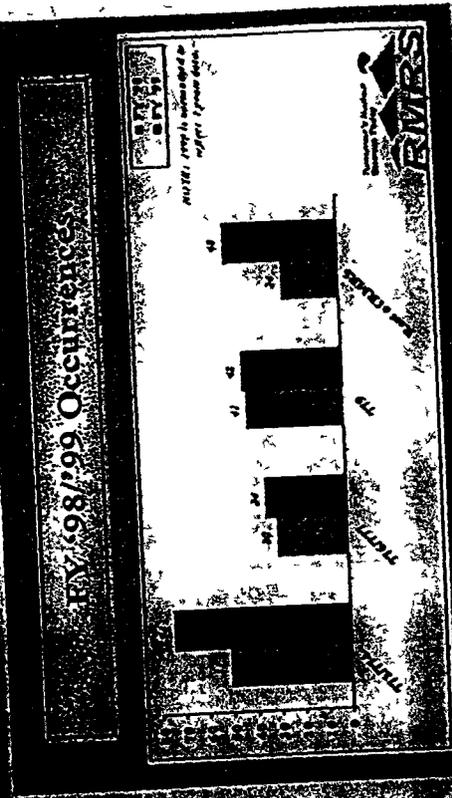
ocus on Rad Violations & Occurrences

Attachment 4



Actions Taken to Date

- Safety shutdown in B771 & B779 on 3/9/99 ✓
to discuss radiological performance
- All Managers/supervisors meeting on 3/22/99 ✓
to address performance trends and expectations
- Review of radiological violations by COO with employee and line management
- Suspended D&D and Construction 3rd tier work on 3/9/99 until 100% oversight guaranteed
- Conducted Lockout/Tagout training with all Managers/Supervisors on 3/25/99 ✓
- Developing scenario-based training for radiological and environmental compliance
- Conducting two Excellence in Operations classes in May by Fred Carlson





Rocky Mountain
Remediation Services, L.L.C.
protecting the environment

All-Manager's Meeting

March 25, 1999

Agenda

- **Manager's Roles and Responsibilities**
- **Scenario's - group exercise**
- **Wrap-up**

LO/TO Driven

REQUIREMENTS

- **Permitting Order Set**
- **LO/TO Program**

Recent LO/TO Work Control Events

- **Building 881 - steam system**
- **Building 771 - actuator**
- **Building 771 - glovebox**
- **Building 836 - condensate pump**
- **Building 44 - drums**

**Manager's
Roles and Responsibilities (cont.)**

**• Non-nuclear facilities energized
electrical approval authority**

- Areas or operations with a facility or project manager

– Facility manager shall be the approval authority unless the work involves a project manager, in which case the project manager would be the approval authority

**Manager's
Roles and Responsibilities (cont.)**

• Non-nuclear facilities energized
electrical approval authority
– Areas or operations with a facility or project manager
– Facility manager shall be the approval authority unless the work involves a project manager, in which case the project manager would be the approval authority

Scenario "A"

You are touring your facility and you notice excessive packing leakage on a 125 psig steam isolation valve. It appears as though packing and adjustment is all that is needed to correct the problem. You just have to give it a wrench and go. You could make the adjustment. You could call for a technician to make the adjustment. You could call for a technician to make the adjustment.

Scenario "B"

Maintenance applies a LOTO to isolate an air compressor on Monday for an overhaul job expected to last five days. This LOTO includes repositioning the isolation valves and the electrical circuit breaker. The LOTO is verified subsequent Monday per HSP 2.08. The job is worked Tuesday with no incident. On Wednesday morning the workers, immediately after the Pre-employment brief, commence work on overhauling the compressor. One of the workers receives an electrical shock. If HSP 2.08 was properly followed could this problem have been prevented?

Scenario "C"

Maintenance applies a LOTO to isolate an air compressor on Monday for an overhaul job expected to last five days. This LOTO includes repositioning the isolation valves and the electrical circuit breaker. The LOTO is verified subsequent Monday per HSP 2.08. The job is worked Tuesday with no incident. On Wednesday morning the workers, immediately after the Pre-employment brief, commence work on overhauling the compressor. One of the workers receives an electrical shock. If HSP 2.08 was properly followed could this problem have been prevented?

SCENARIO #1

Participant Exercise

SCENARIO #1
Participant Exercise

A 15-psig steam regulator in your facility has failed and you have scheduled maintenance to replace the regulator today.

1. Describe the process that is used to isolate the regulator.

2. Identify who should be involved.

2. What type of system isolation is required per HSP 2.08?

3. Would any of your actions change if the system were Domestic Cold Water?

SCENARIO #2

Participant Exercise

SCENARIO #2 Participant Exercise

While performing maintenance, pipefitters were removing an air supply line from a 90 psig air actuator. When the fitting was loosened, they discovered that air to the actuator had not been isolated. Upon realizing the air line was pressurized, the fitting was re-tightened and work was stopped. The Configuration Control Authority reviewed the work package with the evolution supervisor and the engineer that worked the package. The package was thought to provide LOTO details to isolate two actuators. After further examination by the engineer, it was determined that the procedure did not provide isolation for both actuators.

1. Describe what caused this problem.

2. Were the actions taken by the craft appropriate?

3. If HSP 2.08 was properly followed could this problem have been prevented?

SCENARIO #3

Participant Exercise

SCENARIO #3
Participant Exercise

During a MBWA, you notice that one of the locks on a recently installed LO/TO is not locked.

1. What are your actions per HSP 2.08?

2. What are the follow-up actions?

SCENARIO #4

Participant Exercise

SCENARIO #4

Participant Exercise

Maintenance has completed repairing a fan and needs the LO/TO removed so a Post Maintenance Test can be performed. The craft completes the LO/TO Removal Request and gives it to the LTM. The LTM notices that the person who hung the tags has transferred to another company and is unavailable.

1. What actions must the LTM perform to have the tags removed?



MEMORANDUM

DATE November 4, 1998
TO All RMRS Managers
FROM F P Hughes, Vice President, Operations, T893A, X5841 *FPHughes*
SUBJECT LESSONS LEARNED - FPH-011-99

The attached Lessons Learned documents a near miss here at Rocky Flats that had the potential for serious personnel injury. Many of the findings are potentially applicable to work performed by RMRS.

Due to the seriousness of this event the following actions are to be taken

- 1 For hourly workers, the event will be briefed at tool box meetings prior to the end of the day on Thursday, November 11, 1998. This includes all subcontractors and subcontract work scoped to RMRS
- 2 For all salary grade employees, including subcontractors, this event will be briefed at staff meetings or through Cascade briefings by end of the day on Thursday, November 11, 1998
- 3 Training rosters shall be used to document all briefings. Return or fax the rosters to the appropriate Training Coordinator immediately after completion of the briefing
- 4 Operations management will conduct spot checks with workers to ensure the message was adequately communicated
- 5 Provide any worker feedback through the directors to me on similar conditions existing out there that could injure employees if not corrected

Thank you for your cooperation in communicating this vital message and increasing the awareness of our work force

TWO/sle

Attachment
As Stated

cc

43

Lessons Learned Portable Building in PA
Briefing Number 019-866-01/PORT

Approved by TW Overlid TW Overlid 11/4/98
Director Print Name Signature Date
Program Compliance

I Instructions

- A Please generate an Attendance Roster for each presentation of this briefing
- B Review the contents of the Incident Report Portable Buildings in the PA to include the Background, Assessment Findings, Factors that contributed to the errors, and Corrective Actions Entertain Questions as you present the materials
- C Send the original Attendance roster to Esther Beck, RMRS Training, T893A You may keep a copy for your area records The original attendance roster with Incident Report and Briefing outline will be sent to Plant Training Records

II Closing (summary)

Stress the importance of ISMS safety features

- Define the scope of work
- Identify the hazards
- Implement controls
- Safely perform the work
- Provide feedback

Applying these Principals to all routine and non-routine work activities, incidents like this will be avoided in the future

Questions?

INCIDENT REPORT

Portable Building Placement in the PA

Background:

On October 27, 1998, at approximately 1 30 PM, a portable building was being placed near Building 563 in preparation for future telecommunications use. The portable building had been delivered to the location by the building manufacturer's truck and the truck driver proceeded to move the building to its' approved location. The building, which weighs 3000 lbs, was positioned on the transport vehicle on an uphill slope (vehicle pointed down the slope). The driver passed a chain around a power pole and attached the chain to the tie points on the front of the portable building for the purpose of holding the building in its' relative position while the driver offloaded the structure from the truck.

The truck is equipped with rollers to allow offloading (see diagram 1). The driver drove away slowly allowing the structure to slide down the rollers and off the back of the truck. The driver then repositioned the truck on the other side of the approved location and parked in such a way as to allow the winch on the truck to pull the structure up the slope and into position (see diagram 2). A 3/8-inch cable was attached to the building for towing. The "Handbook for Riggers" indicates the capacity for 3/8 inch cable to be as low as 2200 lbs. The vendor was unable to provide the certified rated capacity for the cable used and was unprepared to complete the evolution following other RFETS HSP Hoisting and Rigging requirements.

In addition to "rigging" concerns, the vendor erroneously utilized a 13Kv power pole as a tie off point to prevent the building from sliding down the slope until he could reposition the truck and reattach the tow cable. A DOE Facility Representative stopped the work and contacted a DOE safety Representative. Safety representatives from RFCSS and Dyn I&ET also came to the site. After evaluating the operation, the vendor was unable to satisfy the site safety requirements. Therefore, site support resources were mobilized and the evolution was safely completed.

Management Assessment began when the Dyn I&ET Safety Manager arrived at the work site that same afternoon and additional senior management was engaged the following day.

Assessment Findings:

Upon investigation, the Root Cause for the incident is determined to be *failure to follow established procedures*. The following findings were identified and supports that determination.

- 1 The Vendor that delivered the portable building to the site was selected to return and place the shelter in the PA. This Vendor is not on the Approved Services list as a qualified vendor to perform the work.

- 2 The functions and principles of ISMS were not followed All management personnel have received training on ISMS and this had been verified by K-H Team in August and reported as such
- 3 Work was not adequately planned according to IWCP
- 4 Hazards were not identified Although a walk down had been conducted two months before the placement of the shelter, management failed to take into considerations height clearances which resulted in a change at the time of delivery of the shelter
- 5 A current job walk down and pre-evolution meeting was not conducted
- 6 Standard K-H procedures were not followed.
- 7 The project manager was not qualified to perform the work The manager had never had to place a shelter in a location like this or perform similar work He relied on the subcontractor whom he believed qualified to decide on how to place the building on the selected site
- 8 Common sense did not prevail

Factors that contributed to the errors:

- The vendor and Dyn I&ET management failed to stop the process when it became obvious that the operation was unsafe
- Telecommunication management and supervision failed to recognize the potential hazards associated with this non-routine movement of heavy materials Planning lacked a review process for safety to review and approve the evolution.
- Telecommunication supervision did not recognize unsafe actions and therefore did not implement adequate controls A work package (attached) was developed However, it was a standard package for telecom wiring and cabling and did not address the safety aspects of moving heavy materials. In addition, there was no "pre-evolution" safety meeting conducted to allow safety concerns to be addressed
- When performing the work the expected load factor exceeded the rated load capacity of the vendor equipment used for the operation. In addition, the vendor lacked adequate rigging equipment as specified in 1-K71-HSP-12 02 (Hoisting and Rigging requirements)
- Activity Screening Process procedure was not completed This screening would have provided adequate feedback to ensure that the "Hoisting and Rigging Checklist" was completed
- Site Support groups, i e , Transportation/T P. Enterprises, that are familiar with the Site are available and should have been utilized
- Standing Order 51 (SO) (Attached) that provided additional requirements for review of IWCP Work Packages had been issued the day before (10/26/98) However, I&ET had not received it Had that SO been received and implemented the evolution would have been re-evaluated for safety

Corrective Actions

In response to these findings, Dyn I&ET is implementing the following corrective actions

- 1 All work on standard work packages has been stopped until management personnel and employees receive remedial training and the work packages have been reviewed and updated appropriately
- 2 Telecommunications personnel are receiving training in hazard recognition This training will include an overview of the Activity Screening Process and IWCP requirements and will begin with supervisors who manage IWCP work packages
- 3 All Telecommunication subcontractor work will be reviewed and approved by a qualified safety professional before work is allowed, verification of vendor training and qualifications to perform the work will be included in the review and approval process
- 4 Subcontract bid packages will be provided to ESH&Q for review and approval when issued
- 5 A safety representative will attend the management conduct of a pre-evolution safety briefing before work is allowed to begin and will be present at the start of work
- 6 All equipment used will comply with 1-K71-HSP-12.02 and will have documented certified load ratings present with the equipment
- 7 In cooperation with Kaiser-Hill Safety & Industrial Hygiene's proposed new HSP requirement for moving heavy materials, Telecommunications will become familiar with its requirements and implement the requirements
- 8 Disciplinary action for the supervisor in charge of the work consists of a letter of reprimand and two weeks suspension without pay In addition, the supervisor's manager will receive a letter of reprimand The subcontractor, DynCorp I&ET will receive a warning letter from KH Contracts The supervisor is a valued long term RFETS employee who does not have any previous disciplinary problems His attitude has been cooperative and it's obvious that he has learned much from this situation, and has everyone involved
- 9 Procurement will evaluate their procedure to ensure "furnish and install" purchase requisitions receive the appropriate level of safety requirements

In addition

- 1 A recommendation will be forwarded to Kaiser-Hill procurement requesting action be taken to suspend, for an appropriate period, the subcontractor responsible for moving the portable building

- 2 Formal COOP training was conducted for all Dyn IE&T management personnel on 10/27/98
- 3 All work control packages are being reviewed
- 4 Each manager will make weekly presentations to the KH CIO and IRM managers on policies, procedures and work practices during weekly management reviews

The conditions that resulted from this activity highlights the importance and applicability of the five core functions of the Integrated Safety Management System

- Define the scope of work
- Identify the hazards
- Implement controls
- Safely perform the work
- Provide feedback

By applying these principals to all routine and non-routine work activities, incidents like this will be avoided in the future

Questions regarding this Incident Report document should be directed to DynI&ET Occupational Safety & Health at extension 6621

Assessment Finding	Corrective Actions
<p>The subcontractor, tasked to move the shelter, was on the K-H Vendor list and not on the Services list. The Subcontractor should not have been used to place the shelter in the PA.</p>	<ul style="list-style-type: none"> • Dyn I&ET Contracting will screen all potential vendors for qualifications. Vendor selection will be based on S-H and CCIP along with ability to perform the work. • I&ET professional safety personnel will review pre-award solicitations. • Site contract personnel will be used where applicable. • Action has been initiated to suspend this contractor for an appropriate period.
<p>Standard Kaiser-Hill procedures, to include the principles of ISM, were not followed.</p> <ul style="list-style-type: none"> Define the scope of work Identify the hazards Implement controls Safely perform the work Provide feedback 	<ul style="list-style-type: none"> • Remedial training is being given to management and supervisory personnel. • Additional training on COOP and IWSP requirements was provided 10/29/98, other training to follow. • All Dyn I&ET managers have had previous training in ISMS.
<p>Work was not adequately planned. A standard work package was used to move this building in place. The work control package was for installation of cables, telephones, fiber, etc. in the zone.</p>	<ul style="list-style-type: none"> • All telecommunications work was halted until each work package is reviewed by the Safety Manager and Senior Management. • Instructions have been issued on the proper use of standard work packages. Future work which does not match the standard work control package will require a separate work control package, reviewed and approved by the Safety Manager.
<p>Hazards were not identified. The height of a steam pipe resulted in the change of the planned off-loading point for the building.</p>	<ul style="list-style-type: none"> • The additional training and emphasis on safety includes a focus on implementing and following standard procedures. • In this case, a pre-evolution walkdown with appropriate management and safety personnel would have resulted in a different approach than was taken.
<p>Project Manager was not qualified to manage the work.</p>	<ul style="list-style-type: none"> • Project managers will be selected on their ability to manage the work. • When internal, qualified project managers are not available, other site contract personnel with appropriate qualifications will be chosen to perform the work.
<p>Common sense did not prevail.</p>	<ul style="list-style-type: none"> • Additional training, along with disciplinary actions, has generated attention and discussion of safety issues throughout the group, with a new level of interest and involvement. • It is obvious that this project was not reviewed by management personnel above the supervisory level. The supervisor was in over his head from the start.
<p>The vendor and Dyn I&ET supervisor failed to stop the process when it became obvious that the operation was unsafe.</p>	<ul style="list-style-type: none"> • Additional training has already begun, and will resume after the supervisor returns to work after his two-week suspension. • Action is being taken to suspend the vendor, also.

Greg Cockett
4153

Standing Order No 51
Revision 0
Effective Date 10/26/98
Expiration Date 04/26/99
Page 1 of 1

SUBJECT: Lockout/Tagout (LO/TO) Requirements For IWCP Work Packages

Purpose. This Standing Order provides additional requirements for review of IWCP Work Packages

Recently, an occurrence in Building 371 revealed significant deficiencies in maintenance work control regarding control of vendors involved in Troubleshooting and Repair (TS&R) using Standard Work Packages. This incident included a lack of LO/TO, inadequate Pre-evolution Briefings and lack of clear assignment of supervisory responsibility for the conduct of work.

Scope and Applicability: These compensatory actions apply to all Kaiser-Hill Principal Subcontractors for work in progress using IWCP Maintenance Work Packages

Instructions

For all maintenance work in progress at RFETS using IWCP Maintenance Work Packages, discontinue work under the work package until the following immediate compensatory actions are accomplished

- Subcontractors are to have appropriate level of management review all open IWCP Maintenance Work Packages for appropriateness and adequacy of the LO/TO
- Subcontractors are to ensure that LO/TO is specifically addressed at the applicable Pre-evolution Briefings before authorizing the release to work the IWCP Maintenance Work Package.

These actions are to be completed for each IWCP Maintenance Work Package prior to starting work on that work package. The appropriate level of management should keep a record of review and release to work

For new maintenance work, subcontractors are to initiate a process for ensuring that the work is reviewed for LO/TO adequacy and LO/TO is specifically addressed at Pre-evolution Briefings

Subcontractors report the status of these actions to the Kaiser-Hill Chief Operating Officer by COB, October 27, 1998

These compensatory actions will continue until a work release process is reviewed and appropriate changes are made to the Site infrastructure.

Independent Safety Review (if required) NOT REQUIRED [Signature] Date

Approved by S. POLSTON, KH COO [Signature] ^{FOR S. POLSTON} 10/26/98
Name/Title Date

Responsible Manager Name: [Signature] RS. BARNETT, K-H NUCLEAR OPERATIONS 10/26/98
Name/Title Date

September 10, 1998

Page 1 of 2

WORK CONTROL FORM

Work Control Number. T0098132

Davis-Bacon Status.

Ops Area 66

Program Code AD

REPORT INITIATION SECTION

Originator Name: LINDSEY, OBIE C

Date: 10-SEP-1998 Time: 11.03

Org: SEMA

Emp No 517122 Bldg: T112A Ext: 5655

Source Documents

OTHER N/A

EQUIPMENT/FACILITY

Description: TELECOMMUNICATIONS MINOR MAINTENANCE REPAIR PACKAGE FOR CSS BUILDINGS. INCLUDE WIRING AND CABLING IN DESIGNATED COLD AREAS. RFP.

Equipment Description: TELECOM WIRING & CABLING

Manufacturer:

Model No

Serial No.

EM/PM No

Bldg No 112

Loc. RFP

Operability Status: N Out of Commission

N Out of Service

Y Operational

N Limited Use

Recommendation: REPLACES T0094443

SHIFT MANAGER PROCESSING SECTION

Compensatory Measures

DUPLICATE

MANAGER PROCESSING SECTION

Program Area DCI INFFCM INFRASTRUCTURE TELE Date. 10-SEP-1998 Time 11 05 am

Priority Level: 3 Priority Class

WBS Code. HC011010

Corrective Action Title TELECOM SUPPORT FOR CSS BUILDINGS, RFP

SUPPORT REQUIREMENTS

N NCR Applies

N Fire Sys Deficiency

N Occurrence Report

N Breach of Primary RAD Cont

N Engineering Support

N Davis Bacon Review Req'd

N VSS/SSSC Mod/Repair

N External Compliance

N ABD/LCO Condition

N Asbestos Deficiency

Criticality Safety

Work Description. 02 REPAIR/MODIFICATION

Maintenance Manager Name FERNANDEZ A. P

Emp No R510654

Resolution/Comments SEE ABOVE

57

September 10, 1998

Page 2 of 2

WORK CONTROL FORM

Work Control Number: T0098132

----- RESPONSIBLE ORGANIZATION SECTION -----

Resp Manager Name LINDSEY, OBIE C

Resp Org: TEL - TELECOMMUNICATIONS LAN LINES

Craft Lead. _____

Support. _____

Approved By; FERNANDEZ A P

Appr Emp No. R510654

Date: 10-SEP-1998

----- CLOSEOUT SECTION -----

Standard Work Package Used: _ Standard Work Pkg No _____ Rev ____

Date Closed ____-____-____ Close Status: OPEN

Responsible Mngr: LINDSEY, OBIE C

Closeout Approved By _____

DUPLICATE

Post-It® Fax Note 7671		Date 9/24	# of pages 2
To Obie Lindsey	From B. Fernandez	Co	
Co./Dept	Phone # 5653	Fax # 7195	
Phone # 5653			
Fax # 4646			

Hughes, Fred

From Law, Edward
Sent Tuesday, October 27, 1998 3:47 PM
To Patterson, Jim, Hedahl, Tim
Cc Hughes, Fred, Bargas, Virginia
Subject Standing Order 51 Action Items

Jim,

RMRS has completed a review of active maintenance work packages for appropriateness and adequacy of existing LO/TO's. Below is a list of all these active maintenance work packages. In addition, RMRS specifically addressed LO/TO at the Pre-evolution Briefings prior to commencing work on the specific maintenance work package. It should be noted that the old Pre-evolution Briefing Form required addressing 'tagouts', whereas the new Pre-evolution Briefing Form does not specifically require addressing 'tagouts'. Maintenance has continued to make it a point of addressing all tagouts during the Pre-evolution Brief, even though not specifically required.

Active Maintenance Work Packages

- * T00098403-1 TS/R Heaters
- * T0098403-4TS/R Condensate Pump
- * T0098403-33 Repair F407 Supply Fan
- * T0098411 Install Electric Heaters in B729
- * T0098501 TS/R Condensate Pumps
- * T0098503 TS/R Condensate Pumps P6 & P7
- * T0094245-104 Repair Heaters
- * T0096573 Provide Electrical Power to Drum Crusher
- T0094249-024 TS/R All Furnaces
- P0382728 Inspect Dock Levelers (PMO)
- * T0098465-050 Replace Gasket & Repair Flange
- * T0085605 Replace Reheat Pump #3, Rm 204
- * T0095269 Disconnect Electrical Power to Control Console Rm 112, B886

New maintenance work will follow the same process. The LO/TO will be called out in the maintenance work package and will be discussed at the Pre-evolution Brief.

Any questions please call me on extension 8169

Ed Law

Virginia, please pass on to Martin

Hughes, Fred

From Schweinsberg, Eric
Sent Tuesday, October 27, 1998 11 16 AM
To Raaz, Dick
Cc Trice, Kelly, Korenko, Mike, Hughes, Fred, Dieter, Thomas
Subject Standing Order 051-98

Dick,

We completed a review of the active maintenance work packages (listed below) This was performed by our LO/TO Manager, Adam Smith, who also acts as a CCA. As work is released by the CCA, he will ensure that the PEB included the LO/TO, and that a second verification walkdown was performed. This activity will be documented in the CCA log-book. Call me at your earliest convenience if you have any further questions.

- * TOO98403-1 TSR Heaters
- * TOO98403-4 TSR Condensate pump
- * TOO98403-33 Repair F407 Supply Fan
- * TOO98411 Install Electric Heaters in 729

Eric

*Clegg
Fred has and
is preparing
memo.
Hank*

Standing Order No 51
 Revision 0
 Effective Date 10/26/98
 Expiration Date 04/26/99
 Page 1 of 1

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* [Subcontractors report the status of these actions to the Kaiser-Hill Chief Operating Officer by COB, October 27, 1998

These compensatory actions will continue until a work release process is reviewed and appropriate changes are made to the Site infrastructure

Independent Safety Review (if required): NOT REQUIRED *[Signature]* Date

Approved by S. POLSTON, KH COO *[Signature]* ^{FOR S. POLSTON} *[Signature]* Date 10/26/98

Responsible Manager Name. R.S. BARNETT, K-H NUCLEAR OPERATIONS *[Signature]* Date 10/26/98

*Fred note report
date
[Signature]*

Patterson, Jim

From: Patterson, Jim
Sent: Wednesday, April 21, 1999 3:42 PM
To: Broussard, Marcella, Ellis, Susan, Kesson, Ardys, McAndrew, William, Overlid, Terry, Thomson, Jim; Vaughn, Terry
Subject: FW: Culture within RMRS

Importance: High

Folks,

I concur with Fred's comments below. In some measure, they tie in with the discussion that I am having with all of you and your staffs concerning breaking down the barriers to closure and minimizing traps that we seem to continually set for ourselves in virtually every aspect of our work. Please think about Fred's remarks and discuss these concepts in your own words with your staff at every level

Thanks, Jim

—Original Message—

From: Higgins, Fred

Sent: Wednesday, April 21, 1999 1:51 PM
To: Dunn, Rick; Sproles, Wayne; Law, John, Patterson, Jim, Haug, Darold; Bargas, Virginia; Wolf, Charlie; Trice, Kelly; Mills, Steve
Cc: Crawford, Clegg
Subject: Culture within RMRS
Importance: High

Just a short message on a subject you'll hear over and over as the days and weeks pass

I strongly believe that one of the basic reasons we have had and continue to have too many radiological violations and occurrences is that we accept them throughout line management as part of doing business. For too long it has been part of the culture that they are just a result of doing more radiological work out here at RFETS. I've had employees tell me that over the last few weeks. I've had managers say it. And this initial note is to tell you that I firmly believe that that justification is false.

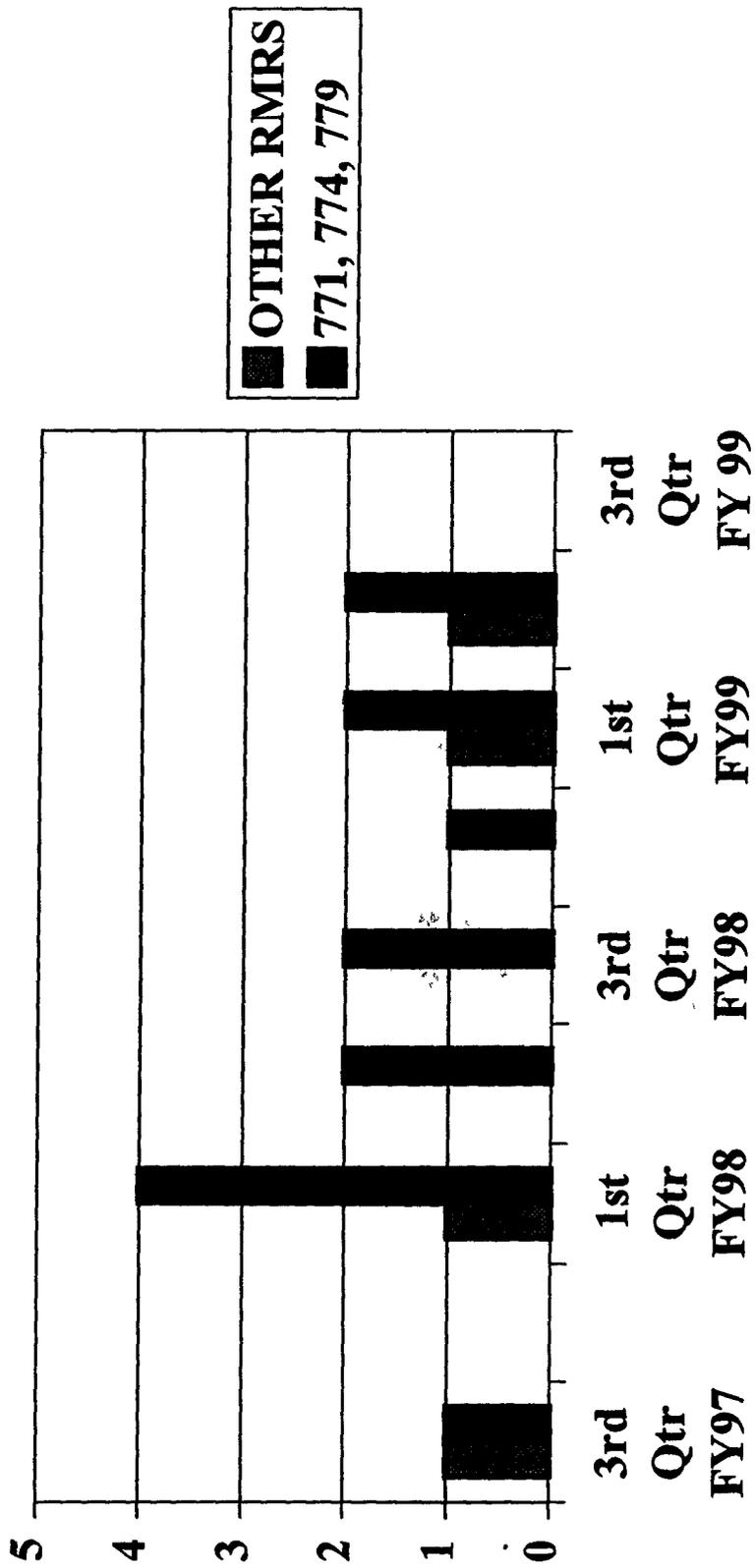
Every occurrence and rad violation we have I personally feel as if I have failed in some small way. And until each and every manager and supervisor feels the same way and is intolerable of these events, we will continue to average 8-10 occurrences a week and 3-4 rad violations a month. And on September 30, we can all sit around crying in our beers over lost bonuses and potentially lost closure contract.

So our culture has to change to one of intolerance for sloppiness that leads to rad violations and occurrences. We have to anticipate where the critical violation traps are and spring them before we step into them. We have to ensure the A/Bs are flexible enough to allow staging material outside for shipments (as an example). We have to make sure we insist on compliance with postings and procedures from everyone including subcontractors and sister companies. We have to insist that support organizations exist to make the closure buildings and projects a success or their need to exist ceases. And we have to personally feel that we have failed to a small degree with every rad violation or critical infraction, or personal error occurrence that occurs.

Only then will we have control of ourselves. Only then can we stand up and say we are a truly outstanding operation. It's up to each and everyone of us to change this culture around as fast as possible. And we have demonstrated we're the best at getting things changed, working as a team, and getting it done!

Thanks, Fred

LO/TO EVENTS



25/88