

Selected Excerpts from the Department of Energy's
***Independent Oversight Assessment of Nuclear Safety Concerns at the Hanford
Site Waste Treatment and Immobilization Plant***

January 13, 2012

“Overall, the HSS Independent Oversight team determined that most personnel at WTP believed that safety was a high priority. However, during the safety culture evaluation, a significant number of staff within ORP, DOE-WTP, and BNI expressed reluctance to raise safety or quality concerns for various reasons. Fear of retaliation was identified in some BNI groups as inhibiting the identification of problems. Employees’ willingness to raise safety concerns without fear of retaliation is an essential element of a healthy safety culture, and therefore significant management attention is needed to improve the safety culture at WTP. While EM, ORP, DOE-WTP, and BNI managers espoused support for a healthy nuclear safety culture, they do not have a full appreciation of the current culture or the nature and level of effort needed to foster a healthy safety culture, including a mature and effective SCWE, and the WTP community has not been sufficiently engaged in creating a mutually shared and desired culture. In addition to the concerns about the current safety culture, the Independent Oversight team identified significant concerns about ORP, DOE-WTP, and BNI processes for nuclear design and safety basis and for managing safety issues” (Executive Summary, p. x).

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“For example, 48 percent of the responding electricians disagreed or strongly disagreed with a statement on the K-MR survey stating ‘I am confident that the ‘zero tolerance’ policy against retaliation at WTP is enforced” (p. x).

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“...there is a definite unwillingness and uncertainty among employees about the ability to openly challenge management decisions. There are definite perceptions that there is not an environment conducive to raising concerns or where management wants or willingly listens to concerns. Most employees also believe that constructive criticism is not encouraged” (p. iv).

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“Fear of retaliation was identified in some groups as inhibiting the identification of problems” (p. iv).

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“BNI management did not adequately evaluate the significance of the collective safety culture issues documented by the DNFSB, the 2010 HSS report, BNI internal reviews, and other external assessments” (p. vi).

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“In this atmosphere, instances where individuals perceive that their concerns about design questions are not listened to, that management does not want to hear problems, that technical dissent is suppressed, and that blame is being assigned unfairly are almost inevitable (for both Engineering and E&NS staff members). The end result is that a significant number of staff either express a general reluctance to raise issues or indicate perceptions of retaliation; the situation is not consistent with a healthy safety culture” (p. viii).

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“ORP, DOE-WTP, and BNI management has not achieved timely resolution of important issues, including those discussed above; in some cases, issues have remained unresolved for about ten years. Further, typically ORP, DOE-WTP, and BNI senior managers are highly experienced but do not have specific experience in applying DOE-STD-3009 nuclear safety design and safety basis processes” (p. viii).

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“Interviews with construction crafts personnel indicated a widespread perception that the performance rating system used for most crafts workers, which defines the ratings that are used as a major factor in decisions about promotions and reductions in force, is arbitrary and unfairly implemented in a way that inhibits or penalizes the raising of safety and quality issues” (p. ix).

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“While many interviewees indicated that their line management was supportive of their challenging conditions and activities, the Independent Oversight team concluded that there is a lack of full engagement on the part of ORP senior management in the area of safety culture. There is a perception that the value of safety is sometimes degraded in the presence of schedule and cost pressures” (p. 11).

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“RL and ORP have established appropriate mechanisms for the Federal staff to raise safety concerns, but these mechanisms have seldom been used. Most Federal staff members said that they would have no reservations about raising concerns to their supervisors and no reservations about using those mechanisms. However, a significant number of ORP staff indicated a reluctance to raise safety concerns” (p. 16).

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“BNI has taken a number of actions to strengthen its safety culture, but most of these actions appear to have been prompted by DNFSB comments and HSS reviews and enforcement actions, rather than by proactive efforts on the part of ORP or DOE-WTP. At the time of this Independent Oversight review, management expectations regarding safety culture had not been formally communicated to the Federal staff through a policy statement or programmatic requirements, and safety culture training had not been provided to the staff. DOE-WTP had not established a program for periodically monitoring safety culture and providing feedback to management” (pp. 16-17).

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“In some cases, safety issues at WTP are not documented in the PIER system, are improperly categorized for significance, are inadequately analyzed for causes, or are not resolved with effective corrective and preventive actions. There are instances where ineffective implementation of the issues management process specifically contributed to negative effects on the project’s safety culture. For example, WTP staff, management, and senior managers were unable to effectively execute a timely root cause analysis for a PIER issued in October 2010 related to nuclear safety analysis” (p. 21).

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“The Independent Oversight team identified a number of specific factors that contribute to the current degraded safety culture in some groups at WTP; ORP, DOE-WTP, and BNI need to address these factors as part of the effort to address the cultural issues” (p. 27).

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“...many crafts workers identified concerns about safety culture, including mistrust of the construction superintendents; frustration with inconsistent disciplinary actions and the craft rating system; fear of retaliation for raising safety issues; inconsistent application and communication of rules and procedures among WTP buildings; and inadequate planning, scheduling, and coordination of work” (p. 32).

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“ORP and DOE-WTP oversight of functional areas, such as industrial safety, industrial hygiene, and radiation protection, warrants attention. Some ORP personnel indicated that the only Federal presence performing oversight of worker safety at WTP facilities is the Facility Representatives, and that ORP safety subject matter specialists did not regularly communicate with the DOE-WTP Facility Representatives. Several ORP safety subject matter specialists indicated that they had not been to the WTP site for months because they were not welcome by the DOE-WTP team; were not involved in safety functions they had previously performed (e.g., review of the worker safety and health plan); and were not involved in reviewing, and sometimes were not formally made aware of, significant safety events at WTP (e.g., the steel girder drop). Conversely, a DOE-WTP manager with responsibility for oversight of construction has indicated that attempts have been made to engage ORP subject matter specialists and that the amount of oversight by subject matter specialists at WTP had been low for some time and was not impacted by the de facto separation of DOE-WTP from the rest of ORP. The apparently limited involvement of subject matter specialists in Federal oversight of worker safety at a major construction site warrants timely management evaluation and attention” (p. 33).

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“There is a perception among some staff that there is less concern with risk now among the current ORP managers, and more concern with project, cost, and schedule” (Supplemental Report, p. 7).

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“Some interviewees indicated that they had heard that colleagues working on the Pre-Treatment (PT) and High Level Waste (HLW) facilities have been asked to leave things out of their reports, e.g. pipe erosion and criticality issues” (Supplemental Report, p. 7)

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“Management is described by staff as considering an issue closed unless testing shows otherwise. Staff indicated that they do not necessarily share that perspective” (Supplemental Report, p. 7).

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“Overall, only 30% of all survey respondents feel that they can openly challenge decisions made by management” (Supplemental Report, p. 20).

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“Approximately 50% of survey respondents agreed with the statement that they feel that they can approach the management team with concerns” (Supplemental Report, p. 21).

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“Interviewees could not identify a formal Nuclear Safety Culture Policy or Program for ORP” (Supplemental Report, p. 21).

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“Several interviewees indicated that while supervision and management claim there will be no retaliation for identifying issues, most people choose not to speak up. There is a strong perception that you will be labeled or red flagged and some individuals indicated that they were transferred to another area by their supervision after having raised concerns.

- Some interviewees indicated a fear of retaliation if they were to use the ECP [Employee Concerns Program]. They perceive that it is not anonymous and that information is shared without their permission.
- Some interviewees indicated that they need to be careful when bringing up a problem due to possible retaliation, and indicated that “questions were invited, but not wanted.”
- Fear of retaliation is also described by some interviewees as part of a legacy issue. While it is difficult to prove, discrimination in the assignment of overtime and other more subtle behaviors on the part of supervision is perceived against those who raise issues.
- Some interviewees did indicate that the event around the whistleblower incident of last year was still on their minds and subtle references to similar consequences were raised as potential inhibitors to their raising concerns” (Supplemental Report, p. 22).

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“Many interviewees in certain BNI organizational groups had indicated that as a result of the fear of retaliation as well as the way they perceived that some supervision and management treated them, they no longer felt comfortable to challenge existing conditions or activities” (Supplemental Report, p. 27).

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“There is a perception that the value of safety is sometimes degraded in the presence of schedule and cost pressures. ORP Senior Management has not addressed delays in the implementation of the corrective actions from the previous HSS Assessment as well as from the DNFSB Recommendation. In addition, ORP management has not provided clear direction to ORP staff on the importance and implementation of safety culture to their oversight activities” (Supplemental Report, p. 28).

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“The Team believes that BNI needs to be more forthcoming in its transparency with its employees and the public for trust to improve and for its legitimate efforts to be successful. The Team believes that there is some reluctance to raise concerns and issues across the BNI Organization. Fear of retaliation was identified in some groups as inhibiting the identification of problems. Employee engagement in decision making, development of policies and procedures, and the implementation of practices and standards, particularly at lower levels of the organization, would facilitate the involvement of these groups in the resolution of issues and ultimately mitigate this perception” (Supplemental Report, p. 28).