

Facility Engineering Services KCP, LLC

Kansas City, MO

Report from the DOE Voluntary Protection Program Onsite Review, July 17-20, 2006



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ABBREVIATIONS AND ACRONYMS

AED	Automated External Defibrillator
ALARA	As Low As Reasonably Achievable
ANSI	American National Standards Institute
BBS	Behavioral Based Safety
BLS	Bureau of Labor Statistics
CM	Construction Management
CPR	Cardiopulmonary Resuscitation
DART	Days Away, Restricted, or Transferred
DOE	U.S. Department of Energy
DOE-VPP	U.S. Department of Energy Voluntary Protection Program
EH	Office of Environment, Safety and Health
ES&H	Environment, Safety, and Health
FES	Facility Engineering Services KCP, LLC
Honeywell FM&T	Federal Manufacturing & Technology
INPO	Institute of Nuclear Power Operators
ISO	International Standards Organization
ISM	Integrated Safety Management
ISMS	Integrated Safety Management System
JHA	Job Hazard Analysis
JTA	Job Task Analysis
KCP	Kansas City Plant
KCSO	Kansas City Site Office
LOTO	Lock Out Tag Out
MSDS	Material Safety Data Sheet
NAICS	North American Industry Classification System
NNSA	National Nuclear Security Administration
OSHA	U.S. Department of Labor's Occupational Safety and Health Administration
PM	Preventive Maintenance
PPE	Personal Protective Equipment
R&D	Research and Development
SHINE	Safety & Health Implementation Needs Everyone
S&H	Safety and Health

ABBREVIATIONS AND ACRONYMS (CONTINUED)

Team On-site review team

VPP Voluntary Protection Program

EXECUTIVE SUMMARY

The U.S. Department of Energy Voluntary Protection Program (DOE-VPP) onsite review of Facility Engineering Services Kansas City Plant (KCP), LLC (FES) was conducted July 17-20, 2006. FES is a subsidiary of Burns & McDonnell Engineering Company located in Kansas City, MO. In February, 2006, the manager of the National Nuclear Security Administration (NNSA) Kansas City Site Office (KCSO) forwarded the Voluntary Protection Program (VPP) application of FES to the Deputy Assistant Secretary of the Office of Corporate Safety Performance at DOE Headquarters. The NNSA/KCSO has already reviewed the FES application and recommended that an on-site review be conducted by the DOE Headquarters VPP team. FES is physically located in the Honeywell KCP building and has approximately 60 employees. Their main mission is to provide engineering/design support and oversight to Honeywell Federal Manufacturing & Technology (FM&T) at KCP. Honeywell FM&T at KCP has been a VPP Star site since 1996 and has achieved recognition by International Standards Organization (ISO) 9000 and ISO 14000. The Integrated Safety Management System (ISMS) serves as a guiding principle in maintaining safety and health (S&H) at KCP and FES. Many of the FES employees and some managers were Honeywell FM&T employees and have already been influenced by the VPP safety culture. FES is also required to adopt many of the S&H policies and procedures established by Honeywell FM&T. The findings of this review and the conclusions are presented below.

Management Leadership

The DOE-VPP on-site review team (Team) found strong evidence of safety and health commitment from all levels of management at FES. The Team noted that management demonstrated a very strong commitment to employee S&H and they held themselves both responsible and accountable for S&H in the workplace. All managers, supervisors and employees are evaluated as to their performance in the safety and health area. Top-level management is visible and actively participates in the S&H program.

The FES manager and the department managers interact and communicate with the employees on a daily basis. Planning and resources are adequate, and there is a strong management commitment for Integrated Safety Management (ISM) and the VPP.

Employee Involvement

The Team found that employees are actively involved in S&H in the workplace. Employee involvement not only occurs through participation in the safety meetings and training activities, but also through the safety inspection processes, the worker observation program, and periodic self-assessments. Employees openly stated that they not only felt responsible for their own safety, but also for their peers' safety. This clearly demonstrates a strong sense of ownership and pride in S&H by the employees. The Team observed that a strong safety "culture" has developed at FES. Notably, employees are involved in hazard recognition, job hazard analyses, and hazard resolution.

The Team noted that the FES employees and managers are strongly influenced by the safety culture of Honeywell FM&T which is a Star site. In addition, FES prepared manuals such as Construction Safety Handbook and Health and Safety Plan useful for their work. During the interviews conducted by the Team, employees indicated that FES is a safe place to work.

Worksite Analyses

Job hazard analyses are thorough and extensively utilized. New worksites are studied by using pre-job walk down. The Safety & Health Implementation Needs Everyone (SHINE) program provides a routine general hazard assessment for work stations. FES has recently conducted ergonomic evaluation for workstations and provided appropriate equipment. Since most of the work involves office/engineering design work, office space environment is important for performing work safely. Employees are not only encouraged to report any unsafe conditions, but are expected to report and correct the situation(s), if safe to do so. Accident investigations are usually conducted by Honeywell, however FES participates in this process. Identified hazards are immediately addressed with appropriate corrective actions being resolved in a timely manner. The site also conducted numerous inspections of all units and areas such that the entire worksite is covered at least quarterly.

Hazard Prevention and Control

FES has a full complement of S&H professional staff. S&H rules have been clearly laid out for all employees and managers. The site employs a standard hierarchy of control for the prevention and mitigation of hazards in the work environment consisting of engineering controls, administrative controls, and Personal Protective Equipment (PPE). The PPE program is well integrated into the operations control, S&H oversight and training portions of the site's programs. FES has implemented a comprehensive Preventive Maintenance (PM) program that uses a combination of preventive, predictive, and corrective maintenance to enhance the availability, operability, and reliability of plant structures, systems and components. The site has mature, well functioning emergency preparedness, and medical programs.

The Team found that the FES is addressing the extreme weather conditions such as lightning, wind and snow or ice conditions as significant hazards at the work place. The unpredictability of snow and ice conditions during winter has necessitated a facility-wide effort to address safety during winter.

Safety and Health Training

The Team noted from employee interviews and document reviews that employees at most levels knew how to identify and protect themselves and others from hazards associated with their jobs. As was noted on several occasions during the interviews, the training provided to employees has made them more conscious of health and safety issues not only in their work environment, but also in their everyday lives away from the site.

All FES employees are given an OSHA 10 hours Construction Management Course, PPE, and Ergonomics classes through Burns & McDonnell University. They also attend courses offered by Honeywell FM&T at the site. Management clearly supports the S&H training programs as evidenced by employee interviews, funding levels, documentation review, accreditation and nationally recognized awards.

Conclusion

The Team concludes that the applicant has met and/or exceeded each of the five DOE-VPP tenets. Accordingly, the technical opinion of the on-site review team as documented in this report will be presented to the Office of Environment, Safety, and Health (EH) senior management for their consideration.

I. INTRODUCTION

The DOE-VPP onsite review of the Facility Engineering Services KCP, LLC was conducted during July 17-20, 2006, in Kansas City, MO. FES is a subsidiary of Burns & McDonnell and is a subcontractor to Honeywell FM&T at KCP. The KCP is a non-nuclear facility involved in the manufacturing of electronic parts for DOE /NNSA defense programs.

FES submitted the VPP application to the NNSA KCSO for concurrence and approval prior to sending to EH for final review. Accordingly, the application was reviewed and approved by the KCSO and this onsite review was conducted with the knowledge and concurrence of KCSO.

The Team evaluated the safety programs of FES against the requirements of the DOE-VPP. The DOE-VPP Team consisted of safety professionals from DOE Headquarters, the Hanford site near Richland, WA, the Yucca Mountain Project, and an observer from Honeywell FM&T. (See Appendix A for a roster of the Team members). During the site visit the Team evaluated relevant safety documents, observed the workspace conditions, conducted interviews, and toured the site to evaluate and verify the information submitted in this VPP application. The Team interviewed approximately 60 FES staff members including six managers.

Prior to the onsite portion of this process, the Team conducted their customary review of other sources of safety and health information and data relative to the applicant.

Physical Site

FES is a subsidiary of Burns & McDonnell Engineering Company with a primary mission to provide engineering design and oversight support to Honeywell FM&T . All the employees of FES have offices in the same building as the KCP and work closely with Honeywell associates. The office spaces and equipment necessary such as computers are provided by Honeywell.

Organization

FES is organized into five major Departments: Corporate Health & Safety, Utilities Engineering Department, Project Engineering, Project Support, and Construction Oversight. The managers of these five Departments report to the FES manager. The FES manager has overall responsibility for all activities including S&H. Burns & McDonnell and Honeywell managers and staff provide necessary support to the FES activities as needed. The FES manager reports to the Vice President of Burns & McDonnell.

Employees

About 95 percent of the FES's employees work in administrative, engineering support, and non-nuclear facilities programs and have offices in the KCP main building. Presently, FES employs a workforce of approximately 60 employees. In addition, Burns

& McDonnell personnel, referred to as Title III Engineers, provide construction management support as needed (maximum 2 or 3 engineers).

No union or collective bargaining unit employees work at FES.

Work Performed and Types of Hazards

Type of Work Performed

The FES is assigned to perform engineering, construction management, and utility engineering services to Honeywell FM&T. Most of the work involves office or administrative type, and not the actual performance of the construction management projects conducted by Honeywell. However, the FES staff may have to physically present at the worksite for oversight purposes or in an advisory capacity. In such situations, they may get indirectly exposed to the hazards at the site.

Types of Hazards

Numerous hazards are present in the environment of research and development, manufacturing, engineering, maintenance, construction, and security. Hazards include temperature extremes, electricity, hoisting and rigging, working at heights, chemicals, heavy metals, petroleum products, cryogenics, materials handling, noise, airborne contaminants, confined spaces, asbestos, lead, beryllium, operating of small hand tools, rotating parts on equipment, ergonomics, and typical construction concerns. Some of the hazards are created by acts of nature, such as snow and ice covered walkways and roadways, and high winds.

II. INJURY AND ILLNESS DATA ASSESSMENT

The Team examined OSHA 300 logs and determined that FES KCP satisfies the DOE VPP requirements. The comparable private industry code is NAICS 541330. The injury-illness rates of this industry are TRC = 1.2 and DART = 0.5. Obviously the FES rates are significantly below private industry.

Injury and Incidence Rates

Year	2005	2004	2003	2002
FES	0.0 YTD	0.0	1.0	0.0

Lost Workday Injury Case (or DART) Rate

Year	2005	2004	2003	2002
FES	0.0 YTD	0.0	0.0	0.0

FES Supporting Data

Year	2005	2004	2003	2002
Hours Worked	70,000	135,720	135,720	135,720
Injuries/Illness	0 YTD	0	1	0
Lost Workday Cases	0 YTD	0	0	0

III. MANAGEMENT LEADERSHIP

Responsibility

Safety and Health Program roles and responsibilities are well defined in the FES documents and effectively communicated to all employees through documents, meetings, and training. From the level of senior management through line management to supervisors and to individual employees, S&H responsibilities are clearly defined, and each employee has the authority commensurate with his or her level of responsibility. In addition to the FES Health and Safety Personnel, two Safety Advocates were appointed to ensure the activities comply with Honeywell and FES safety policies and rules.

Interviews with managers and employees reflected that managers generally understand their safety and health responsibilities, and that they are aware of the potential hazards that employees might be exposed to. The ultimate responsibility lies with the FES Manager who provides direction and guidance to five Departmental Managers in FES.

Accountability

The FES annual review process holds all employees, including managers, accountable for their performance in S&H related areas. Each employee has a primary Environment, Safety and Health (ES&H) element in their individual performance plan and their performance in understanding and participating in S&H programs is evaluated. The determination of monetary awards (bonuses) depends on the ratings obtained by the employees. All employees are held accountable for safety; however, managers take the final responsibility as stated by the company policy: "Accidents, injuries, and illnesses arising from FES employment will be regarded as operational errors due to management oversight and as such are avoidable". During the interviews with the employees, the Team observed that workers at FES are empowered with "Stop Work" authority.

Safety and Health Program Self-Evaluation

The VPP criteria and basis of the FES Safety and Health Program is evaluated at least annually. The issues derived from the evaluation result in unit-specific and Facility-wide improvement action plans and all improvement actions are tracked to completion. The ultimate goal of the annual evaluation is continuous improvement of the Safety and Health program, systems, and processes.

FES effectively utilizes self-evaluations and the data gathered during evaluations to enhance their programs and drive feedback and improvement, and corrective actions. This process will serve as an effective tool to move the FES program to the next level of excellence.

Site Orientation

FES maintains a comprehensive program for ensuring that new employees, subcontractors, vendors, and visitors receive the necessary orientation. In particular, visitors are oriented to security, safety and health, emergency evacuation, and general organizational information requirements. The orientation to new employees includes the OSHA 10 hour Construction Safety Training, Red Cross First Aid and CPR courses.

Employee Notification

Employees are initially notified of their rights at the new employee orientation. Their right to access information is also communicated by way of several different mechanisms after the initial orientation. The FES Manager communicates a health and safety message via e-mail to all FES employees weekly. Employees are encouraged to submit suggestions to improve safety and their participation is regularly reinforced through various ways of promotional programs such as “Safety Month” and recognition awards called “Bright Idea Award.”

Overall, the Team found that the activities of FES satisfy the VPP requirements for this sub element.

Commitment

The Team observed strong commitment by FES management for all S&H activities including ISM and VPP.

Contract Workers

FES does not employ contract workers. The Title III engineers from their Home Office (Burns & McDonnell) provide assistance to FES on some occasions as needed, however, their number is very small (2 or 3 engineers).

Organization

The FES organization consists of five major Departments: Corporate Health & Safety, Utility Engineering, Project Engineering, Project Support, and Construction Oversight. The managers of these organizations report to the FES Manager. FES uses the Human Resources and Training facilities available at Burns & McDonnell Headquarters. However, the organization and the work conducted by FES depends on the Honeywell management directives, policies and procedures.

Resources

FES with extensive support from Honeywell FM&T maintains sufficient resources needed to operate health and safety programs. In addition, FES appointed “Health and Safety Advocates” to provide assistance to employees and to implement safety programs

at FES. The capital resources necessary for safety equipment are covered in kind by arrangements with Honeywell FM&T.

Planning

Safety, health, and the environment are primary considerations integrated into the FES planning processes, from top company-wide strategic planning down through planning for each job. At the company level, safety and health planning is incorporated into the annual budget process. The FES Team Performance Plan includes a safety planning component reflecting DOE and Honeywell strategic plan and goals.

Management Leadership Strengths

1. Management Support and Commitment – Interviews of managers and workers at all levels confirmed a strong management commitment for safety. In almost every instance, the employees interviewed by the Team spoke highly about management visibility and accessibility.
2. Cooperation between Honeywell FM&T and FES – In the role of technical support contractor to Honeywell FM&T, FES adopted successfully to various Honeywell FM&T policies and procedures to conduct the work safely. They maintained a good balance between their Home Office and Honeywell FM&T.
3. Universal understanding of stop work authority – The Team found strong evidence that the employees know that they have authority to exercise stop work authority without fear of reprisal if they feel they or someone else can be injured.

Conclusion

The review team found that FES meets or exceeds all aspects of this VPP tenet.

IV. EMPLOYEE INVOLVEMENT

The Team interviewed approximately 15 employees out of a total of 57 employees in FES. These interviews clearly indicated that FES employees are actively engaged in the safety and health program and in many cases, are the originators of ideas that significantly contribute to the success of the S&H program. The employees also stated that management has empowered them to proactively administer the S&H program, thus meeting the DOE-VPP criteria for employee involvement. The Team observed that many of the FES employees worked before at Honeywell FM&T and were already influenced by the VPP safety culture.

Safety and Health Committees

The employees of FES participate in the S&H committees and the VPP committees of Honeywell FM&T at KCP. The Team suggested that the participation by FES employees in the Honeywell FM&T be made more formal by electing an employee to be on the Honeywell VPP Steering Committee. In addition the Team suggested that FES employees be empowered by forming an internal VPP Committee.

Degree and Manner of Involvement

Most employees interviewed felt they owned the safety program or process. As is required by the VPP Star criteria, employees at all levels appear to be involved in the operation of the safety program and in decisions that directly affect their safety and health.

Employees at most levels expressed that they were comfortable raising concerns. No barriers to communication with management when it comes to safety and health were identified. Employees were candid and showed no fear in talking with the VPP review team during interviews. Most employees indicated that they understood their rights and responsibilities, and are very knowledgeable about safety and health overall, though in a few cases they were not aware of the VPP specifics.

These interviews confirmed that a strong safety culture exists at all levels, and employees feel empowered to voice safety concerns. All employees interviewed (formally and informally) strongly expressed their readiness to stop work if they felt conditions were unsafe and they believed that management would support their action(s). Some employees were able to give examples of when they intervened after observing an unsafe act or condition, and most felt that their interventions were positively received.

The FES Safety Advocate serves as a formal point of contact within FES and this position is open to any employee within the organization. Employees effectively utilize computer based communication systems such as intranet site and the web page. Suggestions and ideas to improve safety may be submitted through these media.

Overall, it was clear that most of the work force has welcomed the opportunity for increased safety and increased participation in the safety program. They indicated that the company's efforts have kept safety in the forefront.

Conclusion

The Team found that employees at FES are actively involved in safety and health programs and FES meets the requirements of the VPP element concerning Employee Involvement.

V. WORKSITE ANALYSIS

Worksite analysis at FES falls into two categories the safety and health inspection, analysis of the FES personnel worksite and secondly of the worksite occupied and under the direction of construction contractors.

Routine Hazard Analysis

Each FES employee is informed through a training program to inspect their office workspace for safety and housekeeping issues. Each employee receives information about the importance of correct ergonomic design in the workspace and encouraged to inform either their management or the safety advocate of any concerns or questions regarding ergonomics. The FES office space is routinely included in the Honeywell inspection and evaluation process SHINE. Each work area is inspected and evaluated by a team composed of workers and management resulting in a completed SHINE evaluation worksheet. FES employees also work with construction and maintenance organization to ensure that each project has engineering support as required. A part of the planning process completed by the FES employee includes a project walk-down to identify safety and health issues that may be encountered during the completion of the construction or maintenance activity. The inventory of possible health and safety concerns is reviewed by procedure using a graded approach, the more complex the activity the more people involved in the planning process. Each FES employee is required to stop work if an unsafe situation should develop during an activity.

Employee Reporting of Hazards

Employees are encouraged and expected to identify, without fear of reprisal, conditions that pose an immediate risk to safety and health are responsible to impose their stop work authority. There are several reporting options available to the employees. The FES safety intranet site includes a Safety Concern/Incident Report to be completed by any employee. Emergencies and hazards can be brought to a line manager or to a Safety Advocate identified to employees. Interviews with employees indicated a high level of confidence with the current hazard reporting system, employees also stated that they had no fear of reprisal and also that their experience indicated that an employee recognizing and reporting a hazard would be appreciated by their management.

Accident Investigations

FES as an engineering support organization does not conduct independent accident investigations, but employees expressed confidence that if they would be included as appropriate with any investigation. The FES Health and Safety Plan specifies the actions required for any accident involving an FES employee.

Pre-Use/Pre-Startup Analysis

Before any project is started under the direction of FES, a packet of information is gathered to support the evaluation of hazards expected in execution of the project. FES employees ensure that hazards are identified for the contractor providing the construction or maintenance work.

Self-Inspections

Various forms of self-inspections are conducted at this site. Job hazard analyses are thorough and extensively utilized. Employees are not only encouraged to report any unsafe conditions, but are expected to report and correct the situation(s), if safe to do so. Identified hazards are immediately addressed with appropriate corrective actions being taken in a timely manner.

The FES organization is responsible for the day to day inspection of the office area. The FES Health and Safety plan includes a comprehensive list of common office hazards and assigns the responsibility for daily inspection to each employee. Interviews indicated that employees completed safety training with FES and Honeywell and are well aware of office and plant self inspection requirements. Each employee interviewed was also aware of the safety advocate and the availability of their management for the solution of ergonomic or other safety related problems.

Trend Analysis

The FES organization reports near miss and incidents on an incident form and forwards this information to the FES health and safety organization. Interviews conducted as part of this assessment indicate that employees are aware of the form, and receive information regarding incidents and near misses.

Conclusion

Worksite analysis methods are effective in addressing the hazards for existing and new hazards. The Team noted a disciplined practice of hazard recognition in all areas that fully supports a meticulous program of worksite hazard management. The Team reported no additional best practices for worksite analysis.

FES meets all of the requirements of the Worksite Analysis tenet for the DOE-VPP.

VI. HAZARD PREVENTION AND CONTROLS

Medical Programs

The Medical Program is comprehensive and includes such aspects as pre-placement physicals as needed and periodic physicals for those employees that are exposed to job site hazards, a few employees are respirator fit and are required to have annual physicals. The medical staffs from physicians through technicians are highly qualified and able to respond to any medical emergency. Medical facilities are strategically located to provide rapid and effective response. At FES observations of the worksite indicated that there was limited availability of Automated External Defibrillators (AEDs).

Professional Expertise

FES employs a full complement of highly trained, competent, and experienced managers and engineers. These professionals receive up-to-date information and training including computer based training through the ELMS system.

Safety and Health Rules

Safety and health behavior and expectations are established and posted throughout the facilities. The behavior and expectations are basic and easy for employees to remember. The result of employees following the behavior and expectations is a safe and productive work environment. The steps of the discipline policy are also effective tools when someone is found willfully violating safety and health requirements. Positive recognition has been the FES Safety and Health Program's first-string instrument in reinforcing safe behavior, and it continues to reap significant benefits in keeping safety and health awareness alive and flourishing. The Employee Handbook is available to every employee. The disciplinary policy is clearly spelled out and readily available to FES employees, it includes verbal instructions for non-serious violations up to time off or dismissal for serious violations.

The safety and health program at FES includes the use of on-line intranet suggestion forms, the right to convene an ad hoc safety and health committee, report safety and health concerns to a safety advocate, submit a Bright Idea Award, discussions at regularly scheduled meetings and participation in management meetings.

Training

All FES employees are given an OSHA 10-Hour Construction Safety course along with Hazard Communications, Personal Protective Equipment and Ergonomics classes through Burns & McDonnell University. All FES employees attend a Honeywell site safety orientation class when they begin work at FES. Some employees are trained in Respirator Protection depending on the hazards identified with their job duties.

Personal Protective Equipment

FES employees are provided with a Construction Safety Handbook and a Service Subcontract Safety Handbook which outline PPE requirements and where it can be found. FES employees can obtain PPE from Honeywell FM&T or Burns & McDonald equipment dispensaries at no cost to the employee and prescription eyewear and safety boots are provided to FES employees.

There are no significant changes to the PPE program since the initial VPP application.

Hazard Prevention and Control Strengths

The FES employees interviewed all recognized the importance of Stop Work Authority, due to the nature of the work (mostly engineering) not many have had the opportunity to use stop work. It was also made very clear that management encourages and supports the Stop Work Authority.

The Team noted that the housekeeping and maintenance programs are world class.

Hazard Prevention and Control Best Practices

1. Winter Hazards Management - Interviewed employees commented on the use of ice cleats to prevent slips were used in winter conditions.
2. Hazard Prevention –FES has a comprehensive program for identifying and controlling hazards.
3. Workplace Ergonomics Program – The Team noted a comprehensive workplace program for ergonomic hazards has been created by FES; the Ergonomics Program is of prime importance at an engineering facility due to the majority of the work being done at the employee's computer.

Hazard Prevention and Control Areas for Improvement

1. AEDs - The Team noted a concern for the lack of AEDs across the facilities and recommend that more AEDs be placed through out the facility and on the roof.

Conclusion

The Team felt that the FES meets all of the requirements of this tenet and its sub-elements as described above.

VII. SAFETY AND HEALTH TRAINING

Employees

FES employees attend S&H courses offered by Honeywell FM&T and Burns & McDonnell University as well as courses offered by outside sources as necessary. All FES employees are required to take the OSHA 10 Hour Construction Safety course based on 29 CFR Part 1926. The training needs of the employees are evaluated annually by FES Health and Safety, and the course schedules /curriculums are adjusted accordingly.

Managers/ Supervisors

Managers and Supervisors at FES attend the same health and safety courses as the employees. In addition, they take courses for improving supervisory skills and they review regularly the “lessons learned” communications generated by Honeywell FM&T.

Conclusion

The Team believes that FES has satisfied the DOE-VPP requirements for the safety and health training tenet as described above.

VIII. CONCLUSION

The Team believes that FES, KCP, LLC operates a highly effective Star-level DOE-VPP program and that it meets the applicable technical requirements for participation in the DOE-VPP. The Team will advise senior management within the Office of Environment, Safety and Health of their technical findings and their recommendations.

APPENDIX A
VPP Onsite Review Team Members

Name	Phone Number	Address	Assignment :VPP Element
Dr. Rama Sastry	(301) 903-4664 Rama.sastry@eh.doe.gov	Team Leader, EH-31, DOE	Management Leadership
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