



# Fluor Government Group

**Report from the DOE  
Voluntary Protection Program  
Onsite Review  
January 24-27, 2005**



U.S. Department of Energy  
Office of Environment, Safety and Health

Office of Corporate Performance Assessment  
Office of Quality Assurance Programs  
Washington, D.C. 20585

**March 2005**





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***"...Some of us will serve in government for a season; others will spend an entire career here. But all of us should dedicate ourselves to great goals: We are not here to mark time, but to make progress, to achieve results, and to leave a record of excellence."***

— **George W. Bush**  
President of the United States  
October 15, 2001  
Constitution Hall, Washington, DC

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# Abbreviations and Acronyms

<b>AED</b>	Automated external defibrillator
<b>AJHA</b>	Automated Job Hazard Analysis
<b>BLS</b>	Bureau of Labor Statistics
<b>CAIRS</b>	Computer Accident/Incident Reporting System
<b>CFR</b>	Code of Federal Regulations
<b>CPR</b>	Cardiopulmonary resuscitation
<b>DART</b>	Days Away, Restricted, or Transferred
<b>DOE</b>	U.S. Department of Energy
<b>DOE-VPP</b>	U.S. Department of Energy Voluntary Protection Program
<b>EH</b>	Office of Environment, Safety and Health
<b>ES&amp;H</b>	Environment, safety, and health
<b>FGG</b>	Fluor Government Group
<b>FFS</b>	Fluor Federal Services
<b>ISM</b>	Integrated Safety Management
<b>ISMS</b>	Integrated Safety Management System
<b>JSA</b>	Job Safety Analysis
<b>LOTO</b>	Lockout/Tagout
<b>LWDI</b>	Lost Workday Injury and Illness
<b>NAICS</b>	North American Industry Classification System
<b>OSHA</b>	U.S. Department of Labor's Occupational Safety and Health Administration
<b>PPE</b>	Personal Protective Equipment
<b>S&amp;H</b>	Safety and health
<b>SIC</b>	Standard Industrial Classification
<b>VPP</b>	Voluntary Protection Program

# Executive Summary

The Department of Energy (DOE) Voluntary Protection Program (VPP) (DOE-VPP) onsite review of the Fluor Government Group (FGG), formerly Fluor Federal Services (FFS), for recertification was conducted from January 24 - 27, 2005 at Richland, WA. The review team (Team) found that FGG met the technical requirements for recertification as a Star participant in the DOE-VPP.

The following paragraphs present a tenet-by-tenet summary of the Team's observations, analysis, and conclusions.

## Management Leadership

The Team found a high degree of management commitment to safety and health (S&H) at FGG. Managers are personally committed to VPP. The leadership is capable, competent, and well-directed. Additionally, the Team found FGG leadership is fully executed, both at the top and in the field. The President of FGG and other FGG managers visibly participate in safety programs and have successfully established an organization to implement VPP. The FGG management believes that all accidents are preventable and encourages a safety culture based on an "injury-free workplace." The VPP is well integrated within FGG, and serves to complement their client's overall S&H efforts.

## Employee Involvement

Employees understand their responsibilities with regard to S&H in the workplace. They understand their responsibility for their own safety and for the safety of their coworkers. They are well qualified, trained, and competent. Additionally, employees are aware of the hazards associated with their jobs and how these hazards are mitigated. The Team found that the workers at FGG are cooperative and ready to follow S&H procedures and processes. All employees understand that they have stop-work authority if unsafe conditions exist. They have no fear of reprisal and are ready to raise safety issues through a variety of communication means. FGG continues to satisfy the VPP requirements for Employee Involvement.

## Worksite Analysis

The VPP onsite review Team found that FGG satisfies the requirements of DOE-VPP criteria. Worksite analysis processes are structured and implemented to identify and control hazards to the workers, environment, and public. FGG hazard analysis processes incorporated a variety of tools. A comprehensive baseline hazard analysis has been completed by S&H professionals for all facilities, and accident investigation and lessons-learned processes are

developed and implemented. The site has established trending of both injury and non-injury S&H data. The results are used to develop continuous improvement actions. Trending results are also communicated to employees. FGG conducts a vigorous and comprehensive Annual Self-Assessment with a companion Annual VPP Report, which in turn is used to generate their annual Project Safety Improvement Plans.

## **Hazard Prevention and Control**

The Team found that FGG satisfies the general requirements of hazard prevention and control tenet of VPP. The Team found that there is a strong program supporting preparations for work tasks. Hazards are identified and job packages are well organized. In many cases, employees are trained under mockup conditions to determine if unexpected hazards exist. This helps workers share a common expectation for the flow of specific tasks. Additionally, FGG has begun an automated approach to work preparation, hazard prevention, and control by their “Design for Safety” program, in which a computer simulates new work processes and designs.

The Team noted a weakness in the operations at the Tank Farms. Working groups from two different organizations or companies have developed sharp contrasts in their work styles, their procedures, and their general attitudes toward safe work. As a result, individual animosities between these workers (craft workers and health physics workers) have arisen and intensified. While this is not presently a serious situation, it has the potential to become serious and it may adversely influence of safe execution of work.

## **Safety and Health Training**

FGG continues to satisfy the S&H training requirements. Training is comprehensive and it addresses all types of managers, workers and subcontractors.

## **Conclusion**

The Team concludes that FGG has satisfied the technical requirements for participation in DOE-VPP and recommends that DOE approve recertification of FGG as a conditional Star participant for a period of 90 days, during which time FGG will address the areas for improvement identified in this report. At the conclusion of the 90-day period, the DOE Field Office will verify whether the areas for improvement have been addressed and advise DOE Headquarters to grant recertification of Star status to FGG.

# I. Introduction

The Department of Energy Voluntary Protection Program (DOE-VPP) onsite review was conducted January 24 - 27, 2005, at the Hanford Site in Richland, Washington. Fluor Government Group (FGG), formerly Fluor Federal Services (FFS), is an internationally recognized company that performs construction and engineering activities for Department of Energy prime contractors in Richland, Washington. It is operated by the Fluor Corporation. The Department of Energy's Office in Richland, Washington provides guidance to FGG on a regular basis and has oversight responsibility.

FGG is organizationally dispersed on the 560-square-mile Hanford Site, located north of the city of Richland, Washington. FGG is a large, multidisciplinary organization that conducts multiple tasks, orders, and projects at numerous locations throughout the Hanford Site. There are approximately 581 FGG employees at the Hanford Site. Of these, approximately 248 are bargaining unit members. DOE-VPP Star-level recognition was initially awarded to the site in July 2001.

The DOE-VPP recertification review Team (Team) evaluated the safety programs of FGG against the *Protocol for DOE-VPP Star Site Recertification of the DOE-VPP*. The Team consisted of safety professionals from the DOE Headquarters Office of Environment, Safety and Health (EH) and Richland Operations Office (RL), employees from CH2M HILL Hanford Group, Inc. (CHG) under the Office of River Protection, and employees of other Fluor organizations from different Hanford Site contractors. In addition, the State of Washington Department of Labor and Industries provided a professional safety staff member to support and assist in this review. (See Appendix for a roster of the Team members and their organizations.) During the site visit, the Team evaluated representative samplings of relevant safety documents and interviewed employees (both bargaining unit and non-bargaining unit) and management to evaluate and verify the information necessary to perform the recertification review.

## II. Injury and Illness Rate Information and Trends

The Team reviewed the Occupational Safety and Health Administration (OSHA) 200/300 logs. The rates below include FGG employees working on the Hanford Site.

FGG INJURY AND ILLNESS DATA					
Calendar Year	Lost Workday Cases or Days Away Restricted or Transferred	Total Recordable Cases	Employee Hours	Lost Workday Case Incident Rate*	Total Recordable Case Incident Rate
2002	2	7	435,368	0.92	3.22
2003	1	3	323,311	0.62	1.36
2004	0	0	367,856	0.0*	0.0
3-Year Avg.	1	3.33	375,512	0.53	1.78
Bureau of Labor Statistics (BLS) national average for North American Industry Classification System (NAICS) 237xx (formerly Standard Industrial Classification (SIC) 1629 - Heavy Construction, Not Elsewhere Classified)					
				3.5	6.5

\* Days Away, Restricted, or Transferred (DART) rate replaced the Lost Workday Injury and Illness (LWDI) rate in 2004

The information on the OSHA 200/300 logs supports the data provided in the FGG self-evaluations – the organization’s first report of injury forms and other recordkeeping documents. A health and safety professional is responsible for classifying all injuries and illnesses for OSHA recording and is responsible for maintaining the OSHA log. Injury and illness data are submitted for inclusion in the DOE Computerized Accident/Incident Reporting System (CAIRS). Routinely, the data output from CAIRS is checked against the actual data reported and submitted. This ensures that accurate information is being presented in the CAIRS database. The staff understands the recordkeeping requirements, including the 29 Code of Federal Regulations (CFR) 1904 recordkeeping changes that went into effect in January 2002.

### **III. Summary of Performance Related to VPP Tenets and Sub-elements**

The level of management leadership, employee involvement, worksite analysis, hazard prevention and control, and safety and health training found at this site generally meet DOE-VPP criteria for Star-level recognition. The DOE-VPP tenets and sub-elements are described below along with the Team's evaluation of FGG performance in these areas.

#### **Management Leadership**

FGG's commitment is demonstrated in strong safety and health policy statements, allocation of resources necessary to support all safety and health program activities, attention to employee-identified safety and health concerns, and active participation in safety committee activities. FGG management – at all levels – demonstrates its commitment to a safe and healthful workplace for all employees through the implementation of VPP.

Employees believe that all levels of FGG management actively participate in the safety and health (S&H) program. Examples include manager attendance at general safety and PRIDE meetings, participation in facility walkdowns, and their active input in resolving safety issues. Examples of safety issues that have been resolved in a timely manner included several ergonomic issues, routine housekeeping issues, and the implementation of floor monitors equipped with radios to assist in emergency response situations.

Additionally, FGG employees unanimously agreed that management implements an open-door policy. Employees provided specific examples of instances in which they have utilized this option. This information clearly shows management's commitment to providing a safe work environment free of the fear of reprisal. However, one area that could be improved upon is visibility of mid-level management in the workplace. Several employees interviewed stated that they only see mid-level managers in the field occasionally.

FGG is organized to support its safety and health roles, responsibilities, and policies. Roles and responsibilities for employees and managers are identified in position descriptions and the labor bargaining agreements. Accountability is demonstrated in performance evaluations for non-bargaining employees and managers, as well as through the means and methods identified in the union agreement for bargaining unit employees. Resources are budgeted and allocated at sufficient levels.

An integrated framework has been established to provide a template to ensure that the S&H planning process is comprehensive. The FGG Self-Assessment and the subsequent VPP Annual Report processes are fully integrated with a well-developed scoring system that trends performance by sub-element.

These annual program evaluations are conducted using VPP criteria. The results of annual program evaluations and other S&H trending data are used by FGG to develop improvement strategies and actions for the coming year. The last annual VPP program review was completed in December 2004.

Employee orientations are well-developed and implemented effectively at all levels, including employee notification of FGG participation in VPP.

FGG meets the basic requirements of the Management Leadership tenet and its sub-elements as described above.

## **Employee Involvement**

The information gathered for this portion of the report relies heavily on observations of employees in the workplace while conducting their routine duties, and on interviews of employees. Employees generally feel that they own the safety culture. Employees at all levels feel comfortable in raising concerns and participating in their resolution. Employees in the bargaining unit feel that barriers to communication to and from management are minimal. Communications to all employees regarded as very effective.

Workers were candid and showed no fear in talking with the Team during interviews. The Team interviewed more than 180 bargaining unit employees and 38 non-bargaining unit employees. All employees indicated that they understood their rights and responsibilities and are very knowledgeable about their responsibilities regarding safety and health. Interviews confirmed that a strong safety culture exists at all levels, and employees feel empowered to voice safety concerns. Taking safety home was voiced (by bargaining unit and non-bargaining unit employees) as a major improvement over the past three years.

Overall, employees are knowledgeable about the FGG S&H program. All employees interviewed understood their stop-work authority and the process to be used to contact supervisors or managers in the event of a safety or health issue. Additionally, employees stated that they did not have a fear of reprisal for bringing a safety issue to management's attention. In general, the crafts seemed to work well together, and they actively remain on alert for each another's safety. Pre-job briefings appear to be well-organized and documented.

At the time of this review, employees were actively involved in two safety committees at FGG. During the review, the two existing safety committees were expanded to become five safety committees. Employees are proud of their worksite, and feel safety is integral to maintaining a world-class safeguards and security organization.

FGG meets the basic requirements of the Employee Involvement tenet and its sub-elements as described above.

## Worksite Analysis

New or modified facility designs, operations, processes, and training at FGG are reviewed and analyzed to identify and mitigate potential hazards before work or training is started. Comprehensive industrial hygiene baseline hazard surveys have been completed, and updates or reviews of previous work is conducted regularly.

Inspections of FGG work areas are performed by safety committee members and managers, and the results of these inspections are documented. All work performed by FGG employees outside of the office environment are planned using either the Automated Job Hazard Analysis (AJHA) or Job Safety Analysis (JSA) process. Daily pre-job briefings are held for all activities.

Employees are encouraged and expected to identify and report conditions that compromise or are not in compliance with company S&H programs. It is clear that, overall, this reporting process is in place and effective. However, the Team noted an opportunity to enhance the S&H reporting processes, and FGG has already implemented some enhancements to aid in future tracking and trending.

FGG systematically investigates injuries including first-aid injuries and occurrences. Also, a formal lessons-learned program is in place at FGG. Trending of illnesses, injuries, and first-aid data is performed regularly and communicated. The Team noted that trending of inspection data and employee reports of hazards needs additional attention.

Team interviews and observations of work activities indicate that FGG personnel actively advocate and participate in their safety programs. They are comfortable with the open-door policy and will readily raise safety concerns through their chain of command. They also recognize that there is a program in place to raise concerns anonymously. The Team noticed a minor lack of feedback to individuals for non-safety concerns. Non-injury events such as near misses are being tracked; however, no trends have been identified. The Team determined that FGG meets the basic requirements of the Worksite Analysis tenet and its sub-elements as described above.

## Hazard Prevention and Control

FGG has six safety professionals and safety representatives on staff. Certified S&H personnel in a variety of areas is immediately available from this staff. FGG has strong safety and health rules in the hierarchy of policies, procedures, and Integrated Safety Management (ISM) plans; safety and health rules are used to guide and enforce or reward compliance with policies and requirements.

Site policy regarding the use of personal protective equipment (PPE) is strong. PPE is made available – including gloves, boots, safety glasses, hearing protection, and respirators. Where PPE is needed, requirements for its use are integrated into AJHAs and JSAs. FGG personnel are consistent and compliant in their use of PPE in the field.

The Hanford Site has a strong emergency preparedness program. FGG employees are routinely involved in drills and exercises. FGG employees follow the requirements of “host” facilities regarding radiation protection training and program requirements. FGG has a strong medical program founded on a well-established and close relationship with the Site Occupational Medicine organization. FGG policies and procedures are based on appropriate DOE contract clauses, orders, contract documents, and industry standards.

The “Design for Safety” program that has been initiated by FGG has significantly improved preparations for safe work. It employs computer simulations to anticipate work steps and associated work interfaces and generates the associated necessary engineering changes or workflow changes to prevent or mitigate potential work hazards. Processes and process products are effectively simulated so that FGG workers can have confidence that their work can proceed safely, and that, when an unexpected hazard arises, it can be quickly addressed. FGG craft and supervisors communicate effectively with each other, making stop-work events almost unnecessary for job safety. Many interviews indicated that FGG craft believed that FGG was the safest place that they had ever worked. Interviews also noted that craft felt that they owned safety and the total job from planning through completion.

Interviews also disclosed that there is tension (animosity) between some craft workers and health physics technicians at the Tank Farms complex. Some employees voiced concerns over inappropriate behavior including the use of profanity, name-calling, and degrading comments, that negatively impacts working conditions at the Tank Farms and contributes to a hostile work environment. The use of profanity, name-calling, and other expressions of anger in the workplace are all risk factors for workplace violence. Management must take action to control this hostility before it escalates into workplace violence. Expectations should be reinforced that this behavior will not be tolerated and may result in immediate dismissal in accordance with Fluor and CH2MHILL policy.

FGG utilizes the JSA process to identify hazards and appropriate controls. Host facilities utilize the AJHA primarily to identify hazards and appropriate controls. Integrated Safety Management System (ISMS) principles are followed in the development of both. There is, however, a potential for confusion between the two systems used depending on what their clients specify in work packages.

The Team found that FGG meets the basic requirements of the Hazard Prevention and Control tenet and its sub-elements as described above.

## **Safety and Health Training**

Safety and health training processes used by FGG are structured and implemented according to ISM core functions and guiding principles. These processes train workers, supervisors, and managers in recognizing hazards and performing their work safely. The Team recognized a weakness for some employees in the recognition of hazards and in first-aid training. In

particular, hazards associated with trenching and excavation activities require further training emphasis.

Generally, employees who were interviewed during this review, as well as observations made by the Team, confirmed that most processes are understood by FGG employees throughout the organization.

Another issue noted by the Team was a weakness in asbestos hazard recognition. An incident noted by the Team concerned a worker who ignored potential indication of the presence of asbestos and continued work without notifying supervision.

Generally, managers, supervisors, and workers are trained to the hazards to which they may be exposed. However, weaknesses were evident and they need to be addressed. The Team noted that workers get training in host facilities for varying or different standards such as lockout/tagout.

All personnel interviewed felt that the level of training was adequate for their work requirements, the exception being current first-aid training for field workers. Interviews indicate that all personnel initially receive first-aid training; however, refresher training has not been kept current for long-term craftspeople.

The Team found that FGG generally meets the basic requirements of the Safety and Health Training tenet and its sub-elements; however, weaknesses need to be addressed.

## IV. Outreach

The Team reviewed the annual VPP self-evaluation submitted by FGG and noted the following mentoring activities identified by FGG:

- DOE-VPP review of Day & Zimmerman Protection Technology Hanford
- DOE-VPP review of Fluor Hanford - Central Plateau Remediation Project
- DOE-VPP review of ORISE (Oak Ridge)
- DOE-VPP review of Battelle Memorial Institute at the Pacific Northwest National Laboratory
- Safety and Health assistance to Bechtel National
- Safety and Health assistance to Valero Oil (PA)
- Safety and Health assistance to Alcoa Primary Metals
- Safety and Health assistance to Fluor Hanford - Spent Nuclear Fuels
- Self-evaluation assistance to Fluor Hanford - GRP
- Support for the Hanford VPP Champions Forum
- Assistance for the Fluor Hanford Nuclear Materials Stabilization Project
- Assistance and support for Bremerton Naval Shipyard
- Assistance and support for Montana Technical Safety and Health Professional Development Program
- Assistance and support for Central Washington University Safety and Health Professional Development Program

## V. Strengths

During this review, the Team noted several strengths within FGG that are indicative of a healthy and comprehensive safety culture. The ISMS principles and methodologies are evident in these behaviors and practices and illustrate the depth and scope to which FGG values the five main tenets of the DOE-VPP. Listed below are the strengths noted by Team members during this review:

- Strong employee ownership of the overall safety programs and a strong safety culture at the employee level.
- Staff is experienced and generally qualified; there is a sufficient core of experienced, seasoned workers to quickly assist new-hires.
- Management is responsive to concerns, especially at the worksite during job execution.
- Immediate or prompt response by front-line management to value-added issues and solutions.
- Open-door policy by supervisors and managers is highly effective.

## VI. Best Practices

The Team recognized a majority of FGG environment, safety, and health (ES&H) programs as long-term assets that provide excellent value and sufficient worker and management involvement. FGG ES&H programs effectively integrate and implement best practices, which have allowed FGG employee involvement to evolve and stabilize into a strong safety culture. Examples of FGG programs and processes best practices are:

- Ergonomic programs – Ergonomic assessments are performed as requested, if there is an employee complaint, or as part of a safety improvement plan. This is an excellent practice. This is an example of FGG going above and beyond compliance with OSHA and DOE requirements. Since musculoskeletal disorders are the leading cause of lost workday cases in the U.S. and there is no national safety standard addressing ergonomics, both FGG and Fluor Corporate are to be commended for this practice.
- The “Design for Safety” computer program.

## VII. Areas for Improvement

Although the Team recognizes that FGG has implemented many good programs and practices, the Team recommends improvements in the following areas to further strengthen current FGG programs and practices.

- ***Safety and Health Concerns Reporting System.*** The Team recommends that the formal systems by which employees report S&H issues and concerns should be further enhanced and given greater visibility to encourage employee use. These systems would then be more useful for tracking and responding to employee concerns and would afford FGG a wider databank of issues from which to identify trends, thereby improving the overall safety program.
- ***Trenching and Excavation Program.*** The Team recommends that FGG perform a site-wide review of trenching and excavation programs including standards, rules, procedures, and personnel training.
- ***Workplace Violence.*** The Team recommends that FGG review current issues that are creating tension in the Tank Farms complex between craft workers and health physics technicians and take appropriate action. Information collected during interviews disclosed employee concerns with the use of inappropriate behavior (i.e. profanity and degrading comments) that contribute to a hostile work environment. Failure to control this hostility could escalate in to further inappropriate behavior and ultimately lead to workplace violence.
- ***Management Visibility.*** The Team recommends that mid-level managers increase visibility in work areas. Managers should routinely visit work areas to reinforce the safety culture and enhance empowerment of all FGG employees.
- ***First-Aid/Cardiopulmonary Resuscitation (CPR) Training.*** The Team recommends that FGG review its current first-aid/CPR training policy and that FGG conduct a review on the need for placing additional automated external defibrillators (AEDs) in work areas.
- ***Company-wide Wellness Program.*** The Team recommends that FGG explore the implementation of a company-wide wellness program. The FGG workforce is aging, and soft-tissue injuries are likely to be more common among these older workers. A wellness program involving stretching and exercise could help reduce the potential for these types of injuries to FGG personnel.

## VIII. Conclusion

The Team found that FGG continues to meet and maintain a safety and health program addressing the basic tenets of DOE-VPP. The past three years since the award of the Star recognition to FGG has been a significant and influential time for FGG and its VPP. The Team recommends that the FGG be conditionally recertified as a Star. The Team expects that in the next 90 days, as specified in the DOE-VPP guidance, FGG will address the areas for improvement identified in this report. The DOE Field Office will verify whether the areas for improvement have been addressed at a Star quality level and advise DOE Headquarters to recertify FGG's Star status.

# Appendix A: DOE-VPP Recertification Team Assignments

## DOE-VPP Review Team Assignments For Fluor Government Group Review

January 24 - 27, 2005

Name	Organization	Contact Information	Area of Responsibility
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Noble J. Atkins, Jr.	DOE Richland Operations Office	(509) 376-4199 <a href="mailto:noble_j_jr_atkins@rl.gov">noble_j_jr_atkins@rl.gov</a>	Safety and Health Training
Theo Martin, Jr.	DOE Richland Operations Office	(509) 376-0125 <a href="mailto:theo_jr_martin@rl.gov">theo_jr_martin@rl.gov</a>	Worksite Analysis
Conni Thacker	CH2MHILL Hanford Group, Inc.	(509) 373-5588 <a href="mailto:conni_thacker@rl.gov">conni_thacker@rl.gov</a>	Management Leadership
John McFadden	State of Washington, Department of Labor and Industry	(509) 886-6570 <a href="mailto:MCFJ235@LNI.WA.GOV">MCFJ235@LNI.WA.GOV</a>	Hazard Prevention and Control
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