



Wackenhut Services, Incorporated - Nevada

Report from the Department of Energy
Voluntary Protection Program
Onsite Review
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**Wackenhut Services, Incorporated – Nevada
Department of Energy Voluntary Protection Program Review**

I. Background

Wackenhut Services, Incorporated – Nevada (WSI-NV) is responsible for providing security to all Nevada Test Site (NTS) personnel, facilities, equipment, material, and operations and for administering safeguards and security awareness programs. In 2004, WSI-NV was also tasked with establishing a special response team capability. WSI-NV was originally awarded the Department of Energy (DOE) - Voluntary Protection Program (VPP) Star status in 2001, and was recertified in 2004. In March 2007, a five-person team, led by the Office of Worker Safety and Health Assistance (HS-12), conducted an onsite review for the second triennial recertification. The team noted that since 2004, WSI-NV had grown almost four times larger, been through a long period of contract uncertainty, and renegotiated the collective bargaining agreement with the Independent Guard Association of Nevada (IGAN). The team assessed that the organizational stresses associated with these changes had a detrimental impact on the VPP implementation. Management leadership in VPP had not been sufficient to sustain the corporate program, self-assessments had not been adequately self-critical to identify developing problems and trends, employees had not been oriented and trained in the tenets of VPP, and worksite inspections and analyses had not been sufficiently rigorous. The team did observe, however, that despite these weaknesses, WSI-NV managers and employees continued to exhibit a desire to restore VPP to its former strength. The dominant hazards and dangers associated with the rigorous training necessary to accomplish the WSI-NV mission were recognized and adequately controlled. The team noted that WSI-NV had taken the lead for the DOE complex in identifying, analyzing, and addressing lead and carbon monoxide hazards associated with the use of blank ammunition. Accordingly, and based upon their overall assessment, the team recommended that WSI-NV be awarded a Conditional Star rating.

During its review, the team identified 18 opportunities for improvement (OFI) that WSI-NV would be required to address in order to regain full DOE-VPP Star status. Those 18 OFIs are listed in Appendix A.

Pursuant to the 2007 onsite assessment and resultant Conditional Star rating, a four-person team (Team), led by HS-12, conducted a followup assessment from May 5-8, 2008. The purpose of this followup assessment was to evaluate WSI-NV actions to address the needed improvements, and determine if WSI-NV now meets the standard for continued participation in DOE-VPP with a Star rating. In addition to reviewing actions to address the 18 OFIs identified in 2007, all 5 tenets were reviewed by the Team to assure that WSI-NV has maintained its safety programs in accordance with DOE-VPP requirements for Star status. During the review, the Team interviewed over 100 employees both formally and during observation of field activities. Interviews included uniformed and nonuniformed personnel, bargaining unit, exempt and nonexempt personnel, and supervisors and managers.

II. Results

A review of the accident and injury statistics at WSI-NV over the past 3 years underscores the difficulty in making comparison between what is essentially a paramilitary force and an industry standard, which is based solely upon guard forces. Comparison of this data against other protective forces throughout the DOE complex, however, revealed that WSI-NV rates were above the DOE average. As of this assessment, WSI-NV has reversed the negative trend in its total recordable cases (TRC) and days away, restricted, or transferred (DART) case rates that was noted in the 2007 review. While calendar year 2007 rates were still above the industry average, rates since October 2007 have been decreasing, and the actions taken to analyze; address root causes; and reduce the injuries, illnesses, and accidents should continue this positive trend and enable WSI-NV to meet its reduction goals for calendar year 2008 and beyond. Moreover, a detailed analysis of the statistics revealed that the respective rates were well below the comparative industry average when those events specifically related to unique security police officer (SPO) II and III training were excluded from the overall data. WSI-NV should continue to look for ways to improve overall injury/illness reduction rates. Moreover, emphasis must be placed on overcoming the elite force mindset that “train like we fight” means something different than “we train safe.” Specifically, WSI-NV must develop techniques and procedures that eliminate, minimize, or mitigate hazards and reduce opportunities for accidents and injuries during tactical responses, both in training exercises and real-world scenarios. This will not only improve accident and injury statistics, but will also enhance the fighting effectiveness of the protective force.

Overall, WSI-NV VPP has become stronger since the review conducted in 2007. Communications between managers and workers have improved significantly. Managers are visible in the field and a climate of mutual trust has been established between WSI-NV and IGAN. Workers are encouraged to actively participate and communicate their concerns to supervisors and managers. Subsequent to the review, WSI-NV conducted a comprehensive assessment of management processes. As a result, 14 environment, safety, and health (ES&H) procedures were revised and updated.

The Team observed that the general attitude of WSI-NV employees interviewed this year was much better than during work observations and interviews last year. Particularly noteworthy were the high morale and motivation of the protective force. This was evident both during interviews and observation of field activities including live fire exercises. WSI-NV employees’ general knowledge of VPP and what VPP means to them has improved greatly. The level of employee involvement in solving safety issues and concerns has also improved significantly over the last year. The interviewed employees indicated that safety concerns were being solicited in most cases and were acted upon more rapidly than a year ago. The interviewed employees felt that their input was appreciated and considered to be valuable. Several employees interviewed felt that if their suggested fix for the concern was not accepted, the reason was cost. While much improved, some employees believed that feedback on safety concerns from managers/supervisors was still slow and in some cases, employees had not received

feedback as of the date they were interviewed by the Team. Feedback from safety team representatives, however, was considered to be much timelier.

WSI-NV managers are committed to providing the leadership, direction, training, and resources for employees to perform their duties in a safe manner. However, ES&H resource shortfalls identified during the 2007 review continue to be a challenge given the reduced budget for the current fiscal year and further cuts projected for the next fiscal year. The General Manager has taken several steps to address and mitigate the resource issue. In April 2007, WSI-NV entered into a memorandum of concurrence (MOC) with the management and operations (M&O) contractor, National Security Technologies, Inc., LLC (NSTec), to provide comprehensive industrial hygiene (IH) support to WSI-NV. Although the M&O contractor had been providing IH support on an as-needed basis, the primary focus of this new initiative was to conduct baseline IH surveys and health hazard evaluations (HHE) of all WSI-NV facilities and to establish and maintain an ongoing monitoring program. Between April and December 2007, HHEs were conducted at all WSI-NV controlled facilities. Only minor issues were identified and all were mitigated. Baseline monitoring for carbon monoxide, noise, airborne lead, and ventilation was also conducted at the new Live Fire Shoot House and the Live Fire Shoot Tower, both located at the WSI-NV Training complex. During this same period, continuing IH support was provided for routine lead, noise, ventilation, and asbestos monitoring. With respect to reduced ES&H manning, the General Manager intends to leverage MOC with NSTec to obtain safety professional service as required, and train and use bargaining unit safety representatives to perform many of the day-to-day safety and health functions currently performed by ES&H staff. Bargaining unit safety representatives are being sent to the appropriate safety courses to perform an increased role in the day-to-day operations of the safety organization. Also, the General Manager intends to incorporate the Human Performance Improvement initiative into a combined quality assurance, ES&H, and performance testing and assessment organization to offset a reduction of ES&H personnel. These actions, coupled with an ongoing focus on ways to more effectively utilize the expertise resident throughout the workforce, should enable WSI-NV to maintain its strong safety culture, while actions to relieve budget shortfalls are pursued.

WSI-NV employee involvement and participation increased during the past year in several ways and on several levels. The committee structure was overhauled to provide a more functional and proactive organization. A new, three-tiered safety committee program was developed and implemented. To support the existing Employee Safety Committee (ESC), the Protective Force Safety Committee (PFSC) and the Senior Safety Committee (SSC) were established. An Equipment and Uniform subcommittee, that ensures proper configuration and integration of new equipment and uniforms, was also established to support PFSC. All of the previously listed safety committees have employees involved in the decisionmaking process regarding safety and health issues. Employees interviewed during the onsite review stated that they knew their committee representatives by name and were comfortable raising issues and reporting potential problems through them. Committee members felt empowered to review and take action as appropriate without fear of reprisal or disregard.

Although the new enhanced committee process was not fully mature in nature due to the recent restructuring, the reorganized model appears to be more effective in dealing with issues, taking action, and establishing policy. There was evidence of SSC addressing issues and taking action on matters originating in or referred from ESC and PFSC.

WSI-NV should continue to formalize the functionality of these committees as stated and, additionally, should better use them to provide feedback to employees and disseminate information on safety and health-related issues. This is especially important for the Equipment and Uniform Subcommittee to ensure employee input is incorporated in the procurement of basic equipment and supplies. In addition to compliance with national standards and DOE/National Nuclear Security Administration directives, employee input should be solicited and valued. There is now evidence of this integration occurring.

At the activity level, employees related that they felt safe in what they were routinely doing, were prepared for exercises, and were well trained in not only the essentials but also in process improvement. Employees displayed a level of safety consciousness by looking out for each other during daily activities. It was also reported that VPP tenets and values were presented and discussed on various occasions at training functions. This was observed firsthand at morning and evening patrol musters.

The IH function has been expanded and improved through the use of an NSTec level-of-effort services contract as discussed above. This contract provides one full-time equivalent employee to provide comprehensive IH services and has improved health and safety conditions at the activity level through the recognition, evaluation, and control of hazards. The industrial hygienist spent a considerable amount of time onsite observing working conditions during both routine and nonroutine activities. Monitoring is conducted using standard methodologies, and analytical support is provided by certified laboratories. Reports are reviewed and signed by a certified industrial hygienist.

Employees stated that working conditions are now being monitored more intensively and their work environment is being assessed in a more systematic manner; three risk analysis reports having been formally completed over the past year and are now in use. These reports addressed potential hazards occurring in the Device Assembly Facility, Live Fire Shoot House, and Explosives and Munitions Storage. These comprehensive documents assess each hazard and assign a severity code and hazard probability. Data is compiled quantitatively to generate a risk analysis designation of low, moderate, or high. Identified control methodologies are described to eliminate or reduce the hazard.

The tracking and closure of maintenance requests submitted to NSTec had previously been reported as incomplete and problematic. This process has been significantly improved. NSTec now provides computer-generated lists of completed items. These lists are compared directly to requested services. Incomplete items, if any, are identified for subsequent action. Also, routine meetings with the support services manager are held to discuss maintenance requests and any problems encountered.

Through documentation review and interviews, the Team confirmed that training has been conducted for supervisors on proper investigation and documentation of accidents and injuries to ensure essential information is captured and preserved. Two WSI-NV employees attended the DOE Accident Investigation Course and one attended the instructor course. Injuries and illnesses continue to be an issue at WSI-NV. This fact makes it especially important to ensure that all injury and illness causes, contributors, and conditions be reviewed in meticulous detail. If the correct data and information are not captured during the initial incident investigation, the trending data is not accurate; thus, the resulting information is not beneficial in prevention of future injuries or illnesses. All injuries should be considered preventable even if the risk is determined to be acceptable.

Safety topics are now presented at muster, a significant improvement since last year. Documentation was reviewed of many different safety topics discussed at musters over the last 15 months. Also, employees who were interviewed by the Team related some of the topics that had been discussed at various musters. The Team reviewed the structured, written briefings for all guard mounts, including safety topics. The Shift Captains' Log contains these safety briefings and is available for all SPOs to review. Interviews confirmed that SPOs were aware of these briefings and reviewed them daily as required.

A formal mentoring process for senior protective force personnel to train/mentor newly hired protective force personnel has been established; however, portions of it have yet to be fully utilized. Further, due to budget restrictions, there have not been any new SPO classes since the DOE-VPP Assessment in 2007. The Basic Security Police Officer Training course includes an on-station training and mentoring process with the senior SPO assigned to the station. To date, an agreement with the union to have senior SPOs mentor new SPOs following graduation has not been reached. Nevertheless, a process is currently in place to ensure the desired level of senior-to-junior interface during day-to-day operations has been incorporated into the appropriate station operating procedures. The supervisor-to-shift ratio, which was previously 1:16, has been drastically improved and is now between 1:3 and 1:12. The Shift Captain has been reassigned to the NTS forward area, and the new ratio of supervisors to subordinates now ensures supervisors make face-to-face contact with their units every 45 minutes to 1 hour, instead of every 4 hours as was the previous practice. A formalized Duty Officer Training Program has been established, which includes a 20-week course for those candidates who are not SPO-qualified and a 12-week course for those transitioning from SPO to supervisor status. Accountability is emphasized and supervisors who were interviewed understood and actively supported this new emphasis. Moreover, interviews with SPOs at all levels of experience indicated a definite improvement in caring about one another in the field.

III. Conclusion

WSI-NV has made significant progress in the areas identified as needing improvement in order to retain DOE-VPP Star status. Many of these improvements are in the early stage of implementation. Achievement and maintenance of desired results will require continued commitment and oversight on the part of managers and employees alike, and efforts should be refocused as continuous self assessment dictates. The overall Team assessment is that the spirit and intent of OFIs identified in the 2007 review have been met. However, several challenges persist, including high accident and injury rates and constrained ES&H resources. WSI-NV must continue to closely monitor and report status of these issues to the Office of Health, Safety and Security on, as a minimum, an annual basis in the annual VPP report. Also, while improvements in feedback were noted since the last review, efforts must be redoubled throughout the workforce. The increased participation and commitment of managers over the last year has contributed greatly to what the Team observed as a renewed culture of safety excellence and drive for continuous improvement. WSI-NV is in an excellent position to assist NSTec in its VPP pursuit. Consequently, the Team is recommending that WSI-NV retain DOE-VPP Star status without condition.

Appendix A

Opportunities for Improvement: 2007 Onsite Review of WSI-NV VPP

- WSI-NV should analyze and document the root causes for negative trend in TRC and DART case rates, and use that analysis to identify specific actions to reduce accident and injury rates in 2007. Further, specific numerical goals should be established to demonstrate effectiveness of those actions.
- WSI-NV and IGAN should find additional opportunities to encourage and improve communications between managers and workers by providing more top management visibility. Look for opportunities to encourage workers to ask questions of managers and ensure those questions are answered openly.
- WSI-NV should perform and document an assessment of management processes to determine which processes require change to better support the rapid growth and expected size of the workforce. This review should include a specific assessment of existing ES&H procedures. WSI-NV should identify areas where it is not in compliance with existing procedures and determine appropriate corrective actions.
- WSI-NV should expand the current ES&H section to include one or more industrial hygienists, safety engineers, and certified safety professionals. These experts should be used to assist in the performance of hazard surveys and analysis, as well as selection and implementation of controls.
- WSI-NV should expand and maintain a more systematic and integrated approach to capturing, prioritizing, and trending internally identified issues that includes identification of corrective actions, tracking those actions to closure, verifying effectiveness of the corrective actions, and providing regular status to managers and employees. This process should include items identified by internal management assessments and walkarounds, ESC concerns and issues, Safety Patrols, and individual employee-identified concerns or suggestions.
- WSI-NV should improve the quality of annual program assessments of both VPP and Integrated Safety Management System to ensure the assessments focus not just on the existence of processes and procedures, but on effective implementation of those procedures through performance-based inspections.
- WSI-NV and IGAN should cooperate to ensure workers can raise safety concerns without regard to seniority and without fear of retribution by managers, supervisors, or fellow employees.
- WSI-NV should form a standing equipment review committee chaired by an appropriate manager and include participation by knowledgeable employees

- and supervisors to review existing and proposed new equipment to ensure employee concerns with equipment safety and suitability are adequately addressed. Ensure management decisions for equipment procurement are clearly explained, particularly when decisions involve potential conflicts between safety and security performance.
- WSI-NV should expand ESC to include a tiered structure of committees that includes geographically or functionally located subcommittees, the current ESC, and a General Manager's safety committee. Establish a process for each of the committees to raise safety concerns (e.g., subcommittees meet weekly or biweekly, ESC meets monthly, and GM committee meets quarterly).
 - WSI-NV should resume safety patrols per SP2-020, and periodically include professional safety expertise (e.g., IH or safety engineer), along with the employees performing the safety patrol. Ensure results of the safety patrols are tracked and trended. Establish a minimum set of inspection criteria used during the patrol that includes vehicle safety checks, first-aid kits, availability and use of water, and any other recurring safety concerns. Encourage employees to look beyond the checklists and identify and correct unsafe behaviors without regard to seniority.
 - WSI-NV and IGAN should cooperate to reestablish their commitment to VPP. Provide regular briefings by WSI-NV managers and IGAN representatives to all employees who focus on the necessary commitment to partnership and excellence in safety performance, not just compliance. Ensure all employees truly understand the tenets of VPP and their individual responsibilities for maintaining VPP Star status.
 - WSI-NV should perform formal hazard surveys of all work areas and worksites to identify previously unrecognized hazards (e.g., use of chemicals in electronics maintenance areas) and missing controls (e.g., lead surveys, eyewash stations). The results of these surveys should be compared to existing risk analysis reports, and discrepancies or errors should be documented and corrected.
 - WSI-NV should establish clear management expectations that all injuries, no matter how minor, are reported to supervisors. This should include minor, self-first aid, as these cases could indicate precursors to more significant safety problems. Identify and trend data from injuries and illnesses to identify at-risk behaviors.
 - WSI-NV should improve tracking of maintenance requests submitted to NSTec to include regular reports to WSI-NV regarding current backlog, priority, and scheduling of work requests. Make these reports available to supervisors, and encourage supervisors to share them with individual employees. Ensure work orders that are open longer than 90 days are clearly

identified, and decisions to either increase the priority or drop the request are documented and communicated.

- WSI-NV should provide training to field supervisors on proper investigation and documentation of accidents and injuries to ensure essential information is captured and preserved.
- WSI-NV should provide additional dedicated safety topics during muster, daily briefings, or other training venues as appropriate. Dedicate sufficient time (e.g., 10-15 minutes at a single muster each week) to specific topics that reinforce basic safety training. Topics to consider for regular review include basic radiological controls, the purpose for wearing dosimeters and the expected doses to workers, lead awareness and controls, carbon monoxide, respirator use and effectiveness, vehicle safety, heat and cold stress management, vehicle placards, emergency response expectations (e.g., leaking vehicle), and other topics that might be raised by individual employee questions.
- WSI-NV should provide a structured, written briefing for all guard mounts, including safety topics, and keep those written briefings in notebooks at all posts. Encourage individual employees to review the guard mount briefings from all guard mounts since their previous duty.
- WSI-NV and IGAN should cooperate to establish a formal mentoring process between senior protective force members and new members. Mentors should be selected from volunteers that exhibit the necessary commitment and attitude to teach new members of the protective force appropriate safety behaviors while performing their duties, as well as improve integration of new employees into the ranks.

Appendix B

Onsite DOE-VPP Audit Team Roster

Management

Glenn S. Podonsky
Chief Health, Safety and Security Officer
Office of Health, Safety and Security

Michael A. Kilpatrick
Deputy Chief for Operations
Office of Health, Safety and Security

Patricia R. Worthington, PhD
Director
Office of Health and Safety
Office of Health, Safety and Security

Bradley K. Davy
Director
Office of Worker Safety and Health Assistance
Office of Health and Safety

Quality Review Board

Michael Kilpatrick	Patricia Worthington
Dean Hickman	Robert Nelson

Review Team

Name	Affiliation/Phone	Project/Review Element
Carlos Coffman	DOE/HSS (301) 903-6493	Team Lead Management Leadership
Frank Greco	DOE/HSS (301) 903-5522	Management Leadership Employee Involvement
Bonnie Anderson	CH2M*Washington Group, Idaho Cleanup Project	Worksite Analysis Safety and Health Training
Robert Kapolka	Oak Ridge Associated Universities, Oak Ridge Institute for Science and Education	Employee Involvement Hazard Prevention and Control