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<b>TITLE:</b> Environment, Safety, and Health Policy	<b>3 YR PERIODIC REVIEW DATE:</b> <u>09/01/25</u>	
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<b>USE CATEGORY:</b>	<b>INFORMATION USE</b>	<b>Page 1 of 8</b>
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**Level 2 Policy**

Revision	Record of Issue/Revision	Affected Pages
6	Revision/Periodic Review: update to current template and format; add Appendix A, <i>Regulatory Requirements Flow Down</i> , and associated step in A, <i>Purpose</i> ; update Acronyms list; move list of DOE regulatory documents from References to Appendix A; rename Exhibits as Appendices; grammatical/editorial changes as needed.	All

Previous Record of Issue/Revision information is available from the history files.

This Fluor-BWXT Portsmouth LLC (FBP) policy is subject to modification or revision in part or in its entirety to reflect changes in conditions subsequent to the effective date of this policy. Employees represented by a union are subject to the terms and conditions of the Union’s Collective Bargaining Agreement (CBA) with FBP. In the event of a conflict between the CBA and this policy, the CBA shall prevail.

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**A. PURPOSE**

To set forth the Fluor-BWXT Portsmouth LLC (FBP) commitment to provide working conditions free of occupational injuries and illnesses and to protect the environment from unacceptable risks resulting from operations, construction, and demolition activities conducted at the Portsmouth Gaseous Diffusion Plant (PORTS) Decontamination and Decommissioning (D&D) Project.

Changes to this policy shall be approved by the FBP Executive Safety Council.

This document implements applicable regulatory requirements. They are listed in Appendix A, *Regulatory Requirements Flow Down*.

**B. SCOPE AND APPLICABILITY**

None

**C. POLICY**

1. FBP places the health and safety of FBP Employees, Subcontractors, Affiliates, and Contract Labor Resource Personnel (collectively, “employees”) performing work at the PORTS D&D Project, above all else. Our goal is no injuries, no accidents, and no unplanned events. FBP will strive to provide a work environment that is free of occupational injuries and illnesses by delivering the controls, procedures, and training necessary to perform work safely.
2. This policy applies to all employees working on behalf of the PORTS D&D Project. Every employee is expected to follow this policy and to report safety or environmental concerns to management.
3. FBP is committed to protecting the environment and surrounding community from unacceptable risks. We will achieve this by integrating environmental requirements and pollution prevention into our work planning and execution, and taking actions to minimize the environmental impact of our operations.
4. To achieve excellence in safety and environmental stewardship, work practices will emphasize the following.
  - a. **Management Leadership, Commitment, and Accountability** – FBP management is responsible and accountable for protecting its Employees, the public, and the environment. Management will provide strong leadership to ensure risk-management strategies are incorporated into business and work processes. Line management is responsible for the safety of individual operations. Managers will provide a workplace where Environment, Safety, & Health (ES&H) concerns are encouraged to be brought forward without fear of reprisal.
  - b. **Employee Engagement and Accountability** – Employees are responsible for working safely, following policies and procedures, stopping at-risk behavior, and stopping work and notifying management of unsafe work conditions, work processes, and adverse impacts to the environment. This applies not only to the activities of the workers themselves, but to their co-workers, as well. Employees may only perform work after it is authorized to proceed by management.

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- c. **Hazard Prevention and Control** – FBP develops and maintains processes to ensure hazard prevention and control methods, including those related to environmental hazards, are in place and effective. Methods for eliminating and controlling hazards are considered in this order:
- Process and/or material substitution (Elimination)
  - Passive design feature
  - Active engineering controls
  - Administrative controls
  - Personal protective equipment
- d. **ES&H Training** – Training is provided to ensure Employees and visitors know and understand the policies, requirements, procedures, and responsibilities established to maintain risk, and prevent exposure to, work place hazards and adverse environmental impacts. For hands-on work, Supervisors are responsible to ensure workers have the competence to perform their assigned tasks safely.
- e. **Continuous Improvement/Organizational Learning** – FBP pursues improvements leading to high-quality performance demonstrated through objective metrics and process reviews. The most basic element of feedback is the Post-Job Review. FBP recognizes that no process or procedure is perfect, and it is important to understand where workers were faced with unexpected conditions, what worked the way they thought it should, and if any new hazards were identified. The intent of continuous improvement/organizational learning is not to add complexity to procedural requirements, but to provide clear and transparent guidance to trained, qualified, and competent workers to safely work.
- f. **Nuclear Facility Safety Tenets (Appendix B)** – We are stewards of a nuclear site. Our Integrated Safety Management System (ISMS), the Department of Energy (DOE), the regulators, and the public are dependent on our decisions and actions to keep co-workers, our environment, and our neighbors safe. FBP utilizes the Nuclear Facility Safety Tenets (NFSTs) as a means to convey management expectations for safe work performance and support for a Safety Conscious Work Environment (SCWE).
- g. **Environmental Protection Principles (Appendix C)** – FBP maintains an environmental policy that is consistent with the DOE Portsmouth/Paducah Project Office (PPPO) environmental policy to bring the company values to the forefront. This policy is implemented through the programs described in FBP-EP-PDD-00008, *Environmental Management System Description*, and by applying the principles of ISMS to integrate environmental protection, environmental regulatory compliance, pollution prevention, sustainability, investment recovery, and continual improvement into the daily planning and performance of FBP work.

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## D. DEFINITION(S)/ACRONYM(S)

### 1. DEFINITIONS

- a. **Active Engineering Control**: A means of control of intermediate rank, involving active electrical, mechanical, or hydraulic hardware that sense a change in a process variable important to safety and provide an automated response to secure the system in a safe condition.
- b. **Administrative Control**: A means of control that relies on human judgment, training, and responsibility. These controls may be actions, restrictions, or verification steps in a work performance document and are the least preferred means of control because they are human-based and subject to error in application.
- c. **Lessons Learned**: A good work practice or innovative approach that is captured and shared to promote repeat application, or an adverse work practice or experience that is captured and shared to avoid recurrence.
- d. **Passive Design Feature**: The most desirable means of safety control, involving fixed, passive design features; design limits on shape, size, location, etc.; or physical limits on chemical processes. These means of safety control are highly preferred because they provide high reliability, cover many potential accident scenarios, require little operational support to maintain effectiveness, and human intervention is not required.
- e. **Post-Job Review**: Meeting held by the Supervisor/Contract Technical Representative with work team members to discuss the work recently completed including, but not limited to, ES&H concerns, Lessons Learned, potential work enhancements, work performance document adequacy, and job progress.
- f. **Safety Conscious Work Environment (SCWE)**: a subset of safety culture related to a work environment in which employees feel free to raise safety concerns to management (and/or a regulator) without fear of retaliation/reprisal.

### 2. ACRONYMS

- a. **D&D** – Decontamination and Decommissioning
- b. **DOE** – Department of Energy
- c. **ES&H** – Environment, Safety & Health
- d. **FBP** – Fluor-BWXT Portsmouth LLC
- e. **ISMS** – Integrated Safety Management System
- f. **NFST** – Nuclear Facility Safety Tenet
- g. **PORTS** – Portsmouth Gaseous Diffusion Plant
- h. **PPPO** – Portsmouth/Paducah Project Office
- i. **SCWE** – Safety Conscious Work Environment

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**E. REFERENCE(S)**

1. DOE Guide 440.1-1B, *Worker Safety and Health Program for DOE Federal and Contractor Employees*
2. DOE Guide 450.4-1C, *Integrated Safety Management System Guide*
3. DOE Order 436.1, *Departmental Sustainability*
4. FBP-EP-PDD-00008, *Environmental Management System Description*
5. FBP-NSE-POL-00005, *Fluor-BWXT Portsmouth LLC Nuclear Criticality Safety Policy*
6. FBP-OS-PDD-00001, *Worker Safety and Health Program*
7. FBP-PM-PDD-00001, *Integrated Safety Management System*

**F. APPENDICES/ATTACHMENTS**

1. Appendix A, *Regulatory Requirements Flow Down*
2. Appendix B, *Nuclear Facility Safety Tenets (NFSTs)*
3. Appendix C, *FBP Environmental Protection Principles*

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**Appendix A**  
**REGULATORY REQUIREMENTS FLOW DOWN**

1. 10 CFR 851, *Worker Safety and Health Program*
2. DOE Order 436.1, *Departmental Sustainability*

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**APPENDIX B  
NUCLEAR FACILITY SAFETY TENENTS (NFSTs)**

The four NFSTs are a simple to remember set of management expectations, which embody the core functions and guiding principles of ISMS and convey support for a SCWE.

**1. Procedural Compliance**

We are in the business of exactness. There is very little margin for error and it must be preserved. The best way to do that is to use a combination of our experience, our training, and the tool called “the procedure”. The procedure is a set of instructions put together by a subject matter expert, not under any duress, with full access to multiple resources. The procedure has been verified to deliver consistent and expected results, when properly followed, combining it with our training and our experience.

**2. Questioning Attitude**

It is our expectation that our workforce will take nothing for granted. We want our workforce at all levels to have a questioning attitude. They must have confidence that their actions will result in the desired effect and stop any time they are unsure of the outcome. They must continue to challenge anything they do not understand until they do understand it. Our supervisors must support workers inquisitiveness!

**3. Willingness to Stop**

It is our intent to foster an environment where every employee feels comfortable stopping when unsure of the results of proceeding. We never want any employee to feel they must or should proceed in the face of uncertainty. Of the four attributes, this one is the most important. Not one of us can always know everything - stopping to get help is to be viewed as the highest act of intelligence and integrity.

**4. Personal Accountability**

As professionals, we realize that our performance on the job is ultimately our responsibility. If there are things which inhibit our performance, we need to bring them up to get them corrected, or to better understand why they need to be accommodated in the performance of our job. **PERSONAL ACCOUNTABILITY** is not about blame, but rather knowing that we need to hold ourselves responsible to the highest standards and act with courage and integrity.



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**APPENDIX C  
FBP ENVIRONMENTAL PROTECTION PRINCIPLES**

1. Execute and complete all D&D and environmental remediation work activities in a manner that complies with DOE decision documents and has the least impact on the environment.
2. Comply with all applicable environmental laws and regulations.
3. Use all means practicable to minimize or eliminate any newly generated wastes. Whenever possible, newly generated wastes shall have a clear disposition path before they are generated.
4. Protect the natural, biological, and cultural resources associated with FBP activities.
5. Conserve natural resources by reusing and recycling materials, purchasing recycled materials, using recycled materials, and incorporating energy and water efficiency principles into site operations and remediation work.
6. Establish documented environmental objectives and targets and update them as necessary to reflect FBP's changing needs, missions, and goals.
7. Consider internal and external stakeholder input when weighing alternative courses of action.
8. Measure our environmental performance and monitor our impact on the environment, and communicate the results to our employees, subcontractors, and internal and external stakeholders.
9. Continuously improve our environmental management system through self-assessment and corrective action.
10. Communicate this policy to all employees and subcontractors, and make it available to the public and our stakeholders.