

Westinghouse Savannah River Site

I. Summary Description

The process of selecting requirements for a subcontract is multi-functional. The technical personnel tasked with preparing the statement of work (SOW) must determine the applicability of Westinghouse Savannah River Complex Site Standards/Requirements Identification Document (S/RID) requirements to the specific work scope. Subject matter experts (SMEs) are contacted from various functional areas to assist in this process.

Statements of work are developed by technical personnel familiar with the nature and location(s) of work requested for subcontract.

Although other site procedure manuals provide some guidance, four main procedures drive inclusion of S/RID requirements in development of the SOW: WSRC Manual 3E, *Procurement Specification Procedure Manual*; WSRC Manual 7B, *Procurement Management Manual*; WSRC Manual 1Q, *Quality Assurance Manual*; and WSRC Manual 8Q, *Employee Safety Manual*.

WSRC Manual 3E contains guidance for preparing SOW, including specific SRS requirements (Site Conditions), and states that only applicable requirements such as codes, standards, orders and regulations will be specified in the SOW. WSRC Manual 7B and WSRC Manual 1Q contain procedural requirements for processing purchase requisition packages, including the SOW. These manuals specify that various subject matter experts (SMEs) shall provide input to and approval of purchase requisition packages prior to submittal to WSRC Procurement buyer.

WSRC Manual 8Q, Procedure 15, “Subcontracted Service Workplace Safety and Health,” provides direction for specifying and documenting safety and health requirements in the purchase requisition package by using a decision matrix and a subcontract safety checklist. The Subcontract Safety Checklist, OSR 1-183, is used to involve SMEs (i.e., safety, industrial hygiene, radiological control) in the initial planning and flow-down of scope and facility-specific requirements when the SOW is being written and the purchase requisition package is being prepared. This checklist encourages specific requirements to be stipulated in the SOW. It is also used to determine the subcontract category, whether the work is hazardous or non-hazardous, and to identify tailored and general-provision requirements for the buyer to include in the solicitation package.

The requisition writer and the area safety engineer determine the applicability of site procedures to the scope of work. To make the determination, they apply guidelines from Manual 8Q, Procedure 15, Attachment B, WSRC Procedure Determination Guide, which addresses applicability of particular site procedures to a specific subcontract scope.

Functional Area (FA) 19 “Occupational Safety & Health” Standards/Requirements Identifications Documents (S/RIDS) are specifically tailored and coded as to their

applicability to specific subcontract categories. The requisition writer and the area safety engineer determine which S/RID requirements are applicable to the scope. The requisition writer may also consult with other subject matter experts (SMEs) in other functional areas to determine applicability of requirements in the subcontract scope of work. An S/RID Database has been developed and made available as a tool to assist in this process.

The selection of subcontractors for procurement is a two-step process. The first step is source selection. During this step, buyers conduct market research to determine the capabilities of the marketplace to perform the work under consideration. The approach may entail consideration of subcontractor capabilities, past performance, socioeconomic status, financial condition, current availability and past safety performance indicators. These indicators include experience modification rates (EMR) and total recordable cases (TRC) with minimum acceptance standards of 1 or less EMR and 4.9 or less TRC for services and 8.6 or less TRC for construction. Based on this research, a list of potential subcontractors is developed. Recommendations are also accepted from SMEs so that a comprehensive list of potential bidders is assembled.

The second step in procurement is the outcome of the proposal process. Once a request for proposal (RFP) has been sent, potential subcontractors have the opportunity to respond to our RFP with their technical proposal, quality program, worker protection program, and price proposals. An evaluation team then evaluates the proposals against the requirements of the SOW and RFP. The buyer reviews the price proposal to determine price reasonableness. The final selection of the subcontractor is made by combining the results of the technical, quality, safety, and price evaluation to determine the proposal that provides the best value to the government and WSRC. Since safety is an integral part of any scope of work performed at SRS, the subcontractor's safety and Integrated Safety Management (ISM) programmatic approach are key in consideration of any proposal. Any subcontractor who does not meet the technical, quality, or safety requirements is excluded from further consideration during the proposal evaluation.

The evaluation of qualifications and selection of a subcontractor takes place during the proposal evaluation. During the proposal evaluation, the evaluation team conducts a technical evaluation of the qualifications presented in the subcontractor's proposal as well as an independent review of the subcontractor's past performance. The qualifications of the prospective subcontractors are evaluated against the criteria and requirements stated in the SOW and RFP. References, provided with the proposal, are contacted and questioned about the subcontractor's past performance, covering topics such as safety, schedule and cost compliance, quality of work, etc. If the potential subcontractor has worked at SRS before, the subcontractor's past performance and safety record at SRS is also evaluated. If the potential subcontractors are required to submit a Quality Assurance (QA) Program Plan (QAPP) or Worker Protection Program (WPP) with their proposal, these documents are evaluated by site Quality and Health & Safety organizations. In addition, a site QA representative may elect to audit the prospective subcontractor's QA program at their facility. The buyers evaluate the price proposals for price reasonableness. Once these independent reviews are complete, the evaluation team

members discuss the results and select a subcontractor based on the proposal that best meets the requirements of the SOW and RFP. Any subcontractor that fails to meet the requirements in the SOW and RFP can and often is eliminated without further consideration.

The subcontractor's performance is evaluated through daily monitoring and oversight by the subcontract technical representative (STR) and periodic oversight by various functional SMEs, who include safety and health personnel in conjunction with the STR. Periodic progress meetings are also held with the subcontractor and appropriate WSRC personnel.

Safety is the primary concern at SRS, and all employees have the right to stop work if they observe activities that place an employee in imminent danger or could cause damage to property or equipment. Routine safety observations are reported to the STR and/or Safety SME for evaluation against the subcontractor's safety requirements (OSHA and subcontract specific). Daily activity reports are prepared for construction subcontracts and include documentation of safety observations and follow-up for corrective action. Construction subcontracts include a safety citation program, which requires subcontractors to have a safety stand down after three violations. Construction also implements a "Heads-Up" Program that identifies incidents, as they occur to provide management awareness and additional corrective actions. Incidents are categorized based on severity by safety personnel, and the more severe incidents are presented before an Incident Review Board, which includes the subcontractor and appropriate WSRC personnel. Not only are incidents critiqued but potential incidents are also critiqued to determine compliance with subcontract requirements and to mitigate future occurrences.

The following are lessons learned that may assist others in the implementation of an effective subcontractor safety program.

- Implement one subcontract management program with two arms, services and construction.
- Establish core training that includes safety and health training for all STRs, task order representatives (TORs), and buyers. Construction implements a STR qualification program that includes education, experience, and training.
- Implement the utilization of formally trained STRs to manage all subcontracts.
- Implement full time STR management for oversight of the STRs. Consider a full time STR Program. Construction has already implemented a full-time program and we are considering a full time STR program for service subcontracts.
- Implement an Incident Review Board, which emphasizes the five elements of ISMS.
- Implement a monthly safety meeting, which includes the subcontractor and site Safety and Health SMEs.
- Implement a Behavior-Based Safety (BBS) Program and include subcontractors in the BBS observation process.

Depending on the complexity of the subcontract, the STR/TOR and the procurement representative may conduct a closeout meeting with the subcontractor. Additional disciplines i.e. quality, safety and health subject matter experts (SMEs) are invited, as

appropriate, to participate in the closeout meeting. During the closeout meeting, the subcontractor's performance is compared to the subcontract requirements, which include such topics as the number of change notices and the reasons for them, the subcontractor's safety record, radiological incidents, working relationship during performance, and overall performance. The results of this discussion are summarized in the meeting minutes and become a part of the documentation included in the STR and purchasing representatives files.

At the completion of the subcontract, the STRs provide PMMD with the subcontractor performance summary, which includes input from safety and health, quality, etc.

II. Points of Contact (POCs)

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III. Contact the POC for a copy of any of the listed reference documents.

A copy of any of the reference documents identified in the description can be obtained by contacting one of the POCs.