



## Department of Energy

Washington, DC 20585

June 14, 2023

Mr. Eric Wollerman  
President  
Honeywell Federal Manufacturing & Technologies, LLC  
14510 Botts Road  
Kansas City, Missouri 64147

WEL-2023-01

Dear Mr. Wollerman:

The Office of Enterprise Assessments, Office of Enforcement has completed an evaluation of safety and health concerns expressed in a request for investigation received from a Honeywell Federal Manufacturing & Technologies, LLC (Honeywell FM&T) employee on August 24, 2022. The request alleged concerns regarding unsafe conditions during outdoor firearms training and qualification activities by Honeywell FM&T at the Department of Energy's National Nuclear Security Administration (DOE/NNSA) Kansas City National Security Campus, in May 2022. Based on this evaluation, the Office of Enforcement identified concerns that warrant management attention by Honeywell FM&T.

The specific concerns relate to Honeywell FM&T's implementation of the requirements in 10 C.F.R. Part 851, *Worker Safety and Health Program* (WSHP), and Honeywell FM&T's approved WSHP, in the areas of hazard identification and assessment, and emergency response.

- Honeywell FM&T's job hazard analysis (JHA) 100384, *Shooting on the Firing Range*, October 29, 2020, did not identify hazards and controls for slips, trips, and falls related to severe weather conditions and shooting-on-the-move as required by the approved WSHP, to ensure that controls were in place and communicated prior to work being conducted. For example, the JHA lacked safe work practices for stopping outdoor firearms training and qualification activities, such as shooting-on-the-move when footing (stability) is impaired due to heavy rain, sleet, hail, or snow.
- Honeywell FM&T did not conduct a heat stress assessment during outdoor firearms training in May 2022, when temperature conditions exceeded the action level stated in Process Description (PD) 5.126, *Dealing with Temperature Extremes*, May 19, 2022. Honeywell FM&T's action level is based on a temperature of 85 degrees Fahrenheit/29 degrees Celsius and one or more of the following conditions: direct solar/radiant heat load, greater



than 70 percent relative humidity, heavy or strenuous physical exertion or thick inner or outer garments.

- On May 11, 2022, when local temperatures exceeded 85 degrees Fahrenheit, a worker suffered symptoms related to heat stress (i.e., heat cramps) during outdoor firearms training activities. Honeywell FM&T responded to the event by escorting the affected worker to an air-conditioned vehicle and accompanying them for a short period of time (i.e., ~ 20 minutes). Honeywell FM&T left the affected worker alone in the vehicle and returned periodically to check on their status. Honeywell FM&T did not have the affected worker evaluated by a medical professional as required by JHA 101134, *How to Protect Employees Against Extreme Temperatures due to Environmental Conditions*, September 9, 2021.

The Office of Enforcement acknowledges that Honeywell FM&T issued General Order 02, *Inclement Weather Restrictions*, in June 2022, to prevent workplace injury and heat-related illness during outdoor training activities at the firing range. For example, Honeywell FM&T recently implemented wet bulb globe thermometer (WBGT) environmental monitoring during firearms training activities with specific screening criteria for unacclimatized workers. The use of a WBGT addresses the action level requirements stated in Honeywell FM&T's heat stress program, PD 5.126, *Dealing with Temperature Extremes*, January 12, 2023. Additionally, Honeywell FM&T developed guidelines on when to cease outdoor firearms training activities to ensure inclement weather hazards do not result in personal injury due to slips, trips and falls. However, Honeywell FM&T should ensure that severe weather hazards and controls to prevent slips, trips, and falls during outdoor firearms training activities are incorporated into JHA 100384 as required by the approved WSHP. Furthermore, Honeywell FM&T should ensure Table A-1, *FM&T WSHP Matrix*, is updated to reflect current plans and procedures for implementing the firearms safety functional area.

The Office of Enforcement has elected to issue this Enforcement Letter to convey concerns about Honeywell FM&T's implementation of worker safety and health requirements. Issuance of this Enforcement Letter reflects DOE's decision to not pursue further enforcement activity against Honeywell FM&T at this time. In coordination with DOE/NNSA, the Office of Enforcement will continue to monitor Honeywell FM&T's efforts to maintain a safe workplace.

This letter imposes no requirements on Honeywell FM&T and no response is required. If you have any questions, please contact me at (301) 903-4033, or your staff may contact Ms. Shannon Holman, Director, Office of Worker Safety and Health Enforcement, at (301) 903-0100.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony C. Pierpoint', with a long horizontal flourish extending to the right.

Anthony C. Pierpoint  
Director  
Office of Enforcement  
Office of Enterprise Assessments

cc: Jeff Shoulta, NA-KC  
Chad Stotler, Honeywell Federal Manufacturing & Technologies, LLC