



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

03-ESQ-037

JUL 14 2003

Mr. E. S. Aromi, President
and General Manager
CH2M HILL Hanford Group, Inc.
Richland, Washington 99352

Dear Mr. Aromi:

CONTRACT NO. DE-AC27-99RL14047 – U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION (ORP) ASSESSMENT REPORT, A-03-ESQ-TANKFARM-003, OF CH2M HILL HANFORD GROUP, INC. (CH2M HILL) PROGRAM FOR THE CONTROL OF DOCUMENTS, RECORDS, AND WORK PROCESSES

This letter forwards the results of the ORP assessment of the CH2M HILL Program for the Control of Documents, Records, and Work Processes conducted May 12 through 16, 2003. Four Findings and two Observations were identified during the assessment. Most of the Findings represent isolated cases of noncompliance and resulted in no significant safety issues. The Finding associated with inadequate record storage appeared generic and warrants immediate management attention. The Findings are discussed further in the Notice of Finding (Attachment 1). The assessment report is included as Attachment 2.

The assessment team concluded, with the exception of Findings A-03-ESQ-TANKFARM-003-F-01, F-02, F-03, and F-04, CH2M HILL's Program for the Control of Documents, Records, and Work Processes were effective and met contractual requirements.

If you have any questions, please contact me, or your staff may call Robert C. Barr, Director, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,


Roy J. Schepens
Manager

ESQ:DHB

Attachments (2)

Notice of Finding

The responsibilities of the CH2M HILL Hanford Group, Inc. (CH2M HILL) as they relate to the Quality Assurance (QA) requirements of CH2M HILL's scope of work are defined in the River Protection Project Tank Farm Contract, Part I – The Schedule, Section H, H.30 *Quality Assurance System*. H.30 states, "The Contractor shall develop and implement a company specific Quality Assurance Program (QAP), supported by documentation that describes its overall implementation of Quality Assurance (QA) requirements." The QAP shall be developed based on:

- Title 10 Code of Federal Regulations (CFR) Part 830.122 for all nuclear facilities and projects within the scope of that document;
- DOE O 414.1A, *Quality Assurance*, requirements for facilities and projects not within the scope of 10 CFR 830.120; and
- Office of Civilian Radioactive Waste Management, *Quality Assurance Requirements and Description*, DOE/RW-0333P, for those elements of CH2M HILL's scope of work that involves the interim storage of spent nuclear fuel and high-level radioactive waste.

CH2M HILL's QA program is defined in *Quality Assurance Program Description*, TFC-PLN-02. Implementing procedures describe processes to meet the requirements described in CH2M HILL's Quality Assurance Program Description (QAPD).

During performance of an assessment of CH2M HILL's program for control of documents, records, and work processes, conducted May 12 through 16, 2003, at CH2M HILL's offices, the U.S. Department of Energy, Office of River Protection (ORP) identified four Findings.

A-03-ESQ-TANKFARM-003-F-01 – Records were not stored in a manner minimizing the risk of loss, damage, or deterioration. Also, access to stored records was not adequately controlled.

Requirements:

- Section 2.4.2.2.6 of TFC-PLN-02, Revision A-1, *Quality Assurance Program Description*, states, "Records shall be stored and maintained in a manner that minimizes the risk of loss, damage, or deterioration. Access to stored records shall be controlled. Prior to storage of records, a written storage procedure shall be prepared and responsibility assigned for enforcing the requirements of that procedure. This procedure shall include, as a minimum:
 - a. A description of the storage facility
 - b. The filing system to be used

- c. A method for verifying that the records received are in agreement with the transmittal document and that the records are legible
- d. A method of verifying that the records are those designated
- e. The rules governing access to and control of the files
- f. A method for maintaining control of and accountability for records removed from the storage facility
- g. A method for filing supplemental information and disposing of superseded records.”

Discussion:

Contrary to these requirements, records were not controlled and maintained in a manner that minimized the risk of loss or damage. Also, access to stored records was not controlled. The following examples illustrate these conditions:

- Maintenance records in Building 272-AW were kept in seven cardboard boxes directly under a sprinkler head. Access to these records was not controlled.
- There was no sprinkler system in the records storage room of Trailer 278-AW where operations records were kept for periods of up to three years.
- Various records, mostly completed work packages, were stacked up on the desks of many individuals. This included, but was not limited to, engineers performing post-review on completed work packages. Personnel said records could exist in this condition for months at a time.
- The procedure for operation of the Building 278-AW file room did not address the requirements for a filing system, accountability, or access control.

A-03-ESQ-TANKFARM-003-F-02 – Controlled drawings maintained in the field by a subcontractor did not reflect three engineering change notices.

Requirements:

- Section 2.4.2.1.5.a of TFC-PLN-02, Revision A-1, *Quality Assurance Program Description*, states, “The process for distribution of controlled documents shall ensure that the latest approved revisions are provided to personnel using these documents.”

Discussion:

Contrary to the above, controlled construction drawings maintained by Apollo, Inc. for work on Project W-211 did not reflect the changes documented in Engineering Change Notices (ECN) W211-TP1-014, W211-TP1-016, and W211-TP1-020. Apollo, Inc. personnel said that the ECNs were delivered to the field on April 22, 2003, but they failed to incorporate them into the controlled drawing set.

A-03-ESQ-TANKFARM-003-F-03 – The Environmental Program organization provided procedures to its personnel that were either out of date or not controlled within the CH2M HILL document control system.

Requirements:

- Section 2.4.2.1.1 of TFC-PLN-02, Revision A-1, *Quality Assurance Program Description*, states, “Document control procedures shall be sufficient to ensure that documents that define processes affecting quality, specify requirements, establish design, or verify the implementation of technical and quality requirements are identified, developed, reviewed, approved, maintained, and available to personnel needing them. When controlled documents reside on the Hanford Intranet, provisions shall be established to allow for hard copy distribution to personnel when the Intranet is not accessible.”

Discussion:

Contrary to the above, the hard copy procedure book maintained by the Environmental Program organization contained superceded and draft procedures from the CH2M HILL controlled manual system. It also contained procedures described as desk instructions that were not approved or identified within the CH2M HILL procedure system.

A-03-ESQ-TANKFARM-003-F-04 – Continuous Air Monitors (CAM) were stored in a repair shop without the required status indicator tags.

Requirements:

- TFC-PLN-02, Revision A-1, *Quality Assurance Program Description*, Section 2.5.2.5 *Identification and Control of Items*:
 - Paragraph 2 states, “Status indicators, specified by procedure, shall be used to indicate the operating status of systems and components such as tagging and/or locking valves, switches and other components to prevent inadvertent operation.”
 - Paragraph 8 states, “Identification of stored items shall be maintained. Identification shall be protected on items subject to deterioration due to environmental exposure, and replaced if damaged due to handling or aging. Plant

or project records shall be updated as needed to reflect changes in identification and the replacement of stored items.”

- HNF-IP-0842, Volume 5, Maintenance/Production Control, Section 3.11, *Rotatable Equipment Control*, dated February 26, 2002, Paragraph 3.3, states, “Complete and attach a service required label or tag (BT-6000-451 or BL-6000-452) to the equipment that has been removed.”

Discussion:

Contrary to these requirements, seven Eberline Beta CAMs, numbers 102, 127, 139, 141, 159, 166, and 168, were found stored in a cabinet at the 200 E CAM repair shop without status indicator tags. Failure to maintain status of items can result in the installation of defective safety components in the field.

Conclusion:

ORP requests that CH2M HILL provide, within 30 days from the date of the letter that transmitted this Notice, a reply to the Findings above. The reply should include: (1) admission or denial of the Findings; (2) the reason for the Findings, if admitted, and if denied, the reason why; (3) the corrective steps that have been taken and the results achieved; (4) the corrective steps that will be taken to avoid further Findings; and (5) the date when full compliance with the applicable commitments in CH2M HILL’s QAPD will be achieved. Where good cause is shown, consideration will be given to extending the requested response time.

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U.S. DEPARTMENT OF ENERGY
Office of River Protection
Office of Environmental Safety and Quality

ASSESSMENT: TANK FARM CONTRACTOR DOCUMENTS, RECORDS, AND
WORK PROCESS QUALITY ASSURANCE

REPORT: A-03-ESQ-TANKFARM-003

FACILITY: CH2M HILL Hanford Group, Inc.

LOCATION: P.O. Box 1500, H6-63
Richland, Washington 99352

DATES: May 12 through 16, 2003

ASSESSORS: David H. Brown, Lead Assessor
Paul R. Hernandez, Assessor
Larry Dell, Assessor
Daniel Truman, Assessor

APPROVED BY: N. Hunemuller, Team Lead, Quality and Industrial Safety

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EXECUTIVE SUMMARY

Tank Farm Contractor Documents, Records and Work Process Quality Assurance

INTRODUCTION

This assessment of CH2M HILL Hanford Group, Inc. (CH2M HILL) covered the following specific areas:

- Documents and Records (Section 1.2);
- Work Processes (Section 1.3);
- Special Processes (Section 1.4);
- Identification and Control of Items (Section 1.5);
- Handling, Storage, and Shipping (Section 1.6);
- Control of Measuring and Test Equipment (M&TE) (Section 1.7);
- Construction (Section 1.8); and
- Sample Control (Section 1.9).

The assessors concluded that, notwithstanding Findings A-03-ESQ-TANKFARM-003-F-01 through A-03-ESQ-TANKFARM-003-F-04, CH2M HILL had established and effectively implemented processes for controlling documents, records, and work processes.

SIGNIFICANT OBSERVATIONS AND CONCLUSIONS

Effectiveness of Procedures

The assessors reviewed CH2M HILL's procedures for control of documents and records; handling, storage, and shipping; M&TE; special processes (welding and nondestructive examination [NDE]); and construction. The assessors confirmed these procedures contained the requirements of the CH2M HILL *Quality Assurance Program Description*, TFC-PLN-02, Revision A, and generally were adequately implemented.

Documents and Records

The CH2M HILL system for generation and approval of documents was adequate. Documents and current document changes were available to workers who needed them. However, the assessors identified three Findings.

Finding A-03-ESQ-TANKFARM-003-F-01 identifies a condition in which records were not protected from loss or damage in accordance with the Quality Assurance Program Description (QAPD). Many records of maintenance tests and completed work were left out on desks for weeks or months at a time without protection from fire and without adequate access control. Also, a record storage facility was not provided with a fire sprinkler system.

Finding A-03-ESQ-TANKFARM-003-F-02 describes a condition where a subcontractor did not update controlled field drawings with three engineering change notices. When the assessors

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brought this problem to the attention of CH2M HILL management, they investigated it and determined it had not resulted in any incorrectly performed work. Working with the subcontractor, CH2M HILL also concluded this was an isolated condition.

Finding A-03-ESQ-TANKFARM-003-F-03 identifies a condition where the Environmental Program organization provided outdated procedures to workers and had not approved and controlled its desk instructions in accordance with the CH2M HILL document control procedures. No safety issues resulted from this Finding.

Observation A-03-ESQ-TANKFARM-003-O-01 describes two situations in which acceptance test procedures were not executed in accordance with CH2M HILL document control procedures. In one case, an unauthorized technical change was made to a procedure, while in the second case implication of this, workers deviated from a procedure rather than obtain the required document change.

Work Processes

The assessors found CH2M HILL activities that could affect quality, safety, or the environment were prescribed by and performed in accordance with procedures, instructions, or design documents. The assessors identified no issues in the implementation of work process requirements of CH2M HILL or its subcontractors.

Special Processes

The assessors concluded the CH2M HILL processes for controlling the welding and NDE special processes were effective. This included the welding and NDE programs of CH2M HILL's subcontractors. The assessors did not identify any concerns or issues with welding or NDE.

Identification and Control of Items

Items used in construction and maintenance of Tank Farms facilities and equipment were identified and status of the items was maintained. However, one Finding identified a problem with status indication of some safety class items in a repair shop.

Finding A-03-ESQ-TANKFARM-003-F-04 describes a condition in which seven non-functional continuous air monitors were stored without the required tags to prevent installation in the field. The assessors verified these monitors had not been used in the field following the inoperability declaration.

Handling, Storage, and Shipping

CH2M HILL provided an appropriate set of procedures to implement the handling, storage, and shipping requirements of the QAPD. The assessors identified no handling, storage, or shipping issues. However, at the time of the assessment, CH2M HILL was investigating a self-identified problem in which some high efficiency particulate air filters were left outdoors over a weekend. This was contrary to the requirements of American Society of Mechanical Engineers AG-1-

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1994, *Code on Nuclear Air and Gas Treatment*, which was invoked by a Notice of Construction approved by the Washington State Department of Health. CH2M HILL said they intended to report whether or not this reflected a breakdown in their processes for handling, storage, and shipping. Observation A-03-ESQ-TANKFARM-003-O-02 identifies a condition where a problem evaluation request screening failed to identify the regulatory implications of the improperly stored filters.

Control of M&TE

The assessors determined control of M&TE was performed in accordance with requirements, including calibration services provided by the Energy Northwest calibration laboratory.

Construction

The assessors concluded the CH2M HILL processes for controlling construction field activities were effective. This included the Quality Assurance oversight of CH2M HILL's contractors and their sub-contractors. CH2M HILL was properly implementing design media in construction work.

Sample Control

The assessment team determined personnel responsible for the control of waste tank samples used current procedures to perform their activities and actions were documented. CH2M HILL was properly controlling the process for maintaining identification and control of waste tank samples. Chain of custody was maintained and sample data was managed in accordance with CH2M HILL requirements.

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TANK FARM CONTRACTOR DOCUMENTS, RECORDS, AND WORK PROCESS QUALITY ASSURANCE

1.0 REPORT DETAILS

1.1 Introduction

In accordance with the River Protection Project Tank Farm Contract,¹ CH2M HILL Hanford Group, Inc. (CH2M HILL) must comply with the accepted and approved *Quality Assurance Program Description*, TFC-PLN-02, Revision A.

The assessors reviewed CH2M HILL's processes for control of documents, records, and work processes to determine if they complied with the commitments in the Quality Assurance Program Description (QAPD) and the related implementing procedures. Work processes evaluated by the assessors included handling, storage, and shipping; the special processes of welding and nondestructive examination (NDE); identification and control of items; construction quality assurance (QA); control of measuring and test equipment (M&TE); and control of waste tank samples. The onsite review was conducted from May 12 through 16, 2003. An exit meeting was conducted on May 16, 2003.

1.2 CH2M HILL Documents and Records Control Program

1.2.1 Assessment Scope

Control of Documents and Records

The assessors reviewed procedures, verified implementation, and interviewed CH2M HILL personnel responsible for management and use of documents and records in the following areas:

- The Environmental Program organization;
- Project W-211;
- Closure Projects Maintenance;
- Documents and records program management;
- Waste Feed Operations; and
- Lockheed Martin Information Technology (LMIT) operations in support of CH2M HILL.

1.2.2 Observations and Assessments

Documents and Records Program Management

The assessors interviewed information management program managers and reviewed CH2M HILL procedures for control of documents and records. CH2M HILL described its document control program in the QAPD. CH2M HILL described its document control processes

¹ Contract No. DE-AC27-99RL14047 between the U.S. Department of Energy and CH2M HILL Hanford Group, Inc, dated September 30, 1999.

in TFC-BSM-IRM_DC-C-01, Revision A, *Document Control*, and described its records management processes in TFC-BSM-IRM_DC-C-02, Revision B, *Records Management*.

LMIT played an important role in the CH2M HILL document control program in that they received documents and entered them into the document control system. LMIT operated document release stations to provide controlled copies of documents for use by CH2M HILL personnel. LMIT also received completed records from CH2M HILL for storage and final disposition.

All documents and records were scanned into the Records Management Information System (RMIS) database. However, TFC-BSM-IRM_DC-C-02, Section 4.6.1, stated, "Renditions of active or inactive records from RMIS are **not** considered a record copy." CH2M HILL management explained this was because the RMIS system could not be certified as a "records storage system" in accordance with DOE-STD-4001-2000, *Design Criteria Standard for Electronic Records Management Software Applications*.

At the time of the assessment fieldwork, CH2M HILL and LMIT were in the process of implementing a new, certified system called the Integrated Document Management System (IDMS). IDMS was scheduled to take over the roles of several Hanford site databases and would provide compliant systems, both for the electronic storage of records and for document control.

Environmental Program Organization

The assessors interviewed personnel in the Environmental Program organization to determine how data was recorded for regulatory compliance purposes. CH2M HILL gathered data from various sources, such as operator round sheets and stack samples, and then entered them into an electronic database called the Automated Bar Coding of Air Samples at Hanford (ABCASH). Fluor Hanford, Inc. (FHI) extracted data from the ABCASH system to satisfy regulatory reporting requirements.

Administrative records required for compliance with the Hanford Federal Facility Agreement and Consent Order were maintained in a formal Administrative Record system in accordance with TFC-ESHQ-ENV_RM-D-02, Revision A, *Environmental Records*. These records consisted of letters, controlled documents, and agreements, and were located in the 2440 Stevens building. State and federal regulators audited the Administrative Record routinely.

Operating records were created by facilities to demonstrate compliance with regulations and permit conditions. The assessors reviewed the process by which this data was gathered and protected. Because they provided a record of environmental compliance, operator round sheets were safeguarded by CH2M HILL. These records were brought to Building 278-AW, Technical Data Service Center (TDSC), which was dedicated to temporary records storage. While records in TDSC were stored in one-hour fire-rated containers, there was no sprinkler system within the facility. The QAPD required records to be maintained to minimize risk of loss, damage, or deterioration; however, it did not specify protection standards. With the lack of a fire protection sprinkler system, the TDSC provided a lesser level of protection from fire than specified in either

American Society of Mechanical Engineers (ASME) NQA-1, *Quality Assurance Requirements for Nuclear Facilities*, for protecting nuclear QA records, or the National Fire Protection Association (NFPA) code NFPA 232, *Standard for Protection of Records*, for protecting business records. These standards were not explicitly imposed on CH2M HILL. However, they served as useful benchmarks in measuring whether or not CH2M HILL was complying with the requirement of the QAPD to protect records from loss or damage due to fire.

The Environmental Program organization provided the assessors with a procedure book containing both company procedures and local desk instructions. Environmental Program managers said personnel had sometimes used the procedure book in conduct of their work. However, several company procedures in the book were superseded by procedures on the CH2M HILL intranet web site, including one marked "draft." Also, the desk instructions in the book were not identified within the company procedure control system and had not been formally approved by management. CH2M HILL procedure TFC-BSM-IRM_DC-C-01 required procedures, including desk instructions, to be controlled within the CH2M HILL document control system. This required they be numbered and formally approved by management. CH2M HILL management said they had recognized this problem, but they had not documented it and had not had time to correct it. Using outdated and unapproved procedures can lead to noncompliances with regulatory requirements. Failure to provide current and approved procedures to workers is considered a Finding (A-03-ESQ-TANKFARM-003-F-03).

Project Document and Records Control

The assessors used Project W-211 as representative of document and records control implementation in the Projects organizations. The assessors looked specifically at how CH2M HILL and its subcontractors assure current instructions and drawings were used at work sites. Because it had ongoing construction work, the assessors evaluated the document control processes applied by Apollo, Inc.

Apollo, Inc. QA personnel described a coherent process for assuring workers used current procedures and drawings. However, the assessors found three ECNs were not incorporated into the controlled drawing set located in the Apollo, Inc. field office at the W-211 construction site. When the assessors brought this problem to the attention of CH2M HILL and Apollo, Inc. management, they conducted an extent-of-condition evaluation. They found that on April 22, 2003 all three ECNs were brought to the field at the same time and were given to the affected electrical subcontractor. Apollo, Inc. said no errors in work resulted from this problem. CH2M HILL and Apollo, Inc. management said they considered this an isolated event. However, CH2M HILL initiated a problem evaluation request² (PER) requiring further evaluation of this issue. Failure to provide current construction drawings at the work site is considered a Finding (A-03-ESQ-TANKFARM-003-F-02).

The assessors pulled several working records from the W-211 project files, including some acceptance test procedures (ATP). In the procedures were two annotations that were inconsistent with CH2M HILL document control procedures. These reflected deviations from the approved

² PER-2003-1897

procedure that probably occurred during conduct of the ATPs. In one case, someone had changed the nomenclature for some items being verified without obtaining a change to the procedure. In the other case, a verification of a "completed action" was initialed off with the notation "(In progress)." The procedure was not changed to permit documenting the verification of completion when the activity being verified was actually "incomplete." The assessors noted these noncompliances were limited in significance and occurred in May 2001, two years before this assessment. However, they indicated weaknesses in conduct of operations and document control discipline during conduct of ATPs. Further deterioration of discipline could lead to facility and industrial safety consequences, as well as incorrectly performed tests. The assessors made an observation regarding the unauthorized procedure change and procedure deviation (A-03-ESQ-TANKFARM-003-O-01).

Closure Project Maintenance Records

Following completion of preventative and corrective maintenance items, records of the work were routed through Engineering for review. Following review of the records (which sometimes included evaluation of test data) records were routed to a records clerk. The records clerk assembled the records for transfer to the Records Holding Area (RHA) in the 700 Area.

Engineering personnel evaluating completed maintenance records were located in Building 274-AW and the records clerk responsible for accumulating and forwarding maintenance records was located in Building 272-AW. While there was a fire protection sprinkler system in both locations, there were no fire-rated containers for temporarily storing records.

The assessors observed most engineers had a number of maintenance records on their desks. When interviewed about these, one engineer said some of the records would be out on his desk for weeks at a time, and sometimes months. During visits to both locations, the assessors determined this was representative of the practices of engineers in Building 274-AW and planners in Building 272-AW.

In the area of Building 274-AW where the records clerk was located there were two filing cabinets for storage of records. These were full and were not fire-rated. Next to the filing cabinets were seven boxes being used to accumulate additional records for eventual transfer to the RHA. The boxes were located under a fire protection sprinkler head. If the sprinkler system were actuated, water could have damaged the records.

CH2M HILL procedure TFC-BSM-IRM_DC-C-02, Revision B, *Records Management*, stated, "A graded approach to protection and storage of record material should be applied. For example, if the record would be very difficult, costly or impossible to recreate, it should be stored in a one-hour fire-rated cabinet or transferred to the site records holding area. If a record could be recreated in a few minutes, special handling may not be necessary. For most instances, it is recommended records be kept in file cabinets or desk drawers when not in use and at the end of the day." CH2M HILL did not provide fire-rated containers to either the engineers or the records clerk.

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Accountability of maintenance records was provided by the Job Control System database. Whenever a record passed from one individual to another, the individual passing the records was to update the database. During interviews, personnel who frequently handle these records said the database is sometimes not updated and it was then sometimes difficult to locate the record.

During inspections of Buildings 272-AW and 274-AW, the assessors estimated there were more than 100 records exposed to loss or damage. Many of these could not be easily replaced and some could not be replaced without completely re-performing work. While the CH2M HILL records management procedure recommended the use of fire-rated containers, these were not provided to employees for protection of records in their possession.

The QAPD specified the CHQ QA program was based on NQA-1-1989, *Quality Assurance Program Requirements for Nuclear Facilities*. The QAPD required records to be protected from loss or damage, but it did not specify how records were protected from loss due to fire. NQA-1-1989, Supplement 17S-1, Section 4.4.3, *Temporary Storage [of quality assurance records]*, stated, "When temporary storage of records (such as for processing, review, or use) is required by an organization's procedures, the records shall be stored in a one-hour fire-rated container. The procedures shall specify the maximum allowable time limit for temporary storage" The NFPA-232 code also specified requirements for safeguarding business records from loss due to fire, including requirements for a fire protection system in file rooms, and storage of records in fire-rated containers. The QAPD did not explicitly invoke the temporary records storage requirements of either NQA-1-1989 or NFPA-232. However, both of these standards are useful benchmarks in measuring whether or not CH2M HILL was complying with the requirement of the QAPD to protect records from loss or damage due to fire. Failure to adequately protect records from loss or damage is considered a Finding (A-03-ESQ-TANKFARM-003-F-01).

Waste Feed Operations

Operator round sheets recorded data used to provide evidence of environmental regulatory compliance. Therefore, the rounds sheets themselves became records.

Engineering collected round sheets weekly and entered data into a computer database. Waste Feed Operations retained copies of the round sheets in 3-ring binders in Building 2704-HV. East Area Tank Farms round sheets went directly to the TDSC. West Area Tank Farms round sheets were kept in Trailer MO-281 for a few days to transfer data before they were taken to the TDSC.

The operations specialist in the TDSC said records were then maintained in the TDSC for up to three years before being sent to the RHA. While records in the TDSC were kept in fire-rated containers, the TDSC had no fire protection sprinkler system. Failure to adequately protect records from loss or damage is considered a Finding (A-03-ESQ-TANKFARM-003-F-01).

LMIT Operations in Support of CH2M HILL

LMIT maintained several document control stations for control and release of documents, such as procedures, drawings, and ECNs. CH2M HILL personnel would bring these documents to the document control station where they were logged in. They were stamped for release and

forwarded for scanning into the RMIS database. If necessary, advance copies of the released documents were provided to personnel requesting them. The originals eventually went to the RHA where they were maintained as the formal record. An exception to this process was drawings. While drawings were scanned into RMIS like other documents, they were also microfilmed. The microfilm, rather than the hard copy, became the permanent record.

The assessors did not identify any issues with the LMIT document control or records management processes supporting CH2M HILL. However, LMIT personnel said upgrades were scheduled, but not yet funded by DOE, to bring the RHA into compliance with applicable regulations, such as Title 36 Code of Federal Regulations (CFR) Part 1230. 36 CFR 1230 specified requirements for preservation of photographic and micro photographic records. For example, the RHA vault still lacked the required humidity control for preservation of microfilm records.

1.2.3 Conclusions

The assessors concluded CH2M HILL had coherent programs for the generation, control, and retirement of documents and records. However, there were three Findings. Records were not stored in a manner minimizing the risk of loss, damage, or deterioration and access to records was not adequately controlled. Controlled drawings maintained in the field by a subcontractor did not reflect three ECNs. The Environmental Program organization provided procedures to its personnel that were either out of date or not controlled within the CH2M HILL document control system. Except for these three Findings, CH2M HILL had adequate processes for control of documents and records.

1.3 Work Processes

1.3.1 Assessment Scope

The assessors reviewed procedures and work products for identification and control of items; handling, storage, and shipping; storage and maintenance of records; development of process control plans; job hazard analysis documents; and critical lift plans.

1.3.2 Observations and Assessments

The assessors reviewed procedures and inspected work products to verify the requirements of QAPD Section 2.5.2.1, *General Requirements for Work Processes*, which states, "All activities that can affect the quality, safety, or the environment of CH2M HILL products and services shall be prescribed by, and performed, in accordance with documented, management-approved procedures, instructions, and design documents that meet the requirements of applicable regulatory requirements, DOE orders, technical standards, and administrative controls."

The assessors interviewed CH2M HILL Safety personnel and reviewed a sample of the following types of documents to verify they adequately addressed QAPD requirements to have work processes defined in management approved controlled documents:

- Critical lift plans;
- Process control plans; and
- Job hazard analyses.

The assessors concluded the documents they reviewed adequately addressed QAPD work process requirements.

1.3.3 Conclusions

The assessors verified work processes affecting the quality, safety, or the environment of CH2M HILL products and services were prescribed by, and performed in accordance with documented, management-approved procedures, instructions, and design documents. With the exception of the problem identified in Finding A-03-ESQ-TANKFARM-003-F-04, the assessors did not identify any issues in the implementation of work process requirements of CH2M HILL or its contractors.

1.4 Special Processes

1.4.1 Assessment Scope

The assessors reviewed Procedure Qualification Records (PQR) and Welding Procedure Specifications (WPS) from Thompson Mechanical Contractor's, Inc. (TM) for the W-211 project against the applicable ASME and American Welding Society (AWS) codes. This was to verify the requirements and parameters of the PQR and WPS were met and maintained. The assessors also reviewed PQRs and WPSs from Fluor Federal Services (FFS) and FHI who were performing work for CH2M HILL on the W-211 project. The assessors verified these against the specified ASME and AWS welding codes.

1.4.2 Observations and Assessments

The assessors verified the NDE service contractors (Northwest Inspection Services and Inspection Services, Inc.) procedures and personnel qualifications and certifications were acceptable and met the requirements of the applicable codes and standards referenced in the CH2M HILL specifications for construction and fabrication.

The assessors confirmed CH2M HILL, FFS, and FHI personnel performing general inspections, civil inspections, mechanical inspections, and visual weld inspections for the CH2M HILL projects were properly trained and qualified. This included confirmation they held certifications for their disciplines.

1.4.3 Conclusion

The assessors concluded the CH2M HILL processes for controlling the welding and NDE special processes were effective. This included the welding and NDE programs of CH2M HILL's sub-contractors. The assessors did not identify any concerns or issues with welding or NDE.

1.5 Identification and Control of Items

1.5.1 Assessment Scope

The assessors performed field inspections and reviewed procedures and records for the identification and control of items at the 6290 Rigging Loft, 2703E and 272AW Tool Cribs, 2101M Warehouse, and the MO-041 Continuous Air Monitor (CAM) Shop.

1.5.2 Observations and Assessments

The assessors reviewed a sample of nonconformance reports (NCR) and performed field inspections of items identified in the NCRs. This was to verify status of items was adequately identified with the required tags and labels.

The assessors concluded the items' status was appropriately identified with appropriate tagging and labels.

6290 Rigging Loft

The assessors performed field inspections of the 6290 Rigging Loft to verify hoisting and lifting equipment was adequately identified. Paragraph 5 of the QAPD Section 2.5.2.5 states, "Physical identification of items shall be used to the extent possible. Marking or labeling shall be clear and legible and shall not be detrimental to the function and service life of the item." The assessors inspected four 10-foot by one-inch nylon synthetic lifting slings, four 20-foot by one-inch lifting slings, four Crosby 20-ton lifting hooks, C-262 Chlorine spreader bar, two Caldwell Strong Back spreader bars, a swivel hoist rig for Actek cover-plate, a 241-C106 Removal Heel Jet Assembly and concluded the items were appropriately identified with tags or labels.

2703E and 272AW Tool Cribs

The assessors performed an inspection of tool and equipment identification, and inventory records at the 2703E and 272AW tool cribs. The assessors inspected the following equipment to verify they were adequately identified with labels or tags:

- Milwaukee Sawzall serial number 916H399300190
- Milwaukee Grinder, serial number 0072126192
- Digital Manometer, serial number 817-28-09-002
- Makita Heat Gun, serial number 594131193

The assessors concluded the equipment was adequately identified with labels or tags.

2101M Warehouse

The assessors performed field inspection of the following items owned by CH2M HILL at the 2101M Warehouse:

- Four digit electrical counter, EBK-K02A 6118-2115-0900

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- Ten 50-pound bags of grout material, EEPL14 6167-2739-0160
- One nuclear grade high efficiency particulate air (HEPA) filter, 12 X 12 X 11.5-inch, 9900-4151-0002 ED H04
- One FUS HEPA filter, 9900-4684-2002 ECPD0SB

The items were appropriately identified with labeling and tagging.

MO-041 CAM Shop

During a field inspection of the 200 E CAM Shop (MO-041), the assessors found seven Eberline Beta CAMs stored in a cabinet without the required status indicator tags. CH2M HILL management confirmed the CAMs were rotatable equipment and should be tagged. These were CAMs numbered 102, 127, 139, 141, 159, 166, and 168. Failure to identify the status of items in accordance with procedures is considered a Finding (A-03-ESQ-TANKFARM-003-F-04).

1.5.3 Conclusions

The assessors concluded, notwithstanding Finding A-03-ESQ-TANKFARM-001-F-04, CH2M HILL had established and effectively implemented procedures for the identification and control of items.

1.6 Handling, Storage, and Shipping

1.6.1 Assessment Scope

The assessors performed field inspections and reviewed procedures and records for the handling, storage, and shipping of items at the 6290 Rigging Loft, 2703E and 272-AW Tool Cribs, 2101M Warehouse, and the MO-041 CAM Shop.

1.6.2 Observations and Assessments

The assessors verified the contractor had developed adequate procedures for the handling, storage, and shipping of items and was effectively implementing them. The assessors did not identify any issues with the handling, storage, and shipping process or process implementation.

Contractor Identified Problem with Safety Class HEPA Filter Storage

The assessors reviewed PERs for indications of contractor-identified problems with handling, storage, and shipping. PER-2003-1040 documented a problem with three safety class HEPA filters staged for use in the C-106 exhausters that were stored on an outdoor pallet. The PER reported they were stored in this manner over a weekend during rainy weather. HNF-IP-0842, Volume 15, Section 7.2 required filters to be stored in a clean, dry location. Also, TFC-ENG-STD-07, Revision A-1, *Management of HEPA Filter Systems*, specified the storage requirements identified in HNF-IP-0842, Volume 15, Section 7.2, *Material Handling and Storage*, are to be met during staging. CH2M HILL's HEPA filter storage requirements reflect implementation of ASME AG-1, *Code on Nuclear Air and Gas Treatment*. ASME AG-1 is specified in the

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Washington Administrative Code, section 246-247-110, Appendix A, and was invoked for these filters in the Radioactive Emissions Notice of Construction (NOC) for "Liquid Pumping and Enhanced Sluicing for Tank 241-C-106." The Washington State Department of Health documented approval of this NOC in their letter AIR 02-1107, NOC ID 540, dated November 23, 2002.

During the screening process for the PER, CH2M HILL personnel evaluating the condition marked "No" in the PER block "Regulatory Related." This was incorrect, since compliance with ASME AG-1 is a regulatory requirement. The nonconforming condition was also documented on NCR CH-03-NCR-013. However, the NCR failed to identify the ASME AG-1 code. Block 6 on the NCR form, "Code Item (e.g., ASME or NEC)," was marked "No." The assessors documented these two problems in an observation (A-03-ESQ-TANKFARM-003-O-02).

At the time of the assessment field work, CH2M HILL was keeping the PER open until the responsible manager performed extent-of-condition and cause analyses, then developed corrective actions. The assessors concluded CH2M HILL was on an appropriate path for resolution of this issue. However, the outcome of the analyses could affect both CH2M HILL's and DOE's understanding of the condition of CH2M HILL's processes for handling, storage, and shipping.

1.6.3 Conclusion

CH2M HILL had developed adequate procedures for the handling, storage, and shipping of items and was effectively implementing them. However, a final conclusion regarding the adequacy of CH2M HILL's handling, storage, and shipping processes depends on the outcome of CH2M HILL's evaluation of the HEPA filter storage problem of PER-2003-1040. At the time of the assessment this evaluation was still in progress.

1.7 Control of Measuring and Test Equipment

1.7.1 Assessment Scope

The assessors reviewed CH2M HILL procedures, M&TE inventory records, M&TE calibration reports, M&TE QA inspection plans, acceptance tags, and M&TE calibration stickers. The team visited four CH2M HILL M&TE storage areas located at tool cribs and the calibration laboratory at Energy Northwest to review documents, interview staff, and observe work activities.

1.7.2 Observations and Assessments

Assessors selected items from the locked M&TE storage areas and compared equipment calibration tags to the information contained in the M&TE inventory records to verify the records were maintained as current. Using CH2M HILL M&TE records, the assessors then verified the calibration lab M&TE records at Energy Northwest were in agreement with CH2M HILL records. All M&TE available for use was calibrated.

The assessors inspected the M&TE calibration delivery vehicle, observed the delivery of calibrated equipment from Energy Northwest at a tool crib, and witnessed the segregation of the delivered equipment until the Quality Control (QC) acceptance was performed. No issues were identified.

CH2M HILL self-identified two issues related to M&TE prior to the DOE assessment as follows:

- QC acceptance of calibrated M&TE did not add value.
- Separate Vent and Balance M&TE storage was redundant.

These issues were being resolved by CH2M HILL, and the assessors had no comment on them.

1.7.3 Conclusions

The assessors determined M&TE procedures and practices, M&TE inventory records, M&TE calibration reports, M&TE QA inspection plans, acceptance tags, and M&TE calibration stickers were all consistent with CH2M HILL requirements for the control of M&TE. This included calibration services work contracted to the Energy Northwest calibration laboratory.

1.8 Construction

1.8.1 Assessment Scope

The assessors reviewed CH2M HILL construction procedures, design drawings, interviewed CH2M HILL and subcontractor staff, and inspected completed construction items.

1.8.2 Observations and Assessments

The assessors reviewed construction drawings and ECNs, interviewed CH2M HILL and subcontractor staff, and observed completed work to determine if completed construction was built in accordance with the design documents. CH2M HILL personnel told the assessors that CH2M HILL QA staff interfaced with Engineering and Construction Management staff on a regular basis. Interfaces include QA approval of subcontractor QA and quality control plans, attendance at weekly project meetings, signoff on ECNs, and ongoing field visits. No issues or concerns were identified.

1.8.3 Conclusions

The assessors concluded the CH2M HILL processes for controlling construction field activities were effective. This included the QA oversight of CH2M HILL's contractors and their subcontractors. With the exception of the issue described in Finding A-03-ESQ-TANKFARM-003-F-02, the assessors did not identify any concerns or issues with the performance and control of construction activities.

1.9 Control of Samples

1.9.1 Assessment Scope

The assessors examined CH2M HILL and 222-S Laboratory procedures and records and interviewed personnel who collected, transported, and analyzed high-level waste tank samples to determine whether or not processes for identification of samples process was adequate and effective. The assessors selected two recent tank sampling events; a grab sampling of Tank 241-C-106 and a push-mode core sample of Tank 241-AY-102, to evaluate the identification of samples processes.

1.9.2 Observations and Assessments

The assessors reviewed prior assessments performed by CH2M HILL, PERs generated as a result of those assessments, waste tank sampling plans, sample analytical result reports, chain of custody forms, and sample data sheets. The assessors interviewed QA staff, Waste Tank Sampling management and staff, and laboratory project coordinators to verify they were implementing the requirements of the procedures with respect to sample control.

1.9.3 Conclusions

The assessment team determined personnel responsible for the control of waste tank samples used current procedures to perform their activities and actions were documented as required. CH2M HILL was properly controlling the process for maintaining identification and control of waste tank samples. Chain of custody was maintained, and sample data was managed in accordance with CH2M HILL requirements.

2.0 EXIT MEETING SUMMARY

The assessors presented preliminary assessment results to members of CH2M HILL's management at an exit meeting held on May 16, 2003. CH2M HILL acknowledged the Findings and conclusions presented.

The assessors asked CH2M HILL whether any materials examined during the assessment should be considered as proprietary data. No proprietary data were identified.

3.0 REPORT BACKGROUND INFORMATION

3.1 Partial List of Persons Interviewed

- W. L. Adams, CH2M HILL, QA Engineer
- J. Aguilar, FHI, Storekeeper
- S. G. Barrett, CH2M HILL, Manager, Vent and Balance
- C. A. Booth, CH2M HILL Document Control

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K. D. Bowen, CH2M HILL, Records Clerk
D. A. Bragg, CH2M HILL, System Engineer
C. E. Brewer, FHI, Operations Specialist
R. L. Bricker, FHI, Operations Specialist
W. G. Brule, CH2M HILL, First Line Manager, Waste Feed Operations
J. A. Burgess, FFS, Quality Control Manager
R. E. Butler III, CH2M HILL, Safety Engineer
G. R. Cannell, FHI, Welding Engineer
K. G. Carothers, Process Engineer
K. E. Carpenter, Manager, C-106 Retrieval Project
G. M. Crummel, CH2M HILL, Environmental Field Support Engineer
R. E. DeBusk, CH2M HILL, Subject Matter Expert
S. O. Deleon, CH2M HILL Construction Quality Assurance Engineer
E. M. Devine, CH2M HILL, Tool Crib Attendant
L. P. Diediker, FHI, Environmental Engineering Manager
W. T. Dixon, CH2M HILL, Director, Environmental Program
R. B. Dunn, CH2M HILL, Waste Feed Operations Planning Lead
J. D. Elliot, CH2M HILL, Quality Field Support, Quality Engineer
P. J. Elmendorf, CH2M HILL, QC Inspector
J. R. Emery, Energy Northwest, Standards Laboratory Quality Manager
M. J. Fish, FHI, Quality Assurance, Quality Assurance Engineer
K. D. Fowler, Criticality Engineer
S. S. Fox, Document Control Specialist
L. D. Franklin, CH2M HILL, Tool Crib Attendant
E. A. Fredenburg, CH2M HILL, Tank Closure Project Manager
R. F. Frost, CH2M HILL, First Line Manager Field Sampling
R. K. Fuller, FHI, Laboratory Project Coordinator
E. R. Gibson, CH2M HILL, Standards and Compliance
D. R. Gregory, FHI, Site Inspection Qualification/Certification Examiner
B. A. Haggerty, CH2M HILL, Tool Crib Attendant
J. M. Hammack, CH2M HILL, Engineering Operations Specialist
T. L. Hanford, CH2M HILL, Materials Specialist
D. C. Hartley, CH2M HILL, First Line Manager Truck Sampling
H. M. Hassell, Manager, Program Quality Support
L. S. Herres, CH2M HILL, Tool Crib Attendant
T. L. Hisson, CH2M HILL, Director, Retrieval and Closure Projects
T. J. Hoge, CH2M HILL, Records Specialist
H. L. Johnson, FHI, QC/QA Engineer
C. W. Jorgensen, CH2M HILL, Double-Shell Tank System Engineering Manager
W. A. Laughery, FHI, Manager Warehouse Operations
J. L. Logston, CH2M HILL, Quality Field Support, Quality Engineer
L. K. Maday, LMIT, Records Specialist
E. W. Martinen, CH2M HILL, Project Manager, W-211
M. L. McElroy, CH2M HILL, Manager Quality Assurance Services
P. S. McElroy, CH2M HILL, Construction Field Engineer
P. McKinnis, TM, Engineer

P. C. Miller, CH2M HILL, Manager, Environmental Program
 C. T. Narquis, FFS, QA Engineer
 R. L. Nelson, CH2M HILL, Director, Information Resources Management
 C. R. Noble, TM, QA Manager
 T. L. Ostrander, Projects Control Cost and Scheduling Engineer
 A. L. Phillips, CH2M HILL, Document Control Specialist
 K. Pohl, Apollo, Inc., Quality Control Specialist
 M. J. Powers, Safety Hazard Review Template Coordinator
 R. J. Praznik, CH2M HILL, First Line Supervisor Waste Feed Operations
 R. P. Raven, CH2M HILL, Shift Manager, Waste Feed Operations
 D. J. Rokkan, FHI, Environmental Engineer
 N. J. Scott-Proctor, CH2M HILL, Engineering Operations Specialist
 D. L. Shultz, CH2M HILL, Material Coordinator
 J. F. Sickels, CH2M HILL, Waste Tank Sampling Sr. Technical Advisor
 D. W. Sieler, FFS, Welding Foreman
 G. W. Steward, CH2M HILL, Construction Manager, W-211
 G. W. Stone, FHI, Welding Specialist
 B. M. Sullivan, LMIT, Project Hanford Document Control Manager
 K. S. Tollefson, Manager, Life Extensions Upgrade Project
 B. Tosh, TM, Construction Field Supervisor
 P. F. Uik, CH2M HILL, Operations Specialist/Field Engineer
 J. E. Van Beek, Project Director, Project W-211
 G. Von Druska, LMIT, Manager, Records Holding Area
 M. Washington, LMIT, Document Control Specialist
 F. E. Wickstrand, LMIT, Document Control Specialist

3.2 Records Reviewed

3.2.1 Documents

1. Heel Jet Removal 241-C-106 Pit C-06B, *Critical Lift Procedure*, Revision 0, dated January 15, 2003.
2. TF-SJHA-0184, *HPT-Perform Routine Work Activities*, dated September 5, 2002.
3. Supplier Submittal Number 002, *Provide documentation to demonstrate possession of Safety Rep. Qual.*, dated October 3, 2002.
4. Supplier Submittal Number 002, *Provide documentation to demonstrate possession of Safety Rep. Qual.*, dated September 24, 2002.
5. CH-03-NCR-013, *Inadequate HEPA Filter Storage*, dated March 10, 2003.
6. CH-01-DST-NCR-098, *Flow Control Valves do not have inlet Filters*, dated December 6, 2001.
7. CH-02-DST-NCR-072 R.1, *Storage of Blind Flanges*, dated November 14, 2002.
8. CH-03-DST-NCR-018, *Three-inch by 3" jumper flex jumper with no QA green tag*, dated April 15, 2003.
9. CH-03-DST-NCR-019, *Flanders HEPA filters with new adhesive*, dated April 17, 2003.
10. CH-03-NCR-010, *Damaged HEPA filter gasket*, dated February 20, 2003.

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11. CH-02-IS-NCR-079, Load test exceeded load capacity of eyebolts, dated December 13, 2002.
12. CH-01-DST-NCR-108, Repeat CAM failure AMS-4-943, dated December 18, 2001.
13. CH-01-DST-NCR-109, Repeat CAM failure AMS-4-944, dated December 18, 2001.
14. 272AW Tool Crib inventory report, dated May 14, 2003.
15. Salt Wells Maintenance M&TE LOG, dated April 21, 2003.
16. Warehouse Storage Request, No. 0550, HEPA Filters, dated March 6, 2003.
17. Material Request 00082547, Power Supply, dated October 31, 2002.
18. Parts and Tool Return Form, PTR #11706, Ticket number 42443000, dated April 8, 2003.
19. Parts and Tool Return Form, PTR #09138, Ticket number 54543000, dated April 8, 2003.
20. Portable Electric Tool Inspection Record #272AW004, Milwaukee Bandsaw, H.D. #678E400471404, dated April 14, 2003.
21. Portable Electric Tool Inspection Record #272AW005, Milwaukee Jigsaw, #890A996300380, dated April 14, 2003
22. Portable Electric Tool Inspection Record #272AW006, Master Heat Gun, dated April 14, 2003.
23. Portable Electric Tool Inspection Record #272AW007, Milwaukee Sawzall, #916H399300190, dated April 14, 2003.
24. Portable Electric Tool Inspection Record #272AW008, Milwaukee Bandsaw, H.D. #678E400471405, dated April 14, 2003.
25. Portable Electric Tool Inspection Record #272AW009, Master Heat Gun, dated April 14, 2003.
26. Portable Electric Tool Inspection Record #272AW012, Skilsaw Circular Saw, #HD-701331, dated April 16, 2003.
27. Portable Electric Tool Inspection Record #272AW013, Milwaukee Drill Right Angle, #5321447987, dated April 16, 2003.
28. Portable Electric Tool Inspection Record #272AW014, Milwaukee Die grinder 2", #669B494450267, dated April 16, 2003.
29. Portable Electric Tool Inspection Record #272AW015, Black and Decker ¼ Drill, Reverse, #3790, dated April 14, 2003.
30. Portable Electric Tool Inspection Record #272AW016, Makita Heat Gun, #594131193, dated April 16, 2003.
31. Portable Electric Tool Inspection Record #272AW017, Milwaukee Grinder, #0072126192, dated April 16, 2003.
32. Portable Electric Tool Inspection Record #272AW006, Milwaukee Sander/grinder, dated April 15, 2003.
33. Certificate of Calibration, Energy Northwest, Report Number 1052409462, dated May 8, 2003.
34. 241-AP-03-004, CH2M HILL Lockout/Tagout Authorization, AP Tank Farm Cathodic Protection, Transfer Systems.
35. 241-AP-03-006, CH2M HILL Lockout/Tagout Authorization, Electrical.
36. CH2M HILL, Hanford Group Inc., Standing Job Hazard Analysis Log, printed May 13, 3003, dated February 26, 2003.
37. TF-SJHA-0216, Revision 0, *Rad Painting in Farms*, dated August 20, 2002.
38. TF-SJHA-0224, *CPO Hose Inspection/Corrective Maintenance*, dated September 5, 2002.

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39. TF-SJHA-0350, Revision 1, *CAM Source Checks*, dated August 29, 2002.
40. Inventory report for 272 AW, dated May 14, 2003.
41. Inventory report for 272 AW, dated March 12, 2003.
42. Inventory printout for 2101M, May 15, 2003.
43. CH2M HILL Quality Assurance NCR Report Open Items, dated May 8, 2003.
44. CH2M HILL Quality Assurance NCR Report, dated May 7, 2003.
45. HNF-SD-WM-PCP-013, Revision 2, *Tank 241-C-106 Waste retrieval Sluicing system Process Control Plan*, dated May 18, 1999.
46. FHI-0301797, *Tank 241-C-106 Grab Samples, 6C-03-02, 6C-03-03, 6C-03-05 and 6C-03-06 Analytical Results for the Final Report*, dated April 30, 2003.
47. RPP-15772, Revision 0, *Tank 241-C-106 Pre-Retrieval Solids Grab Sampling Plan*, dated April 17, 2003.
48. RPP-15622, Revision 0, *Tank 241-AY-102 Push-Mode Core Sampling and Analysis Plan for Fiscal Year 2003*, dated April 18, 2003.
49. *Calibration Items List for 2703E Tool Crib*, dated May 14, 2003.
50. *Calibration Items List for WFO Tool Crib*, dated May 8, 2003.
51. *Calibration Items List for Vent and Balance Tool Crib*, dated May 13, 2003.
52. *Calibration Items List for 272WA Tool Crib*, dated May 16, 2003.
53. CH-02-RPP-QSR-122, Quality Surveillance Report, *Tank Farms Characterization Chain of Custody*, dated September 12, 2002.
54. CH-02-RPP-QSR-076, Quality Surveillance Report, *Laboratory Control Sample Quality Control Comparison Surveillance (222-S Laboratory)*, dated May 6, 2002.
55. CH-02-RPP-QSR-040, Quality Surveillance Report, *PFP Waste Generator Sampling Protocol*, dated March 17, 2003.
56. CH-02-RPP-QSR-055, Quality Surveillance Report, *Tank 241-AP-108 Grab Sampling Chain of Custody*, dated April 15, 2003.
57. Energy Northwest Standards Laboratory, *Certificate of Calibration*, Report # 1018530301, for a Fluke Digital Multimeter, dated April 11, 2002.
58. Energy Northwest Standards Laboratory, *Certificate of Calibration*, Report # 1051531772, for a Siemens Test Set, dated April 28, 2003.
59. Energy Northwest Standards Laboratory, *Certificate of Calibration*, Report # 1028184030, for a Druck Pressure Indicator, dated August 1, 2002.
60. Energy Northwest Standards Laboratory, *Certificate of Calibration*, Report # 1052807329, for a Druck Pressure Indicator, dated May 13, 2003.
61. Energy Northwest Standards Laboratory, *List of all M&TE*, printed May 14, 2003.
62. *Engineering Service Request*, Revision 2, dated October 18, 2002.
63. *East & West Tank Farm Integrated Scheduling Input Sheet*, M. L. Hall, dated March 3, 2003.
64. Document Number WS-03-00116/6 Routine Work Request, Work Item Title, *241-S-107 DTAM Replace Face Plate*, dated May 7, 2003.
65. Document Number WS-02-00511/M Routine Work Request, Work Item Title, *241-A-101, AX-101, BY-105, AY-106 Inst New Valves*, dated May 7, 2002.
66. TFC-OR-EF-AYAZ-D, Revision D-5, *AY and AZ Tank Farm Daily Rounds*, dated March 22, 2003.
67. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for William Van Pelt, Level II, Magnetic Particle and Liquid Penetrant.

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68. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Randy Watkins, Level II, Magnetic Particle, Liquid Penetrant, and Ultrasonic.
69. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Brian Martin, Level II, Radiographer.
70. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Jerry Kimball, Level II, Radiographer, Liquid Penetrant, and Magnetic Particle.
71. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Grant Caufield, Level II, Liquid Penetrant, Magnetic Particle, and Radiographer.
72. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Tony Martin, Level III, Liquid Penetrant, Magnetic Particle and Radiographer.
73. Northwest Inspection, Inc., NDE Personnel Qualification and Certification Record for Kevin Rider, Level II, Magnetic Particle and Liquid Penetrant.
74. Inspection Services Inc., NDE Personnel Certification Record for Sam Wellenbrock, Level II, Liquid Penetrant and Magnetic Particle.
75. TM, Welder Qualification Test Record for Chesley Phillips, TM-2016, shielded metal arc welding (SMAW).
76. TM, Welder Qualification Test Record for Ron Ledgerwood, TM-2021, gas tungsten arc welding (GTAW)/SMAW.
77. TM, Welder Qualification Test Record for Darren O'Leary, TM-2007, SMAW.
78. TM, Welder Qualification Test Record for Darren O'Leary, TM-2010, SMAW.
79. TM, Welder Qualification Test Record for Ron Ledgerwood, TM-2010, SMAW.
80. TM, Welder Qualification Test Record for William Ziegler, TM-2010, SMAW.
81. TM, Personnel Qualification Certificate for Elizabeth Griswold, Level II, General Process Inspector.
82. TM, Welder Continuity Summary for TM Inc., Welders.
83. FFS, Welder Qualifications by Procedure List, dated May 14, 2003.
84. FFS, Welder Qualifications by Welder List, dated May 14, 2003.
85. FFS Inspection Certifications for John Tucker, Level II, C1, concrete and grout inspections M1, equipment, piping and vessel inspections, and M3, leak test inspections.
86. FFS Inspection Certifications for Steve Calvert, Level II, C1 concrete and grout inspections, C2 civil inspections, C3 structural inspections, C4 protective coatings inspection, C5 expansion anchors inspections, E1 electrical inspections, and G3 receiving inspection.
87. FFS Inspection Certifications for Leon Fleming, Level II, C3 structural inspections, and C5 expansion anchor inspections.
88. FFS Inspection Certifications for Chuck Noble, Level II, C1 concrete and grout inspections, C2 civil inspections, C3 structural inspections, C4 protective coating inspections, C5 expansion anchor inspections, E1 electrical inspections, G1 weld inspections, M1 equipment, piping and vessel inspections, and M3 leak testing inspections.
89. FHI Welder Qualification Report for proof of welder continuity for Jerald Nelson, Robert Mead, Richard Kane, and David Bushey.
90. FHI Inspection and Test Personnel Certification Letter for CH2M HILL Inspector Ron Cowgill, Level II, for instrumentation inspections, electrical inspections, mechanical inspections, weld inspections, and basic inspections.

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91. FHI Inspection and Test Personnel Certification Letter for CH2M HILL Inspector P. J. Elemendorf, Level II, for receiving inspections, mechanical inspections, basic inspections, electrical inspections, and instrumentation inspections.
92. FHI Inspection and Test Personnel Certification Letter for John Verderber, Level II, for mechanical inspections, and basic inspections.
93. FFS Welding Procedure Specification and Welding Procedure Qualification Record for Weld Procedure 8-8-GT-1.
94. FHI Welding Procedure Qualification Record and Welding Procedure Specification for 8-8-GT/SM-1 (GT).
95. TM, Welding Procedure Specification and Procedure Qualification Record, TM-2010.
96. TM, Welding Procedure Specification and Procedure Qualification Record, TM-2016.
97. TM, Welding Procedure Specification and Procedure Qualification Record, TM-2007.
98. TM, Welding Procedure Specification and Procedure Qualification Record, TM-2021.

3.2.2 Procedures and Other Directives

1. TFC-PLN-02, Revision A-1, *Quality Assurance Program Description*, dated March 1, 2003.
2. TFC-BSM-IRM_DC-C-02, Revision B, *Records Management*, dated March 17, 2003.
3. TFC-BSM-FPM_MC-C-01, Revision A, *Material Receipt, Storage, Issuance, Return, and Excess Control*, dated April 9, 2003.
4. HNF-IP-0842, Volume 4, Engineering, Section 4.8, *Process Control Plans*, Revision 0f, dated March 31, 2003.
5. RPP-POL-PROCEDURE, *Procedure Compliance Expectations*, Revision 0a, dated February 1, 2001.
6. TFC-OPS-OPER-C-05, *Lockout/Tagout Program*, Revision A-5, dated March 27, 2003.
7. TFC-OPS-OPER-C-13, Revision A-1, *Technical Procedure Control and Use*, dated February 3, 2003.
8. TFC-ESHQ-S_SAF-C-02, *Job Hazard Analysis*, Revision A-4, dated February 25, 2003.
9. TFC-OPS-MAINT-C-03, *Maintenance Tools and Equipment Control*, Revision A, dated January 22, 2003.
10. HNF-IP-0842, Volume 10, Business, Section 3.30, *Acquisition Planning*, Revision 0h, dated September 10, 2002.
11. TFC-ESHQ-Q_ADM-C-02, *Nonconformance Item Reporting and Control*, Revision A-1, dated March 31, 2003.
12. TFC-ESHQ-S_IS-C-05, *Hoisting and Rigging*, Revision A-1, dated March 11, 2003.
13. HNF-IP-0842, Volume 2, Operations, Section 6.1, *Tank Farm Operations Equipment Labeling*, Revision 1, dated November 30, 2001.
14. TFC-OPS-MAINT-C-06, Revision A, *Notification and Evaluation of Out-of-Calibration Measuring and Test Equipment*, Effective Date October 30, 2002.
15. TFC-OPS-MAINT-D-07.1, Revision A, *Control and Calibration of Measuring and Test Equipment for the Vent and Balance Group*, Effective Date November 27, 2002.
16. TO-060-003, Revision D-1, *Perform Field Inspection and Loading of On-Site Transfer Casks During Core Sampling Operations*, Effective Date October 22, 2002.
17. TO-080-090, Revision J-0, *Transfer the Onsite Transfer Cask*, Effective Date December 31, 2002.

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18. TO-080-075, Revision F-0, *Sample Transfer Truck Operation*, Effective Date April 1, 2002.
19. TO-080-403, Revision H-7, *Supernatant or Sludge Sampling of Waste Storage Tanks Using A Glovebag*, Effective Date May 6, 2003.
20. TO-080-075, Revision F-0, *Sample Transfer Truck Operation*, Effective Date April 1, 2002.
21. TO-080-503, Revision J-0, *Push Mode Sampling with Truck 1*, Effective Date January 16, 2003.
22. TFC-BSM-FPM_MC-C-01, Revision A, *Material Receipt, Storage, Issuance, Return, and Excess Control*, Effective Date April 9, 2003.
23. TFC-OPS-MAINT-C-06, Revision A, *Notification and Evaluation of Out-Of-Calibration Measuring and Test Equipment*, Effective Date October 30, 2002.
24. HNF-PRO-490, Revision 4, *Calibration Management Program*, Effective Date October 19, 2001.
25. LO-090-101-USQ, Revision Y-0, *222-S Laboratory Sample Receiving and Custodianship*, Effective Date March 5, 2003.
26. LO-090-103, Revision G-0, *Labeling Sample Carriers*, Effective Date January 9, 2003.
27. TFC-ESHQ-Q_PP-P-02, Revision C, *Quality Assurance Surveillance*, Effective Date March 31, 2003.
28. TFC-PLN-17, Revision A, *Document Control and Records Management Program Description*, dated March 3, 2003.
29. TFC-BSM-IRM_DC-C-01, Revision A, *Document Control*, dated March 31, 2003.
30. TFC-BSM-IRM_DC-C-02, Revision B, *Records Management*, dated March 17, 2003.
31. TFC-OPS-OPER-C-13, Revision A-1, *Technical Procedure Control and Use*, dated February 3, 2003.
32. TFC-ESHQ-Q_INSP-C-05, Revision A-3, *Independent Review and Approval of Documents*, dated March 31, 2003.
33. TFC-BSM_AD-C-02, Revision A, *Forms Control*, dated January 14, 2003.
34. HNF-IP-0842, Vol. 6, *Environmental*, Section 1.7, Revision 0b, *Air Quality – Radioactive Emissions*, dated February 26, 2002.
35. HNF-IP-0842, Vol. 4, *Engineering*, Section 3.5, Revision 2d, *Engineering Documents*, dated March 31, 2003.
36. HNF-IP-0842, Vol. 4, *Engineering*, Section 3.6, Revision 1d, *Engineering Calculations*, dated March 31, 2003.
37. HNF-IP-0842, Vol. VI, *Environmental*, Section 1.8, Revision 0a, *Air Quality Program – Non-Radioactive Emissions*, dated June 25, 2001.
38. HNF-IP-0842, Vol. 4, *Engineering*, Section 4.25, Revision 0g, *Engineering Drawings*, dated March 31, 2003.
39. HNF-IP-0842, Vol. 4, *Engineering*, Section 4.29, Revision 4f, *Engineering Document Change Control Requirements*, dated March 31, 2003.
40. TFC-ESHQ-ENV_RM-D-02, Revision A, *Environmental Records*, dated September 30, 2002.
41. TFC-ENG-DESIGN-C-06, Revision A-1, *Engineering Change Control*, dated March 21, 2003.
42. TFC-BSM-AD-C-03, Revision B, *Correspondence Control*, dated February 27, 2003.

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43. CH2M Hill Hanford Group, Inc., *Visual Weld Inspection*, TFC-ESHQ-Q-INSP-P-02, Revision A-1, dated March 31, 2003.
44. CH2M Hill Hanford Group, Inc., *Training Records Administration*, TFC-BSM-TQ-MGT-C-04, Revision A, dated October 31, 2002.
45. CH2M Hill Hanford Group, Inc., *Test Control*, TFC-ESHQ-Q-INSP-C-03, Revision A-1, dated March 27, 2003.
46. CH2M HILL, *Control of Inspections*, TFC-ESHQ-Q-INSP-C-01, Revision A-1, dated January 28, 2003.
47. CH2M HILL, *Procurement of Services*, TFC-BSM-CP-CPR-C-05, RevisionA-4, dated October 31, 2002.
48. Inspection Services, Inc., *Magnetic Particle Examination Procedure*, NDE-04, Revision 1, dated March 10, 2003.
49. Inspection Services, Inc., *Quality Assurance Plan*, Revision 0, dated May 23, 2002.
50. Inspection Services, Inc., *Materials Procurement Written Practice*, QCP-01, Revision 0, dated May 23, 2002.
51. Inspection Services, Inc., *Material Storage and Control Written Practice*, QCP-02, Revision 0, dated May 23, 2002.
52. Inspection Services, Inc., *Material Receiving Inspection Written Practice*, QCP-03, Revision 0, dated May 23, 2002.
53. Inspection Services, Inc., *Pressure Gauge Calibration Written Practice*, QCP-04, Revision 0, dated May 23, 2002.
54. Inspection Services, Inc., *Control of Measuring and Test Equipment Written Practice*, QCP-05, Revision 0, dated May 23, 2002.
55. Inspection Services, Inc., *Training Policy and Procedure Written Practice*, QCP-06, Revision 0, dated May 23, 2002.
56. Inspection Services, Inc., *Written Practice for Qualification and Certification of NDE Personnel*, NDE WP, Revision 1, dated January 20, 2003.
57. Inspection Services, Inc., *Visual Weld Examination*, NDE-02, Revision 2, dated February 6, 2003.
58. Inspection Services, Inc., *Liquid Penetrant Examination Procedure*, NDE-03, Revision 1, dated January 17, 2003.
59. Inspection Services, Inc., *Ultrasonic Examination of Groove Welds*, NDE-05, Revision 0, dated May 23, 2002.
60. Inspection Services, Inc., *Weld Test and Qualification Written Practice*, WTP-01, Revision 0, dated May 23, 2002.
61. Northwest Inspection, Inc., *Visual Weld Inspection*, VT-01, Revision 4, dated February 3, 2003.
62. Northwest Inspection, Inc., *Written Practice for Qualification and Certification of NDE Personnel*, WP-01, Revision 3, dated February 3, 2003.
63. Northwest Inspection, Inc., *Magnetic Particle Examination*, MT-01, Revision 1, dated February 3, 2003.
64. International Inspection Services, Inc., *Radiographic Weld Inspection Procedure-ASME/API/ABS/AWWA*, II-SPPQ-401, Revision 6, dated November 11, 2002.
65. International Inspection Services, Inc., *Written Practice for Qualification and Certification of Nondestructive Testing Personnel*, II-TC-9002, Revision 5, dated December 11, 1998.

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66. FFS, *Administration and Control of Welding*, FFS-GWO-0, Revision 2, dated October 1, 2002.
67. FFS, *Qualification of Welders and Welding Operators*, FFS-GWP-3, Revision 4, dated October 1, 2002.

3.2.3 Problem Evaluation Requests

1. PER-2002-5402, *QA Surveillance of Tank Farm Chain of Custody*, dated September 17, 2002.
2. PER-2002-5399, *QA Surveillance of Tank Farm Chain of Custody*, dated September 17, 2002.
3. PER-2002-5397, *QA Surveillance of Tank Farm Chain of Custody*, dated September 17, 2002.
4. PER-2002-5405, *QA Surveillance of Tank Farm Chain of Custody*, dated September 17, 2002.
5. PER-2003-1866, Items with expired shelf life, dated May 13, 2003.
6. PER-2002-6474, Load test exceeded load capacity of eyebolts, dated December 12, 2002.
7. PER-2003-1040, Inadequate HEPA Filter Storage, dated March 10, 2003.
8. PER-2003-1756, ATP with No QA Concurrence.
9. PER-2003-1748, OTP with No QA Concurrence.
10. PER-2003-1631, Outdated Procedure in the Field (DOE Fac Rep Identified).
11. PER-2003-1688, Work Packages with NCRs and ECNs.
12. PER-2003-1690, No Tool for Tracking Changes Resulting from ECNs.
13. PER-2003-1687, Improper Use of a Field Change Notice.
14. PER-2003-1569, No Radcon Review of Procedure.
15. PER-2003-1543, Lost Work Package.

3.3 Assessment Procedures Used

ORP PD 220.1-9, *Assessment of Tank Farm Contractor Documents and Records and Work Process Activities*, Revision 0, dated February 27, 2003.

3.4 List of Items Opened, Closed, and Discussed

3.4.1 Items Opened

Findings

A-03-ESQ-TANKFARM-003-F-01 – Records were not stored in a manner minimizing the risk of loss, damage, or deterioration. Also, access to stored records was not adequately controlled. See Section 1.2.2 for details.

A-03-ESQ-TANKFARM-003-F-02 – Controlled drawings maintained in the field by a subcontractor did not reflect three ECNs. See Sections 1.2.2 for details.

A-03-ESQ-TANKFARM-003-F-03 – The Environmental Program organization provided procedures to its personnel that were either out of date or not controlled within the CH2M HILL document control system. See Section 1.2.2 for details.

A-03-ESQ-TANKFARM-003-F-04 – CAMs were stored in a repair shop without the required status indicator tags. See Section 1.5.2 for details.

Observations

A-03-ESQ-TANKFARM-003-O-01 – During execution of two ATPs, there was an unauthorized technical change to a procedure, and there was a procedure deviation. See Section 1.2.2 for details.

A-03-ESQ-TANKFARM-003-O-02 – The regulatory screening for PER-2003-1040 did not recognize a regulatory issue with improper storage of some safety class HEPA filters. Also, the associated nonconformance report did not cite the applicable ASME code noncompliance. See Section 1.6.2 for details.

3.4.2 Items Closed

None

3.4.3 Items Discussed

None

3.5 List of Acronyms

ABCASH	Automated Bar Coding of Air Samples at Hanford
ASME	American Society of Mechanical Engineers
ATP	acceptance test procedures
AWS	American Welding Society
CAM	continuous air monitor
CFR	Code of Federal Regulations
CH2M HILL	CH2M HILL Hanford Group, Inc.
DOE	U.S. Department of Energy
ECN	Engineering Change Notice
FFS	Fluor Federal Services
FHI	Fluor Hanford, Inc.
GTAW	Gas Tungsten Arc Welding
HEPA	high-efficiency particulate air
HPT	Health Physics Technician
IDMS	Integrated Document Management System
LMIT	Lockheed Martin Information Technology
M&TE	Measuring and Test Equipment
NCR	nonconformance report

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NDE	Nondestructive Examination
NFPA	National Fire Protection Association
NOC	Notice of Construction
ORP	Office of River Protection
PER	Problem Evaluation Request
PQR	Procedure Qualification Record
QA	Quality Assurance
QC	Quality Control
QAPD	Quality Assurance Program Description
RHA	Records Holding Area
RMIS	Record Management and Information System
SMAW	Shielded Metal Arc Welding
TDSC	Technical Data Service Center
TM	Thompson Mechanical Contractor's, Inc.
WPS	Weld Procedure Specification

E-STARSTM Report
Task Detail Report
07/14/2003 12:39

TASK INFORMATION

Task#	ORP-ESQ-2003-0034	Status	CLOSED
Subject	CONCUR:03-ESQ-037;ORP, A-03-ESQ-TANKFARM-003, PRGM FOR THE CONTROL OF		
Parent Task#		Due	
Reference	03-ESQ-037	Priority	None
Originator	Mosby, Debbie A	Category	None
Originator Phone	(509) 376-9106	Generic1	
Origination Date	06/11/2003 15:15	Generic2	
Remote Task#		Generic3	
Deliverable	None	View Permissions	Normal
Class	Undetermined		
Instructions	<i>No Instructions</i> <i>Close - Tank Farm & ORP</i>		

ROUTING LISTS

1 Route List Inactive

- Brown, David H - Approve - Approved - 06/12/2003 06:31
- Hunemuller, Neal K - Approve - Approved - 06/12/2003 08:26
- Barr, Robert C - Approve - Approved with comments - 06/18/2003 09:05
- Swailes, John H - Approve - Approved with comments - 06/23/2003 08:25
- O'Connor, Judith S - Approve - Approved - 07/14/2003 07:15
- Erickson, Leif - Approve - Approved with comments - 07/14/2003 11:28
- Schepens, Roy J - Approve - Approved - 07/14/2003 11:10

ATTACHMENTS

Attachments

1. 03-ESQ-037.att1.doc
2. 03-ESQ-037.att2.A-03-ESQ-TANKFARM-003.doc
3. 03-ESQ-037.dhb.doc

COMMENTS

Poster Barr, Robert C (Hopkins, Dianne) - 06/18/2003 09:06
 Approve
 Concurred with editorial changes to letter and attachments.

Poster Swailes, John H (Struthers, Deborah J) - 06/23/2003 08:06
 Approve
 John signed hard copy

Poster Erickson, Leif (Deutsch, V Genie) - 07/14/2003 11:07
 Approve
 Schepens concurred in Erickson's absence.

TASK DUE DATE HISTORY

No Due Date History

SUB TASK HISTORY

RECEIVED
 JUL 14 2003
 DOE-ORP/ORPCC

No Subtasks

-- end of report --

RECEIVED
JUL 14 2003
DOE-ORP/ORPCC

Task Detail Report

06/11/2003 03:21 PM

Task #: ORP-ESQ-2003-0034

Parent Task #:
Subject: CONCUR:03-ESQ-037;ORP, A-03-ESQ-TANKFARM-003, PRGM FOR THE CONTROL OF
Category: None
Due Date:
Originator: Mosby, Debbie A

Reference #: 03-ESQ-037
Deliverable: None
Status: Open
Priority: None
Originator Phone: (509)376-9106

Assigned By: Self
Assigned Role: Originator

Assigned Date: 06/11/2003
Assigned Due Date:

Routing Lists: **Route List - Active**

- Brown, David H - Approve - Awaiting Response *DOB 6/12/03*
- Hunemuller, Neal K - Approve - Awaiting Response *NK 6/12/03*
- Barr, Robert C - Approve - Awaiting Response *RCB 6/18/03*
- Swailes, John H - Approve - Awaiting Response *JH 7/10/03*
- O'Connor, Judith S - Approve - Awaiting Response *JS 7/14/03*
- Erickson, Leif - Approve - Awaiting Response *LE*
- Schepens, Roy J - Approve - Awaiting Response

Instructions:

BCC:
ESQ OFF FILE
ESQ RDG FILE
MGR RDG FILE
JH SWAILES, AMTF
RC BARR, ESQ
DH BROWN, ESQ
NK HUNEMULLER, ESQ
JS O'CONNOR, OPA

- Attachments:**
1. 03-ESQ-037.att1.doc
 2. 03-ESQ-037.att2.A-03-ESQ-TANKFARM-003.doc
 3. 03-ESQ-037.dhb.doc

Comments

Task Due Date History:

Date Modified	Task Due Date	Modified By
---------------	---------------	-------------

-- End of Report --

RECEIVED
JUL 14 2003
DOE-ORP/ORPCC