



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

03-ESQ-069

OCT 20 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 – CH2M HILL HANFORD GROUP, INC. (CH2M HILL) CORRECTIVE ACTIONS FROM U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION (ORP) ASSESSMENT OF CH2M HILL SELF-ASSESSMENT PROGRAM, ASSESSMENT REPORT A-03-RADCON-TANKFARM-003, MAY 5-8 AND SEPTEMBER 22-26, 2003

- References:
1. ORP letter from R. J. Schepens to E. S. Aromi, "CH2M HILL Hanford Group, Inc. (CHG) Radiological Control Self-Assessment Program, Assessment Report A-03-RADCON-CHG-001, November 12, 2002 through January 13, 2003," 03-ESQ-009, dated March 28, 2003.
 2. CHG letter from E. S. Aromi to R. F. Schepens, "Contractor Requirements, Radiation Protection Program, Revision 3," CH2M-0200621 R2, dated February 25, 2003.
 3. CHG letter from E. S. Aromi to R. F. Schepens, "U. S. Department of Energy, Office of River Protection Assessment A-03-RADCON-CHG-001," CH2M-0301149 R1, dated April 28, 2003.

This letter documents the subject assessment as detailed in the Enclosure (A-03-RADCON-TANKFARM-003). The assessment team concluded CH2M HILL has completed corrective actions for only one of four Findings contained in Reference 1. While the submittal of Reference 2 completed the corrective actions for Finding A-03-RADCON-CHG-001-F-01, CH2M HILL has not made substantive progress toward completing the corrective actions for the remaining three Findings, which all had planned completion dates of August 1, 2003 (Reference 3). In addition, the assessment team made an Observation (A-03-RADCON-TANKFARM-003-O-01) on the pace and schedule for CH2M HILL Radiological Controls self-assessments.

ORP will treat the remaining Findings as Assessment Follow-Up Items (Finding A-03-RADCON-CHG-001-F-02, Finding A-03-RADCON-CHG-001-F-03, and Finding A-03-RADCON-CHG-001-F-04) and will continue to evaluate their closure in the coming months.

Mr. E. S. Aromi
03-ESQ-069

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If you have any questions, please contact me, or your staff may contact Larry McKay,
Radiological Control Manager, (509) 376-7120.

Sincerely,



Roy J. Schepens
Manager

ESQ:LRM

Enclosure

cc w/encl.:
E. E. Bickel, CH2M HILL
E. J. Millikin, CH2M HILL
F. M. Roddy, RL

Enclosure
03-ESQ-069
A-03-RADCON-TANKFARM-003

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

ASSESSMENT: CH2M HILL Hanford Group, Inc.
Self-Assessment Program Corrective Actions

REPORT NO.: A-03-RADCON-TANKFARM-003

FACILITY: Tank Farms

LOCATION: Hanford Site

DATES: May 5-8, 2003 and September 22-26, 2003

ASSESSMENT TEAM: L. R. McKay, U.S. Department of Energy
Office of River Protection (Assessment Team Lead)

F. M. Roddy, U.S. Department of Energy
Richland Operations Office

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EXECUTIVE SUMMARY

INTRODUCTION

On March 28, 2003, the Office of River Protection (ORP) published its report on the assessment of the CH2M Hill Hanford Group, Inc. (CH2M HILL) Radiological Controls (RadCon) Self-Assessment Program¹ and requested a formal, written response identifying proposed corrective actions for each Finding. On April 28, 2003, CH2M HILL responded by a letter that contained a list of corrective actions.² From May 5-8, 2003, the ORP assessment team (the team) evaluated the corrective actions for completeness, relevance, adequacy and priority. The team closed Finding A3-03-RADCON-CHG-001-F-01 based on that submittal. Because the estimated completion date for the remaining corrective actions was August 1, 2003, the team revisited CH2M HILL during September 22-26, 2003. This report documents the ORP assessment conducted during both periods, May 5-8 and September 22-26, 2003.

FINDINGS, OBSERVATIONS AND CONCLUSIONS

The team found that CH2MHILL meets the minimum requirements of 10 Code of Federal Regulations (CFR) 835, *Occupational Radiation Protection*, for self-assessments as required by 10 CFR 835.102, "Internal Audits." However, the team found corrective actions had not been completed as planned for three of four Findings identified in the original assessment report. The team added an Observation on the pace and schedule of the CH2M HILL RadCon Self-Assessments.

The Findings, Observation and the team's evaluation of corrective actions appear below:

- **Finding A3-03-RADCON-CHG-001-F-01:** The CH2M HILL Radiation Protection Program (RPP) or Tank Farms Radiological Control Manual (TFRCM) did not incorporate all of the 10 CFR 835 requirements.

Evaluation: CH2M HILL Corrective actions were complete. CH2M HILL submitted Rev. 3 of the RPP to ORP for approval on February 25, 2003, and CH2M HILL published Rev. 1 of the TFRCM on February 20, 2003. These revisions corrected the deficiencies identified in the Finding.

- **Finding A3-03-RADCON-CHG-001-F-02:** The current training and qualification program for the RadCon Self-Assessment Program did not implement fully the requirements of 10 CFR 830, "Nuclear Safety Management," Section 122, "Quality Assurance Criteria," to ensure that staff members, who perform self-assessments, were trained and qualified to be capable of performing their assigned work.

¹ ORP letter from R. J. Schepens to E. S. Aromi, CH2M HILL, "CH2M HILL Hanford Group, Inc. (CH2M HILL) Radiological Control Self-Assessment Program, Assessment Report A-03-RADCON-CH2M HILL-001, November 12, 2002, through January 13, 2003," 03-ESQ-009, dated March 28, 2003.

² CH2M HILL letter from E. S. Aromi to R. J. Schepens, ORP, "U.S. Department of Energy, Office of River Protection Assessment A-03-RADCON-CH2M HILL-001," CH2M-0301149 R1, dated April 28, 2003.

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Evaluation: CH2M HILL Corrective actions had not been completed. CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions. The team examined the Qualification Card for the Self-Assessment Program Coordinator, which has been generated since the May 2003 assessment. However, the team observed no substantive progress in revising and enhancing the training and qualification program for other personnel who plan and conduct RadCon self-assessments. For example, there were no Qualification Cards for Assessment Team Leaders or for Assessment Team Members.

- **Finding A3-03-RADCON-CHG-001-F-03:** Self-assessment records did not demonstrate full compliance with 10 CFR 835, Section 102 and Section 104 requirements.

Evaluation: Corrective actions had not been completed. CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions. The team observed that no additional records of assessments required by 10 CFR 835 had been completed since the May 2003 assessment, so the team was unable to gauge progress in revising and enhancing the self-assessment records. The team reviewed the self-assessment procedure which required the retention of records and was able to review a draft of a self-assessment report on internal dosimetry. Since the report had not been published at the time of the assessment, CH2M HILL was not retaining any actual records yet in accordance with the new procedure.

- **Finding A3-03-RADCON-CHG-001-F-04:** CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions. CH2M HILL procedures for performing radiological self-assessment procedures did not provide adequate guidance, commensurate with the education, training, and skills of individuals who performed the assessments.

Evaluation: Corrective actions had not been completed. Procedure TFC-ESHQ-RP_ADM-C-05, *Radiological Control Self-Assessment Program*, Revision A, July 25, 2003, had been written and implemented. It provided guidance for the responsibilities of the Radiological Control Assessment Coordinator and Program Manager, the process and the records for the self-assessment. It provided a cross-reference to the Qualification Card for the Facility Technical Authority Radiological Control Assessment Coordinator 351530 which contained the Knowledge, Skills and Abilities for the Self-Assessment Program Coordinator, but it was silent to other individuals who plan and conduct self-assessments. As a result, the team was unable to evaluate additional progress in improving self-assessment procedures.

- **Observation A3-03-RADCON-TANKFARM-003-O-01 (new):** The team noted that the triennial self-assessment schedule is aggressive (Section 3.5); with the exception of January 2004, one assessment a month is scheduled from September 2003 through November 2004. In a resource-limited environment, completing all these assessments, which are required by 10 CFR 835.102, will be a challenge.

The team plans to treat the Findings as Assessment Follow-Up Items and will continue to evaluate their closure in the coming months.

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**SELF-ASSESSMENT PROGRAM CORRECTIVE ACTIONS
ASSESSMENT REPORT
FOR THE PERIOD OF MAY 5-8 & SEPTEMBER 22-26, 2003**

1.0 REPORT DETAILS**1.1 Introduction**

The assessment team evaluated CH2M HILL's corrective actions to the Office of River Protection's (ORP) report on the assessment of the CH2M HILL Hanford Group, Inc. (CH2M HILL) Radiological Control (RadCon) Self-Assessment Program.¹ As requested, CH2M HILL provided a formal, written response identifying proposed corrective actions for each Finding.²

From May 5-8, 2003, the ORP assessment team (the team) evaluated the corrective actions for completeness, relevance, adequacy, and assigned priority. The team based its conclusions on reviews of program plans, assessment schedules, self-assessment procedures, and supporting documentation; and interviews with RadCon managers and lead Health Physicists responsible for the design and implementation of the RadCon self-assessment program.

The team found that CH2M HILL meets the minimum requirements of 10 Code of Federal Regulations (CFR) 835 for self-assessments as required by 10 CFR 835.102, Internal Audits.

Corrective actions were completed for one Finding and under way for the three other Findings identified in the original ORP assessment report. Because the estimated completion date for the remaining corrective actions was August 1, 2003, the team decided to revisit CH2M HILL from September 20-24, 2003. This report documents the status of corrective actions CH2M HILL has taken to close the Findings.

1.2 Finding A-03-RADCON-CHG -001-F-01 (Closed)**1.2.1 Assessment Scope**

The team evaluated the closure of corrective actions for this Finding:

Finding A3-03-RADCON-CHG-001-F-01: The CH2M HILL Radiation Protection Program (RPP) or Tank Farms Radiological Control Manual (TFRCM) did not incorporate all of the 10 CFR 835 requirements

The team interviewed the current Interpretive Authority, the former Interpretive Authority (now Health Physicist Lead), and the RadCon Programs Manager. These individuals are responsible for

¹ ORP letter from R. J. Schepens to E. S. Aromi, CH2M HILL, "CH2M HILL Hanford Group, Inc. (CH2M HILL) Radiological Control Self-Assessment Program, Assessment Report A-03-RADCON-CH2M HILL-001, November 12, 2002, through January 13, 2003," 03-ESQ-009, dated March 28, 2003.

² CH2M HILL letter from E. S. Aromi to R. J. Schepens, ORP, "U.S. Department of Energy, Office of River Protection Assessment A-03-RADCON-CH2M HILL-001," CH2M-0301149 R1, dated April 28, 2003.

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revising and maintaining the CH2M HILL RPP and TFRM. In addition, the team reviewed current and superseded versions of both the RPP and the TFRM for changes.

1.2.2 Assessment Results

CH2M HILL submitted Rev. 3 of the RPP to ORP for approval on February 25, 2003, and published Rev. 1 of the TFRM on February 20, 2003.

1.2.3 Conclusion

The team determined that the RPP and TFRM revisions corrected the deficiencies identified in the Finding. CH2M HILL corrective actions for this Finding are complete.

1.3 Finding A3-03-RADCON-CHG-001-F-02 (Open)

1.3.1 Assessment Scope

The team evaluated the closure of corrective actions for this Finding:

Finding A3-03-RADCON-CHG-001-F-02: The current training and qualification program for the RadCon Self-Assessment Program did not implement fully the requirements of 10 CFR 830, "Nuclear Safety Management," Section 122, "Quality Assurance Criteria," to ensure that staff members who perform self-assessments were trained and qualified to be capable of performing their assigned work.

The team interviewed the RadCon Programs Manager and the Lead Health Physicist concerning proposed enhancements to the training and qualification program for employees who conduct RadCon self-assessments.

1.3.2 Assessment Results

CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions.

In May 2003, the team observed no substantive progress in revising and enhancing the training and qualification program for personnel who perform RadCon self-assessments.

In September 2003, CH2M HILL had generated a Qualification Card for the "Facility Technical Authority Radiological Control Assessment Coordinator, 351530," but not for other personnel who plan and conduct RadCon self-assessments. For example, no Qualification Cards were generated for Assessment Team Leaders or for Assessment Team Members in the Self-Assessment procedure TFC-ESHQ-RP_ADM-C-05, *Radiological Control Self-Assessment Program*, Revision A, July 25, 2003. The qualification card specified three courses required for qualification and the required reading.

1.3.3 Conclusion

CH2M HILL corrective actions for this Finding are incomplete.

1.4 Finding A3-03-RADCON-CHG-001-F-03 (Open)

1.4.1 Assessment Scope

The team evaluated the closure of corrective actions for this Finding:

Finding A3-03-RADCON-CHG-001-F-03: Self-assessment records did not demonstrate full compliance with 10 CFR 835, Section 102 and Section 104 requirements.

The team interviewed the RadCon Programs Manager and the Rad Assessment Health Physicist. In addition, the team reviewed the self-assessment procedure, the schedule for assessments, and the draft report on a self-assessment of internal dosimetry.

1.4.2 Assessment Results

CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions.

The self-assessment procedure provided the process for performing a self-assessment, including the retention of records in accordance with the standard records retention procedure. However, no new self-assessments had been performed since the procedure was written so the team could not evaluate new record retention. As a result, the team was unable to gauge progress in revising and enhancing the self-assessment records to comply with 10 CFR 835.102.

1.4.3 Conclusion

CH2M HILL corrective actions for this Finding are incomplete.

1.5 Finding A3-03-RADCON-CHG-001-F-04 (Open)

1.5.1 Assessment Scope

The team evaluated the closure of corrective actions for this Finding:

Finding A3-03-RADCON-CHG-001-F-04: CH2M HILL procedures for performing radiological self-assessment procedures did not provide adequate guidance, commensurate with the education, training, and skills of individuals who performed the assessments.

The team interviewed the RadCon Programs Manager, the Health Physicist Lead, and the Rad Assessment Health Physicist.

1.5.2 Assessment Results

CH2M HILL assigned an estimated completion date of August 1, 2003, for these actions.

The self-assessment procedure provided the personnel responsibilities, the generic process, and record retention requirements. However, it did not provide sufficient detail to permit a less-experienced Health Physicist to plan and conduct an effective self-assessment. The new procedure did not require

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or even acknowledge the existence of the Assessment Cards, which did provide such guidance. While the RadCon Programs Manager stated that it was his intent to continue using the cards, the procedure does not require their use.

As a result, the team observed no substantive progress in revising the self-assessment procedures to include guidance commensurate with the education, training, and skills of individuals who perform assessments.

1.5.3 Conclusions

CH2M HILL corrective actions for this Finding are incomplete.

1.6 Observation A-03-RADCON-TANKFARM-003-O-01 (New)

1.6.1 Assessment Scope

Because 10 CFR 835.102 requires Contractor self-assessment of each major functional element of the Radiological Control Program at least once every 36 months, the team examined the current CH2M HILL Self-Assessment Schedule (Section 3.5).

1.6.2 Assessment Results

Since the May 2003 assessment, no triennial assessments had been performed and reported. The team noted that, with the exception of January 2004 (when no assessments are scheduled), CH2M HILL has scheduled one assessment a month from September 2003 through October 2004.

The Self-Assessment Program has had four different lead persons in the past 30 months, and it is scheduled to have its fifth lead November 2003, according to information provided by the RadCon Program Manager.

1.6.3 Conclusions

In the resource-limited environment in which the CH2M HILL Radiological Control Programs organization is in, completion of all the required assessments, in order to comply with 10 CFR 835.104, appears challenging.

Observation A3-03-RADCON-TANKFARM-003-O-01: The team noted that the triennial self-assessment schedule is very full (Section 3.5); with the exception of January 2004, one assessment a month is scheduled from September 2003 through November 2004. In a resource-limited environment, completing all these assessments, which are required by 10 CFR 835.104, appears challenging.

2.0 PRESENTATION OF RESULTS TO CH2M HILL

The team presented the assessment results to members of CH2M HILL RadCon management by means of a series of communications during May 2003 and September 2003 and an exit briefing on September 25, 2003. CH2M HILL acknowledged the team's evaluation of the status of corrective actions.

3.0 REPORT BACKGROUND INFORMATION

3.1 Partial List of Persons Contacted

E. E. Bickel, RadCon Program Manager
C. L. Cahow, Interpretive Authority
E. J. Millikin, Health Physicist Lead (former Interpretive Authority)
D. F. Pedersen, Rad Assessment Health Physicist

3.2 List of Inspection Procedures Used

ORP PD 220.1-1, *Conduct of AMSQ Assessments*, August 24, 2001

3.3 List of Documents Reviewed

CH2M HILL RadCon Program Documents

HNF-5183, Revision 0, "Tank Farms Radiological Control Manual (TFRCM)," July 19, 2000.

HNF-5183, Revision 1, "Tank Farms Radiological Control Manual (TFRCM)," February 20, 2003.

HNF-MP-5184, Revision 2, "CH2M HILL Hanford Group, Inc. Radiation Protection Program," March 21, 2000.

HNF-MP-5184, Revision 3, "CH2M HILL Hanford Group, Inc. Radiation Protection Program," February 28, 2003.

Qualification Card for Facility Technical Authority Radiological Control Assessment Coordinator, 351530.

TFC-ESHQ-RP_ADM-C-05, *Radiological Control Self-Assessment Program*, Revision A, July 25, 2003.

TFC-PLN-010, Revision A-1, "Assessment Program Plan," December 10, 2002.

"Tank Farm Contractor (CH2M HILL) Radiological Control Triennial Assessment Schedule," April 2003 draft.

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Correspondence

ORP letter from R. J. Schepens to E. S. Aromi, "CH2M HILL Hanford Group, Inc. (CH2M HILL) Radiological Control Self-Assessment Program, Assessment Report A-03-RADCON-CHG-001, November 12, 2002, through January 13, 2003," 03-ESQ-009, March 28, 2003.

CH2M HILL letter from E. S. Aromi to R. F. Schepens, "U.S. Department of Energy, Office of River Protection Assessment A-03-RADCON-CHG-001," CH2M-0301149 R1, April 28, 2003.

CH2M HILL letter from E. S. Aromi to R. F. Schepens, "Contractor Requirements, Radiation Protection Program, Revision 3," CH2M-0200621 R2, February 25, 2003.

Other Records

Organization Chart for CH2M HILL Hanford Group ESH&Q, March 27, 2003

3.4 List of Acronyms

CH2M HILL	CH2M HILL Hanford Group, Inc.
CFR	Code of Federal Regulations
ORP	Office of River Protection
RadCon	Radiological Control
RPP	Radiation Protection Program
TFRCM	Tank Farms Radiological Control Manual

3.5 CH2M HILL RadCon Triennial Assessment Schedule

The current schedule, provided by the Rad Assessment Health Physicist on September 24, 2003, appears on the following two pages.

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Tank Farm Contractor (CH2M HILL) Radiological Control Triennial Assessment Schedule			
Month	Year One (2002)	Year Two (2003)	Year Three (2004)
January	<ul style="list-style-type: none"> Subpart N - Emergency Exposure Situations (1302 completed) 		
February			<ul style="list-style-type: none"> Instrumentation Calibration and Maintenance (multi-contractor triennial review)
March			<ul style="list-style-type: none"> Instrumentation Calibration and Maintenance (areas not covered in the multi-contractor review - includes confirmation of adequacy of self-assessment completed in 12/02 under previous program)
April	<ul style="list-style-type: none"> 5c. Contamination Monitoring & Control (completed) 		<ul style="list-style-type: none"> Radiological Controls
May			<ul style="list-style-type: none"> External Dosimetry (multi-contractor triennial review - HPDAC)
June		(Start of new schedule based on DOE G 441.1-1 functional areas)	<ul style="list-style-type: none"> External Dosimetry (areas not covered in the multi-contractor review)
July		<ul style="list-style-type: none"> Internal Dosimetry (multi-contractor triennial review - HPDAC) 	<ul style="list-style-type: none"> Emergency Exposure Situations (includes confirmation of adequacy of self-assessment completed in 01/02 for part of functional element)
August			<ul style="list-style-type: none"> Nuclear Accident Dosimetry
September		<ul style="list-style-type: none"> Internal Dosimetry (areas not covered in the multi-contractor review) 	<ul style="list-style-type: none"> Radiation Safety Training (includes confirmation of adequacy of self-assessment completed in 11/02 under previous program)

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Month	Year One (2002)	Year Two (2003)	Year Three (2004)
October		<ul style="list-style-type: none"> • Area Monitoring and Controls (includes confirmation of adequacy of self-assessment completed in 04/02 and 12/02 under previous program for part of functional element) 	<ul style="list-style-type: none"> • Records and Reports to Individuals (multi-contractor triennial review)
November	11. Radiation Safety Training, Subpart J (completed)	<ul style="list-style-type: none"> • Organization and Administration 	<ul style="list-style-type: none"> • Records and Reports to Individuals (areas not covered in the multi-contractor review)
December	5d. Instrument Calibration & Maintenance, 401(b) (completed)	<ul style="list-style-type: none"> • ALARA Program 	

October 20, 2003

E-STARSM Report
Task Detail Report
10/08/2003 02:53

TASK INFORMATION

Task#	ORP-ESQ-2003-0064	Status	Open
Subject	CONCUR 03-ESQ-069/CH2M HILL Corrective actions from A-03-RADCON-TANKFARM-003		
Parent Task#		Due	
Reference		Priority	None
Originator	Hopkins, Dianne	Category	None
Originator Phone	(509) 376-4132	Generic1	
Origination Date	10/08/2003 14:46	Generic2	
Remote Task#		Generic3	
Deliverable	None	View Permissions	Normal
Class	None		
Instructions	bcc: MGR RDG FILE Judy O'Connor, OPA J. Swailes, AMTF		

ROUTING LISTS

1	Swailes List	Active
<i>JRMC</i>	<ul style="list-style-type: none"> • Barr, Robert C - Review - Awaiting Response <i>Rob 10/14/03</i> • Swailes, John H - Review - Awaiting Response <i>John Swailes</i> • Schepens, Roy J - Approve - Awaiting Response <i>10/16/03</i> 	

ATTACHMENTS

- 1. 03-ESQ-069 A-03-RAD-TANKFARM-003 Report.doc
- 2. 03-ESQ-069 Assessment Report letter.lrm.doc

COMMENTS

No Comments

TASK DUE DATE HISTORY

No Due Date History

SUB TASK HISTORY

No Subtasks

-- end of report --

RECEIVED

OCT 21 2003

DOE-ORP/ORPCC