



U.S. Department of Energy
~~Office of River Protection~~

P.O. Box 450
Richland, Washington 99352

03-ESQ-023

MAY 13 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. (CHG)
RADIOLOGICAL CONTROL TECHNICIAN (RCT) TRAINING PROGRAM,
SURVEILLANCE REPORT S-03-RADCON-TANKFARM-001, MARCH 27, 2003,
THROUGH APRIL 4, 2003

This letter forwards the results of the subject surveillance. The surveillance team concluded CHG was implementing the RCT Training Program required by Title 10 Code of Federal Regulations (CFR) Part 835.901, "Radiation Safety Training." One Finding and four Observations were noted. The Enclosure (S-03-RADCON-TANKFARM-001) documents the details of the surveillance.

The Finding dealt with errors in the On the Job (OJT) Training Program Job Performance Measures, Student Texts, and Scoring Sheets. These errors hampered implementation of Article 643.4 of the Tank Farm Radiological Control Manual, "Continuing Training."

Positive Observations included the "On the Job Training Status" web page on the CHG website and the active workplace monitoring by the Training and Source Control Health Physicist (with lessons learned fed back into the training program). Observations for improvement involved potential confusion of field (convenience) copies of RCT qualification records with the originals, and the possibility of RCTs performing work on overtime in areas they do not normally work and on tasks for which they do not have current practical experience.

By June 16, 2003, CHG shall provide a response to the Finding, including:

- Actions taken or planned to identify any similar Findings in other programs or activities;
- Evaluation of the underlying causes for each Finding;
- Actions taken or planned to correct the underlying cause(s) for each Finding; and
- Actions planned to verify the effectiveness of the corrective actions.

While written responses are not required for Observations, they represent opportunities for CHG to improve its program.

Mr. E. S. Aromi
03-ESQ-023

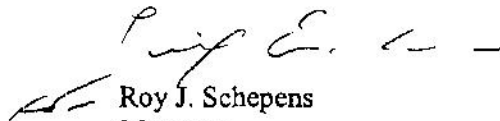
-2-

MAY 13 2003

When corrective actions for the Findings have been completed, please notify the U.S. Department of Energy, Office of River Protection.

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, CHG
C. A. Meyers, RL

Enclosure
03-ESQ-023

S-03-RADCON-TANKFARM-001

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

SURVEILLANCE: CH2M HILL Hanford Group, Inc.
Radiological Control Technician Training Program

REPORT NO.: S-03-RADCON-TANKFARM-001

FACILITY: Tank Farms

LOCATION: Hanford Site

DATES: March 27, 2003 – April 4, 2003

ASSESSORS: L. R. McKay, U.S. Department of Energy
Office of River Protection (Surveillance Lead)

C. A. Meyers, U.S. Department of Energy
Richland Operations Office

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S-03-RADCON-TANKFARM-001

EXECUTIVE SUMMARY

INTRODUCTION

The U.S. Department of Energy, Office of River Protection surveillance team (the team) evaluated the CH2M HILL Hanford Group, Inc. (CHG) Radiological Control Technician (RCT) Training Program for scope, adequacy and compliance with Title 10 Code of Federal Regulations (CFR) Part 835 requirements.

FINDINGS, OBSERVATIONS, AND CONCLUSIONS

The team concluded that the CHG RCT Training Program satisfied the requirements of 10 CFR 835. The team identified the following one Finding and four Observations.

Finding:

- Many On the Job Training Program Job Performance Measures, Student Texts, and Scoring Sheets contained the following types of errors (**Finding S-03-RADCON-TANKFARM-001-F-01**, Section 1.2):
 - Typographical errors
 - References to superseded procedures
 - Lack of clarity in performance directions
 - Performance requirements inaccurately identified as discussion rather than performance items
 - Acronyms not spelled out the first time used
 - Incomplete problem solution (Onsite Tank Cask problem)

Observations:

- Field records (convenience copies) of RCT qualification records are not marked as such and may be confused with the original copies maintained by CHG Records. In addition, no file is maintained of names, signatures, and initials for future identification of the person who signed or initialed a record (**Observation S-03-RADCON-TANKFARM-001-O-01**, Section 1.3 [Negative Observation]).
- Some RCTs were scheduled to work overtime in areas where they do not normally work without the opportunity to practice all tasks beforehand (**Observation S-03-RADCON-TANKFARM-001-O-02**, Section 1.4 [Negative Observation]).
- An "On the Job Training Status" page on the CHG web site provided a convenient method for first-line managers to verify training status prior to assigning the RCT to work (**Observation S-03-RADCON-TANKFARM-001-PO-01**, Section 1.4 [Positive Observation]).

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- The Training and Source Control Health Physicist periodically observed RCTs performing fieldwork and uses the information to improve the RCT Training Program (Observation S-03-RADCON-TANKFARM-001-PO-02, Section 1.4 [Positive Observation]).

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**RADIOLOGICAL CONTROL TECHNICIAN TRAINING PROGRAM
SURVEILLANCE REPORT
FOR THE PERIOD OF MARCH 31, 2003, THROUGH APRIL 4, 2003**

1.0 REPORT DETAILS**1.1 Introduction**

The surveillance team evaluated the CH2M HILL Hanford Group, Inc. (CHG) implementation of the requirements of Title 10 Code of Federal Regulations (CFR) Part 835, *Occupational Radiation Protection*, and the Tank Farm Radiological Control Manual (TFRCM). The team limited its evaluation to Radiological Control Technician (RCT) training. The training of radiological workers will be the subject of a future evaluation.

The team based its conclusions on reviews of procedures, training materials, training and qualification records, and supporting documentation; and interviews with managers, RCTs and the Training and Source Control Health Physicist who is responsible for the training program.

1.2 Training Materials**1.2.1 Surveillance Scope**

The team interviewed the CHG Training and Source Control Health Physicist and reviewed CHG's RCT Training Program materials for accuracy, completeness and relevance against the requirements of 10 CFR 835.901, *Radiation Safety Training*, and Articles 641-645 and 713 of the TFRCM.

1.2.2 Surveillance Results

The On the Job (OJT) Training Program Job Performance Measures (JPM), Student Texts, and Scoring Sheets contained the following types of errors:

- Typographical errors.
- References to superseded procedures.
- Lack of clarity in performance directions.
- Performance requirements inaccurately identified as discussion rather than performance items.
- Acronyms not spelled out the first time used.
- Incomplete problem solution (Onsite Tank Cask problem).

Although CHG identified these errors prior to the surveillance, they hampered implementation of Article 643.3 of the TFRCM, which states, "Continuing training should provide continued improvement in the knowledge and skills of the Radiological Control Technician."

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Examples included:

- Typographical errors (copies of marked up OJT Program documents will be provided to CHG and kept in backup files for this report).

The word "the" was used when it should have been "that"; the word "is" was used rather than "are" when the subject was plural; and the word "unattended" was misspelled "aunattended." Other errors existed and are marked in the documents.

- References to superseded manuals

References were made to Westinghouse Hanford Company manuals, and the Hanford Site Radiological Control Manual.

- Lack of clarity in performance directions

Some examples included omission of an operational check when describing the steps taken after obtaining instrumentation, and unclear directions in the "Core Sampling" student text telling the student to "report the uncorrected dose rate to the truck operator for their records" – but not explaining how that relates to the numbers recorded on the survey record. Other areas with unclear directions are marked in the JPM material.

- Performance requirements inaccurately identified as discussion rather than performance items.

In the Containment JPM a Task Element was described as "2. Obtain a thorough understanding of the job to be done." The Condition/Standard for this element was "Read the work package." This was incorrectly identified as a discussion (D) rather than a Perform (P) item.

- Acronyms not spelled out the first time used

"OTC" was not spelled out as "Onsite Tank Cask" in the Core Sampling Student Text.

- Incomplete problem solution (Onsite Tank Cask problem)

In the Core Sampling JPM, a sentence read "the OTCs are staged next to each other so background from another OTC could be a problem." No solution was given to this defined problem.

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1.2.3 Conclusions**Finding S-03-RADCON-TANKFARM-001-F-01**

OJT Program JPMs, Student Texts, and Scoring Sheets contained errors.

1.3 Records**1.3.1 Surveillance Scope**

The team reviewed training and qualification records for active RCTs, both official records (maintained by CHG and field copies maintained by the CHG Training and Source Control Health Physicist.

1.3.2 Surveillance Results

Field records (convenience copies) of RCT qualification records were not marked as such and might be confused with the original copies maintained by CHG Records.

During the interview with the Training and Source Control Health Physicist, field copies of training records were reviewed. These were kept in a locked filing cabinet and were known by the current Radiological Control Organization to be field copies only, not record copies, but were not marked as such. Also, there was no file maintained of names, signatures, and initials for future identification of the person who signed or initialed a record (TFRCM Article 713.2 Record Keeping Standards).

1.3.3 Conclusion**Observation S-03-RADCON-TANKFARM-001-O-01**

Field records (convenience copies) of RCT qualification records were not marked as such and might be confused with the original copies maintained by CHG Records. Also, there was no file maintained of names, signatures, and initials for future identification of the person who signed or initialed a record.

1.4 Program Implementation**1.4.1 Surveillance Scope**

The team evaluated the effectiveness of the CHG RCT Training Program as applied to day-to-day work in the Tank Farms.

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1.4.2 Surveillance Results

The team identified one area of improvement:

- Some RCTs were scheduled to work overtime in areas where they did not normally work without the opportunity to practice all tasks beforehand.

The team interviewed RCTs and learned the overtime list and the method by which overtime must be offered did not take into consideration the experience level of the RCT. While the RCT might have been signed off on a particular task, he or she might not have been normally assigned to an area where this task is routinely performed. The team concluded that lack of familiarity with assigned tasks could potentially affect RCT proficiency.

The team made two positive Observations about the way the Program is implemented in the field:

- An "On the Job Training Status" page on the CHG web site provided a convenient method for first-line managers to verify training status prior to assigning the RCT to work

This page allowed the Tank Farms personnel assigning work to ensure that RCTs were not assigned to cover work or perform surveys for which they are not qualified. The only other method available was the Individual Training Employee Matrix, which was not as convenient to use as the "On the Job Training Status" for these purposes.

- The Training and Source Control Health Physicist periodically observed RCTs performing fieldwork and used the information to improve the RCT Training Program.

This allowed the Health Physicist to provide optimal input into the continuing training program content, as it was provided to Fluor Hanford, Inc. and CHG RCTs on a biyearly basis. The subjects covered in these classes needed to add value to both companies and this clearly allowed some insight into the needs of CHG.

1.4.3 Conclusion

Observation S-03-RADCON-TANKFARM-001-O-02 Some RCTs were scheduled to work overtime in areas where they do not normally work without the opportunity to practice all tasks beforehand.

Observation S-03-RADCON-TANKFARM-001-PO-01 An "On the Job Training Status" page on the CHG web site provided a convenient method for first-line managers to verify training status prior to assigning the RCT to work.

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Observation S-03-RADCON-TANKFARM-001-PO-02 The Training and Source Control Health Physicist periodically observed RCTs performing fieldwork and used the information to improve the RCT Training Program.

2.0 PRESENTATION OF RESULTS TO CH2M HILL HANFORD GROUP, INC.

The team presented the surveillance results to members of CHG Radiological Control (RadCon) management by means of a series of communications and the distribution a "factual accuracy review" draft of the report during April 2003. CHG acknowledged the findings, observations, and conclusions presented and committed to provide a written response to the Findings after the report was published.

3.0 REPORT BACKGROUND INFORMATION

3.1 Partial List of Persons Contacted

W. A. Beach, RCT
 E. E. Bickel, RadCon Program Manager
 R. V. Cole, RCT
 J. J. Davis, Closure Projects Surveillance RadCon Supervisor
 A. K. Galliher, RCT
 K. W. Gray, Closure Project Radiological Control Manager
 D. L. Hagen, Waste Feed Operations Facility RadCon Supervisor
 J. W. Hobbs, Closure Project Environmental, Safety, Health, and Quality (ESH&Q) Director
 E. E. Kennedy, Waste Feed Operations ESH&Q Director
 S. N. Landoe, RCT
 S. H. Livesey, Closure Project Retrieval RadCon Supervisor
 R. G. Massie, RCT – Lead for Retrieval and Saltwells
 J. M. McAuley, Waste Feed Operations Projects RadCon Supervisor
 J. G. Radford, RCT – Lead for Surveillances
 K. R. Seely, RCT
 C. P. Seilhymmer, Training and Source Control Health Physicist
 C. E. Upchurch, Waste Feed Operations RadCon Manager
 J. E. Valdez, Jr., RCT, Projects

3.2 List of Inspection Procedures Used

ORP PD 220.1-1, Revision 0, "Conduct of AMSQ Surveillances."

3.3 List of Documents Reviewed

CHG RadCon Program Documents

- HNF-5183, Revision 0, "Tank Farms Radiological Control Manual," dated July 19, 2000.
- HNF-MP-5184, Revision 2, "CH2M HILL Hanford Group, Inc. Radiation Protection Program," dated March 21, 2000.

CHG RadCon Technician Training Program Documents

Tank Farms Radiological Control
OJT Training Program
Job Performance Measure
Task Title: Containments
Course No. 351514
Revision 4
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Student Text
Task Title: Containments
Course No. 351514
Revision 4
December 14, 1999

Tank Farms Radiological Control
OJT Training Program
Performance Evaluation Scoring Sheet
Task Title: Containments
Course No. 351514
Revision 4
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Student Text
Task Title: Core Sampling
Course No. 022193
Revision 4
December 16, 1998

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Tank Farms Radiological Control
OJT Training Program
Job Performance Measure
Task Title: Core Sampling
Course No. 022193
Revision 4
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Performance Evaluation Scoring Sheet
Task Title: Core Sampling
Course No. 022193
Revision 4
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Job Performance Measure
Task Title: Retrieve air samples using the Automated Bar Coding of Air Samples
at Hanford System
Course No. 351516
Revision 5
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Student Text
Task Title: Retrieve air samples using the Automated Bar Coding of Air Samples
at Hanford System
Course No. 351516
Revision 5
December 16, 1998

Tank Farms Radiological Control
OJT Training Program
Performance Evaluation Scoring Sheet
Task Title: Retrieve air samples using the Automated Bar Coding of Air Samples
at Hanford System
Course No. 351516
Revision 5
December 16, 1998

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Tank Farms Radiological Control
OJT Training Program
Job Performance Measure
Task Title: Tank Farm Alarm Response
Course No. 351511
Revision 5
December 14, 1999

Tank Farms Radiological Control
OJT Training Program
Student Text
Task Title: Tank Farm Alarm Response
Course No. 351511
Revision 5
December 14, 1999

Tank Farms Radiological Control
OJT Training Program
Performance Evaluation Scoring Sheer
Task Title: Tank Farm Alarm Response
Course No. 351511
Revision 5
December 14, 1999

CH2M HILL Hanford Group, Inc.
CHG Training
OJT Card and Guide for Intrusive Pit Work
351513
Revision 1
September 21, 2001

Organization Chart for CHG ESH&Q, March 27, 2003

Field Training and Qualification Records for two RCTs (selected at random)

CHG Program Documents

- HNF-5183, Revision 0, "Tank Farms Radiological Control Manual," dated July 19, 2000.
- HNF-MP-5184, Revision 2, "CH2M HILL Hanford Group, Inc. Radiation Protection Program," dated March 21, 2000.

CHG Procedures Reviewed

- TFC-ESHQ-RP_ADM-P-17, Revision A, *Selection of Senior Health Physics Technician Lead*, dated July 31, 2003.

- TFC-ESHQ-RP_TRN-P-01, Revision A-1, *Health Physics Technician/First Line Manager Training and Qualification*, dated February 20, 2003.

3.4 List of Acronyms

CFR	Code of Federal Regulations
CHG	CH2M HILL Hanford Group, Inc.
JPM	Job Performance Measures
OJT	On the Job
PD	Procedure Directive
RadCon	Radiological Control
RCT	Radiological Control Technician
TFRCM	Tank Farm Radiological Control Manual

Task Detail Report

05/15/2003 07:59 AM

Task #: ORP-ESQ-2003-0021 - Closed (05/15/2003)

Parent Task #:

Subject: CONCUR:03-ESQ-023;CHG RCT TRNG PROGRAM
RPT S-03-RADCON-TANKFARM-001

Reference #: 03-ESQ-023

Deliverable: None

Category: None

Status: Closed

Due Date:

Priority: None

Originator: Mosby, Debbie A

Originator Phone: (509)376-9106

Assigned By: Self

Assigned Date: 04/30/2003

Assigned Role: Originator

Assigned Due Date:

Routing Lists: Route List - Inactive

- McKay, Larry R - Approve - Approve - 05/02/2003 11:16
- Barr, Robert C - Approve - Approve with comments - 05/02/2003 14:54 (By: Hopkins, Dianne)
- O'Connor, Judith S - Approve - Approve - 05/07/2003 15:24
- Erickson, Leif - Approve - Approve - 05/14/2003 16:37 (By: Deutsch, V Genie)
- Schepens, Roy J - Approve - Approve with comments - 05/14/2003 16:37 (By: Deutsch, V Genie)
- Swailes, John H - Review - Concur with comments - 05/12/2003 11:12 (By: Struthers, Deborah J)

Instructions:

Correspondence is being routed for concurrence via hard copy instead of electronically. Once you receive the correspondence, please approve or disapprove electronically via E-STARS and route to next person on the routing/concurrence list.

bcc:

ESQ OFF FILE
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 MGR RDG FILE
 R. C. BARR, ESQ
 L. R. MCKAY, ESQ
 J. Swailes, AMTF
 J. S. O'CONNOR, OPA
 C. J. BOSTED, TOD
 M. C. BROWN, TOD
 B. A. HARKINS, TOD
 B. J. HARP, TOD
 S. H. PFAFF, TOD
 G. D. TRENCHARD, TOD
 K. G. WADE, TOD
 B. I. WILLIAMSON, TOD
 D. L. NOYES, TPD

Attachments: 1. 03-ESQ-023.lrm.S-03-RAD-TANKFARM-001 Report Final 4-29-03.doc
 2. 03-ESQ-023.lrm.Transmittal Letter.doc

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MAY 15 2003

Comments

Response Comments

Poster / Date : Barr, Robert C (Hopkins, Dianne) - 2003-05-02 14:54:27

DOE-ORP/OR.PC

Subject : Hopkins, Dianne -- Approve

Corrected number of observations in letter - moved one paragraph. Made one small change in Exec. Summary. DH for RCB

Poster / Date : Swailes, John H (Struthers, Deborah J) - 2003-05-12 11:12:43
Subject : Struthers, Deborah J -- Concur
John signed hard copy
Poster / Date : Schepens, Roy J (Deutsch, V Genie) - 2003-05-14 16:37:31
Subject : Deutsch, V Genie -- Approve
Erickson signed in Schepens' absence.

Task Due Date History:

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

-- End of Report --

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PM

Task Detail Report

05/02/2003 02:55

Task #: ORP-ESQ-2003-0021

Parent Task #:

Subject: CONCUR:03-ESQ-023;CHG RCT TRNG PROGRAM
RPT S-03-RADCON-TANKFARM-001

Reference #: 03-ESQ-023

Deliverable: None

Category: None

Status: Open

Due Date:

Priority: None

Originator: Mosby, Debbie A

Originator Phone: (509)376-9106

Assigned By: Self

Assigned Date: 04/30/2003

Assigned Role: Originator

Assigned Due Date:

Routing Lists: Route List - Active

- McKay, Larry R - Approve - Approve - 05/02/2003 11:16
- Barr, Robert C - Approve - Approve with comments - 05/02/2003 14:54 (By: Hopkins, Dianne)
- O'Connor, Judith S - Approve - Awaiting Response *JS 5/7/03*
- Erickson, Leif - Approve - Awaiting Response *LE 13 May 2003*
- Schepens, Roy J - Approve - Awaiting Response *RS 13 May 2003*
- Swailes, John H - Review - Awaiting Response *JS 5/12/03*

Instructions:

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Response Comments

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Subject : Hopkins, Dianne -- Approve

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 Exec. Summary. DH for RCB

Task Due Date History:

Date Modified

Task Due Date

Modified By **RECEIVED**
MAY 15 2003

-- End of Report --

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Task Detail Report

04/30/2003 09:55 AM

Task #: ORP-ESQ-2003-0021

Parent Task #:

Subject: CONCUR:03-ESQ-023;CHG RCT TRNG
PROGRAM RPT S-03-RADCON-TANKFARM-
001

Reference #: 03-ESQ-023

Deliverable: None

Category: None

Status: Open

Due Date:

Priority: None

Originator: Mosby, Debbie A

Originator Phone: (509)376-9106

Assigned By: Self

Assigned Date: 04/30/2003

Assigned Role: Originator

Assigned Due Date:

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- McKay, Larry R - Approve - Awaiting Response *SRhe*
- Barr, Robert C - Approve - Awaiting Response *RB 5/3/03*
- O'Connor, Judith S - Approve - Awaiting Response
- Erickson, Leif - Approve - Awaiting Response
- Schepens, Roy J - Approve - Awaiting Response

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Comments**Task Due Date History:**

Date Modified

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