



U.S. Department of Energy
Office of River Protection

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Richland, Washington 99352

05-ESQ-029

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

Dear Mr. Aromi:

CONTRACT NO. DE-AC27-99RL14047 – ASSESSMENT REPORT A-05-ESQ-TANKFARM-006, PRICE-ANDERSON AMENDMENTS ACT (PAAA) PROGRAM REVIEW, MAY 2 THROUGH 9, 2005

This letter forwards the results of the U.S. Department of Energy, Office of River Protection assessment of the CH2M HILL Hanford Group, Inc. (CH2M HILL), PAAA Program conducted during the period of May 2 through 9, 2005 (attached).

The purposes of this assessment were to determine program effectiveness in implementing PAAA requirements noted in the CH2M HILL Quality Assurance Program Description (QAPD); to verify the corrective actions for four Noncompliance Tracking System (NTS) reports associated with the Office of Price-Anderson Enforcement (OE) Preliminary Notice of Violation (PNOV) dated March 2005; and to verify closure of issues from the 2003 review of the CH2M HILL PAAA Program.

The assessors concluded that CH2M HILL had effectively implemented the PAAA requirements of its QAPD into adequate processes and procedures. In support of this conclusion, the assessors noted the Contractor appropriately reported and documented events in NTS; effectively trended PAAA related events; and adequately verified the corrective actions for PAAA reportable events. The assessors verified the corrective actions associated with the NTS reports of the March 2005 OE PNOV and the closure of issues associated with the 2003 CH2M HILL PAAA Program review were adequate. In particular, NTS closure packages were well organized and complete.

No Findings or significant issues were identified during this assessment. 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:SAV

Attachment

cc: See page 2

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

ASSESSMENT: CH2M HILL Hanford Group, Inc. Quality Assurance Program
Assessment

REPORT: A-05-ESQ-TANKFARM-006

FACILITY: CH2M HILL Hanford Group, Inc. Price-Anderson Amendments Act
Program Assessment

LOCATION: Hanford Site

Dates: May 2 through 9, 2005

ASSESSOR: Samuel Vega, Lead Assessor

APPROVED BY: Patrick P. Carier, Team Lead
Verification and Confirmation

Executive Summary

The U.S. Department of Energy, Office of River Protection (ORP) conducted an assessment of the CH2M HILL Hanford Group, Inc. (CH2M HILL) Price-Anderson Amendments Act (PAAA) Program during the period of May 2 through 9, 2005. The purposes of this assessment were to determine program effectiveness in implementing PAAA requirements identified in the CH2M HILL Quality Assurance Program Description (QAPD); to verify the corrective actions for four Noncompliance Tracking System (NTS) reports associated with the Office of Price-Anderson Enforcement (OE) Preliminary Notice of Violation (PNOV) dated March 2005; and to verify closure of issues from the 2003 review of the CH2M HILL PAAA Program.

The assessors concluded that CH2M HILL had effectively implemented the PAAA requirements of its QAPD into adequate processes and procedures. In support of this conclusion, the assessors noted the Contractor appropriately reported and documented events in NTS; effectively trended PAAA related events; and adequately verified the corrective actions for PAAA reportable events. The assessors verified the corrective actions associated with the NTS reports of the March 2005 OE PNOV and the closure of issues associated with the 2003 CH2M HILL PAAA Program review were adequate. ORP will recommend closure of the enforcement action related NTS reports. In particular, NTS closure packages were well organized and complete, and examples of NTS reports being generated from trends were noted.

The assessors identified no Findings or Observations.

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List of Acronyms

CH2M HILL	CH2M HILL Hanford Group, Inc.
DOE	U.S. Department of Energy
NTS	Noncompliance Tracking System
OE	Office of Price Anderson Enforcement
ORP	Office of River Protection
PAAA	Price-Anderson Amendments Act
PER	Problem Evaluation Request
PNOV	Preliminary Notice of Violation
QAPD	Quality Assurance Program Description

**CH2M HILL Hanford Group, Inc. (CH2M HILL)
Price-Anderson Amendments Act (PAAA)
Program Assessment**

Details

The assessor reviewed selected CH2M HILL PAAA Program processes, reviewed related documents and records, and interviewed management and staff to verify the implementation of program requirements and determine program effectiveness. The following sections identify the areas reviewed, describe the scope of the assessor’s review and provide assessor’s conclusions and observations.

Evaluation and reporting

The assessor evaluated the effectiveness of the CH2M HILL’s PAAA evaluation and reporting efforts by reviewing procedure TFC-ESHQ-PAAA-C-01, “Price-Anderson Amendments Act Evaluation and Reporting,” interviewing PAAA staff, and reviewing documentation maintained in the PAAA Evaluation Tracking System.

The assessor concluded CH2M HILL staff event evaluation and reporting was adequate because all newly generated Problem Evaluation Reports (PER) were reviewed daily for PAAA applicability; more detailed “full” evaluations were performed for PERs designated as “Significant,” or as “Potential NTS,” to determine if Noncompliance Tracking System (NTS) reporting was required; and evaluation results were maintained electronically to support CH2M HILL’s senior management reporting decisions.

Trending

The assessor evaluated the effectiveness of the CH2M HILL PAAA trending by reviewing the PAAA trending procedure TFC-ESHQ-PAAA-C-05, “PAAA Trending Program,” interviewing PAAA staff, and reviewing documentation that resulted from trending activities.

The assessor concluded CH2M HILL trending of Tank Farm events met PAAA program requirements because the contractor maintained and evaluated performance indicators; compared newly generated PERs against past evaluations; and discussed and shared information and concerns during staff meetings and during meetings of the Collective Significance Review Committee and the PER Screening Team. The assessor identified several examples where NTS reports of significant issues resulted from PAAA trending. The assessor identified a few instances where the trending procedure should be clarified. The contractor captured these as process improvements in PER-2005-1869.

NTS Closure Packages

The assessor evaluated the contractor's completeness and timeliness of NTS package closure by reviewing requirements in PAAA procedure TFC-ESHQ-PAAA-C-04, "PAAA Review and Closure of Noncompliance Tracking System Packages," interviewing PAAA staff, and reviewing NTS closure packages.

The assessor concluded NTS packages were complete, in that the packages compiled the objective evidence needed to demonstrate corrective action completion, and closed within a reasonable time.

Control of NTS Commitments

The assessor evaluated the effectiveness of the contractor's control of NTS commitments by reviewing the requirements of procedure TFC-BSM-AD-C-01, "Administrative Document Development and Maintenance," interviewing CH2M HILL staff, and reviewing changes to related documents to assure these changes were implemented.

The assessor concluded CH2M HILL effectively controlled NTS commitments. The assessor reached this conclusion by noting that applicable CH2M HILL procedures contained subscripts attached to process steps that satisfied a regulatory or contractual requirement, or were a result of a commitment made to the U.S. Department of Energy (DOE). The reference section of each procedure identified the specific requirement or commitment document associated with each subscript. Procedure controls were in place to ensure changes to subscribed portions of procedures could not be made without first assuring the proposed change did not undo a commitment. If a procedure change does change a DOE commitment, approval from DOE is first obtained. The assessor also reviewed six procedures incorporating process changes made as a result of NTS corrective actions to verify the proper sections had subscripts and the subscripts referenced the related NTS report. The assessor verified corrective actions associated with procedure changes for the NTS reports reviewed during closure verification were still in place in the current revisions of those procedures.

Verification of Corrective Actions from 2005 Preliminary Notice of Violation (PNOV) and 2003 PAAA Program Review

The assessor found the contractor had implemented, and continues to implement, the corrective actions for four NTS reports associated with the Office of Price Anderson Enforcement PNOV of March 2005 and corrective actions associated with the closure of issues from the 2003 review of the CH2M HILL PAAA Program.

Items Opened, Closed, and Discussed

Opened Findings

None

Closed

Closure verification for the following NTS reports was completed:

- NTS-RP-CHG-TANKFARM-2003-0012;
- NTS-RP-CHG-TANKFARM-2003-0013;
- NTS-RP-CHG-TANKFARM-2003-0014; and
- NTS-RP-CHG-TANKFARM-2004-0009.

For details, see the attached matrix. DOE Office of River Protection will recommend closure of the four NTS reports looked at.

Signatures

Samuel Vega,
Assessment Team Leader