



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

05-ESQ-045

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-009, ASSESSMENT OF THE CH2M HILL HANFORD GROUP, INC. (CH2M HILL) EMPLOYEE CONCERNS PROGRAM (ECP)

This letter transmits the results of the U.S. Department of Energy (DOE), Office of River Protection (ORP) assessment of the CH2M HILL ECP. The assessment was completed on July 7, 2005.

The team evaluated compliance with the Contractor Requirement Document to DOE Order 442.1A, "Department of Energy Employee Concerns Program," reviewed 20 recently completed ECP investigations, verified that CH2M HILL and subcontractors employees were aware of the ECP, and reviewed completed self-assessments of CH2M HILL ECP. Based on this review, the ORP assessment team concluded the CH2M HILL ECP complied with applicable DOE standards, and was effective in providing Tank Farm workers with an alternative method for raising concerns. The team identified two Observations and appropriate corrective actions were initiated to resolve those issues.

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:PPC

Attachment

cc w/attach:
G. W. Smith, CH2M HILL
K. Parnell, PAC
C. R. Ungerecht, PAC

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

**Assessment of
CH2M HILL Employee Concerns Program**



Office of River Protection

July 2005

**U.S. Department of Energy (DOE),
Office of River Protection (ORP)
Assessment Report**

Division: Office of River Protection Employee Concerns Program

Assessors: B. J. Harp, G. D. Trenchard

Assessment Number: A-05-ESQ-TANKFARM-009

Date Completed: July 7, 2005

Contractor: CH2M HILL Hanford Group, Inc. (CH2M HILL)

Facility: Tank Farms

Title: Assessment of CH2M HILL Employee Concerns Program (ECP)

Guide: DOE CRD O 442.1A, Revision 1

Assessment Scope:

The purpose of this assessment was to evaluate the CH2M HILL ECP for compliance with DOE CRD O 442.1A, Revision 1. The assessment also evaluated whether: 1) contractual requirements were in place for subcontractors; 2) individuals from CH2M HILL and their subcontractors were aware of the program; 3) issues from the previous DOE Richland Operations Office (RL) assessment were resolved and closed-out; 4) files were adequate with respect to the record of events, depth of investigation, and corrective actions; and 5) self-assessments performed by the CH2M HILL ECP provided an effective feedback and improvement process.

Assessment Summary:

Interviews:

- Eleven craft workers from Integrated Disposal Facility (IDF), Demonstration Bulk Vitrification System (DBVS), and C-Farm construction;
- Two Field Work Supervisors (subcontractor);
- Two CH2M HILL Construction leads; and

- Twelve CH2M HILL employees (two engineers, three operators, electrician, pipe fitter, maintenance manager, Field Work Supervisor, planner, building maintenance, and shift manager).

Documents Reviewed:

- DOE O 442.1A, Supplemental Contractor Requirements Document;
- CH2M HILL Onsite Work Provisions Revision 0;
- Standard/Requirements and Identification Document (SRID) HNF-SD-MP-SRID-001, Revision 3D, Management Systems;
- TFC-BSM-HR-MA-C-02, Revision A, ECP;
- TFC-ESHQ-AP-C-07, Revision A, Specialty Assessments;
- HNF-SD-MP-SRID-001 SRID;
- 20 ECP files – The case review included 20 cases from 2004 and 2005;
- CH2M HILL self-assessment reports for years 2003 and 2004;
- RL ECP surveillance S-03-SCO-CH2M-ECP-001;
- CH2M HILL informal response to surveillance S-03-SCO-CH2M-ECP-001;
- ECP database (both ORP and CH2M HILL);
- Employee Assistance presentation – training material that includes ECP; and
- CH2M HILL ECP User Survey Results Report.

Facility Walkdowns:

- IDF;
- DBVS;
- C-Farm construction trailers; and
- Administrative Areas, 274-AW, 272-AW, 242-A, 2704-HV, 2440 Stevens.

Adherence to Requirements

This assessment was conducted by reviewing CH2M HILL policy and procedures, and the flow down of ECP requirements into the contracts for subcontractors. CH2M HILL

ECP is included in subcontractor contracting in their Onsite Work Provisions, Revision 0. CH2M HILL ECP has provided information through briefings about the program to a number of sub-contractor employees. During the review, a walkdown of three construction sites was conducted and employees were asked if they were aware of the ECP. None of the eleven individuals interviewed knew of the CH2M HILL ECP; two individuals were aware of the DOE hotline and two individuals knew that the Department of Labor had issues resolution avenues because of the poster in the construction trailer. Two of the three areas visited had not received the CH2M HILL training that includes ECP.

CH2M HILL ECP provides posters, brochures, and training to inform employees and subcontractors of the avenues to raise concerns. For the three subcontractor areas visited, no posters or brochures were available, and two of the three subcontractors visited had not received the training. Once informed of this issue, CH2M HILL took corrective actions during the review to train the subcontractors and get posters and brochures to the area.

As a result of the subcontractor interviews, twelve individuals from CH2M HILL were randomly interviewed regarding the CH2M HILL ECP. All twelve workers were familiar with the program. Although the sample size was not statistically significant, the workers were from various professional and bargaining unit disciplines. Because all individuals were aware of the program no further interviews were conducted. Walkdowns of CH2M HILL work spaces revealed that CH2M HILL ECP posters were displayed in common areas and could be readily found by employees seeking information.

Adequacy of documentation

The primary focus of this review was to ensure proper investigation and closure of issues raised by concerned individuals. A previous assessment completed by DOE RL ECP evaluated the program for compliance with DOE Acquisition Regulations (DEAR) 952.203-70 Whistleblower Protection for Contractor Employees (December 2000) and DOE CRD O 442.1A, Revision 1. The previous surveillance evaluated compliance with the program elements to baseline the program and did not complete an in-depth review of closure documentation and corrective actions to determine the effectiveness of the program.

To accomplish the objectives of the review, the adequacy of the ECP files were reviewed to ensure completeness, timeliness, and corrective action identification and closure. Twenty files were chosen from the database that included a variety of cases and investigators involving harassment, safety, transfers from DOE, and corrective actions. The overall conclusion of the review was the files were complete, conclusions of the investigation were reasonable, timelines were appropriate, and appropriate feedback was provided to the Concerned Individual. One noteworthy practice was identified related to case closure. In the most recent files, if an item is transferred to another organization, the file is closed but there is a note to document the resolution of the concern in the file.

Performance Indicators were also reviewed to ensure timeliness and closure of concerns. The average closure time was eight days which was well below the established goal of 30 days.

Feedback and Improvement

Evidence was provided that the Self-Assessment Program was in place at CH2M HILL ECP. The assessments for Fiscal Year (FY) 2003 and FY 2004 were reviewed and the assessments verified implementation of the requirements in DOE CRD O 442.1A. Self-Assessments were conducted annually in accordance with the CH2M HILL implementing procedure and appeared to adequately measure the effectiveness of the ECP. Corrective actions for the assessments were identified and tracked to closure. The CH2M HILL ECP requires follow-up to concern closure and this is being performed on an ongoing basis. An annual review looking for recurring issues and effectiveness of corrective actions could be beneficial. The self-assessment process would be a likely method to capture these items.

ORP found that the 2004 ECP Self-Assessment was not performed in accordance with the CH2M HILL Assessment Program. Future self-assessment would benefit from standardization provided in TFC-ESHQ-AP-C-07, Revision A, Specialty Assessments because appropriate assessor training would be provided; identified issues would be documented using the Problem Evaluation Request (PER) Process; and a standardized report format would be used. This would result in a self-assessment that clearly discusses issues found and would provide a link for issues found to the contractor's corrective action program. CH2M HILL also recognized the need to perform self-assessments per a standardized process and has plans to change the ECP procedure to include requirements to perform assessments in accordance with the above procedure.

Conclusion:

This assessment found that CH2M HILL ECP complied with DOE CRD O 442.1A, Revision 1. In addition, contractual requirements were in place for subcontractors, individuals from CH2M HILL were aware of the program, issues from the previous RL assessment were resolved and closed-out, files were adequate, and self-assessments performed by the CH2M HILL ECP provided an effective feedback and improvement process.

The reviewers identified the following two Observations during this assessment:

- **A-05-ESQ-TANKFARM-009-O01:** Some CH2M HILL subcontractors were not aware of the ECP; and
- **A-05-ESQ-TANKFARM-009-O02:** CH2M HILL ECP Self-Assessments would benefit from standardization with the CH2M HILL Assessment Program.

CH2M HILL ECP personnel were responsive to these Observations and corrective actions were being performed during the conduct of this assessment. PERs have been issued for the two Observations. Actions should be taken to minimize recurrence.

Assessment Results:

Observation A-05-ESQ-TANKFARM-009-O01:

Some CH2M HILL subcontractors were not aware of the ECP.

Requirement:

DEAR 952.203-70 Whistleblower Protection for Contractor Employees (December 2000)

(a) The contractor shall comply with the requirements of “DOE Contractor Employee Protection Program,” at 10 CFR part 708 for work performed on behalf of DOE directly related to activities at DOE-owned or leased sites; and

(b) The contractor shall insert or have inserted the substance of this clause, including this Paragraph (b), in subcontracts at all tiers, for subcontracts involving work performed on behalf directly related to activities at DOE-owned or –leased sites.

DOE CRD O 442.1A, Revision 1, states, that contractor and subcontractor employee’s shall be informed of the availability of the ECP, their right to raise concerns relating to environment, safety, health, or management of DOE-related activities through the Contractor ECP or Departmental ECP programs and to do so without any fear of harassment or reprisal.

Discussion:

The subcontractor terms and conditions state: “The CH2M Employee Concerns Program is available for use by all subcontractor personnel working on the site for the reporting of issues/concerns related to safety, health, environmental protection, quality, security, or illegality. Issues should be raised through CH2M project management if possible, or made directly to the Employee Concerns Office at phone numbers posted on-site. Concerns may also be submitted anonymously by calling 373-5444.” The ECP Home Page and Hot Line are available.

During the review, a walkdown of three construction sites was conducted and employees were asked if they were aware of the ECP. The construction sites were DBVS, IDF, and C-Farm construction. None of the eleven subcontractor individuals interviewed knew of the contractors ECP, two individuals were aware of the DOE hotline and two individuals knew of that the Department of Labor had issues resolution avenues because of the poster in the construction trailer. The two of the three areas visited were not part of the CH2M HILL training that includes ECP.

CH2M HILL ECP provides posters, brochures, and training to inform employees and subcontractors of the avenues to raise concerns. For the three areas visited no posters or brochures were available, and two of the three contractors visited had not received the training. As a result of this issue CH2M HILL took corrective actions during the review to train the contractors and get posters and brochures to the area.

It is recommended that CH2M HILL periodically assess the subcontractor regarding the understanding of the ECP, and verify that posters and brochures are available in the subcontractor facilities.

PER 2005-2628 documents this ORP Observation.

Observation A-05-ESQ-TANKFARM-009-O02:

CH2M HILL ECP Self-Assessments would benefit from standardization with the CH2M HILL Assessment Program.

Requirement:

DOE CRD O 442.1A, Revision 1, Section C states, that contractor shall conduct an annual self-assessment to measure the effectiveness of the ECP. Problems that hinder the ECP from achieving its objectives shall be corrected.

Discussion:

ORP found that the 2004 ECP Self-Assessment was not performed in accordance with the CH2M HILL Assessment Program. Future self-assessment would benefit from standardization provided in TFC-ESHQ-AP-C-07, Revision A, Specialty Assessments because appropriate assessor training would be provided; identified issues would be documented using the PER Process; and a standardized report format would be used. This would result in a self-assessment that clearly discusses issues found and would provide link for issues found to the contractor's corrective action program. CH2M HILL also recognized the need to perform self-assessments per a standardized process and has plans to change the ECP procedure to include requirements to perform assessments in accordance with the above procedure.

PER 2005-2629 documents this ORP Observation.

Management Debriefed: An exit briefing was held on July 7, 2005.

R. E. Boykin, CH2M HILL
G. W. Smith, CH2M HILL