



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

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

06-ESQ-102

Mr. M. S. Spears, President  
and Chief Executive Officer  
CH2M HILL Hanford Group, Inc.  
Richland, Washington 99352

Dear Mr. Spears:

CONTRACT NO. DE-AC27-99RL14047 – CLOSURE OF ISSUES FROM THE  
U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION (ORP)  
ASSESSMENT A-06-ESQ-TANKFARM-007, “CH2M HILL TRAINING AND  
QUALIFICATION ASSESSMENT”

- References:
1. ORP letter from R. J. Schepens to E. S. Aromi, CH2M HILL, “Assessment Report A-05-ESQ-TANKFARM-004 - CH2M HILL Hanford Group, Inc. (CH2M HILL) Training and Qualification (T&Q) Assessment, April 25 Through May 5, 2005,” 05-ESQ-025, dated August 12, 2005.
  2. CH2M HILL letter from E. S. Aromi to R. J. Schepens, ORP, “Assessment Report A-05-ESQ-TANKFARM-004 CH2M HILL Hanford Group, Inc. Training and Qualification Assessment, April 25 Through May 5, 2005,” CH2M-0501706 R1, dated September 16, 2005.

This letter forwards the results of an ORP assessment of completed corrective actions for the CH2M HILL Hanford Group, Inc. (CH2M HILL) Training and Qualification program. Reference 1 identified four deficiencies with the Training and Qualification program (one Finding and three assessment follow-up-items). Reference 2 forwarded CH2M HILL’s corrective actions for the identified deficiencies. The assessor concluded that all corrective actions were satisfactorily implemented. All deficiencies identified in ORP Assessment A-06-ESQ-TANKFARM-007, “CH2M HILL Training and Qualification Assessment,” are closed.

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

Sincerely,

Roy J. Schepens, Manager  
Office of River Protection

ESQ:PPC

Attachment

cc: See page 2

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

ASSESSMENT: CH2M HILL Training and Qualification Issues

REPORT: A-06-ESQ-TANKFARM-007

FACILITY: Hanford Tank Farms (CH2M HILL Hanford Group, Inc.)

LOCATION: Richland, Washington

DATES: July 21 through 24, 2006

ASSESSOR: David H. Brown, Lead Assessor

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

## **Executive Summary**

The U.S. Department of Energy, Office of River Protection (ORP) evaluated the corrective actions CH2M HILL Hanford Group, Inc. (CH2M HILL) completed that addressed the Finding and follow up items associated with ORP Assessment A-05-ESQ-TANKFARM-004, “CH2M HILL Hanford Group, Inc. Training and Qualification Program Assessment.”

The original assessment identified one Finding and three Assessment Follow-up Items (AFI). The Finding identified that a CH2M HILL manager failed to document a management assessment issue in the required Problem Evaluation Request (PER) system. One AFI identified that the approved Training Implementation Matrix (TIM) was not current. The other two AFIs identified that there were no qualification cards for some positions in the TIM. Specifically, there were no qualification cards for Industrial Hygiene Technicians (IHT) and Health Physics Technicians (HPT).

The assessor interviewed CH2M HILL managers responsible for the assessment corrective action and reviewed documentation of completed corrective action. The assessor found that CH2M HILL counseled the manager on following the procedure on initiating PERs. In accordance with its assessment response commitment, CH2M HILL also had issued the updated TIM and qualification cards for IHTs and HPTs.

The assessor concluded all corrective actions were implemented and closure was appropriate. This assessment identified no new issues.

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## **List of Acronyms**

AFI	Assessment Follow-up Item
CH2M HILL	CH2M HILL Hanford Group, Inc.
DOE	U.S. Department of Energy
HPT	Health Physics Technician
IHT	Industrial Hygiene Technician
ORP	Office of River Protection
PER	Problem Evaluation Request
TIM	Training Implementation Matrix

## **CH2M HILL Hanford Group, Inc. (CH2M HILL) Training and Qualification Issues**

### **Scope**

From July 21 through 24, the U.S. Department of Energy (DOE), Office of River Protection (ORP) evaluated CH2M HILL's completed corrective actions for the issues identified in ORP Assessment A-05-ESQ-TANKFARM-004, "CH2M HILL Hanford Group, Inc. Training and Qualification Program Assessment." That assessment identified one Finding and three Assessment Follow-up Items (AFI). This assessment was to determine if the corrective actions were properly implemented.

### **Results**

The assessor found CH2M HILL corrective actions were implemented affectively, and the assessment issues could be closed. This assessment identified no new issues.

### **Details**

The assessor evaluated the completed CH2M HILL corrective actions proposed in the CH2M HILL letter from E. S. Aromi to R. J. Schepens, ORP, "Assessment Report A-05-ESQ-TANKFARM-004, 'CH2M Hill Hanford Group, Inc. Training and Qualification Program Assessment, April 25 through May 5, 2005,'" CH2M-0501706 R1, dated September 16, 2005. ORP evaluated the proposed corrective actions and accepted them.

The assessor reviewed the following documents: The assessment Finding and AFIs, the contractor's response, an e-mail from the lead assessor accepting the contractor's response, the Problem Evaluation Request (PER) documenting the Finding and corrective action, the revised Training Implementation Matrix (TIM), and new qualification cards for Health Physics Technicians (HPT) and Industrial Hygiene Technicians (IHT). The assessor also interviewed the CH2M HILL Director, Training and Procedures, and the CH2M HILL Manager, Procedures, and one member of the ORP assessment team for Assessment A-05-TANKFARM-004. The results for each deficiency are discussed below.

**A-05-ESQ-TANKFARM-004-F01:** "The failure to use the Corrective Action Management system: The failure to use the Corrective Action Management system to document a significant Observation reported in MA Report TFC-M-0172, is contrary to 10 CFR 830.122 'Nuclear Safety Management' Subpart A 'Quality Assurance Requirements,' Criterion 3, Management/Quality Improvements, based on CH2M HILL QAPD Section 2.2.3."

The assessment team found that CH2M HILL failed to initiate the required PER in response to a management assessment issue. The ORP assessors found only one example of this problem. In response, CH2M HILL reported they took action with the responsible individual and verified there were no other examples of this problem.

The assessor reviewed the response to A-05-ESQ-TANKFARM-004 and found it acceptable. In the response, CH2M HILL provided information to demonstrate the problem was caused by a single error, by a single individual.

The assessor interviewed the Director, Training and Procedures, determining CH2M HILL had appropriately counseled him and he clearly understood the requirement.

**A-05-ESQ-TANKFARM-004-A01:** “The CH2M HILL did not have an approved TIM reflecting the approved Training Plan as the implementing document for compliance to DOE Order 5480.20A.”

The assessor reviewed a copy of the currently approved TIM. The TIM was submitted to ORP for approval in accordance with DOE Order 5480.20A on August 8, 2005, and was approved by ORP on August 23, 2005. This was consistent with the corrective action CH2M HILL proposed and ORP accepted. The assessor reviewed the approved TIM and identified no issues.

**A-05-ESQ-TANKFARM-004-A02:** “The failure to flow down the Training Plan requirement for a qualification process documented in a qualification card, for those required positions in the TIM, to the implementing procedure TFC-BSM-TQ-IMP-C-02, ‘Conduct of Qualification Cards.’”

In the response to this AFI CH2M HILL explained why qualification cards were not necessarily required for every position on the TIM. ORP accepted this response. However, the response noted that it was still appropriate to create qualification cards for IHTs and HPTs, as discussed in AFI A-05-ESQ-TANKFARM-004-A03. The assessor verified the corrective action was implemented.

**A-05-ESQ-TANKFARM-004-A03:** “The failure to provide a qualification card for the IHTs and HPTs in accordance with the Contractor procedure TFC-BSM-TQ-IMP-C-02, ‘Conduct of Qualification Cards and Guides’ is contrary to the Training Plan commitment to provide qualification of required positions identified in the approved TIM.”

The CH2M HILL response to this AFI stated that, while there was no requirement to specify qualification cards for IHTs or HPTs, CH2M HILL found there would be value in instituting them. The assessor reviewed the new qualification cards for IHTs and HPTs and found they were properly approved and issued.

**Conclusion:**

The Finding and three AFIs are closed based on effective implementation of corrective actions.

## Items Opened, Closed, and Discussed

### Opened

None

### Closed

**Assessment Finding A-05-ESQ-TANKFARM-004-F01:** The failure to use the Corrective Action Management system: The failure to use the Corrective Action Management system to document a significant Observation reported in MA Report TFC-M-0172, is contrary to 10 CFR 830.122 “Nuclear Safety Management” Subpart A “Quality Assurance Requirements,” Criterion 3, Management/Quality Improvements, based on CH2M HILL QAPD Section 2.2.3.”

**Assessment Follow-up Item A-05-ESQ-TANKFARM-004-A01:** The CH2M HILL did not have an approved TIM reflecting the approved Training Plan as the implementing document for compliance to DOE Order 5480.20A.

**Assessment Follow-up Item A-05-ESQ-TANKFARM-004-A02:** The failure to flow down the Training Plan requirement for a qualification process documented in a qualification card, for those required positions in the TIM, to the implementing procedure TFC-BSM-TQ-IMP-C-02, “Conduct of Qualification Cards.”

**Assessment Follow-up Item A-05-ESQ-TANKFARM-004-A03:** The failure to provide a qualification card for the IHTs and HPTs in accordance with the Contractor procedure TFC-BSM-TQ-IMP-C-02, “Conduct of Qualification Cards and Guides” is contrary to the Training Plan commitment to provide qualification of required positions identified in the approved TIM.

### Discussed

None.

## Signatures

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David H. Brown,  
Lead Assessor