

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

MAR 2 6 2007

07-ESQ-041

Mr. C. M. Albert, Project Manager Bechtel National, Inc. 2435 Stevens Center Place Richland, Washington 99354

Dear Mr. Albert:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-07-ESQ-RPPWTP-003 – OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT (OCRWM or RW) QUALITY ASSURANCE (QA) PROGRAM JANUARY 16 THROUGH FEBRUARY 5, 2007

This letter forwards the results of the U.S. Department of Energy (DOE), Office of River Protection (ORP) assessment of the Bechtel National, Inc. (BNI) OCRWM QA program conducted from January 16 through February 5, 2007 (attached). The purpose of the assessment was to evaluate the process for determination of DOE/RW-0333P, "Quality Assurance Requirements Document (QARD)," applicability and to evaluate selected elements of the QARD program for proper implementation.

The Team concluded that the requirements of the QARD were incorporated within the BNI QA Manual and these requirements were properly flowed down into BNI implementing procedures. The Team found minor program implementation issues in those areas where BNI had determined that the QARD applied. These implementation issues resulted in four Findings and three Observations.

The Team also concluded that the overall activity that forms the basis for determining Waste Affecting Items such that the OCRWM Waste Acceptance Systems Requirements Document (WASRD) will be met with a QARD qualified program is not well supported by BNI's documented analysis. This issue was documented as an Observation (A-07-ESQ-RPPWTP-003-001). The Team is concerned that some activities including Immobilized High-Level Waste (IHLW) test canister design, procurement, fabrication; IHLW production canister design and fabrication; and Molten Feed Preparation Vessel analytical equipment design, procurement, and testing have been performed or are planned to be performed outside of the QARD (A-07-ESQ-RPPWTP-003-F01). If the peer review activity discussed below determines that the current scope of application is too narrow, then additional work and data qualification may be necessary to establish the required QARD pedigree.

As a result of the Team's Findings, ORP will coordinate a review of BNI's technical plan for meeting the WASRD to include technical and QA personnel from DOE Environmental Management (EM), RW, and ORP to ensure that the current BNI approach is consistent with DOE expectations for meeting WASRD requirements for ultimate disposal in a Federal repository. This assessment will be announced by separate correspondence.

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Mr. C. M. Albert 07-ESQ-041

Within 30 days of receipt of this letter BNI should respond to the assessment Findings and Observation A-07-ESQ-RPPWTP-003-O01. For the Findings, the response should include:

- The causes of the Findings;
- The corrective steps that have been taken to control or remove any adverse impact to identified noncompliance situations (remedial actions) and the results achieved;
- The corrective steps that will be taken to prevent further Findings; and
- The date when all corrective actions are completed, verified, and compliance to applicable requirements is achieved.

The assessment Observations do not identify deficiencies, but represent experience-based Observations of the Team that BNI should consider as a source of information in improving its program. BNI is required to respond only to Observation A-07-ESQ-RPPWTP-003-O01.

If you have any questions, please contact me, or your staff may call William J. Taylor, Assistant Manager, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

John R. Eschenberg, Project Manager Waste Treatment and Immobilization Plant

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**ESQ:SAV** 

Attachment

cc w/attach:

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D. J. Jantosik, BNI

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L. T. Lamm, BNI

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G. H. Clare, WGI

BNI Correspondence

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

ASSESSMENT:

Bechtel National, Inc. Office of Civilian Radioactive Waste

Management (OCRWM) Quality Assurance Program

REPORT:

A-07-ESQ-RPPWTP-003

FACILITY:

Waste Treatment and Immobilization Plant Construction

LOCATION:

Richland, Washington

DATES:

January 16 through February 5, 2007

ASSESSORS:

P. P. Carier, Lead Assessor

W. L. Smoot, Assessor R. Toro, Assessor – RW E. Robbins, Assessor - RW

APPROVED BY:

P. P. Carier, Team Lead

Verification and Confirmation Official

#### **Executive Summary**

During the period January 16 through February 5, 2007, the U.S. Department of Energy (DOE), Office of River Protection, with support of DOE Environmental Management and DOE Office of Civilian Radioactive Waste Management (RW) evaluated the Bechtel National, Inc. (BNI) Office of Civilian Radioactive Waste Management (OCRWM) Quality Assurance (QA) program implementation. This performance-based assessment focused on reviewing documents and procedures used by BNI to delineate scopes of work that the OCRWM QA program was to be applied to, and then evaluated program implementation in selected program elements. The Team reviewed the Immobilized High-Level Waste (IHLW) Product Compliance Plan, the Waste Form Qualification Report (WQR), 12 screening forms used to determine applicability of the DOE/RW 0333P, "Quality Assurance Requirements Document (QARD)" to various activities and items, and the BNI Waste Acceptance Impacting Items and Activities (WAIIA) report. Evaluation of these documents and other selected supporting documents establish the frame work in which the QARD is to be applied by BNI. In addition, the Team reviewed selected design records, drawings, procurement activities, and assessment activities to measure the degree and effectiveness of program implementation. Areas reviewed included:

- Organization and Quality Assurance Program
- Design Control
- Procurement Document Control
- Control of Purchased Items and Services
- Identification and Control of Items
- Control of Special Processes
- Audits

The Team concluded that the requirements of the QARD were incorporated within the BNI QA Manual and these requirements were properly flowed down into BNI implementing procedures. The Team found minor program implementation issues in those areas where BNI had determined that the QARD applied. However, the Team concluded that the overall activity that forms the basis for determining Waste Affecting Items such that the OCRWM Waste Acceptance Systems Requirements Document (WASRD) will be met with a QARD qualified program is not well supported by BNI's documented analysis. The Team is concerned that some activities including IHLW test canister design, procurement, fabrication; IHLW production canister design and

fabrication; and Molten Feed Preparation Vessel analytical equipment design, procurement, and testing have been performed or are planned to be performed outside of the QARD. If the upcoming DOE technical review activity determines that the current scope of application is too narrow, then additional work and data qualification may be necessary to establish the required QARD pedigree.

The Team identified four Findings and three Observations. The Team concluded that BNI was managing and implementing most aspects of the QARD in accordance with the expectations in the DOE/RW 0333P. The most significant issues identified during the assessment deal with the process and records for proper identification of the scope of WAIIA.

- The overall activity that forms the bases for determining WAIIA such that the WASRD requirements will be met using a QARD qualified program requires revision. The logic for several determinations of non-waste affecting for items or activities are questionable and require a more detailed technical review. Additionally, the WQR, a support document for the evaluations, contains elements that are incomplete or not consistent with current thinking. (Observation)
- Design work covered by the QARD was accomplished on several items and activities
  without the QARD being applied to the activity. Design activities included test
  canister, production canister, and analytical equipment. The concept of performing a
  design review to accept design work that was performed without application of the
  QARD is not in accordance with the QARD. (Finding)
- BNI has not performed a Management Assessment of QARD program implementation as required by 10 CFR 830, Sub-part A, to ensure that the decisions by affected organizations properly reflect program requirements. (Finding)

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# Acronyms

BNI	Bechtel National, Inc.
DOE	U.S. Department of Energy
EM	Environmental Management
IHLW	Immobilized High-Level Waste
MFPV	Melter Feed Pretreatment Vessel
OCRWM	Office of Civilian Radioactive Waste Management
ORP	Office of River Protection
PCP	Product Compliance Plan
QA	Quality Assurance
QAM	Quality Assurance Manual
QARD	Quality Assurance Requirements Document
RW	Office of Civilian Radioactive Waste Management
SCAR	Supplier Corrective Action Reports
WAI	Waste Affecting Items
WAIIA	Waste Acceptance Impacting Items and Activities
WASRD	Waste Acceptance Systems Requirements Document
WQR	Waste Form Qualification Report
WSRC	Westinghouse Savannah River Company
WTP	Waste Treatment and Immobilization Plant

Assessment of the Bechtel National, Inc. (BNI)
Implementation of the Office of Civilian Radioactive Waste Management
(OCRWM) Quality Assurance Program

#### **Purpose and Scope**

During the period January 16 through February 5, 2007, the U. S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of the BNI implementation of the OCRWM Quality Assurance (QA) program. This performance-based assessment focused on reviewing documents and procedures used by BNI to delineate scopes of work covered by the OCRWM QA program. The assessment also evaluated program implementation in selected program elements. The Team reviewed the Immobilized High-Level Waste (IHLW) Product Compliance Plan (PCP), Waste Form Qualification Report (WQR), twelve screening forms used to determine applicability of the DOE/RW 0333P, "Quality Assurance Requirements Document (QARD)" to various activities and items, and the BNI Waste Acceptance Impacting Items and Activities (WAIIA) report. Evaluation of these documents and other selected supporting documents by the BNI reviewers establish the frame work in which the QARD is to be applied as documented in the WAIIA. In addition, the Team reviewed selected design records, drawings, procurement activities, and assessment activities to measure the degree and effectiveness of program implementation.

#### **Background**

The Waste Treatment and Immobilization Plant (WTP) Project Execution Plan describes that design is more than 69% complete, construction is 27% complete, and Critical Decision-3c, Full Construction, was approved on April 21, 2003. Currently, BNI, by ORP direction, has implemented Revision 13 of the QARD. Recent direction from ORP was for BNI to provide an analysis and cost estimate for implementation of Revision 18 of the QARD.

BNI has prepared and submitted to ORP their Quality Assurance Manual (QAM) which includes as a consensus standard, NQA-1 and the QARD. Revision 7 of the QAM was issued on October 31, 2006, and describes the internal and external organizational interfaces, organizational structures, quality requirements, and responsibilities for WTP design/construction.

ORP has provided the BNI QAM to Environmental Management (EM)/Office of Civilian Radioactive Waste Management (RW) for review and comment. Two sets of comments have been provided by RW, however the process has been ongoing since 2005 with the first set of comments provided by RW on October 16, 2005. The initial BNI re-submittal was provided on November 15, 2005, and sent again to RW by ORP on February 24, 2006. A breakdown in the communication process between RW and EM/ORP resulted in a second set of comments not being passed on to BNI. The second set of comments was

provided by RW during the assessment on January 18, 2007. Recognizing that there are outstanding questions from RW regarding the flow down of QARD requirements, the Team concluded that the QARD was embedded within the BNI QAM and properly flowed down into implementing procedures. Three areas of needed improvement are noted below. Only minor issues were noted in the program implementation when BNI had determined that the QARD applied.

#### Results

#### Determination of QARD Applicability

QARD, Section 2.2.3.D, states, "The QA program shall apply to activities related to the high-level waste form from development through qualification, production, and acceptance." In evaluating the above requirement, the Team concluded that the overall activity that forms the basis for determining WAIIA such that the Waste Acceptance Systems Requirements Document (WASRD) requirements will be met with a QARD qualified program is not supported by BNI's documented analysis. The effectiveness of this activity can have far reaching impact on overall project cost, schedule, and ultimate acceptance of IHLW in a Federal repository. Examples of areas of needed improvement include:

- There is a lack of clear connection between the WQR, stand alone submittals for updating the WQR and the Engineering Design Guide for determining WAIIA. As such, the WQR is not a reliable document to use as part of the determination process as expected by BNI procedures.
  - BNI Procedure, 24590-WTP-GPG-ENG-063, Revision 4, "Determination of IHLW Product Quality-Affecting Items and Activities," Appendix C, 2.1 states that all of the activities that are described in the PCP and WQR as forming the bases for compliance with the specifications in the WASRD are to be designated Waste Affecting Items (WAI). Currently the WQR is not aligned with the PCP in establishing criteria to meet the WASRD requirements and is being revised in accordance with 24590-WTP-PL-RT-04-0003, Revision 0, "IHLW Product Qualification Report Plan." The plan lists fourteen deliverables that should have been issued in 2004, 2005, and 2006, to assist in making the WAIIA determination or to update decisions that had already been made. However, based on review of the plan and discussions with BNI, the stand alone documents have not been issued.
- The logic provided in the screening forms for determination of WAI for IHLW Canister and Melter Feed Pretreatment Vessel (MFPV) sampling and analysis activities raises questions with the process used by BNI to determine the list of items and activities that were non-WAI.

Two sets of screening forms were reviewed that were prepared to determine WAI applicability for Test and Production Canisters and for MFPV Sampling activities. The logic provided in the screening forms for determination of WAI is questionable in drawing the conclusion of non-WAI. Examples of acceptance logic that BNI intends to use includes design reviews, testing, and an algorithm to determine the adequacy of activities that have led up to that point of operation instead of applying QARD quality to design work, procurement activities, inspection, acceptance, and operations to establish the QARD pedigree.

DOE/RW 0333P, "Quality Assurance Requirements Document," Chapter 2, Section 2.2.1.B. specifies in part that each affected organization shall establish implementing documents applicable to their scope of work that translate QARD requirements into work processes. These requirements include such areas as design, procurement, construction, fabrication, production, inspection, testing, operation, repair, and modifications.

• Review of WSRC-IM-93-45, Revision 16, August 2004, "DWPF Waste Acceptance Reference Manual," identified a much more aggressive application of QARD to the waste identification, pretreatment, sampling, packaging, and storage than what is planned for by BNI. Since the Westinghouse Savannah River Company (WSRC) process is the most recent IHLW program evaluated and was developed in part, through a technical review group (peer review) which included EM and RW input, BNI should consider the logic developed in the WSRC document for meeting WASRD requirements.

A-07-ESQ-RPPWTP-003-O01 – The overall activity that forms the basis for determining WAHA such that the WASRD requirements will be met with a QARD qualified program requires revision.

Because of the importance of this activity to the success of the project, BNI should respond to the above Observation describing actions being taken to strengthen the evaluation process for determination of WAIIA and what impact that has, if any, on the currant WAIIA report.

#### Design Control

During the review of the WAIIA report and the screening form logic it was not the Team's intention to determine the technical adequacy of the logic documented in the PCP and screening forms for meeting WASRD requirements. However, in review of screening forms associated with IHLW test canister, production canister and MFPV sampling and analysis activities it was clear that the QARD was not applied in area of design where the Team would have expected it.

• For example, screening form – 24590-HLW-WSF-PR-04-064, "Test Canister Design and Fabrication," was screened non-WAI. The form stated that the design and fabrication of the test canisters forms part of design development and the test

canisters are being manufactured to confirm that the requirements of PCP can be met. To address the QARD requirements, the screening form further stated that a design verification process will be performed on the production canister procurement documents to confirm design adequacy prior to procuring the production canisters. This will confirm the accuracy of design information.

It should be noted that design verification is only one aspect of a robust QARD design activity and should not be used to justify not applying the full suite of quality design requirements. It is equally important to establish the pedigree of the test canister prior to testing so that the test data also has the appropriate quality pedigree. Based on QARD requirements, the Team concludes that design inputs, design process, modification to an existing QARD qualified design from a previous IHLW activity, and design analysis should have been designated WAI. Without the appropriate QARD pedigree starting with design inputs, the quality of the IHLW package is affected.

Screening Form 24590-HLW-WSF-PR-04-070 – "IHLW Production Canister," determined to be WAI, states the IHLW production canisters are part of the canistered waste form that will be shipped from WTP to the long term repository so must be considered WAI. QARD, Section 2.2.3.D, states, "The QA program shall apply to activities related to the high-level waste form from development through qualification, production, and acceptance." As such, if the canisters are WAI, then all processes starting with development are WAI.

A-07-ESQ-RPPWTP-003-F01 – Design work on test canisters, production canisters and IHLW analysis and analytical equipment has been or is planned to be performed without being determined as WAI with appropriate QARD requirements applied.

BNI should provide a response to the above Finding describing the corrective actions that will be taken to ensure that design work on WAI is performed in accordance with the OARD.

#### Document Control

During review of the WAIIA activity it was noted that a WAI screening form (Appendix A) is specified by 24590-WTP-GPG-ENG-063, Revision 4, Section 3.2 to be used in conjunction with the guidelines in Appendix C in the determination of WAI. The information developed by this activity and documented on the form is used to develop the WAIIA Report. Section 4.0 states that there are no QA records generated using this guide.

QARD, Section 6.2.1 states that any implementing documents that specify technical requirements or quality requirements shall be controlled in accordance with QARD Section 6, "Document Control."

A-07-ESQ-RPPWTP-003-F02 – BNI did not establish the IHLW screening forms for determination of WAI as a Quality Record and then establish controls for the records in accordance with the QARD.

BNI should provide a response to the above Finding describing the corrective actions to ensure that records that support the pedigree of the application of QARD to WAIIA are controlled as quality records.

#### Quality Assurance Program

Currently BNI, by ORP direction, has implemented Revision 13 of the QARD. Recent direction from ORP was for BNI to implement Revision 18 of the QARD. The current working revision in the field for most IHLW sites is Revision 17. While it is recognized that ORP did not request feed back on the impact of implementation nor provide direction for implementation of QARD revisions between 13 and 18, the QARD, Section 2.2.1.B.4 states that each Affected Organization shall review revisions to the QARD and incorporate changes into their implementing documents, as appropriate. Documentation of the analysis of Revisions 15, 16, and 17, were not able to be reproduced by BNI. As such, there is not a record of BNI meeting QARD review requirements.

A-07-ESQ-RPPWTP-003-F03 – BNI did not have objective evidence of a review of QARD Revisions 15, 16, and 17, as required by QARD.

BNI should establish corrective actions to ensure that revision review requirements are met for future revisions.

During the Team's review of the provided revision of BNI's implementation matrix and of the comments to Revision 18, three activities were identified that could help BNI during its internal review and acceptance activity that did not indicate QARD requirements had been flowed down into implementing procedures. However, when the Team reviewed the QAM, program requirements were identified that would implement the QARD. BNI should consider taking credit in their implementing matrix for programs they have in place such that when needed, peer review activities, acceptance of commercial grade items and qualification of unqualified data could be implemented without additional communications with ORP, EM, and RW. During discussions, BNI stated that as currently defined, the QARD supplement on Scientific Investigation only applied to natural phenomena. After review by the Team and discussions with RW, the Team concludes that reference to natural phenomena is only one activity where Scientific Investigation could apply and as such, Supplement III will support data qualification activities as written. It was also noted that Revision 18 provides further clarification in this area.

A-07-ESQ-RPPWTP-003-O02 – Based on review of the QARD Implementation Matrix and discussions with BNI personnel, the BNI flow down of QARD requirements into implementing procedures does not take credit for processes in the QAM that address peer review, acceptance of commercial grade items and

qualification of unqualified data. While this has not been an issue up to this point, because of other issues discussed in this report, these activities could be used to address potential deficiencies in QARD application.

BNI should consider taking actions to update the QARD Implementation Matrix to recognize BNI procedures in place that address peer review and qualification of unqualified data. This review should ensure that all QARD requirements applicable to these areas are covered in the existing procedures.

#### Audits

The QARD, Sections 18.2.1 to 18.2.3, "Scheduling Internal and External Audits," were captured in BNI's QAM (24590-WTP-QAM-QA-01-001, Revision 7, Policy Q-18.1, "Independent Assessment (Audit)." The BNI audit requirements were implemented via BNI Procedure 24590-WTP-GPP-QA-501, Revision 6. Section 3.2 of the audit procedure required the development of an annual audit schedule that was approved by the Quality Assurance Manager. The WTP QA Internal Audit Schedule (24590-WTP-SC-QA-01-002) provided the appropriate coverage, consistency and coordination with ongoing WTP work. OCRWM QARD audits were performed on an annual basis since the inception of the project. The QARD annual audit requirement was captured in Appendix 1, Additional QA Audit Requirements. The breadth and depth of the audits reviewed were adequate and identified opportunities for improvement in the audited programs.

DOE O 414.1B and 1C, "Quality Assurance," Paragraph 3.1: <u>Assessment/Criterion 9 – Management Assessment</u>. Ensure that managers assess their management processes and identify and correct problems that hinder the organization from achieving its objectives. As part of the review of assessment activity, the Team reviewed the Management Assessment process for its application to the OCRWM program as applied to IHLW activities including implementation of the QARD. While the Team noted improvement in the implementation of BNI's Management Assessment activity, BNI was not able to demonstrate that any management assessments had been performed by any organization tasked with implementing OCRWM technical and QARD requirements within the past two years.

A-07-ESQ-RPPWTP-003-F04 – A Management Assessment of WTP OCRWM technical and QARD program activities has not been performed by any of the affected organizations performing these activities for at least the past two years.

BNI should provide a response to the above Finding describing actions being take to ensure appropriate Management Assessment activities are established for OCRWM related activities in technical and QARD areas. Because of the potential cost, schedule, and Federal repository disposal issues, a robust Management and Independent assessment activity is required to identify potential issues within the project in a timely manner.

#### Control of Purchased Items and Services

During the Team's review of Control of Purchased Items and Services, evaluation was made of several Supplier evaluation reports. It was noted that the Supplier annual evaluation reports do not clearly indicate the impact of Supplier Corrective Action Reports (SCAR) identified during a survey or audit. A review of the SCAR form provides a block for a Work Restriction and Stop Shipment Restriction with a requirement to provide an explanation for imposing a restriction. However, the conclusion provided in the supplier evaluation report only provides an effectiveness statement on the QA program evaluated as required by BNI Procedure 24590-WTP-GPP-PSQ-020, Revision 1, "Supplier Qualification." The evaluation does not address a SCAR's impact, whether any restrictions should be imposed on the QA program as a result of an individual or accumulation of SCAR(s), and whether the supplier should be retained on the Approved Suppliers List.

A-07-ESQ-RPPWTP-003-O03 – BNI could improve the overall effectiveness of the annual Supplier Evaluation process and form by referencing any SCAR documented on a Vendor during the year. This could facilitate a more through review of a Vendor and actions taken in response to a SCAR or series of SCARs.

BNI should consider taking actions to improve the annual vendor evaluation process by specifically referencing any SCAR actions taken and the effectiveness of corrective actions taken.

#### **E-STARS**

# Task# ORP-ESQ-2007-0041

E-STARS<sup>TM</sup> Report Task Detail Report 03/26/2007 1116

TASK INFORMATION	N				
Task#	ORP-ESQ-2007-0041				
Subject	CONCUR:07-ESQ-041; ASSESS JANUARY 16 - FEBRUARY 5, 20		-RPPWTP-003 - OCR	WM/RW QA PF	ROGRAM
Parent Task#			Status	CLOSED	
Reference	07-ESQ-041	I	Due		
Originator	Gano, Becky		Priority	High	
Originator Phone	(509) 376-6004		Category	None	
Origination Date	03/14/2007 0853		Generic1		
Remote Task#			Generic2		
Deliverabl <b>e</b>	None		Generic3		
Class	Long Term		View Permissions	Normal	
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COLLABORATION				REC	EIVED
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### E-STARS

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Poster	Carier, Patrick P (Gano, Becky) - 03/15/2007 0303
	Concur
	Pat Carier concurred for Bill Taylor as Acting ESQ on 3/15/07.
Poster	Olinger, Shirley J (Brazil, Kelly) - 03/22/2007 1203
	Concur
	Shirley okay w/a note to add Dae Chung and Ines Triay to cc's
TASK DUE D	ATE HISTORY
No Due Date	e History
SUB TASK H	ISTORY
No Subtasks	

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#### E-STARS

# Task# ORP-ESQ-2007-0041

E-STARS<sup>TM</sup> Report Task Detail Report 03/14/2007 0857

TASK INFORMATI	ON				
Task#	ORP-ESQ-2007-0041				
Subject	CONCUR:07-ESQ-041; ASSESSMENT REPORT A-07-ESQ-RPPWTP-003 - OCRWM/RW QA PROGRAM JANUARY 16 - FEBRUARY 5, 2007				
Parent Task#		Status	Open		
Reference	07-ESQ-041	Due			
Originator	Gano, Becky	Priority	High		
Originator Phone	(509) 376-6004	Category	None		
Origination Date	03/14/2007 0853	Generic1			
Remote Task#		Generic2			
Deliverable	None	Generic3			
Class	Long Term	View Permissions	Normal		
Instructions	Correspondence is being routed for concurrence via har receive the correspondence, please approve or disappreperson on the routing/concurrence list.  BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE MGR RDG FILE P.P.CARIER, ESQ W.J.TAYLOR, ESQ S.A.VEGA, ESQ RECORD NOTE:	rd copy instead of elec ove electronically via i	ctronically. Once you E-STARS and route to next		
ROUTING LISTS			*		
1	Route List		Active		
	Vega, Samuel A - Review - Awaiting Response     Instructions:      Carier, Patrick P - Review - Awaiting Response     Instructions:	3/4/	5/07		
	• Wiegman, Stephen A - Review - Awaiting Response Instructions:	ellic for 2	7/15/07		
<b>\</b>	Olinger, Shirley 1 Review - Awaiting Response Instructions: 3/16/19 00 5/10				
ATTACHMENTS	Eschenberg, John R - Approve - Awaiting Paporse     Instructions:	3/26			
Attachments  COLLABORATION	07-ESQ-041 att Assessment Report A-07-ESQ-     07-ESQ-041 BNI LTR Assessment Report A-07- Feb 5 2007.doc	RPPWTP-003.doc ESQ-RPPWTP-003 OC	RWM QA Program Jan 16 -		
COMMENTS					