

JAN 0.4 2008

07-ESQ-201

Mr. W. S. Elkins, Project Director Bechtel National, Inc. 2435 Stevens Center Place Richland, Washington 99354

Dear Mr. Elkins:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-07-ESQ-RPPWTP-014 – ASSESSMENT OF BECHTEL NATIONAL, INC. (BNI) CONTROL OF DOCUMENTS AND RECORDS, AUGUST 13 THROUGH 23, 2007

This letter forwards the results of the U.S. Department of Energy, Office of River Protection (ORP) assessment of the BNI Document Control and Records Management programs conducted from August 13 through 23, 2007. The Team had no findings.

The Quality Assurance Manual (QAM), Policy Q-06.1, "Document Control," states in Section 1, "Purpose and Applicability," that the policy identifies requirements and responsibilities to ensure that specified documents, either in hard copy or electronic media, including latest changes thereto, are controlled, reviewed for adequacy, approved for release, and distributed to and used at the location where the work is being performed. In Section 2, "Implementation Strategy," documents are to be prepared, reviewed, approved, issued, used, and revised and maintained to prescribe processes, specify requirements, or establish design. The QAM requires documents to be controlled, maintained, stored, protected, and capable of being retrieved in a timely manner. Record copies of documents are to be retained for their specified retention period. The QAM Policy 17.1, "Quality Assurance Records," identifies requirements and responsibilities for identifying, administrating, and temporarily storing documents and construction records.

The Assessment Team determined that BNI's implementation of BNI's Documents and Records Programs and Procedures met 10 Code of Federal Regulations 830, Subpart A, "Quality Assurance," DOE O 414.1 "Quality Assurance," and BNI's QAM requirements. The Team determined that BNI's Project Administrative Services performed Document Control and Records Management functions and responsibilities and implemented processes in accordance with the stated requirements. ORP concluded BNI performance was effective in this area, resulting in no findings or observations.

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

Sincerely,

Shirley J/Olinger, Manager Office of River Protection

**ESQ:PRH** 

Attachment

cc w/attach:

D. J. Jantosik, BNI

D. E. Kammenzind, BNI

S. W. Sanders, PAC

C. R. Ungerecht, PAC

Administrative Record

BNI Correspondence

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

ASSESSMENT:

Bechtel National, Inc. Waste Treatment and Immobilization Plant

Control of Documents and Records

REPORT:

A-07-ESQ-RPPWTP-014

FACILITY:

Waste Treatment and Immobilization Plant Construction

LOCATION:

Richland, Washington

DATES:

August 13 through 23, 2007

**ASSESSORS** 

Paul R. Hernandez, Assessment Team Leader

Mary A. Ryan, Assessor

APPROVED BY:

Patrick P. Carier

Verification and Confirmation Official

## **Executive Summary**

The U.S. Department of Energy (DOE), Office of River Protection, conducted an assessment of the Bechtel National, Inc. (BNI) Control of Documents and Records Management Program from August 13 through 23, 2007. The purpose of the assessment was to determine effective flow down and implementation of the:

- 1. Waste Treatment and Immobilization Plant (WTP) Contract related to Quality Assurance (QA) Requirements.
  - Local and State Requirements
  - 10 Code of Federal Regulations 830, Subpart A, "Quality Assurance"
  - DOE O 414.1, "Quality Assurance"
  - American Society of Mechanical Engineers Nuclear Quality Assurance, 1998
     QA requirements
- 2. 24590-WTP-QAM-QA-01-001, "Bechtel National, Inc. Quality Assurance Manual."
- 3. A Sampling of BNI's lower tiered documents (listed in Section 4.0 of this report).

The scope of the assessment was to ensure that the BNI's QA program elements and implementing procedures adequately address the DOE QA program requirements in the areas of controlling documents and managing records. The Team assessed whether BNI was adequately implementing the QA requirement in both the project offices and at the WTP site.

After a thorough review of the WTP Contract, BNI's processes, BNI's higher and lower tiered documents the Assessment Team determined that BNI has developed and is implementing a document control and records management system that meets the requirements listed above. No findings and observations resulted from this assessment.

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# List of Acronyms

AI Acceptance Inspector

ASME American Society of Mechanical Engineers

BNI Bechtel National, Inc.

CFR Code of Federal Regulations
DOE U.S. Department of Energy
FPDC Field Project Document Control

ITS Important-to-Safety LAW Low-Activity Waste

NQA-1 Nuclear Quality Assurance ORP Office of River Protection

PADC Project Archives and Document Control

QA Quality Assurance

QAM Quality Assurance Manual

WTP Waste Treatment and Immobilization Plant

# Bechtel National, Inc. (BNI) Control of Documents and Records Program

#### 1.0 Details

The U.S. Department of Energy (DOE), Office of River Protection (ORP), conducted an assessment of the BNI Control of Documents and Records Program from August 13 through August 23, 2007. The purpose and scope of the assessment was to ensure that the BNI Quality Assurance (QA) program elements and implementing procedures adequately address the DOE QA program requirements in the areas of preparing, reviewing, approving, revising, and controlling documents that specify or prescribe quality affecting activities. The DOE QA program requirements utilized to evaluate these areas were the 10 Code of Federal Regulations (CFR) 830, Subpart A, "Quality Assurance," DOE O 414.1, "Quality Assurance." The Assessment Team also evaluated BNI's implementation and performance in accordance with BNI document 24590-WTP-QAM-QA-01-001, "Bechtel National, Inc. Quality Assurance Manual (QAM)." In addition, the Team assessed the Contractor's records management process. Specifically, how this process establishes requirements for collecting, storing, maintaining, and dispositioning of documents, including providing sufficient evidence regarding quality of activities performed.

## 1. Program Overview and Flow Down of Requirements

The requirement for BNI to develop and implement a Quality Assurance Program is within the Waste Treatment and Immobilization Plant (WTP) Contract, number DE-AC27-01RV14136; this includes QA requirements such as 10 CFR 830, American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA-1) and DOE O 414.1. BNI transferred these requirements to BNI's QA Manual (QAM). During this assessment the Assessment Team evaluated BNI's implementation the following QAM policies:

- The QAM, Policy Q-06.1 "Document Control," "identifies requirements and
  responsibilities to ensure that specified documents, either in hard copy or electronic
  media, including latest changes thereto, are controlled, reviewed for adequacy,
  approved for release, and distributed to and used at the location where the work is
  being performed."
- QAM Policy Q-17.1, "Quality Assurance Records" "identifies further requirements
  and responsibilities for identifying, administrating, and temporarily storing
  documents and construction records designated as QA records. A document becomes
  a record when it is completed and validated."

In Addition, the QAM requirements are transferred to BNI's overarching documents such as 24590-WTP-GPP-PADC-002 "Project Document Control," and 24590-WTP-GPP-PADC-002 "Project Records Management." The Team also evaluated BNI's lower tiered documents (evaluation results are documented through this report).

Records are identified and used for activities affecting completed work. Record maintenance includes provisions for record retention, protection, personnel access control, preservation, traceability, accountability, and retrievability. Obtaining a "Quality" product applies to all structures, systems and components. Quality-affecting implementing procedures identified which records must be maintained and controlled as a record. Records are stored as hard copy, microfilm, magnetic media, or on optical disks. Records specified in documents that affected quality, were prepared, reviewed, approved, and maintained using a graded approach. This graded approach for completing records and controlling documents incorporates accepted industry practices for commercial grade items. A more rigorous document control and record maintenance system is applied for Important-to-Safety (ITS) items because these items could compromise safety of the public, employees, facility, or the environment. BNI's document control and record retention requirements associated with ITS items are described in BNI's QAM.

The Assessment Team verified that BNI's QA program elements were compliant with requirements that address areas of controlling documents and managing records. BNI's QAM, 24590-WTP-QAM-01-001, describes BNI's QA policies with respect to:

- 1. 10 CFR 830, Subpart A "Quality Assurance Requirements," Criteria, Criterion 4, titled Documents and Records
- 2. DOE O 414.1 "Quality Assurance"
- 3. NQA-1-1989 "Quality Assurance Requirements," Requirement 17 titled Quality Assurance Records and Requirement 6 titled Document Control, as well as other contract requirements.

The Assessment Team evaluated BNI's QAM Policies Q-17, "Quality Assurance Records," and Q-06, "Document Control." These BNI policies adequately identified QA requirements and responsibilities related to QA records and documentation control. Although the Assessment Team evaluated a number of BNI, subcontractor and miscellaneous QA contract documents, listed in Section 4.0 of this report, a few examples verifying BNI's compliance with the WTP Contract, BNI QAM, 10 CFR 830, DOE O 414.1 and NQA-1-1989 are shown below:

- NQA.1 Requirement 17, DOE O 414.1 and 10 CFR 830.122 Criterion 4 and 5: BNI's document 24590-WTP-GPP-PADC-002, "Projects Records Management,"
   Paragraph 3.13 states that "records shall be stored ......and maintained in a manner that minimizes the risk of damage or destruction..."
- DOE O 414.1 and 10 CFR 830.122 Criterion 4: BNI's document 24590-WTP-GPP-PADC-012 establish a procedure to administratively process, control changes, distribute, maintain, and retain design change control documents prepared by Engineering, Construction, and others at the Hanford Tank WTP project.
- DOE O 414.1 and 10 CFR 830.122 Criterion 4 & 5: BNI's Project Archives and Document Control (PADC) have the primary role of processing, distributing and

maintaining project documents. The project Document Control Procedure is 24590-WTP-GPP-PADC-009. This document identifies PADC and the BNI project personnel responsibilities.

- DOE O 414.1 and 10 CFR 810.122: BNI document 24590-WTP-GPP-PADC-011
  Paragraph 4.0 "Records Documentation" generated by this procedure shall be
  submitted to PADC for logging, issuance, distribution, and records retention to meet
  project records management requirements. This is also in QAM Policy 4-17.1,
  Section 3.2.41.
- NQA-1-1989 Requirement 4: BNI's document 24590-WTP-GPP-CON-7105 states that BNI's quality requirements are also specified within subcontractor's procurement documents and sub-tier procurement documents.
- NQA-1 Requirements 4 and 17: BNI subcontractor document 24590-QL-BOD-SS00-00003-02-00008 titled Subcontractor American Fabricator Inc. "QA Record" was assessed to evaluate NQA-1 compliance by assuring that BNI QA requirements are being transferred to procurement documents and subcontractors. Paragraph 3.0 and 4.0 of this document, recorded that "all QA records shall be retained in accordance with Nonpermanent records and Life Time records per NQA-1 Requirement 17. Life time records will be stored properly and turned over to Prime Contractor for Life time storage." These paragraphs are compliant with NQA-1 Requirement 17, Paragraphs 400 through 500.

Section 8 titled Quality Assurance of the Glass Former Storage Facility Specification, 24590-CM-POA-MH00-00001-12-00002, identified the QA program requirements and requires the supplies to incorporate appropriate QA requirements in sub-tier procurement documents in accordance with QA requirements. This section identified that BNI is flowing requirements to BNI's subcontractor and sub-tier contractors.

The ORP Assessment Team evaluated the document listed in Paragraph 4.0 below to ensure adequate flow down of BNI's QAM requirements. The project document control procedure 24590-WTP-GPP-PADC-009, clearly identified BNI's PADC and the BNI project personnel responsibilities. Below is the Teams assessment of BNI's Document Control Procedure, PADC, and BNI's management responsibilities which have the primary role of processing, distributing, and maintaining project documents.

- 1. BNI Managers and their designees are responsible for: a) distribution requirements; and b) ensuring that documents are submitted to PADC for processing, distribution, and maintenance.
- 2. BNI Personnel within project archives and document control areas are responsible for: a) establishing and maintaining document; b) managing documents in accordance with requirements; c) capture electronic relationships to documents as defined by document type or procedure requirements.

3. BNI Project personnel are responsible for complying with the procedures/documents. Requirements specify using the last revision and maintaining controlled copies until receipt of the next revision.

#### 1.2 Document Control

The assessors evaluated BNI's processes for the preparation, issue, and change of documents that specify technical requirements, quality requirements, or prescribe activities affecting quality. ORP reviewed instructions, procedures, and drawings to determine if they were effectively controlled to ensure that correct documents were being employed.

The procedure WTP-GPP-CON-7107, "Field Project Document Control," defines the process to ensure the current issued revisions of documents are available for use at the WTP construction site. To assess compliance to requirements ORP was assisted by a welding expert employed as an Acceptance Inspector (AI) at the WTP construction site who knew where work was being performed that day. The AI introduced the Assessment Team to a welding foreman responsible for directing craft welders installing pipe supports in the Low-Activity Waste (LAW) building. The welding crew was using drawings issued that morning from a printout generated by WTP Construction Viewer. The work package was issued by Field Project Document Control (FPDC) station and signed out by the foreman. ORP reviewed work package No. LP 1000056. The work package contained many drawings; ORP randomly selected two:

- 24590-LAW-P3-BSA-GB01874003, Revision 0, BSA-GB-01874-S10A-3 LAW Vitrification Building Isometric; and
- 24590-WTP-PH-50-00001001, Revision 1, Standard Pipe Support Details Axial Stop-Welded AW.

During field interviews ORP was informed that both the foremen and the craft personnel check and verify whether they are using the latest version of documents, as required. ORP requested a comparison of the drawings used in the field with the latest current document list.

The Assessment Team was directed to the LAW FPDC Area Specialist, who issued the above-mentioned work package and associated drawings. The Area Specialist demonstrated how, the Area Specialists utilize a computer program, called Construction Viewer, each morning before the craft arrive at the WTP construction site. Construction Viewer is used to view drawings and reports that pertain to a particular Construction Work Package. The documents in Construction Viewer are related to a computer program called Infoworks which provides a quick and convenient way to view the most current issued revisions. Area Specialists check the previous day's document and drawing revisions that have impacted work packages they are responsible for. Any changes in the last day are printed out and inserted in the work package binders to replace outdated documents and drawings. The revisions are recorded within the Area Specialist Log to show the latest updates. If there were no changes to a particular work package the document list page is printed each day, changes or no changes.

ORP verified that the LAW work package No. LP 1000056 was the current, updated version and the drawings within this work package were current. The Assessment Team discovered that document WTP-GPP-CON-7107 "Field Project Document Control," Work Package LP 1000056 along with Construction Viewer were satisfactorily utilized and implementation in accordance with QA requirements. The Team evaluated BNI's implementation of procedures/programs to ensure WTP personnel were using the current controlled documents or controlled revised documents to perform work (e.g., design, procurement or construction procedures/documents). The Team discovered that BNI was satisfactorily implementing QA requirements and did not discover any issues.

### 1.3 Records Management

QAM Policy 17.1, "Quality Assurance Records," identifies requirements and responsibilities for identifying, administrating, and temporarily storing documents and construction records. A document becomes a record when it is completed and validated. Records, sufficient to provide objective evidence of the quality of an item or activity, and if necessary, to support technical and regulatory decisions, will be identified and used for activities affecting completed work. Records are specified in documents affecting quality, and prepared, reviewed, approved, and maintained using a graded approach. Record maintenance includes provisions for record retention, protection, personnel access control, preservation, traceability, accountability, and retrievability. Quality-affecting implementing procedures identify which records must be maintained and controlled as a record. Records are stored as hard copy, microfilm, magnetic media, or on optical disks. Records requiring special processing and control, such as computer codes or information on high-density media or optical disks are controlled to ensure their validity and usability.

ORP verified that records were identified, generated, authenticated, and maintained. Requirements and responsibilities regarding records were documented in BNI's Project Record Management procedure. Since the last ORP assessment of Document Control and Records Management Programs, BNI consolidated the Project Administrative Services department at the Atrium Building in downtown Richland, Washington. ORP toured the Atrium facility, observed staff performing records management functions, and interviewed several employees. The Assessment Team was briefed on INFOWORKS. This is an electronic document management system used to process and store purchase orders, vendor submittals, drawings, and supporting documentation. INFOWORKS data populates external document searches and internal BNI document search.

The Assessment Team verified that requirements and responsibilities for record transmittal, distribution, and retention were established, documented, and records were distributed, handled, and controlled in accordance with BNI's Project Records Management procedure 24590-WTP-GPP-PADC-002. The Assessment Team observed PADC staff performing the data entry of a typical vendor submittal into INFOWORKS. The data entry clerk showed the ORP Team BNI's desk instructions which provided a step-by-step direction derived from BNI's approved Project Records Management procedure. The Team watched BNI's data entry clerk input submittal 24590-CM-POA-JL10-00001-10-0001, titled "Spare Parts List," for processing. The input process included prechecks of the hardcopy submittal before the submittal was electronically

scanned. Each document and its associated electronic file were assigned the same bar code to interconnect the related documents. In addition, BNI performes a 100 percent accuracy check on changed documents. Upon final QA inspection the submittal information was transferred to the INFOWORKS database. The Assessment Team discovered that this records management process was satisfactory and no issues were noted.

ORP verified the BNI QA records were stored in accordance with NQA-1 requirements, which states "Records shall be stored in facilities, containers, or a combination thereof, constructed and maintained in a manner which minimizes the risk of damage or destruction from the following:

- Natural disasters such as winds, floods, or fires;
- Environmental conditions such as high and low temperatures and humidity; and
- Infestations of insects, mold, or rodents."

The ORP Assessment Team inspected the Atrium Building Richland, Washington, used exclusively by the BNI Project Administrative Services department. The building was secured for limited access requiring the use of a BNI proxy card by authorized personnel. The building was well-maintained and configured into office cubicles, walled offices, and file retention areas. The file areas were subdivided into fire resistant file cabinets and fire resistant data storage cabinets. The file cabinets were organized in orderly rows with indexes to the contents clearly displayed. The Team verified that there were no issues in the area of identifying, administrating, and storing documents and records.

## 2.0 Findings and Observations

There were no findings or observations resulting from this assessment.

#### 3.0 Conclusions

#### **Program Overview and Flow Down of Requirements**

The ORP Assessment Team concluded that BNI has satisfactorily flowed down and implemented QA requirements within their document control and records management processes. The Assessment Team discovered that BNI incorporated the WTP Contract, DE-AC27-01RV14136, QA requirements related to Washington State requirements and also QA requirements such as, but not limited to, 10 CFR 830, ASME NQA-1 and DOE O 414.1. BNI has transferred these requirements to their QAM. In addition, BNI has satisfactorily completed a flow down of these requirements from the QAM to the following procedures: 1) 24590-WTP-GPP-PADC-009, "Project Document Control;" and 2) 24590-WTP-GPP-PADC-002, "Project Records Management." As shown in Section 4.0 of this report the Assessment Team evaluated documents as well as process verifying the flowdown and implementation of QA requirements to lower tiered BNI documents and subcontractor documents.

Overall BNI demonstrated that Project Administrative Services performs Document Control and Records Management functions effectively. BNI efficiently implements their responsibilities and processes in accordance with the stated requirements.

No findings and observations resulted from this assessment.

#### 4.0 Referenced Documents

#### **BNI Documents**

DE-AC27-01RV14136, "Waste Treatment and Immobilization Plant (WTP)"

24590-WTP-QAM-QA-01-001, 24590-WTP-QAM-QA-01-001, Revision 7, "Quality Assurance Manual"

24590-WTP-GPP-PADC-009, Revision 3, "Project Document Control"

24590-WTP-GPP-PADC-006, Revision 6, "Correspondence Preparation and Control"

24590-WTP-GPP-PADC-002, Revision 10, "Project Records Management"

24590-WTP-GPP-CON-7107, Revision 8, "Field Project Document Control"

24590-WTP-GPP-CON-7105, Revision 3, "Subcontractor Documents/Submittals"

24590-WTP-GPP-CON-7113, Revision 2, "Construction Records Management"

24590-WTP-GPP-QA-208, Revision 2, "Management of Corrective Action"

24590-WTP-GPP-PADC-011, Revision 1, "Control of Bechtel Design, Procurement, and Miscellaneous Documents"

24590-WTP-GPP-PADC-002, Revision 10, "Project Records Management"

24590-WTP-GPP-PADC-012, Revision 1, "Design Change Control Documents"

24590-WTP-PL-MG-01-002, Revision 4, "WTP Configuration Management Plan"

24590-WTP-IAR-QA-07-0005, May 25, 2007, "BNI Assessments/Audit"

24590-CM-POA-MH00-00001-12-00002, "GFSF Specification"

## <u>DOE – ORP and Related Miscellaneous Documents</u>

D-06-Design-031, "ORP Design Assessment of BNI GFSF Design"

10 CFR 830.122, "Quality Assurance Criteria"

NQA-1 1998/2000 "Requirements 1 through 18"

DOE O 414.1C, "Quality Assurance"

DOE G 414.1-2A, "Quality Assurance Management System Guide for Use with 10 CFR 830 Subpart A, Quality Assurance Requirements"

DOE O 414.1C, "Quality Assurance"

# Task# ORP-ESQ-2007-0209

E-STARS<sup>R</sup> Report Task Detail Report 01/04/2008 1016

	ORP-ESQ-2007-0209				
Subject	CONCUR:07-ESQ-201; ASSESSMENT REPORT A-07-ESQ-RPPWTP-014 - ASSESSMENT OF BNI CONTROL OF DOCUMENTS AND RECORDS, AUGUST 13 - 23, 2007				
Parent Task#		Status	CLOSED 01/04/2008		
Reference	07-ESQ-201	Due			
Originator	Gano, Becky (Gano, Becky)	Priority	High		
Originator Phone	(509) 376-6004	Category	None		
Origination Date	10/31/2007 1422	Generic1			
Remote Task#		Generic2			
Deliverable	None	Generic3			
Class	Long Term	View Permissions	Normal		
	BCC: ESQ OFF FILE ESQ RDG FILE MGR RDG FILE T.M.WILLIAMS, AMD P.P.CARIER, ESQ P.R.HERNANDEZ, ESQ				
POLITING LISTS	W.J.TAYLOR, ESQ  RECORD NOTE:				
ROUTING LISTS	W.J.TAYLOR, ESQ		Inactive		
	W.J.TAYLOR, ESQ RECORD NOTE:	007 1046 ents - 12/31/2007 1047 2/2008 1225	Inactive		
	<ul> <li>W.J.TAYLOR, ESQ</li> <li>RECORD NOTE:</li> <li>Hernandez, Paul R - Review - Concur - 12/31, Instructions:</li> <li>Carier, Patrick P - Review - Concur - 12/31/20 Instructions:</li> <li>Taylor, William - Review - Concur with common Instructions:</li> <li>Eschenberg, John R - Review - Concur - 01/03 Instructions:</li> <li>Olinger, Shirley J - Approve - Approved - 01/03</li> </ul>	007 1046  ents - 12/31/2007 1047  2/2008 1225  04/2008 0957  -ESQ-RPPWTP-014.doc			

Task# ORP-ESQ-2007-0209  COMMENTS					
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# Task# ORP-ESQ-2007-0209

E-STARS<sup>R</sup> Report Task Detail Report 10/31/2007 0226

TASK INFORMATION	)N						
Task# ORP-ESQ-2007-0209							
Subject	CONCUR:07-ESQ-201; ASSESSMENT REPORT A-07-ESQ-RPPWTP-014 - ASSESSMENT OF BNI CONTROL OF DOCUMENTS AND RECORDS, AUGUST 13 - 23, 2007						
Parent Task#		Status	Open				
Reference	07-ESQ-201	Due					
Originator	Gano, Becky (Gano, Becky)	Priority	High				
Originator Phone	inator Phone (509) 376-6004 Category		None				
Origination Date	10/31/2007 1422	Generic1	4				
Remote Task#		Generic2					
Deliverable	None	Generic3					
Class	Long Term	View Permissions	Normal				
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 ESQ RDG FILE MGR RDG FILE MGR RDG FILE T.M.WILLIAMS, AMD P.P.CARIER, ESQ P.R.HERNANDEZ, ESQ W.J.TAYLOR, ESQ RECORD NOTE:  ROUTING LISTS							
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	<ul> <li>Hernandez, Paul R - Review - Awaiting F Instructions:</li> </ul>	Response - Due Date	PR# 12/20/07				
• Carier, Patrick P - Review - Awaiting Response - Due Date  Instructions:  19/20/07							
• Taylor, William - Review - Awaiting Response - Due Date  Instructions:							
Rein	Eschenberg, John R - Review - Awaiting  Instructions:	Response - Due Date	12,2008				
Olinger, Shirley - Approve - Awaiting Response - Due Date Instructions:							
Attachments							
COLLABORATION							