

U.S. Department of Energy

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

MAR 1 9 2007

07-ESQ-028

Mr. M. S. Spears, President and Chief Manager CH2M HILL Hanford Group, Inc. 2440 Stevens Center Place Richland, Washington 99354

Dear Mr. Spears:

CONTRACT NO. DE-AC27-99RL14047 – ASSESSMENT REPORT A-07-ESQ-TANKFARM-001, CONTAMINATION CONTROL PROGRAM, FEBRUARY 5 THROUGH 12, 2007

This letter forwards the results (attachment) of the U.S. Department of Energy, Office of River Protection assessment performed from February 5 through 12, 2007, to evaluate the CH2M HILL Hanford Group, Inc. Contamination Control Program (the Program).

The assessor determined the Program effectively controlled radioactive contamination as required by 10 CFR 835, Subpart L (Radioactive Contamination Control) and contract requirements.

The assessor identified no Findings or Good Practices, and made two Observations for Program improvement: lack of a dedicated contaminated tool program (a common nuclear industry practice) and inadequate Health Physics Technician coaching of Radiological Worker protective clothing wear during the observed T-202 filter replacement job.

No response to the Observations is required.

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

Sincerely,

Shirley J/Olinger, Acting Manager

Office of River Protection

ESQ:LRM

Attachment

cc: See page 2

Mr. M. S. Spears 07-ESQ-028

-2-

MAR 19 2007

cc w/attach:

E. J. Adams, CH2M HILL

C. K. Bean, CH2M HILL

O. D. Berglund, CH2M HILL

P. B. Brannan, CH2M HILL

T. E. Bratvold, CH2M HILL

J. D. Butler, CH2M HILL

E. Carreras, CH2M HILL

R. L. Higgins, CH2M HILL

F. M. Ito, CH2M HILL

L. M. Livesey, CH2M HILL

M. S. McGrory, CH2M HILL

K. W. McLain, CH2M HILL

C. R. Ungerecht, PAC

S. W. Sanders, PAC

Administrative Record

CH2M HILL Correspondence

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

ASSESSMENT: Contamination Control Program

REPORT: A-07-ESQ-TANKFARM-001

FACILITY: CH2M HILL Hanford Group, Inc. Tank Farms

LOCATION: Hanford Site

DATES: February 5 through 12, 2007

ASSESSOR: Larry R. McKay

APPROVED BY: Patrick P. Carier, Team Lead

Verification and Confirmation

Executive Summary

The U.S. Department of Energy, Office of River Protection (ORP) evaluated the CH2M HILL Hanford Group, Inc. (CH2M HILL) Contamination Control Program from February 5 through 12, 2007.

The assessor determined the Program effectively controlled contamination as required by 10 CFR 835, Subpart L, and contract requirements. Since the last Program assessment (March 2003), CH2M HILL made greater use of engineered controls to contain radioactive contamination. Dedicated project Radiological Control staff members effectively maintained Fixed Contamination Area records (an Observation in the March 2003 assessment). In addition, CH2M HILL renovated the 272-S Facility for camera maintenance and decontamination, an innovation completed at minimal cost.

The assessor identified no Findings or Program Strengths and made two Observations for Program improvement:

CH2M HILL Has Not Implemented a Dedicated Tool Control Program. While an occasional work crew utilized a gang box dedicated to contaminated tools, CH2M HILL has not institutionalized the hot tool crib concept. As a result, workers were not reusing previously contaminated tools to any appreciable extent, potentially incurring unnecessary costs from using new tools for each job.

The assessor recommended CH2M HILL management's evaluation of a "hot tool" program for the Tank Farms.

Health Physics Technicians (HPT) Displayed Inadequate HPT Coaching of Radiological Workers (Protective Clothing). The T-202 filter replacement job on February 6, 2007, required eight individuals to be dressed out in a "full set" of protective clothing. The assessor observed two of the eight entered the dress-out area. The workers then entered a posted Contamination Area and proceeded to work with sweatshirt hoods extending outside the coveralls. This practice could have lead to the unnecessary spread of contamination. Two HPTs inside the dress-out area did not coach the workers about this improper protective clothing wear. The assessor discussed this deficiency with the RadCon Directors and Facility Points-of-Contact during the daily assessment debriefing.

The assessor recommended the addition of a refresher module during HPT requalification cycle training to remind them that the HPT sets the standards, they must be vigilant of the workers' condition and workers must meet accepted contamination control dress requirements.

Observations are the assessor's recommendations for Program improvement; ORP requires no response to them.

Assessment details are described in this report and in Assessment Note A-07-ESQ-TANKFARM-001-01.

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List of Acronyms

ATS Analytical Technical Services CH2M HILL CH2M HILL Hanford Group, Inc. CO Closure Operations Company Technical Authority CTA DOE U.S. Department of Energy Fixed Contamination Area **FCA FPOC** Facility Point-of-Contact **HPT** Health Physics Technician ORP Office of River Protection

RadCon Radiological Control WFO Waste Feed Operations

Radiological Control (RadCon) Assessment Contamination Control Program

Scope

The U.S. Department of Energy (DOE), Office of River Protection (ORP) evaluated the CH2M HILL Hanford Group, Inc. (CH2M HILL) Contamination Control Program from February 5 through 12, 2007. The last ORP assessment of this Program was conducted in March 2003. The assessor focused on comparing the current Program condition to that determined during the 2003 evaluation, in particular engineered controls and record-keeping.

The March 2003 assessment report contained one Finding and several Observations. The Finding dealt with inadequate engineered controls for controlling loose contamination during the 244-A Lift Station work. One of the Observations addressed the lack of dedicated staff to maintain Fixed Contamination Area (FCA) records.

The requirements and guidance are contained in 10 CFR 835, the CH2M HILL Radiation Protection Program, the Tank Farm RadCon Manual, the Hanford Radiological Health & Safety Document, DOE Program Guide 441.1-9 on contamination control, and implementing procedures. The assessor used the Program Guide sections on engineered controls, record-keeping and contaminated tool program to evaluate the CH2M HILL Program.

The assessor interviewed staff members responsible for implementing the Program or knowledgeable of it; evaluated procedures against regulatory requirements and guidance; examined records; and conducted two field inspections totaling four hours to evaluate applied Program controls.

Details

The DOE specified contamination control requirements in Subpart L of 10 CFR 835, "Occupational Radiation Protection," November 28, 2006. The DOE specified guidance for contamination control in DOE G 441.1-9, "Radioactive Contamination Control Guide for Use with Title 10, Code of Federal Regulations, Part 835, Occupational Radiation Protection," June 17, 1999.

The following CH2M HILL implementing procedures governed the Program:

- TFC-ESHQ-RP-MON-C-14, "Radiologically Contaminated Area Controls," Revision D, August 18, 2006.
- TFC-ESHQ-RP-MON-C-17, "Fixed Contamination Areas," Revision A-5, April 6, 2006.

The assessor interviewed the following CH2M HILL RadCon staff members:

- Closure Operations (CO) Facility Point-of-Contact (FPOC) Contamination Control.
- Analytical Technical Services (ATS) FPOC Contamination Control.
- Waste Feed Operations FPOC Contamination Control.
- RadCon Director & *Backup Company Technical Authority (CTA) Contamination Control.
 - *The CTA Contamination Control was on leave during the assessment and unavailable for interview.

The assessor evaluated the above implementing procedures to determine effectiveness in controlling radioactive contamination in the Tank Farms.

In addition, the assessor conducted two field tours of four hours total duration to inspect and evaluate applied controls.

Assessment Note A-07-ESQ-TANKFARM-001-01 contains details of interviews, records review, and field inspections.

Results

The assessor determined the interviewees were knowledgeable of regulatory requirements and industry practices for controlling contamination. They unanimously confirmed the greater use of engineered controls to control contamination and the use of dedicated staff members to maintain FCA records. Examples included the following:

- Closed-top containment tents over pits (e.g., AY-102, AW-B) instead of open-top ones.
- Much broader use of glove bags (e.g., HEPA filter removal from exhausters) in all projects.
- More use of polyethylene sleeving (e.g., camera removal jobs) in WFO.
- Use of drapes for installation/removal of tank riser flanges in CO.
- Use of containment houses called "greenhouses" (e.g., 1F drain line replacement) in ATS.

The assessor found no deficiencies in the two CH2M HILL contamination control implementing procedures CH2M HILL listed above.

The assessor reviewed the FCA contamination surveys and record inventories for the ATS, CO and WFO Projects. The reviewer determined the audited records for all CH2M HILL projects effectively captured the required information, and that dedicated project RadCon staff were assigned the responsibility of keeping the records.

In 2003 the central RadCon organization maintained FCA records. In October 2005 CH2M HILL reassigned the responsibility for maintaining contamination area records to the projects. This change in ownership has led to more effective record-keeping.

Based on discussions with staff members, review of Program documents and a field observation of the February 6, 2007 (T-202 filter replacement job), the assessor determined the Program effectively controlled contamination as required by 10 CFR 835, Subpart L, "Radioactive Contamination Control," and contract requirements. Since the last Program assessment (March 2003), CH2M HILL made greater use of engineered controls to contain radioactive contamination. In addition, it renovated the 272-S Facility for camera maintenance and decontamination, an innovation completed at minimal cost. The assessor confirmed the lack of an institutional "hot tool" program and observed two Health Physics Technicians (HPT) fail to adequately coach Radiological Workers improperly dressed in protective clothing.

The assessor identified no Findings or Program Strengths and two Observations for Program improvement, as described below:

CH2M HILL Has Not Implemented a Dedicated Tool Control Program. While an occasional work crew utilized a gang box dedicated to contaminated tools, CH2M HILL has not institutionalized the hot tool crib concept. As a result, workers were not observed reusing previously contaminated tools to any appreciable extent, potentially incurring unnecessary costs from using new tools for each job. Section 4.3.5, Conduct of Radiological Work, in Program Guide G 441.1-9 recommends "a dedicated contaminated tool program, if justified by the extent of contaminated area work activities." During the daily debriefing, CH2M HILL RadCon Directors did not offer plausible reasons why such a program was not being implemented; as a result, this Observation was made.

The assessor recommended CH2M HILL management's evaluation of a "hot tool" program for the Tank Farms.

HPTs Displayed Inadequate HPT Coaching of Radiological Workers (Protective Clothing). The T-202 filter replacement job on February 6, 2007, required eight individuals to be dressed out in a "full set" of protective clothing. The assessor observed two of the eight entered the dress-out area, then a posted Contamination Area, and proceeded to work with the sweatshirt hoods extending outside the coveralls. This practice could have lead to the unnecessary spread of contamination. Two HPTs inside the dress-out area did not coach the workers about this improper protective clothing wear.

The assessor recommended the addition of refresher module during HPT requalification cycle training to remind them that the HPT sets the standards, they must be vigilant of the workers' condition and workers must meet accepted contamination control dress requirements. The assessor discussed this issue with the RadCon Directors and FPOCs at the February 6, 2007, daily debriefing.

The assessor recognized the potential value of the renovated 272-S Facility for camera maintenance and decontamination and commended the responsible staff members on this improvement, which was completed at minimal cost. The assessor determined that the Observation from the March 2003 assessment no longer applied to current practices for CH2M HILL: currently dedicated project staff effectively prepare and maintain FCA records.

Conclusions:

The assessor concluded the CH2M HILL Contamination Control Program met regulatory requirements, was adequately controlled by procedure, and effectively controlled contamination in the Tank Farms. The assessor identified no Findings or Program Strengths and two Observations for Program improvement, more fully described above:

- CH2M HILL Has Not Implemented a Dedicated Tool Control Program.
- HPTs Displayed Inadequate HPT Coaching of Radiological Workers (Protective Clothing).

The CH2M HILL RadCon Directors and FPOCs – Contamination Control agreed with these Observations presented at the exit meeting held on February 12, 2007.

Open Items

None

Closed Items

None

Discussed Items

None

Task# ORP-ESQ-2007-0033

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BACKGROUND

(PLEASE SCAN)

LETTER # 07-028

Assessor: Larry R. McKay

Dates of Assessment: February 5 through 12, 2007

Areas/Items Assessed: CH2M HILL Contamination Control Program

A U.S. Department of Energy, Office of River Protection assessor evaluated the CH2M HILL Hanford Group, Inc. (CH2M HILL) Contamination Control Program against established requirements and guidance from February 5 through 12, 2007.

Assessment Report A-07-ESQ-TANKFARM-001 contains the assessment results.

This assessment note captures details of personnel interviews, documents reviewed, field observations from the T-202 filter replacement job and a walkthrough of the 272-S facility.

Personnel Interviewed (listed alphabetically):

CH2M HILL Radiological Control Program

- J. D. Butler, Analytical Technical Services Facility Point-of-Contact (FPOC) Contamination Control
- M. S. McGrory, RadCon Director & *Backup Company Technical Authority Contamination Control
- R. L. Brown, Closure Operations FPOC Contamination Control
- E. Carreras, Waste Feed Operations FPOC Contamination Control

Documents Reviewed:

10 CFR 835, "Occupational Radiation Protection," Subpart L, Contamination Control, November 28, 2006

"CH2M HILL Radiological Control Company Technical Authorities and Facility Points of Contact," January 22, 2007 (CH2M HILL web site)

HNF-5183, "Tank Farms Radiological Control Manual," Revision 1, February 28, 2005

HNF-MP-5194, "CH2M HILL Hanford Group, Inc. Radiation Protection Program," Revision 4, Change 1, November 15, 2005

DOE G 441.1-9, "Radioactive Contamination Control Guide for Use with Title 10, Code of Federal Regulations, Part 835, Occupational Radiation Protection", June 17, 1999

TFC-ESHQ-RP-MON-C-14, "Radiologically Contaminated Area Controls," Revision D, August 18, 2006.

^{*}The CTA – Contamination Control (L. M. Livesey) was on leave during the assessment.

TFC-ESHQ-RP_MON-C-17, "Fixed Contamination Areas," Revision A-5, April 6, 2006.

Form A-6003-608 (04/06), "Fixed Contamination Fixative Request"

Form A-6004-017 (04/06), "Fixed Contamination Area Inventory"

Form BD-6003-0043 (06/05), "Tank Farm Contractor Radiological Survey Report"

"Annual Routine Sign-Off Sheet 2006" (no form number)

Field Inspections:

Attachments 1 and 2 contain details of field Observations made as part of this assessment.

Approved By: FRMWay Date: 3/9/07

Larry R. McKay, Assessor

Attachment 1

Observation of T-202 Filter Replacement Job February 6, 2007

Tank Farm "T" is on "quarterly access" and not surveyed for radiation and contamination as often as "active" farms. A Contamination Area corridor was established from change trailer to work site (tank T-202, west side of T Farm). The work scope was to remove and replace the HEPA filter with a smaller one of different design (easier to install & remove).

Owen Berglund, Closure Operations was present in order to perform an As Low As Reasonably Achievable (ALARA) assessment of protective clothing dress. Owen was present during about the first half of the Observation, which began at 0915 hrs.

The Field Work Supervisor was Mark Johnson, who conducted an effective, brief pre-job briefing just before the work began. Workers present included three Health Physics Technicians (HPT), millwrights, sheet metal workers and operators. A total of eight workers dressed out to enter the Tank Farm.

Two HPTs were positioned inside the dress-out area (Radiological Buffer Area, [RBA]) inside change trailer to assist workers with dress and undress. The three HPTs assigned to this job were Bob Massie, Vivian Wyant, and Vince Rhodes.

The HPTs rearranged the furniture and layout of the dress-out and undress areas of the change trailer, moved the barriers and posted a Contamination Area (CA) on the outside change trailer door to prevent inadvertent access. The RBA dress-out area became a CA undress area with the HPTs inside, dressed in protective clothing. This was an innovation that made the job go more smoothly and was a good Radiological Control practice.

The step-off pad bore the obsolete wording "Before stepping here remove <u>SWP</u> clothing" (emphasis added). SWP is not a currently used term in Tank Farms.

Positive: The replacement filter was bolted to the spool piece (pre-fabricated) which sped up the job and displayed effective ALARA principles.

Observation: Twice, workers were seen displayed poor contamination control techniques (handing objects from the dress-out area, an RBA) across the barrier rope to the "clean" part of the change trailer without frisking the item.

Observation: Two workers wearing hooded sweatshirts allowed the hood to protrude outside the coveralls, a poor contamination control practice.

Good practice: One worker lost his rubber overshoe in the middle of the corridor. The HPT told him to stand fast until he could locate a replacement shoe for him.

Attachment 1

(cont'd)

RadCon posting for the tank farm and the change trailer were correct and properly positioned. The radiological status map was updated within the past week (February 1, 2007).

Overall, the job went very well and I detected no programmatic deficiencies in the Contamination Control Program.

Attachment 2

Tour of 209-S Facility February 8, 2007

Bob Brown (Closure Operations Radiological Control [RadCon]) gave me a tour of the facility, along with Steve Williams (Operations). The 209-S facility was previously used for maintenance and sign-painting activities. CH2M HILL Hanford Group, Inc. converted it to allow camera decontamination/maintenance activities to occur there, retaining only a small portion of the facility for sign-painting.

The facility should be ready for use "soon" (perhaps as early as February 12, 2007).

A tour revealed:

- A large substantial table on which one complete glove bag was installed, with room for a second glove bag.
- o The installed glove bag featured adequate ports and glove access for all types of work.
- o The area in which the glove bag was positioned had a fresh coat of epoxy paint on the floor and walls.
- The area was long and narrow (approximately 15' wide by 30' long) which will facilitate its use on cameras with long cables.
- o Provisions for air monitoring had been installed, but the air sampler was not yet installed.
- The area is posted Radiological Buffer Area.
- According to the tour escort (Owen Berglund) a Health Physics Technician will be present before work proceeds.
- o Routine RadCon surveys are taken in the area (contamination, radiation levels)
- o Additional areas included a separate room for a computer terminal, separate dress-out area, and a large area for containment fabrication.
- o About 25% of the facility space devoted to sign-painting.
- "Caution Asbestos" signs note asbestos contained in walls. Escort told me this was not a problem as the walls would not be disturbed.