



U.S. Department of Energy



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

07-ESQ-040

MAR 23 2007

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

Dear Mr. Spears:

CONTRACT NO. DE-AC27-99RL14047 – U.S. DEPARTMENT OF ENERGY (DOE),  
OFFICE OF RIVER PROTECTION (ORP) ASSESSMENT REPORT A-07-ESQ-  
TANKFARM-002 OF THE CH2M HILL HANFORD GROUP, INC. (CH2M HILL)  
EMPLOYEE CONCERNS PROGRAM (ECP)

This letter transmits the results of the ORP assessment of the CH2M HILL ECP. The assessment was conducted January 8 through 26, 2007.

The Team evaluated compliance with the Contractor Requirement Document to DOE O 442.1A, "Department of Energy Employee Concerns Program Contractor Requirements Document" and to CH2M HILL's procedure on employee concerns "TFC-BSM-HR-MA-C-02, REV B-1." One Finding was identified and the CH2M HILL's ECP manager took immediate action and initiated Problem Evaluation Report (PER) 2007-0169 to address the Finding. A response to the Finding is not required. ORP will close the Finding after the PER corrective actions have been completed.

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:BLW

Attachment

cc w/attach:  
S. Sanders, PAC  
C. R. Ungerecht, PAC  
CH2M HILL Correspondence

**Attachment  
07-ESQ-040  
A-07-ESQ-TANKFARM-002**

**U.S. Department of Energy,  
Office of River Protection  
Environmental Safety and Quality**

**Title:** Assessment of CH2M HILL Hanford Group, Inc. Employee Concerns Program

**Report Number:** A-07-ESQ-TANKFARM-002

**Facility:** Tank Farms

**Location:** Hanford Site

**Dates:** January 8 through 26, 2007

**Assessors:** Patrick P. Carier, and Bobby L. Williams

**Approved by:** Patrick P. Carier, Team Lead, Verification and Confirmation Team

**Contractor:** CH2M HILL Hanford Group, Inc.

**Guide:** DOE O 442.1A & DOE G 442.1-1 & TFC-BSM-HR-MA-C-02, Revision B-1

## Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP) evaluated the CH2M HILL Hanford Group, Inc. (CH2M HILL) Employee Concerns Program (ECP). The assessment focused on reviewing CH2M HILL case files for compliance with the Contractor Requirements Document from DOE O 442.1A "Department of Energy Employee Concerns Program", DOE G 442.1-1 "Department of Energy Employee Concerns Program Guide" and the CH2M HILL Procedure TFC-BSM-HR-MA-C-02, Revision B-1 "Employee Concerns Program." The Team evaluated 19 case files from 2004, 2005, and 2006.

The Team concluded that CH2M HILL ECP complied with Contractor Requirements Document (CRD) from DOE O 442.1A, and did not meet the requirements of their ECP Procedure TFC-BSM-HR-MA-C-02, Revision B-1, Employee Concerns Program. The CH2M HILL ECP is a mature program and reflected a sound process for investigation and closing employee concerns.

The Team identified one Finding. The Team concluded that CH2M HILL was managing and implementing the ECP in accordance with the expectations embodied in the CRD for DOE O 442.1A "Department of Energy Employee Concerns Program." However, the Team found that CH2M HILL ECP was not complying with the requirements stated in their ECP procedure. The Team identified the following Finding:

**A-07-ESQ-TANKFARM-002-F01 – The CH2M HILL ECP does not fully comply with their ECP procedure TFC-BSM-HR-MA-C-02, Revision B-1, ECP.**

- **No concern letters were prepared and delivered to the Concerned Individual's (CI) for the 19 case files reviewed.**
- **No chronologies of events were developed for 4 out of the 19 case files reviewed.**
- **The Employee Concern Tracking log did not contain the method of receipt for concerns or the date the CI was notified of the resolution.**

In response to the above Finding during the assessment the CH2M HILL ECP manager took immediate action when the Finding on the procedure was identified and initiated Problem Evaluation Report (PER) 2007-0169 to address the Finding. In order to track the PER to closure an action item (#9425) was entered into the DOE ORP Consolidated Action Reporting System and will be evaluated for closure when the PER is closed.

## Table of Contents

|                         |   |
|-------------------------|---|
| Purpose and Scope ..... | 4 |
| Results.....            | 4 |
| Conclusions.....        | 6 |
| Items Opened .....      | 7 |
| Items Closed.....       | 7 |
| Items Reviewed.....     | 7 |

## Purpose and Scope

On January 8 through 26, 2007, the U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted an assessment of CH2M HILL Hanford Group, Inc.'s (CH2M HILL) Employee Concerns Program (ECP). The purpose of this assessment was to verify that the Contractor's ECP is performing in accordance with DOE O 442.1A, "Department of Energy Employee Concerns Program Contractor Requirements Document." In addition the case files were verified to see if they were in compliance with the CH2M HILL procedure on employee concerns "TFC-BSM-HR-MA-C-02," Revision B-1.

The assessment also evaluated the following:

- CH2M HILL self-assessment report for 2006 (Little Harbor).
- CH2M HILL ECP Employee Concern Status and Result Database (Excel Spreadsheets).
- CH2M HILL ECP Employee Concern Status and Tracking Database (Excel Spreadsheets).
- CH2M HILL Employee Concerns Program Survey Results Report (Survey Period April 1, 2005, through March 31, 2006).

The assessment evaluated whether the 19 case files were complete and accurate: 1) did they contain the minimum information discussed in DOE G 442.1-1; 2) was the concern appropriately investigated; 3) are the files maintained in an adequate location and steps taken to protect the identity of the concerned employee consistent with the employee's request for confidentiality and the provisions of the Privacy Act; 4) for cases warranting corrective actions, were the corrective actions appropriate and completed in a timely manner; 5) was the case investigated and closed out in a timely manner; and 6) was the concern documented with sufficient detail to allow for investigation.

Specific CH2M HILL ECP case files reviewed were: 06-0036, 06-0035, 06-0033, 06-0030, 06-0028, 06-0023, 06-0025, 06-0020, 06-0019, 06-0016, 06-0014, 06-0012, 06-0011, 06-0002, 05-0068, 05-0018, 05-0010, 05-0001, and 04-0017.

## Results

### Case File Review

The ORP Team reviewed the case files and identified the following Finding:

**A-07-ESQ-TANKFARM-002-F01 – The CH2M HILL ECP does not fully comply with their ECP Procedure TFC-BSM-HR-MA-C-02, Revision B-1, ECP.**

- No concern closure letters were prepared and delivered to the CI's for the 19 case files reviewed.

- **No chronologies of events were developed for 4 out of the 19 case files reviewed.**
- **The Employee Concern Tracking log did not contain the method of receipt for concerns or the date the CI was notified of the resolution.**

CH2M HILL Procedure TFC-BSM-HR-MA-C-02, Revision B-1, Section 4.11 states: "Prepare and deliver a concern letter to the employee that documents the following: summary of fact finding and conclusions with basis; basis for closure; actions that were or will be taken to address and/or correct the concerns, problems, and/or violations of codes or standards; comments made by the employee after reviewing the investigative results, conclusions, and basis for concern closure." A closure letter or email to the Concerned Individual (CI) would provide clear documentation that the concern was acted upon and closed properly. Of the 19 case files reviewed no closure letters were evident, however, there were 4 cases where the CI was informed by email of the closure of the concern. The use of an email for closure will require a change to the procedure. It is recommended that CH2M HILL prepare and deliver a concern letter or email to document to the employee the following: summary of fact finding and conclusions with basis; basis for closure; actions that were or will be taken to address and/or correct the concerns, problems, and/or violations of codes or standards; comments made by the employee after reviewing the investigative results, conclusions, and basis for concern closure.

CH2M HILL Procedure TFC-BSM-HR-MA-C-02, Revision B-1, Sections 4.4 & 4.6 state: "Maintain a chronology for the concern case file." An accurate chronology of events assists in the resolution of concerns or comments that might arise after the case is closed out. It is recommended that CH2M HILL maintain a chronology of events in each case file as required by their procedure.

CH2M HILL Procedure TFC-BSM-HR-MA-C-02, Revision B-1, Section 4.14 states: "Include in the tracking log the following information: Method of receipt (e.g., walk-in, mail, hotline, telephone, etc.); Date the employee was notified of the resolution." The ECP tracking log can be used as a quick overview of employee concerns. The tracking log contains multiple data fields such as concern number, date concern received, category of concern, brief description of the concern, etc... The inclusion of method of receipt and date the employee was notified of the resolution makes the log more complete. It is recommended that CH2M HILL record the method of receipt and date the employee was notified of the resolution in the ECP tracking log as required by their procedure.

The Team reviewed the Safety Conscious Work Environment independent assessment performed by Little Harbor Consultants (LHC) dated March 15, 2006. The CH2M HILL ECP was reviewed as part of this effort. The independent assessment was performance based and used as a basis for the assessment the Institute of Nuclear Power Operations guidelines, U.S. Nuclear Regulatory Commission "Best Practices" document, and model ECP program assessment tools. LHC concluded the following:

“With respect to the review of the ECP program through the eyes and perceptions of the workforce, there is a reported lack of confidence in the ECP by personnel who have used the program and a perception or belief that ECP is neither timely nor effective in resolving concerns. ECP has not changed that perception since the last survey, notwithstanding having taken some corrective actions.”

Based on the above conclusion LHC made the following recommendations:

- The ECP needs to develop a communication plan to address, where it can, information on successful ECP intervention and investigation work to reinforce the role it plays in resolving employee concerns.
- The ECP, in conjunction with Human Resources (HR) and Labor Relations (LR), needs to better identify, recognize and reinforce jurisdictional boundaries between HR, LR, Legal, and ECP on who is responsible for investigating complaints of hostile work environment, harassment, discrimination, and retaliation, and how these issues should be resolved.
- Establish a focus area on the ECP/HR/LR relationship and product delivery with their respective customers, and a review of the efficiency of the People Team/ECP/HR problem resolution process.
- The ECP needs to host a facilitated workshop on improving the confidence of employees in the area of resolving employee concerns. Participants will be asked to evaluate employee feedback, provide suggestions, and additional recommendations.

The Team had provided written documentation that demonstrated CH2M HILL ECP had acted on the above recommendation.

The Team concluded that the LHC independent assessment was performed by knowledgeable individuals and provided good recommendations for program improvement. CH2M HILL ECP appropriately implemented corrective actions for the recommendations. The Team recommends that future assessments use the DOE O 442.1A, Department of Energy Employee Concerns Program and the associated Guide 442.1-1 as source documents to determine if potential gaps exist between the CH2M HILL ECP and DOE expectations.

#### **Exit Meeting with CH2M HILL Management**

An exit briefing was held on March 12, 2007, with G. W. Smith, CH2M HILL.

#### **Conclusions**

The primary focus of this review was to ensure proper investigation and closure of issues raised by concerned individuals. 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. Nineteen files with dates ranging from 2004 to 2006 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 that the ECP program and files met the requirements of the Contractor Requirements Document from DOE O 442.1A, however the program and files do not meet the requirements of the CH2M HILL ECP procedure.

Conclusions of the case file investigations were reasonable, timelines were appropriate, and the database tracking systems are kept up to date. Self-assessments were conducted annually in accordance with the CH2M HILL implementing procedure and adequately measured the effectiveness of the ECP. Corrective actions for the assessments were identified and tracked to closure. In several case files reviewed the resolution of corrective actions was not well documented.

The reviewed case files did not comply with the CH2M HILL ECP procedure, files were not completed in accordance with the procedure, and concern resolution that was provided to the CI in most cases was not documented in the case files.

The CH2M HILL ECP manager is proactive in monitoring the Problem Evaluation Reports (PER) for issues that are appropriate to be tracked by the ECP. He was also responsive to the Observations that were generated on procedural deficiencies identified during this assessment. He took immediate action when the Finding on the procedure was identified and initiated PER 2007-0169 to address the Finding.

#### **Items Opened**

**A-07-ESQ-TANKFARM-002-F01 – The CH2M HILL ECP does not fully comply with their ECP Procedure TFC-BSM-HR-MA-C-02, Revision B-1, ECP.**

- **No concern closure letters were prepared and delivered to the CI's for the 19 case files reviewed.**
- **No chronologies of events were developed for 4 out of the 19 case files reviewed.**
- **The Employee Concern Tracking log did not contain the method of receipt for concerns or the date the CI was notified of the resolution.**

#### **Items Closed**

None

#### **Items Reviewed**

None



|                                |
|--------------------------------|
| <b>Task# ORP-ESQ-2007-0044</b> |
|--------------------------------|

E-STARS™ Report  
Task Detail Report  
03/26/2007 0727

| TASK INFORMATION        |  |                         |          |
|-------------------------|--|-------------------------|----------|
| <b>Task#</b>            | ORP-ESQ-2007-0044  |                         |          |
| <b>Subject</b>          | CONCUR:07-ESQ-040; DOE ORP ASSESSMENT REPORT A-07-ESQ-TANKFARM-002 OF THE CH2M HILL EMPLOYEE CONCERNS PROGRAM  |                         |          |
| <b>Parent Task#</b>     |  | <b>Status</b>           | CLOSED   |
| <b>Reference</b>        | 07-ESQ-040   | <b>Due</b>              |          |
| <b>Originator</b>       | Gano, Becky  | <b>Priority</b>         | High     |
| <b>Originator Phone</b> | (509) 376-6004   | <b>Category</b>         | None     |
| <b>Origination Date</b> | 03/15/2007 1157  | <b>Generic1</b>         |          |
| <b>Remote Task#</b>     |  | <b>Generic2</b>         |          |
| <b>Deliverable</b>      | None   | <b>Generic3</b>         |          |
| <b>Class</b>            | Long Term  | <b>View Permissions</b> | Normal   |
| <b>Instructions</b>     | <p>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.</p> <p>BCC:<br/>ESQ OFF FILE<br/>ESQ RDG FILE<br/>MGR RDG FILE<br/>C.B.REID, AMD<br/>P.P.CARIER, ESQ<br/>J.L.POLEHN, ESQ<br/>W.J.TAYLOR, ESQ<br/>B.L.WILLIAMS, ESQ<br/>T.Z.SMITH, TF</p> <p>RECORD NOTE:</p> |                         |          |
| <b>ROUTING LISTS</b>    |  |                         |          |
| 1                       | Route List   |                         | Inactive |
|                         | <ul style="list-style-type: none"> <li>● Williams, Bobby L - Review - Concur - 03/22/2007 0814<br/><i>Instructions:</i></li> <li>● Carier, Patrick P - Review - Concur - 03/26/2007 0726<br/><i>Instructions:</i></li> <li>● Smith, Zack - Review - Concur with comments - 03/22/2007 1117<br/><i>Instructions:</i></li> <li>● Olinger, Shirley J - Approve - Approved - 03/23/2007 1409<br/><i>Instructions:</i></li> </ul>                                   |                         |          |
| <b>ATTACHMENTS</b>      |  |                         |          |
| Attachments             | <ol style="list-style-type: none"> <li>1. 07-ESQ-040 att ORP ECP Assessment A-07-ESQ-TANKFARM-002.doc</li> <li>2. 07-ESQ-040 CH2M HILL LTR ECP Assessment A-07-ESQ-TANKFARM-002.doc</li> </ol>   |                         |          |
| <b>COLLABORATION</b>    |  |                         |          |
| RECEIVED                |  |                         |          |
| MAR 26 2007             |  |                         |          |
| <b>COMMENTS</b>         |  |                         |          |
|                         |  |                         |          |

**DOE-ORP/ORPCC**

| <b>Task# ORP-ESQ-2007-0044</b> |  |
|--------------------------------|--|
| <b>Poster</b>                  | Smith, Zack (Perez, Annez) - 03/22/2007 1103 |
|                                | Concur                                       |
|                                | Delmar concurred for Zack Smith 3/22/2007    |
| <b>TASK DUE DATE HISTORY</b>   |  |
| <i>No Due Date History</i>     |  |
| <b>SUB TASK HISTORY</b>        |  |
| <i>No Subtasks</i>             |  |

-- end of report --

**Task# ORP-ESQ-2007-0044**

E-STARSM Report  
 Task Detail Report  
 03/15/2007 1202

| TASK INFORMATION        |  |                         |        |
|-------------------------|--|-------------------------|--------|
| <b>Task#</b>            | ORP-ESQ-2007-0044  |                         |        |
| <b>Subject</b>          | CONCUR:07-ESQ-040; DOE ORP ASSESSMENT REPORT A-07-ESQ-TANKFARM-002 OF THE CH2M HILL EMPLOYEE CONCERNS PROGRAM  |                         |        |
| <b>Parent Task#</b>     |  | <b>Status</b>           | Open   |
| <b>Reference</b>        | 07-ESQ-040   | <b>Due</b>              |        |
| <b>Originator</b>       | Gano, Becky  | <b>Priority</b>         | High   |
| <b>Originator Phone</b> | (509) 376-6004   | <b>Category</b>         | None   |
| <b>Origination Date</b> | 03/15/2007 1157  | <b>Generic1</b>         |        |
| <b>Remote Task#</b>     |  | <b>Generic2</b>         |        |
| <b>Deliverable</b>      | None   | <b>Generic3</b>         |        |
| <b>Class</b>            | Long Term  | <b>View Permissions</b> | Normal |
| <b>Instructions</b>     | 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.<br><br>BCC:<br>ESQ OFF FILE<br>ESQ RDG FILE<br>MGR RDG FILE<br>C.B.REID, AMD<br>P.P.CARIER, ESQ<br>J.L.POLEHN, ESQ<br>W.J.TAYLOR, ESQ<br>B.L.WILLIAMS, ESQ<br>T.Z.SMITH, TF<br><br>RECORD NOTE: |                         |        |
| <b>ROUTING LISTS</b>    |  |                         |        |
| 1                       | Route List   | Active                  |        |
|                         | <ul style="list-style-type: none"> <li>Williams, Bobby L - Review - Awaiting Response<br/> <i>Instructions:</i></li> </ul>   |                         |        |
|                         | <ul style="list-style-type: none"> <li>Carier, Patrick P - Review - Awaiting Response<br/> <i>Instructions:</i></li> </ul>   |                         |        |
|                         | <ul style="list-style-type: none"> <li>TAYLOR, WILLIAM - REVIEW</li> <li>Smith, Zack - Review - Awaiting Response<br/> <i>Instructions:</i></li> </ul>   |                         |        |
|                         | <ul style="list-style-type: none"> <li>Olinger, Shirley J, Approve - Awaiting Response<br/> <i>Instructions:</i></li> </ul>  |                         |        |
| <b>ATTACHMENTS</b>      |  |                         |        |
| Attachments             | 1. 07-ESQ-040 att ORP ECP Assessment A-07-ESQ-TANKFARM-002.doc<br>2. 07-ESQ-040 CH2M HILL LTR ECP Assessment A-07-ESQ-TANKFARM-002.doc   |                         |        |
| <b>COLLABORATION</b>    |  |                         |        |
| <b>COMMENTS</b>         |  |                         |        |