

United States Government

Department of Energy
Office of River Protection

memorandum

DATE: JUN 05 2008

REPLY TO
ATTN OF: ESQ:JDM 08-ESQ-103

SUBJECT: U.S. DEPARTMENT OF ENERGY (DOE), OFFICE OF RIVER PROTECTION (ORP)
ASSESSMENT A-08-ESQ-INTERNAL-002, SELF-ASSESSMENT OF ORP
OVERSIGHT PROGRAM PER DOE O 226.1A AS IMPLEMENTED BY ORP M 220.1

TO: Stacy L. Charboneau, Assistant Manager
for Tank Farms Project

This memorandum transmits the results of the DOE ORP Assessment A-08-ESQ-INTERNAL-002, Self-Assessment of ORP Oversight Program per DOE O 226.1A as Implemented by ORP M 220.1 (attached). The assessment was performed from April 28 through May 9, 2008. The purpose of the assessment was to evaluate the adequacy and effectiveness of the Tank Farm Project (TFP) Oversight Program in meeting DOE O 226.1A requirements.

The Assessment Team determined the TFP oversight procedures did not adequately satisfy all the assessment criteria specified in ORP M 220.1. TFP processes and activities associated with assessment scheduling, assessment management, training and qualification of assessors, and conducting assessments were adequate and generally effective in meeting ORP M 220.1 requirements. However, improvement in the procedures used by the Facility Representatives (FR) is still required for the TFP to meet requirements.

The Assessment Team identified two findings associated with assessment reporting and with documenting and tracking of deficiencies. Two observations were also identified during the assessment:

Finding A-08-ESQ-INTERNAL-002-F01: TFP procedures for conducting independent assessments implemented by the TF FRs did not fully satisfy the requirements in ORP M 220.1.

Finding A-08-ESQ-INTERNAL-002-F02: The TFP procedures implemented by the FRs do not provide formal processes for managing and tracking corrective actions or for performing trending activities required by ORP M 220.1.

Observation A-08-ESQ-INTERNAL-002-O01: Proficiency evaluation of Lead Auditors was not always timely.

JUN 05 2008

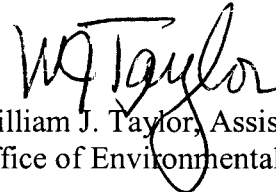
Observation A-08-ESQ-INTERNAL-002-002: Management Assessments conducted by the TFP were not always performed by the Direct Reports to the Manager and Division Directors as required by ORP M 220.1.

Within 30 days of receipt of this letter, the TFP should respond to the assessment findings. The response should include:

- The causes of the findings;
- The corrective actions taken to control or remove any adverse impact to identified non-compliance situations (remedial action) and the results achieved;
- The corrective actions that will be taken to identify the extent of condition, correct the cause(s), and prevent further findings; and
- The date when all corrective actions will be completed, verified, and compliance to applicable requirements achieved.

If you have any questions, please contact me, or your staff may contact Patrick P. Carier, Team Lead, Quality Assurance Team, (509) 376-3574.

Sincerely,



William J. Taylor, Assistant Manager
Office of Environmental Safety and Quality

Attachment

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

ASSESSMENT: Self-Assessment of ORP Oversight Program per DOE O 226.1A as Implemented by ORP M 220.1

REPORT: A-08-ESQ-INTERNAL-002

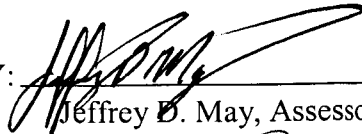
FACILITY: Department of Energy, Office of River Protection

LOCATION: Richland, Washington

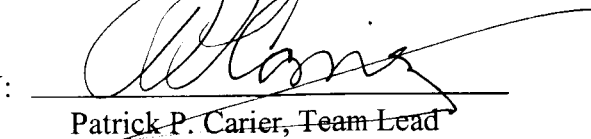
DATES: April 28 through May 9, 2008

ASSESSORS: Patrick P. Carier, Assessment Team Leader
Jeffrey D. May, Assessor
Samuel A. Vega, Assessor

SUBMITTED BY:


Jeffrey D. May, Assessor
Quality Assurance Team

APPROVED BY:


Patrick P. Carier, Team Lead
Quality Assurance Team

Executive Summary

The U.S. Department of Energy (DOE), Office of River Protection (ORP), conducted an assessment of the ORP Oversight Program as Implemented by ORP M 220.1, "Integrated Assessment program." The assessment was conducted from April 28 through May 9, 2008. The purpose of the assessment was to evaluate the adequacy and effectiveness of the ORP Oversight Program in meeting DOE O 226.1A requirements.

The initial scope of the assessment was to assess ORP oversight activities of its Contractors (Bechtel National, Inc., CH2M HILL Hanford Group, Inc., and Advanced Technologies and Laboratories International, Inc.). This was changed the first day of the assessment because the ORP Waste Treatment and Immobilization Plant (WTP) Project was in the middle of conducting a self-assessment on the same subject and had indicated that assessment was already indicating the ORP WTP assessment processes and procedures were not in compliance with ORP M 220.1. As a result, the Scope of the assessment was changed to include only the Tank Farm Project (TFP) oversight activities.

The Assessment Team determined the TFP oversight procedures implemented by the Facility Representatives (FR) did not adequately satisfy all the assessment criteria specified in ORP M 220.1. TFP processes and activities associated with assessment scheduling, assessment management, training and qualification of assessors, and conducting assessments were adequate and generally effective in meeting ORP M 220.1 requirements. However, improvement in procedures is still required for the TFP to meet requirements in report writing and corrective action management. The Assessment Team identified two findings associated with assessment reporting, and with documenting and tracking of deficiencies. Two observations were also identified during the assessment:

Finding A-08-ESQ-INTERNAL-002-F01: TFP procedures for conducting independent assessments implemented by the TF FRs did not fully satisfy the requirements in ORP M 220.1.

Finding A-08-ESQ-INTERNAL-002-F02: The TFP procedures implemented by the FRs do not provide formal processes for managing and tracking corrective actions required by ORP M 220.1.

Observation A-08-ESQ-INTERNAL-002-O01: Proficiency evaluation of Lead Auditors was not always timely.

Observation A-08-ESQ-INTERNAL-002-O02: Management Assessments conducted by the TFP were not always performed by the Direct Reports to the Manager and Division Directors as required by ORP M 220.1.

Table of Contents

Executive Summary	ii
Table of Contents	iii
List of Acronyms	iv
1.0 Details.....	1
2.0 Findings and Observations	2
Appendix A – Personnel Contacted	
Appendix B – Documents Reviewed	

List of Acronyms

CARS	Consolidated Action Reporting System
DNFSB	Defense Nuclear Facilities Safety Board
DOE	U.S. Department of Energy
FR	Facility Representative
FRI	Facility Representative Instruction
ORP	Office of River Protection
TF	Tank Farm
TFP	Tank Farm Project
WTP	Waste Treatment and Immobilization Plant

1.0 Details

This assessment evaluated The U.S. Department of Energy (DOE), Office of River Protection (ORP) Tank Farm Project (TFP) oversight activities of CH2M HILL Hanford Group, Inc. to determine the adequacy and effectiveness in meeting DOE O 226.1A requirements. This was accomplished by interviewing TFP staff and management, reviewing implementing procedures, and reviewing documents generated as a result of TFP oversight and training activities.

Activities reviewed included: 1) Oversight of Contractors; assessment scheduling, assessment planning, conducting assessments, and assessor qualification; 2) Communications; assessment notification, assessment reporting, entrance and exit briefing, and communication of issues; 3) Corrective Action; identifying and documenting findings, tracking and trending, and finding closure.

Following is a brief discussion of the assessment results. For more details of the discussed findings and observations, see the discussion in Section 3 of this report titled "Findings."

1.1 Discussion

The TFP Facility Representative (FR) qualification was conducted in accordance with Facility Representative Instructions (FRI)-013, "Lead Auditor Qualification." The rest of the TFP organization conducted assessments and qualified assessors in accordance with ORP M 220.1, "Integrated Assessment Program." Auditor and assessor qualifications were reviewed and determined to meet ORP M 220.1 requirements. One observation related to the timeliness of proficiency evaluations was noted. This is captured in Observation A-08-ESQ-INTERNAL-002-O01.

FRI-009, "Master Assessment Plan" was the procedure applied by the FR to plan and develop an assessment schedule. The rest of the TFP organization applied ORP M 220.1. No issues were identified in the planning and development of the assessment schedule.

The TFP FR oversight of the contractor activities was performed as specified in ORP FRI-010, "Conduct of Performance Reviews." The rest of the TFP organization applied ORP M 220.1. The assessment determined that the planning, conducting, and management of assessment was in compliance with ORP M 220.1 requirements, with two exceptions; FRI-010 only required the assessed organization to be briefed on the assessment scope and schedule at the start of an assessment, and be briefed of the assessment results at the exit briefing, but ORP M 220.1 also required ORP management and the Defense Nuclear Facilities Safety Board (DNFSB) to be briefed. This is captured in Finding A-08-ESQ-INTERNAL-002-F01.

FRI-011, "Reports," was the procedure applied by the FR for developing assessment reports, transmitting assessment results to the contractor, and tracking findings. The rest of the TFP organization was using ORP M 220.1. The assessment noticed several improvements in the application of requirements since Revision 5 of ORP M 220.1 was issued in September 2007. However, the assessment determined that TFP procedures implemented by the FRs still need improvement in this area. The TFP procedures implemented by the FRs did not require the use of the Consolidated Action Reporting System (CARS) database to track assessment activities, track findings, or notify the contractor when findings are closed as required by ORP M 220.1.

These procedures also do not address processes for generating quarterly trend reports. This is captured in Finding A-08-ESQ-INTERNAL-002-F02.

1.1.1 Conclusion

The Assessment Team determined the TFP oversight procedures implemented by FRs did not adequately satisfy all the assessment criteria specified in ORP M 220.1. TFP processes and activities associated with assessment scheduling, assessment management, training and qualification of assessors, and conducting assessments were adequate and generally effective in meeting ORP M 220.1 requirements. However, improvement in procedures is still required for the TFP to meet requirements.

2.0 Findings and Observations

Finding A-08-ESQ-INTERNAL-002-F01: TFP procedures for conducting independent assessments implemented by the Tank Farm (TF) FRs did not fully satisfy the requirements in ORP M 220.1.

Requirements:

ORP M 220.1, Section 6.2.4 required that the Assessment Team Leader: “Develops an individual assessment plan that includes the purpose, scope, criteria, team members, pertinent documents, and other information needed to define the bounds of the assessment. Reviews previous assessment results to incorporate into the plan a review for recurrence of previous assessment findings.”

ORP M 220.1, Section 6.2.4 required that the Assessment Team Leader: “Prior to initiation of field work, ensures the scope and schedule of the assessments are communicated to assessment team members, the FR, facility manager, Defense Nuclear Facilities Safety Board (DNFSB) representative, and others as appropriate. The appropriate method for communicating this information (e.g., meeting, writing, telephoning) is at the discretion of the assessment team leader.”

ORP M 220.1, Section 6.2.4 required that the Assessment Team Leader: “Upon completion of the fieldwork, conducts a formal exit meeting with the assessed organization and ORP management. DNFSB representatives are invited to the exit meeting.”

ORP M 220.1, Section 6.2.4.1 provided the requirements for preparing and distributing assessment reports.

Discussion:

ORP FRI reviewed by the assessment team that addressed conducting assessments included FRI-010, “Conduct of Performance Reviews,” and FRI-011, “Reports.” Interviews and a review of assessment documentation indicated TFP FRs assessors were implementing these procedures when conducting assessments. The assessment Team determined these procedures did not meet

the criteria for conducting and reporting assessments specified ORP M 220.1, “Integrated Assessment Program.” Examples noted of activities that did not meet ORP M 220.1 included:

- FRI-010 did not require assessment plans to be prepared.
- FRI-010 required the FR to conduct an initial briefing only with the contractor management to discuss the scope, schedule, and conduct of the assessment. ORP M 220.1 required the scope and schedule of the assessments be communicated to assessment team members, the FR, facility manager, DNFSB representative, and others as appropriate, which is the purpose of the FR initial briefing.
- FRI-010 required that only the contractor’s management to be briefed during the exit briefing, where ORP M 220.1 required that ORP management and the DNFSB representatives also be invited to the exit meeting.

Finding A-08-ESQ-INTERNAL-002-F02: The TFP procedures implemented by the FRs do not provide formal processes for managing and tacking corrective actions required by ORP M 220.1.

Requirements:

ORP M 220.1 Section 6.2.2 required Assistant Managers to report trends associated with assessment finding and concerns on a quarterly basis.

ORP M 22.0.1 Attachment 9.8 States: “For entering issues (findings, concerns, and assessment follow-up findings) into CARS, the assessment team leader will identify the trending and root cause code using the guidance on the following page.”

ORP M 220.1, Section 6.2.8 states:

“The assessment team leader or other individual conducting an assessment enters assessment findings and concerns into the CARS, including the following dates and milestones:

- When the exit meeting was conducted;
- When the report was issued;
- When the contractor responded; and
- When corrective action verification was completed.”

ORP M 220.1, Section 6.2.9 states:

- “CARS entries are made to document acceptance or rejection of the corrective action correspondence.
- When all issues for an assessment, surveillance, or other oversight activity requiring corrective action are completed and closed, the SME or assessment team leader places a letter or memorandum into concurrence notifying the assessed organization that the assessment is closed.

- The SME or assessment team leader then closes the assessment out in CARS.”

Discussion:

The TFP organization used the CARS Database to track findings and to provide information for quarterly trend reporting. Closed findings were communicated to the contractor via monthly reports. However TFP organization’s use of the CARS Database did not capture all the information required by ORP M 220.1. TFP procedures for conducting independent assessments implemented by the TF FR (FRI-010, “Conduct of Performance Reviews,” and FRI-011, “Reports.”) do not implement the ORP M 220.1 requirements for using CARS.

Observation A-08-ESQ-INTERNAL-002-O01: Proficiency evaluation of Lead Auditors was not always timely.

Discussion:

Procedure FRI-013 required proficiency of lead auditors to be evaluated annually, however the procedure did not stipulate any grace period for performing the proficiency evaluation. The assessors noted cases where the proficiency evaluation was due but had not yet been initiated. Proficiency evaluations were sometimes conducted several months after the one year anniversary. Typical industry practice is to perform the proficiency evaluation no later than 30 days from the due date. After the 30 days, Lead Auditor qualification would be suspended until the evaluation was conducted. TFP procedures FRI-013 should be revised to address proficiency evaluation expectation and consequences if not conducted within a reasonable time.

Observation A-08-ESQ-INTERNAL-002-O02: Management Assessments conducted by the TFP were not always performed by the Direct Reports to the Manager and Division Directors as required by ORP M 220.1.

Discussion:

ORP M 220.1, Section 6.2.5 states: “Direct Reports to the ORP Manager and Division Directors are to assess their own management processes and identify and correct problems that hinder their organizations from achieving their objectives.” Management Assessments performed by the TFP were not always performed by the Direct Reports to the ORP Manager or Division Directors. In some cases, staff was assigned to perform these Management Assessments. Direct Reports to the ORP Manager and Division Directors actively participated in the planning of the management assessment, but did not always conduct or participated in the assessments.

Appendix A

Personnel Contacted

- Director, Tank Farms Operations Division
- Project Control Specialist
- Facility Representative
- Director, Federal Project Division
- Tank Farm Assistant Manager

Appendix B

Documents Reviewed

- ORP M 220.1, "Integrated Assessment Program," Revision 5, September 5, 2007.
- Facility Representative Instruction, FRI -009, "Master Assessment Plan."
- Facility Representative Instruction, FRI -010, "Conduct of Performance Review."
- Facility Representative Instruction, FRI-011, "Reports."
- Facility Representative Instruction, FRI -013, "Lead Auditor Qualification."
- Demonstration Bulk Vitrification System Self-Assessment Plan, "Determine the Readiness of the Demonstration Bulk Vitrification System Project to Proceed with an External Independent Review."
- Table, "FR Qualification and Lead Auditor Status."
- Facility Representative (FR) Lead Auditor Qualification Record (for seven FRs)
- "Tank Farm Project Monthly Report for February 2008," and cover letter 08-TOD-033.
- "Tank Farm Project Monthly Report for August 2007."
- Office of Independent Oversight and Performance Assurance Database Surveillance Reports (2964, 3146, 3149, 3118, 3361, 3360, 3244, 3257).
- Tank Farms Operations Division Surveillance Report S-08-AMTF-TANKFARM-003, "AP-101 to AW-102 Waste Transfer," February 2008.
- "Tank Farm Facility Representative Weekly Report for the Week Ending May 1, 2008."
- "Tank Farm Project Monthly Report for January 2008," and cover letter 08-TOD-021.
- "Tank Farm Project Monthly Report for September 2007," and cover letter 07-TOD-104.
- U.S. Department of Energy, Office of River Protection (ORP) Integrated Assessment Schedule (Posted on the ORP Web Site).