Mr. J.K. Fortenberry  
Technical Director  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, N.W.  
Suite 700  
Washington, D.C.  20004-2901  

Dear Mr. Fortenberry:

This is in response to Chairman Eggenberger’s April 29, 2008, letter regarding an evaluation of the activity-level craft work planning and control process and its implementation by the CH2M HILL Hanford Group, Inc. (CH2M HILL) which was performed by the Board staff. Subsequent to the Staff’s evaluation, members of my organization performed an independent assessment of the CH2M HILL work planning and control processes, conduct of operation programs, and the Office of River Protection’s (ORP) oversight programs per our annual assessment schedule. I believe the results of these evaluations are consistent, and both CH2M HILL and ORP have been responsive to the concerns identified by both of our organizations.

Both the Board staff review and the Office of Environmental Management (EM) noted concerns with the process for categorizing work as either minor, standard, or complex. CH2M HILL has indicated that it is working through the Energy Facility Contractors’ Group (EFCOG) to identify a better methodology for categorizing work. In addition, CH2M HILL is also working through the EFCOG Work Management subgroup to improve their hazard analysis checklists that are used for planning complex work. It is anticipated that this will resolve the concern that the Board staff identified in this regard.

The EM assessment of ORP’s oversight and corrective action programs concluded that the ORP programs had sufficient scope and depth; however, several findings and observations were noted, and are being addressed. ORP oversight of the tank farms includes the identification of focus areas which change, based upon performance trends or adverse events. Following the Board staff’s visit, work planning and control was identified as a focus area for the ORP Facility Representatives. In addition, ORP recently began an assessment of CH2M HILL’s design and administrative control, which includes an evaluation of work planning and control.

Currently, CH2M HILL and ORP are working on corrective action plans to
address the findings and significant observations identified in the EM assessment report. That plan is due by June 6, 2008. If you or other members of the Board staff are interested, we will be pleased to provide copies of the assessment and corrective action plan.

If you have any further questions, please call me at (202) 586-5151 or Dr. Robert Goldsmith, Director of Operations Oversight at (301) 903-4954.

Sincerely,

Dae Y. Chung
Deputy Assistant Secretary for
  Safety Management and Operations
  Environmental Management

cc:
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