



U.S. Department of Energy
Office of River Protection

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

0076870

APR 14 2008

08-ESQ-077

Ms. Polly Zehm, Deputy Director
Washington State
Department of Ecology
300 Desmond Drive
Lacey, Washington 98503

RECEIVED
APR 16 2008
EDMC

Dear Ms. Zehm:

NOTICE OF PENALTY INCURRED AND DUE NO. 5218

Attached please find a signed settlement agreement resolving the parties' dispute regarding Washington State Department of Ecology's (Ecology) Notice of Penalty Incurred and Due No. 5218. This agreement was developed jointly with representatives from our agencies and the contractor.

We appreciate Ecology's recognition of the U.S. Department of Energy (DOE) and its Contractor's cooperation and investigations of the events surrounding the S-102 release. This agreement supports our joint interest to implement corrective actions necessary to prevent or mitigate the impacts of a similar release in the future. In addition, it provides much needed emergency response equipment to the Tri-County Hazardous Materials Response Team.

Please indicate your acceptance by signing and dating the attached settlement agreement and returning it to my office. When your signed copy is received, it will be entered into the Hanford Site Administrative Record.

If you have any questions, please contact me, or your staff may contact Woody Russell, Environmental Compliance Division, (509) 373-5227.

Sincerely,

Shirley J. Olinger, Manager
Office of River Protection

ESQ:RWR

Attachment

cc: See page 2

Ms. Polly Zehm
08-ESQ-077

-2-

APR 14 2008

cc w/attach:

S. J. Bensussen, CH2M HILL

L. J. Cusack, CH2M HILL

J. C. Fulton, CH2M HILL

M. N. Jaraysi, CH2M HILL

J. A. Hedges, Ecology

E. R. Skinnarland, Ecology

E. J. Van Mason, Ecology

Administrative Record

CH2M HILL Correspondence

Environmental Portal, LMSI

Attachment
08-ESQ-077

Draft Settlement Agreement

DRAFT SETTLEMENT AGREEMENT

RESOLUTION OF DISPUTE

Regarding Notice of Stipulated Penalty Incurred and Due No. 5218

On December 4, 2007, the Washington State Department of Ecology (Ecology) issued Notice of Stipulated Penalty Incurred and Due No. 5218 (NOP No. 5218) regarding a release of radioactive and hazardous waste ("the S-102 release") that occurred during retrieval operations at Tank S-102 on or about July 27, 2007. In NOP No. 5218, Ecology assessed stipulated penalties under the Hanford Federal Facility Agreement and Consent Order (HFFACO) in the amount of \$500,000. On December 7, 2007, the U.S. Department of Energy (DOE) timely filed its notice of Initiation Of Dispute Resolution For Notice Of Stipulated Penalty Incurred And Due No. 5218 pursuant to Article VIII, Section 30 and Article IX, Section 31 of the HFFACO. By agreement, the Parties extended the dispute resolution process at the Project Managers' level until April 25, 2008, have engaged in good faith informal negotiations, and have resolved the dispute as follows:

I. Notice of Violation No. 1.

Notice of Violation No. 1 set forth in NOP No. 5218 is hereby amended retroactive to December 4, 2007 to read as follows:

Violation #1: HFFACO Primary Document; S-102 Initial Waste Retrieval Functions and Requirements (S-102 F&R), Section 4.15 (RPP-10901, Revision 2)

Section 4.15 of the S-102 F&R requires that the Tank S-102 Waste Retrieval System shall incorporate in new components secondary containment and leak detection design features in accordance with 40 CFR 265.193 and WAC 173-303-640.

WAC 173-303-640(5)(b)(i) requires the owner or operator to use appropriate controls and practices to prevent spills and overflows from tank or containment systems, at a minimum spill prevention controls (e.g., check valves, dry disconnect couplings).

The Raw Water System of the Waste Retrieval System was not provided with backflow prevention controls (e.g., check valves) adequate to prevent waste from entering the Raw Water System. As the Raw Water system was not designed to transfer or contain any waste, the lack of backflow prevention resulted in a release of dangerous waste to the environment. Numerous opportunities were afforded by the S-102 Waste Retrieval System design review process to identify the need for backflow prevention on the Raw Water System. However, no action was taken to do so. In a comment documented during the design review process, a CH2M HILL Hanford Group, Inc. (CH2M HILL) engineer identified the exact scenario that is now thought to have caused the S-102 spill as a potential risk, but no satisfactory response was given to the comment.

In addition, the S-102 F&R references the Level 2 Design Criteria for the Waste Retrieval System. These design criteria also specify that backflow prevention will be provided for the Raw Water System.

II. Stipulated Penalty.

Ecology assessed stipulated penalties of \$500,000 against DOE under the HFFACO. In consideration of DOE and its Contractor's cooperation, investigations of the events surrounding the S-102 release, and prompt adoption of corrective actions necessary to prevent or mitigate the impacts of any such similar release in the future, Ecology agrees to hold \$250,000 of the \$500,000 stipulated penalty in abeyance pending completion of the following two conditions:

1. DOE and its Contractor shall complete the corrective actions associated with the violations listed in Ecology's Notice of Stipulated Penalty related to the S-102 release that are set forth in the list "S-102 Corrective Action Plan" attached to and made a part of this settlement agreement as Attachment A. All such corrective actions shall be completed on or before September 30, 2008. DOE shall, within 15 days of completion of all such corrective actions (or no later than October 15, 2008), submit to Ecology a report (certified as true and accurate under penalty of law) that documents the completion of corrective actions that have been implemented. Ecology shall provide in writing to DOE a statement accepting completion, or if completion is not accepted, describing in full (with any relevant documentation included) the basis upon which Ecology believes the corrective action[s] have not been completed as set forth in the certified statement from DOE. Ecology shall provide such statement in writing to DOE within 15 days of receipt of DOE's certified statement of completion. DOE shall have 60 days to cure any deficiency in completion of corrective actions Ecology deems not completed.
2. DOE and its Contractor shall demonstrate effective implementation of the corrective actions listed on Attachment A by conducting retrieval actions in the tank farms in compliance with the corrective actions and requirements set forth in the F&R Section 4.15 and 4.11.3 and the Washington State regulations cited therein for a period of one calendar year beginning on the day tank retrieval actions are restarted. The demonstration period will include at least 360 cumulative hours (roughly equivalent to 45 - 8 hour shifts) of active retrieval field operations in support of or in actual removal of waste which may extend the period of demonstration beyond one year. DOE shall, within 15 days of completion of the demonstration period, submit to Ecology a report (certified as true and accurate under penalty of law) that describes all tank retrieval actions undertaken during the demonstration period and identifies whether those actions are in compliance with the corrective actions and requirements set forth in the F&R section 4.15 and 4.11.3 and the Washington State regulations cited therein.

A statement confirming whether or not Ecology accepts satisfaction of the above two conditions shall be provided by Ecology in writing within 15 days of the receipt of the latter of the above two reports. Upon acceptance by Ecology, DOE shall not be required to pay any amount of that portion of the penalty assessed in NOP No.5218 that is held in abeyance under this settlement agreement, and the full amount of penalty held in abeyance (\$250,000) shall be deemed satisfied. If Ecology does not accept completion of the two conditions set forth for abeyance of penalty, then Ecology shall provide a full description to DOE of its reason(s) for non-acceptance, including any relevant documents.

DOE agrees that a failure to complete conditions set forth in Paragraph 1 and 2 above will trigger the obligation to pay the \$250,000 portion of the stipulated penalty held in abeyance under this agreement.

Within 30 days of the approval of this settlement agreement, DOE or its Contractor shall pay the remaining one half (\$250,000) of the stipulated penalty to Ecology in accordance with the administrative directions provided in NOP No. 5218. Alternatively, DOE may satisfy this penalty amount (\$250,000) with a minimum payment of \$50,000 within 30 days of DOE and Ecology approval of this settlement agreement and completion of the Supplemental Environmental Projects (SEP) set forth below, as approved by Ecology consistent with its settlement guidelines.

If DOE chooses to complete the approved SEPs as an alternative to payment of the full \$250,000 amount not held in abeyance, DOE shall, by September 30, 2008, submit a report (certified as true and accurate under penalty of law) that provides the following information: 1) a detailed description of the SEPs as implemented; 2) itemized costs; 3) certification that the SEPs have been fully implemented pursuant to the provisions of this settlement agreement; and 4) a description of the environmental and public health benefits resulting from implementation of the SEPs. A statement confirming whether or not Ecology accepts that the SEPs have been fully implemented pursuant to the provisions of this settlement agreement shall be provided by Ecology in writing within 15 days of the receipt of DOE's report. DOE agrees that a failure to complete no part of the approved SEPs and/or submit the required report by September 30, 2008, will trigger the obligation to pay the remaining \$200,000 portion of the stipulated penalty within 30 days of such date. If DOE undertakes all or a portion of the SEP, then DOE shall be entitled to prorated reduction in the \$200,000 portion of the penalty consistent with EPA guidelines for Supplemental Environmental Projects. Such payment shall be made in accordance with the administrative directions provided in NOP No. 5218.

DOE hereby certifies that, as of the date of this settlement agreement, neither DOE nor its contractor are required to perform or develop the below SEPs by any federal or state law or regulation, nor that DOE or its contractor are required to perform or develop the below SEPs under any other agreement. DOE further certifies that neither it nor its contractor have received credit for, or are negotiating to receive credit for, the SEPs under any other agreement.

This settlement agreement represents a complete resolution of the dispute over HFFACO stipulated penalties assessed in NOP No. 5218. Nothing in this settlement agreement shall be construed as prohibiting, altering, or in any way limiting the ability of Ecology to seek any other remedies or sanctions available by virtue of DOE's violation of this settlement agreement or of the statutes and regulations upon which this settlement agreement is based, or for DOE's violation of applicable law. Nothing in this settlement agreement is intended to, nor shall be construed to operate to, resolve any criminal liability of DOE.

Supplemental Environmental Projects

Replace HEPA Breather filters in TY Farm plus Provide Emergency Response Equipment for the Tri-County Hazardous Materials Response Team (\$303,831)

New Design HEPA Breather Filter (\$204,440)

The traditional HEPA breather filter designs consist of a relatively large capacity HEPA filter (125-250 cfm) contained in a metal housing. The filter is approximately 8 cubic feet in size and must be tested annually. If a filter fails, it is removed from the metal housing, replaced with a new filter and re-tested. Testing and replacement requires a crew of 13 people. Because of the nature of the activities and size and location of the filters, there is a significant potential for exposing tank farm workers to radiological and chemical exposures within the tank farms, in addition to the normal industrial hazards associated with lifting and working in the tank farms.

Use of newly developed radial filters (40cfm) provides a lighter, test free, system with less potential exposure to tank farm hazards. Eliminating the need for a test reduces the crew size required and the number of people potentially exposed. The filters are integrated with the housing (similar to an oil filter) and much smaller and lighter, further reducing the size of the crew needed to change the filter and the potential physical hazards associated. Fewer workers performing an easier task greatly reduces the potential for exposures or other industrial hazards.

This proposal will spend at least \$200,000 replacing G-1 HEPA filters in the Single-Shell Tank system. The first requirement is to replace all 12 G-1 HEPA filters in TY Farm with the new radial filters. Focusing on one farm and changing all the filters as a single project can gain labor cost efficiencies. The total cost is slightly below \$200,000, so CH2M HILL anticipates replacing one additional G-1 HEPA filter in another, to be determined, farm to satisfy the \$200,000 requirement.

Estimated Costs: The cost of this proposal includes equipment, material, and labor costs associated with removing the existing filters and replacing them with the new filters. The breather filters are approximately \$500 each and the associated valve and spool piece is about \$ 6,500. For the purposes of this estimate, \$7,000 is used for total filter costs. This estimate (based on previous individual tank change-outs in BY farm) is based on changing a filter in about 4.5 hrs of field work. Therefore, this estimate assumes the change of two filters per shift.

Contingency: Because these filters have not previously been replaced for an entire tank farm as one project, the estimate includes 2 contingency shifts (8 shifts total to replace 12 filters) for the field work. The following table summarizes total costs of labor, materials, and equipment for a complete change-out of TY Farm. If costs are less than estimated, CH2M HILL will replace additional G-1 HEPA filters in other farms to offset the savings.

Due to the size and configuration of the G-1 HEPA filters, the initial change-out requires a crew of 12 staff representing various crafts.

Cost Estimate to remove 12 existing G-1 HEPA filters in TY Farm and replace with 12 radial filters.

Function	Classification	Man Hours	Rate (\$/hr)	Cost (\$)
Planning – Develop work packages (40 hr for first pkg, 10 hr thereafter)	Planner	150	75	11,250
Planning – (9 hrs for first pkg 4 hr thereafter)	Engineering	53	75	3,975
Planning	Project manager	90	75	6,750
Field Work - (8 days @9hr/day plus 4 hr for each filter)	Field Work Supervisor	120	60	7,200
8 days @9hr/day for 2 FTE	Mill Wright	144	60	8,640
8 days @9hr/day for 4 FTE	Nuclear Chemical Operator	288	60	17,280
8 days @9hr/day for 1 FTE	Industrial Hygienist	72	60	4,320
8 days @9hr/day for 3 FTE	HPT	216	60	12,960
8 days @9hr/day for 2 FTE	Sheet Metal	144	60	8,640
Equipment (filters, valves, spool pieces 12@ \$8,000 each)				84,000
One wye adapter				\$25,000
Total for TY Farm				\$190,015

Additional filter installation costs of approximately \$14,425 (\$7,000 for equipment and \$7,425 for labor) / filter are detailed below.

Cost Estimate to remove one existing G-1 HEPA filter and replace with one radial filter

Function	Classification	Man Hours	Rate (\$/hr)	Cost (\$)
Planning – Develop work packages	Planner	40	75	3,000
	Engineering	9	75	675
Field Work	Field Work	8.5	60	510
1 FTE	Supervisor			
2 FTE	Mill Wright	9	60	540
4 FTE	Nuclear Chemical Operator	18	60	1080
1 FTE	Industrial Hygienist	4.5	60	270
3 FTE	HPT	13.5	60	810
2 FTE	Sheet Metal	9	60	540
Equipment (filters, valves, spool pieces 12@ \$7,000 each)				7,000
Total for one filter				\$14,425

Benefits to potential worker exposure and waste reduction:

1. reduced potential for worker exposure to radiological, chemical, and industrial hazards, and
2. could (with further laboratory testing) result in a reduction in waste generation.

Emergency Response Equipment for the Tri-County Hazardous Materials Response Team (\$ 99,391)

The Tri-County Hazardous Materials Response Team is a public corporation that includes the following members:

- Richland City Fire Department
- Kennewick City Fire Department
- Pasco City Fire Department
- Yakima City Fire Department
- Benton County Fire District No. 1
- Benton County Fire District No. 2
- Benton County Fire District No. 4
- Franklin County Fire District No. 3
- Walla Walla Fire District No. 5

They operate within a Tri-County (Benton, Franklin, Yakima, and Walla Walla Counties) mutual aid pact, and respond to any call for aid within the State of Washington.

The organization is funded through member's contribution through an annual assessment and with grants that have been through the Tri-County Emergency Management and

Home Land Security and Yakima County Emergency Management. The following list of equipment represents their highest priority needs that are not currently funded in the 2008 budget for the Team. Under this SEP, the equipment on the following list will be gifted to the Tri-County Hazardous Materials Response Team.

Cost:

The following is a list of the Team's highest priority needs for FY 08

Two (2) Honda (or equivalent) 2000 watt generators	\$1,973.00
Eight (8) Halogen lights with telescoping bases.	\$ 691.00
Scene lighting is not currently carried on the Teams response vehicle or available to the team.	
Two (2) Drum patching kits	\$ 2,201.00
Two (2) pipe patching kits	\$ 1,894.00
Four (4) MSA 1 hour high pressure SCBA bottles	\$ 6,550.00
A Tow Vehicle for pulling Haz-Mat trailer.	\$77,812.00
Bed box to carry equipment	\$ 8,000.00*

The Current vehicle is an older vehicle and underpowered (loses significant speed going up inclines) that is costly to maintain and has reliability issues.

This is a worst case estimate and not based on an actual bid.

Total cost is approximately **\$99,391**

Benefits for reducing the risk to surrounding communities and waste minimization:

1. improves the local communities' ability to respond to chemical releases.
2. when a spill is correctly responded to, the extent of migration of contaminants is minimized and the volume of waste generated as a result decreased.

U. S. Department of Energy

Washington State Department of Ecology

by Shirley J. Olinger

by _____

Title: ORP Manager

Title: _____

S-102 CORRECTIVE ACTION PLAN

A	B	C
Number	ISSUE / ACTION STATEMENT	DELIVERABLE
3	CH2M-PER-2007-1738	
4	CH2M HILL needs to revise its design review processes, procedures and implementation to ensure approved designs are technically correct and satisfy the requirements of the DSA.	
5	CH2M-PER-2007-1738.1	Engineering Design Program Review report and record of corrective action implementation.
6	CH2M-PER-2007-1738.2	New engineering procedure/standards. Listing of trained personnel
7	CH2M-PER-2007-1738.3	Revised design review procedures including structure, roles and responsibilities for design reviews.
8	CH2M-PER-2007-1745	
9	CH2M-PER-2007-1745.1	Test Report will be issued
10	CH2M-PER-2007-1745.2	Work Package(s) will be completed
11	CH2M-PER-2007-1745.3	lighting standard will be published
12	CH2M-PER-2007-1745.4	Revise procedures implementing the published standards and completed training rosters
13	CH2M-PER-2007-1745.5	Evaluation Report
14	CH2M-PER-2007-1746.2	Revised procedure ADM-P-01.
15	CH2M-PER-2007-1746.3	Training materials and attendance rosters indicating 90% completion.
16	CH2M-PER-2007-1747	
17	CH2M-PER-2007-1747.1	Revised Abnormal Operating Procedures
18	CH2M-PER-2007-1747.2	Revised Abnormal Operating Procedures
19	CH2M-PER-2007-1747.3	Implemented procedures for new process
20	CH2M-PER-2007-1747.4	Drill attendance indicating 90% completion
21	CH2M-PER-2007-1750	
22	CH2M-PER-2007-1327.3	Modified procedures (TFC-ENG-Design-P-17 and TFC-ENG-Design-C-06)
23	CH2M-PER-2007-1327.16	Revision of TFC-ENG-FACSUP-D02.2 Waste Leak Path Evaluations, with a current or past effective date, requiring evaluation of potential waste transfer paths to the DSA, consideration of the waste channeling PISA, and the literal definition of physically connected.
24	CH2M-PER-2007-1327.17	Waste Transfer Confinement Review Board Charter is created.
25	CH2M-PER-2007-1327.18	New procedure, Waste Leak Path Evaluations.

S-102 CORRECTIVE ACTION PLAN

A	B	C
3 Number	ISSUE / ACTION STATEMENT	DELIVERABLE
26	CH2M-PER-2007-1327.19 Establish an Engineering Standard on confinement for all tank farm designs. Design reviews verify that the design meets the appropriate Engineering Standard. Likewise, Engineering performs walk-downs to verify visible portions of confinement systems are installed as designed.	New Standard
27	CH2M-PER-2007-1493 TF-AOP-006 and TF-AOP-011 procedures lack guidance in responding to an unknown High Radiation Area.	Review the PER Screening Tab and Senior Manager Review for requested data. Complete the task in E-STARS in accordance with TFC-ESHQ-Q_C-C-01, and TFC-ESHQ-Q_ADM-C-12 Apparent Cause Analysis & Corrective Action Planning
28	CH2M-PER-2007-1496 Timely response was delayed while necessary re-entry plans were developed and approved. Evaluate/develop pre-planned and approved re-entry, investigative and habitability surveys for and with both IH and HPT involvement.	Review the PER Screening Tab and Senior Manager Review for requested data. Complete the task in E-STARS in accordance with TFC-ESHQ-Q_C-C-01, and TFC-ESHQ-Q_ADM-C-12 Apparent Cause Analysis & Corrective Action Planning
29	CH2M-PER-2007-1370 During reverse rotation of the positive displacement (progressive cavity) pump installed in S-102, a release of waste occurred outside of the designed transfer system confinement boundary. Visual observation of the leak site and review of radiological data, indicate that the likely waste release point was from the dilution water supply hose. The hose ultimately leads to the suction of the pump. (The suction when the pump is running in forward, the discharge when running in reverse). The mechanism proposed is plugging of the pump intake area while the pump is running in reverse causing pressurization of the dilution line sufficient to overcome the hydraulic lift to the top of the tank and rupture the dilution hose. Backflow of waste into the dilution line of the 241-S-102 progressive cavity pump was not considered in the safety basis. Dilution lines in the normal	
30	CH2M-PER-2007-1370.1 DC-01-01: Develop desk instruction providing detailed guidance to engineers on the future evaluation of all equipment that could be considered physically connected to a waste transfer route. The evaluation includes consideration of equipment that could be considered "physically connected" per the existing TSR definition, and is not constrained by pressurization capability. Update desk instruction to match existing TSR definition of "physically connected".	Desk Instruction TFC-ENG-FACSUP-D-02.2
31	CH2M-PER-2007-1370.6 CATPR-02: Develop training on lessons learned regarding mindset errors and the need to incorporate explicit TSR requirements into the design and design review processes.	Copy of training material
32	CH2M-PER-2007-1370.9 MPA-01: Perform a Mid-Point effectiveness assessment. MPA-01 Criteria Includes: 1.) Review objective evidence from all completed corrective actions to ensure completeness and adequacy. 2.) Conduct Interviews with individuals (project and system engineers) after implementation of CATPR-01 to determine their level of understanding of physically connected. 3.) Conduct Interviews with individuals (project and system engineers) after implementation of CATPR-03 to determine their understanding of expectations regarding integration of explicit TSR requirements into design and design review processes. 4.) Perform a search of the PER database (September 1, 2007 to February 15, 2008) to identify any further instances of incorrect application of TSR definitions..	Completed Mid-Point Assessment that has been presented to and accepted by the Executive Safety Review Board.
33	CH2M-PER-2007-1370.10 EPA-01: Perform an End Point effectiveness assessment. EPA criteria includes: 1.) Review objective evidence from all corrective actions to ensure completeness and adequacy. 2.) Conduct Interviews with individuals (project and system engineers) after implementation of CATPR-01 to determine their level of understanding of physically connected. 3.) Conduct Interviews with individuals (project and system engineers) after implementation of CATPR-03 to determine their understanding of expectations regarding integration of explicit TSR requirements into design and design review process. 4.) Perform a review of selected designs produced (after implementation of CATPR-01) evaluating how physically connected is being used, to demonstrate CATPR-01 effectiveness. 5.) Perform a search of the PER database (February 16, 2008 to August 31, 2008) to identify any further instances of incorrect application of TSR definitions.	Completed End Point Assessment that has been presented to and accepted by the Executive Safety Review Board.
34	7-1596.1 EM-60-17.1 Develop and present training to the Field Work Supervisors on the requirements for completing a new Worksite Hazards Analysis and when it is appropriate to utilize the General Hazards Analysis	Training materials and attendance rosters indicating 90% attendance

S-102 CORRECTIVE ACTION PLAN

A	B	C
3 Number	ISSUE / ACTION STATEMENT	DELIVERABLE
35 7-1596.2	EM-60-17.2 Revise TFC-OPS-MAINT-C-01, Tank Farm Contractor Work Control, to clarify a.) When a troubleshooting plan is required, and b.) What type of work can be performed using a Standing Minor Work Package	Procedure revised and issued
36 7-1596.3	EM-60-17.3 Develop and present training to the Field Work Supervisors on: a.) The changes to TFC-OPS-MAINT-C-01 regarding when a troubleshooting plan is required and the type of work which can be performed using a Standing Minor Work Package, b.) The expectations for documenting proposed work scope on a Standing Minor Work Package, including use of the proper work package with regards to the primary craft performing the work, c.) The expectations for documenting work release of a Standing Minor Work Package through the shift office, and d.) The expectations for documenting work completion of an item in a Standing Minor Work Package.	d) Training materials and attendance rosters indicating 90% attendance
37 CH2M-PER-2007-1605	The Delta HAZOP performed on the most recently installed S-102 retrieval pump did not include all system modifications, did not document conclusions, and results were not formally communicated. Although the "delta HAZOP" process is a good practice, it is not governed by procedure although the process should be consistent with CH2M HILL HAZOP process.	Evaluate suggestion, enter comments and required actions on PIE/CIM tab of the PER. Disposition in accordance with TFC-ESHQ-Q_C-C-01, Problem Evaluation Request.
38 CH2M-PER-2007-2042	REC-28, Change the focus of the engineering assessment program to one that is focused on quality and follow-through, rather than the current program that seems more focused on quantity and documentation. (Long-term)	Evaluate suggestion, enter comments and required actions on PIE/CIM tab of the PER. Disposition in accordance with TFC-ESHQ-Q_C-C-01, Problem Evaluation Request