



U.S. Department of Energy  
**Office of River Protection**

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

MAY 24 2006

06-TED-032

Ms. Jane Hedges, Program Manager  
 Nuclear Waste Program  
 State of Washington  
 Department of Ecology  
 3100 Port of Benton Blvd.  
 Richland, Washington 99354

RECEIVED  
 MAY 26 2006

EDMC

Dear Ms. Hedges:

RESPONSE TO THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY) INSPECTION ON THE REPORTED COMPLETION OF DOUBLE-SHELL TANK (DST) FARM UPGRADES REQUIRED BY HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (HFFACO) MILESTONE M-48-07A

Reference: Ecology letter from E. V. Mason to R. J. Schepens, ORP, and M. S. Spears, CH2M HILL, "November 29, 2005, Inspection on the Reported Completion of Double Shell Tank Farm (DST) Upgrades Required by Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-48-07A," dated March 9, 2006. 68952

The U.S. Department of Energy, Office of River Protection (ORP) has reviewed Ecology's concerns detailed in the Reference. ORP recognizes that Ecology's concerns with some of the past Tank Farms projects reports requiring Independent, Qualified, Registered, Professional Engineer (IQRPE) assessment and certification need to be addressed to minimize misunderstanding with the regulations and content of future integrity assessment reports.

ORP has taken an active interest in Ecology's comments on the adequacy of inspections conducted and the 241-AZ-301 Condensate Return System written assessment report by an IQRPE.

ORP and CH2M HILL Hanford Group, Inc. (CH2M HILL) management is committed to ensuring the adequacy of integrity assessment reports certified by IQRPEs for Hanford Tank Farms projects. Recent initiatives include:

- CH2M HILL directives to coordinate and manage new master agreement contracts requiring independent inspection and IQRPE certification starting in Fiscal Year 2007 and beyond. Standardized deliverables using consistent task order details and best practice contract language to be coordinated through procurement specialists and Buyer Technical Representatives.

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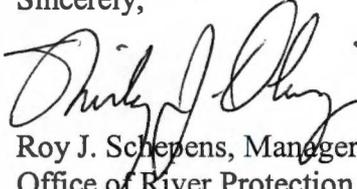
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- CH2M HILL issuance of a lessons learned bulletin on expected level of detail in IQRPE assessment reports to all contractors with open task orders for IQRPE work for the remainder of Fiscal Year 2006.
- Update of existing Tank Farm Contractor procedures, TFC-ESHQ-Q-INSP-C-01, "Control of Inspections" to incorporate elements of the lessons learned to incorporate best practices and to establish CH2M HILL regulatory staff review of IQRPE assessment reports prior to issuance of the final report. Regulatory staff review is designed to ensure IQRPE assessment reports address all regulatory requirements.
- Increased ORP oversight of the recently submitted DST Integrity Assessment Report to ensure validation of M-48-14 requirements was thoroughly documented.

If you have any questions, you may call me, or your staff may contact, Victor L. Callahan, Tank Farms Engineering Division, (509) 373-9880.

Sincerely,

  
Roy J. Schepens, Manager  
Office of River Protection

TED:VLC

cc: M. N. Jaraysi, CH2M HILL  
R. S. Popielarczyk, CH2M HILL  
M. S. Spears, CH2M HILL  
J. J. Lyon, Ecology  
CH2M HILL Correspondence  
TPA Administrative File