



## Department of Energy

Washington, DC 20585

September 28, 2011

Mr. Thomas J. Dieter  
President  
CH2M-Washington Group Idaho, LLC  
P.O. Box 2010  
MS-9204  
Idaho Falls, Idaho 83403-2010

NEL-2011-02

Dear Mr. Dieter:

The Office of Health, Safety and Security's Office of Enforcement and Oversight conducted an evaluation of the facts and circumstances associated with quality assurance and work control deficiencies that occurred during the construction of the Sodium Bearing Waste Treatment Project (SBWTP) at the U.S. Department of Energy's (DOE) Idaho National Laboratory. On February 9, 2011, CH2M-Washington Group Idaho, LLC (CWI) reported noncompliances associated with these deficiencies in DOE's Noncompliance Tracking System (NTS) in reports NTS-ID--CWI-IWTU-2010-0002 and NTS-ID--CWI-IWTU-2011-0001.

As the prime contractor, CWI is responsible for the design, construction, and operation of the SBWTP. This responsibility includes the oversight of all subcontractors. In February 2010, the DOE Idaho Operations Office (DOE-ID) issued a letter, EM-FMDP-10-013, *Significant Conditions Adverse to Quality at the Sodium Bearing Waste Treatment Project*, to CWI stating that the quality assurance process used by CWI's subcontractor, URS-Washington Division (URS-WD), was ineffective in that it failed to prevent recurrence of the issues related to construction work package quality and control of "information only" drawings. A causal analysis performed by CWI found that these issues were not routinely entered into the URS-WD corrective action process. As the CWI casual analysis indicates, URS-WD failed to: (1) perform and document casual analyses of the identified issues; (2) institutionalize corrective actions into nuclear safety procedures; and (3) schedule formal independent assessments.

In January 2011, a CWI assessment revealed that actions taken by URS-WD to correct previously identified quality and work control issues were not effective. Subsequently, in January 2011, DOE-ID issued letter EM-FMDP-11-006, *Issues with Sodium Bearing Waste Treatment Weld Travelers and Inspection Documentation*, to CWI that documented additional issues associated with work control, document control, and handling of quality assurance records.

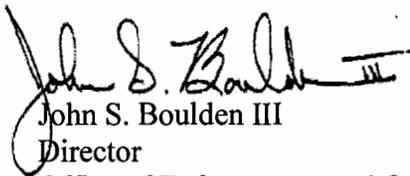


Based on a review of the evidence associated with these events, DOE finds that potential violations of 10 C.F.R. Part 830, *Nuclear Safety Management*, occurred. Specifically, CWI did not ensure that URS-WD implemented effective corrective actions to prevent known problems with its quality assurance process during the construction of the SBWTP.

The Office of Enforcement and Oversight is issuing this Enforcement Letter to CWI to emphasize the importance of CWI's responsibilities associated with nuclear safety oversight of its work and the work of its subcontractors. The Office of Enforcement and Oversight acknowledges that SBWTP construction activities were completed in June 2011, and that the documented quality issues had a well defined path to closure before the completion of construction. Consequently, the Office of Enforcement and Oversight has determined that further enforcement activity is not warranted at this time. However, quality assurance oversight will continue to be an important part of the CWI responsibilities during the start-up and operations of the SBWTP, and the Office of Enforcement and Oversight, DOE-ID, and the Office of Environmental Management will continue to closely monitor CWI's oversight of quality assurance and work control items during future operations to ensure compliance with nuclear safety requirements associated with these activities.

No response to this Enforcement Letter is required. If you have any questions, please contact me at (301) 903-2178, or your staff may contact Mr. Steven Simonson, Acting Director, Office of Nuclear Safety Enforcement, at (301) 903-7707.

Sincerely,



John S. Boulden III

Director

Office of Enforcement and Oversight  
Office of Health, Safety and Security

cc: Lee Fife, CWI  
Richard Provencher, DOE-ID  
Richard Azzaro, DNFSB