



**Department of Energy**  
Washington, DC 20585

September 6, 2007

Mr. John Fulton  
Chief Executive Officer  
CH2M Hill Hanford Group, Inc.  
2440 Stevens Drive  
Richland, Washington 99352

Dear Mr. Fulton:

The Department of Energy (DOE) held an Enforcement Conference on August 29, 2006, with CH2M Hill Hanford Group (CHG) to discuss potential violations of nuclear safety requirements described in our Investigation Summary Report dated July 26, 2006. At that time, DOE elected to defer a decision on a potential quality improvement violation related to recurring radiological events and deficiencies in the identification and control of radiological hazards at the Tank Farms. This decision was based upon the fact that CHG senior management had initiated radiological work improvements but insufficient data was available to assess their effectiveness. On July 12, 2007, Office of Enforcement and DOE Office of River Protection personnel met with you and your staff to review the progress and effectiveness of these actions.

The Office of Enforcement's investigation of quality improvement deficiencies identified that multiple contamination events occurred between 2003 and 2005 and that many of these events were similar in that the work planning had not fully recognized the radiological hazards or implemented effective controls. During the Enforcement Conference, CHG management identified that a number of actions to improve radiological work planning and the conduct of radiological work were in progress. These improvement initiatives included increased senior management participation, the establishment of an Executive Safety Review Board to monitor safety performance, improvements in radiological worker knowledge of hazards, and improvements in radiological work planning and controls. Key improvements to radiological worker safety included the implementation of a more conservative approach to planning work that requires verification that radiological hazards are not present rather than assuming this condition; and strengthening the radiological controls for all work that involves removing items from tanks or breaching their containment/confinement boundaries.

We are optimistic that your improvements will be sustainable and will demonstrate effectiveness over time in preventing or mitigating harm to workers from unplanned radiological events. Accordingly, DOE has determined that no further enforcement action is necessary for the events described in our Investigation Summary Report.

However, we are currently reviewing a recent event involving a radioactive material spill in the vicinity of the S-102 retrieval pump. As you know, DOE intends to conduct a Type A investigation of this event. Should radiological work deficiencies similar to those identified in our Investigation Summary Report be identified in this event or future radiological events, the Office of Enforcement may choose to pursue further enforcement action. DOE will continue to monitor radiological work activities at the Tank Farms to ensure that radiological work improvements continue to be effective in protecting workers.

No response to this letter is required. Should you have any questions, please contact me at (301) 903-2178 or have your staff contact Mr. Richard Day at (301) 903-8371.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Guevara", with a large, decorative flourish at the end.

Arnold E. Guevara  
Director  
Office of Enforcement  
Office of Health, Safety and Security

cc: Richard Azzaro, DNFSB  
Craig Anderson, CHG