December 29, 2016 WRPS-1605859

Mr. W. E. Hader, Contracting Officer U.S. Department of Energy Office of River Protection Post Office Box 450 Richland, Washington 99352-0450

Dear Mr. Hader:

CONTRACT NUMBER DE-AC27-08RV14800 – WASHINGTON RIVER PROTECTION SOLUTIONS LLC RESOLUTION OF RECOMMENDATIONS FOR OFFICE OF INSPECTOR GENERAL SPECIAL REPORT OIG-SR-17-01

Reference: Letter, T. W. Fletcher, ORP, to K. A. Downing, WRPS, "CONTRACT NUMBER

DE-AC27-08RV14800 – Transmittal of Direction to Implement Recommendations for Office of Inspector General Special Report OIG-SR-17-01," 16-TF-0128/1604744, dated November 23, 2016.

The purpose of this letter is to communicate closure of the response actions completed by Washington River Protection Solutions LLC (WRPS) in resolution of the three recommendations contained in the Office of Inspector General special report referenced above. These actions were discussed with members of your staff on Wednesday, December 21, 2016.

The recommendations and associated response actions were:

1. "Take action to input all vapor issues in the WRPS Problem Evaluation Request (PER) system, to ensure adequate tracking, closure, and visibility of corrective actions."

WRPS incorporated all Tank Vapors Assessment Team (TVAT) report actions into the PER system (WRPS-PER-2014-0602.1 through WRPS-PER-2014-0602.122) to provide greater visibility of actions being completed in response to the TVAT team recommendations.

2. "Take steps to improve communication with the workforce about prior proposals to address vapor hazards that have been studied and not acted upon, to explain the rationale for these decisions."

Along with employee briefings and the WRPS weekly employee newsletter, Tank Operations Contract vapors website (HanfordVapors.com) has been used as a primary method of employee and public outreach regarding chemical vapors at Hanford. The website has been updated with information related to controls previously considered or currently in place to manage vapors. The following posting has also been added to the website to summarize work completed to date:

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## Proposals to Address Tank Farm Vapor Hazards

Many technologies have been or are being evaluated for reducing or eliminating tank farm vapors. Studies have examined combinations of adsorbents (e.g., activated carbon), absorption (e.g., water scrubbing), oxidation (e.g., thermal or catalytic), biofiltration, and dilution/dispersion (e.g., increased active ventilation and taller exhaust stacks). Proposed technologies are reviewed in RPP-RPT-23101 SRNL-STI-2016-00484. Testing of some technologies began in the late 1980s and has continued intermittently through today. Efforts range from simple activities such as closing shut-off (isolation) valves in tank risers, to complex multistage treatment of ventilation exhaust. Technologies deployed thus far have had some success, while others were problematic (RPP-22171). WRPS has an ongoing program to evaluate engineering controls that will be integrating results from final data from the vapor monitoring and detection system (VMDS) and as the Industrial Hygiene Technical Basis is updated. In addition, WRPS Engineering has provided briefings on engineered controls.

Information on controls that have been tested, tested and implemented, or considered but not implemented has been shared with the Tank Farms workforce through the website at HanfordVapors.com.

3. "Continue to reinforce the Office of Environmental Management safety culture principles where: (a) Employees feel responsible for safety; (b) Leaders demonstrate commitment to safety; (c) Trust towards each other is a signature of the organization; and (d) Decision making reflects safety as the overriding priority."

Reinforcing safety culture principles is a continuous priority for WRPS, and has been done through concrete actions including establishing a Safety Culture Monitoring Panel, creating a Safety Culture Monitoring Team (SCIT) comprised of a 50/50 mix of bargaining unit and exempt employees, and implementing methods through the SCIT to change teamwork related employee behaviors. WRPS also completed a Safety Conscious Work Environment Assessment (FY2016-0PI-S-0403) in September 2016, the results of which were analyzed to gain insight into known safety culture related improvement areas. The three strengths above were documented as part of the assessment along with two opportunities for improvement (OFI) related to increasing visibility of Integrated Safety Management System expectations and declining rates of PER issuance among some work groups. The OFIs have been incorporated into the PER system for tracking and resolution.

WRPS has also provided information on available mechanisms for employees to raise concerns on the HanfordVapors.com website, including the Employee Concerns program, employee-based safety councils, the Problem Evaluation Request system for documenting potential issues and their resolution, Alternative Dispute Resolution and the Differing Professional Opinion Process. (http://hanfordvapors.com/respond/employee-resources/).

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You may contact me at 376-4592, or your staff may contact Mr. R. E. Gregory at 376-8916, with any questions and requests for further information regarding this matter.

Sincerely,

(Signature Attached)

K. A. Downing Contracts Manager

KAD: KJL

cc: ORP Correspondence Control

B. M. Ballard, ORP

R. L. Burt, ORP

J. A. Diediker, ORP

D. R. Garcia, ORP

B. J. Harp, ORP

M. J. Harrison, ORP

J. M. Johnson, ORP

C. J. Kemp, ORP

J. J. Lynch, ORP

D. M. MacDonald, ORP

E. M. Mattlin, ORP

M. T. McCusker, ORP

S. C. Persons, ORP

S. H. Pfaff, ORP

K. W. Smith, ORP

S. C. Smith, ORP

S. D. Stubblebine, ORP

G. D. Trenchard, ORP

R. L. Urie, ORP

## WRPS Correspondence Control

A. D. Basche, WRPS

P. J. Bengtson, WRPS

S. B. Cherry, WRPS

J. F. Corrado, WRPS

T. L. Farber, WRPS

R. E. Gregory, WRPS

M. A. Lindholm, WRPS

R. B. McPherson, WRPS

R. J. Sams, WRPS

J. M. Shelt, WRPS

C. A. Simpson, WRPS

B. R. Thomas, WRPS

## **Electronically Approved by:**

UserName: Simpson, Charles (h8856234)

Title: Manager of Contracts

Date: Thursday, 29 December 2016, 02:05 PM Pacific Time Meaning: Signed per direction of the TOC President's Office