



OFFICE OF RIVER PROTECTION

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

MAR - 6 2018

18-QAD-0016

Ms. K.D. Irwin  
Project Manager  
Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354

Ms. Irwin:

CONTRACT NO. DE-AC27-01RV14136 – U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION **REQUEST FOR INVESTIGATION OF ISSUES WITH STRUCTURAL STEEL MATERIAL RECORDS**

References: See page 3

During recent oversight, the U.S. Department of Energy, Office of River Protection (ORP) reviewed the References and identified the quality records needed to demonstrate that the important-to-safety structural steel could perform its safety function were either missing or of indeterminate quality. This condition is a potentially unrecoverable quality issue. The major Waste Treatment and Immobilization Plant (WTP) facilities, including Low-Activity Waste, are credited in the safety bases to reduce the probability of a release of radioactive and chemically hazardous material by maintaining their structural stability under design basis events and provides support for major WTP systems during normal, abnormal, and accident conditions. Structural steel, in conjunction with reinforced concrete structures, is integral to performing functions relied on in safety basis accident analyses.

ORP is concerned with the age of the issue coupled with the apparent lack of appropriate corrective actions and a documented extent of condition to evaluate whether the issue pertains to other accepted items (e.g., rebar, hangers, piping).

ORP directs Bechtel National, Inc. (BNI) to promptly investigate the facts and circumstances surrounding the procurement, receipt, and acceptance of materials installed in WTP described herein to justify the continuation of work. Within 14 calendar days of receipt of this letter, BNI shall brief ORP concerning the results of the investigation to determine the extent of condition, to provide a technical basis for continuation of procurement activities, and the controls to be applied for the continued receipt, acceptance, and installation of important-to-safety items in all WTP facilities, including the Effluent Management Facility. Within 30 calendar days of receipt of this letter, BNI shall submit formal documentation of the investigation, the extent of condition, the implemented controls, and the action plan to remediate the deficiencies identified in the cited condition reports.


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The action taken herein is considered to be within the scope of work of the existing contract and does not authorize the Contractor to incur any additional costs (either direct or indirect) or delay delivery to the Government. If the Contractor considers that carrying out this action will increase contract/project costs or delay of delivery, the Contractor shall promptly notify the Contracting Officer orally, confirming and explaining the notification in writing within ten (10) calendar days, and otherwise comply with the requirements of the Contract clause I.84 FAR 52.243-7, -- "Notification of Changes (APR 1984)." Following submission of the written notice of impacts, the Contractor shall await further direction from the Contracting Officer.

If you have any questions, please contact me, or your staff may contact Paul A. Schroder, Director, Quality Assurance Division, (509) 373-8939.



William F. Hamel,  
Assistant Manager, Federal Project Director  
Waste Treatment and Immobilization Plant

QAD:WBS

cc: L. Fritz, BNI  
K.D. Irwin, BNI  
D.E. Kammenzind, BNI  
B.P. Reilly, BNI  
J. Tibble, BNI  
P. Fox, DNFSB  
BNI Correspondence

- References:
1. 24590-WTP-NCR-CON-13-0057, *LAW Missing Mill test reports for Pour cave and Process Cell hatch plates [RVP]*, issued March 19, 2013.
  2. 24590-WTP-PIER-MGT-13-0440, *MTRs Not Found In MRR Packages for Structural Steel [RVP]*, issued April 15, 2013.
  3. 24590-WTP-GCA-MGT-17-01862, *Structural Steel Mill Test Reports missing from HLW Structural Steel Material Receiving Reports*, issued December 20, 2017.
  4. 24590-WTP-GCA-MGT-17-01863, *Structural Steel Mill Test Reports missing from LAB Structural Steel Material Receiving Reports*, issued December 20, 2017.
  5. 24590-WTP-GCA-MGT-17-01864, *Structural Steel Mill Test Reports missing from LAW Structural Steel Material Receiving Reports*, issued December 20, 2017.