

EM-53

LESSONS LEARNED BULLETIN

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Establish a Controlled Repository and Document All Bases Regarding Remediation Management Decisions



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Statement:

While performing Soil Contamination Removal projects, actual site conditions are often encountered that require deviation from Stakeholder pre-approved work plans and/or procedures. It is vital to capture all decisional information and stakeholder agreements in a proactive and controlled manner in order to ensure that the project completion reports (e.g., Final Status Survey Reports) reflect clearly and accurately what occurred during the project and how each deviation was managed. For the SPRU North Field project, some decisional information was captured via informal means; the time required to reconstitute the information extended the schedule for delivery of project completion reports.

Discussion:

At the SPRU, prior to execution of remediation work activities, characterization of the potentially affected areas is performed to the extent practicable. Work execution documents are then prepared in accordance with the characterization data, such as Excavation Work Plans etc., several of which are documents approved or concurred upon by Stakeholders. However, as remediation proceeds and actual site conditions are encountered, it may become necessary to deviate from the approved work plans to varying degrees. It is vital to document the rationale, bases, and technical discussions associated with any changes in technical approach or work execution that are not specifically delineated in the approved work documents. This must occur real-time in a controlled manner while the remediation is ongoing in order to ensure that a complete file/database exists at project completion that provides the necessary project execution information to ensure accurate, defensible, and approvable completion reports. The SPRU North Field Contaminated Soil removal Project was performed on the Knolls Atomic Power Laboratory site, which is owned/controlled by the local Office of Naval Reactors Field Office (NR).

Analysis:

When unexpected site conditions are encountered after the physical work has started, any delays to remediation progress, due to a mobilized contractor, are costly. Therefore, project managers work through issues real-time in an expedited manner to ensure safe and effective remediation can continue as soon as possible. Consequently, much of the communications, agreements, clarifications etc. between the DOE, Contractor, Regulators and Stakeholders that aggregate to resolve the issues are typically "informal", such as IPT meetings, telephone conversations, tail gate meetings, e-mails and side-bar discussions. In such an environment, documentation of such communications is often overlooked for expediency, with the intent to document later. After physical completion of the North Field project and during review of the Project Completion reports, the DOE SPRU Regulatory Manager noted information gaps in the project file to support management actions taken during the remediation process. It required extensive effort to reconstitute from memory, e-mails, phone conversations, etc., all of the decision bases, and EM/Office of Naval Reactors (NR) agreements that occurred during the project. The Regulatory Manager and the project contractor were able to reconstitute enough of the project database to achieve approval of the completion reports; however, the project file should have been more complete.

Actions:

Establish in the Project Planning phase a process to "formally" document and control ALL information associated with work execution, technical approach, project changes, etc., that may be relied upon to document project decisions. The process should be assigned to a specific position (e.g., member of the IPT with regulatory compliance expertise) and monitored periodically to ensure the process is effectively maintained. This will ensure that the basis for all decisions and agreements is documented, including concurrence, buy-in, understanding, etc. by all regulators and stakeholders such that the project completion reports will be accurate, defensible, and approvable.

Critical Decision(s): CD-4
Facility Type(s): D&D - NonNuclear
Work Function(s): Communication, Construction, Design/Engineering, Environmental
Technical Discipline(s): Safety - Nuclear



DOE and Accelerated Remediation Company workers gather in front of the final shipment of contaminated soil from North Field at Separations Process Unit on Sept. 22, 2010. The contaminated soil was shipped to a disposal facility in Utah.

The removal of 9,400 cubic yards of contaminated soil in 2010 was completed about \$1 million under budget and four years ahead of schedule with the help of \$13.8 million from the Recovery Act.

Questions about the EM Lessons Learned program? Contact Johnnie Newson at johnnie.newson@em.doe.gov.