



**U.S. Department of Energy**  
**Office of Inspector General**  
**Office of Audits and Inspections**

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# AUDIT REPORT

Corrective Action Program at the Waste  
Treatment and Immobilization Plant

OAI-M-16-06

February 2016

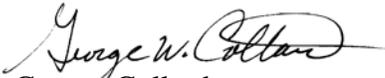
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Department of Energy  
Washington, DC 20585

February 1, 2016

MEMORANDUM FOR THE ASSISTANT SECRETARY FOR ENVIRONMENTAL  
MANAGEMENT

FROM:   
George Collard  
Deputy Inspector General  
for Audits and Inspections  
Office of Inspector General

SUBJECT: INFORMATION: Audit Report on the "Corrective Action Program at  
the Waste Treatment and Immobilization Plant"

BACKGROUND

The Waste Treatment and Immobilization Plant (WTP), when complete, will be the world's largest radioactive waste treatment plant, with an approved budget of \$12.3 billion. Its mission is to treat and vitrify the majority of the 56 million gallons of radioactive and chemical waste at the Hanford Site near Richland, Washington. Bechtel National, Inc., (Bechtel) is the contractor responsible for the design, construction, and commissioning of the WTP. Bechtel's contract requires it to establish and implement effective programs for reporting and resolving safety and quality problems, an essential element in creating a safety conscious work environment. The WTP project and the Bechtel contract are administered by the Department of Energy's (Department's) Office of River Protection (ORP).

According to Bechtel's Corrective Action Management Program, the *Integrated Issues Management Policy* establishes the Corrective Action Management Program as the primary issues management program for documenting and resolving conditions adverse to quality identified at the WTP. The program is used to manage adverse conditions, technical issues, as well as other issues, recommendations, and suggestions for improvement. The program also provides a mechanism to document issues and initiate the process for evaluating, correcting, and verifying resolution of issues. A condition report is generated to document issues in the corrective action program, which is managed through a graded process based on the significance of the issue. An effective corrective action program promotes prompt identification of issues and appropriate evaluation, tracking, trending, and correction in a timely manner. Given the complexity and cost of the WTP, we initiated this audit to determine whether WTP's corrective action program was effective in managing and resolving issues.

RESULTS OF AUDIT

The WTP corrective action program was not fully effective in managing and resolving issues. Specifically, we discovered the following:

- In some instances, issues were not managed and tracked in the corrective action program, as required. For example, several significant technical issues related to Inadequate Design of Mixing System were managed outside of the corrective action program and were closed before the overall issue was resolved. Inadequate performance of mixing systems at WTP could lead to nuclear criticality accidents, explosions of flammable gases, and mechanical failures of process vessel components. Management asserted that although these issues were originally managed under an alternative, routine issue action tracking system, they are now managed under the corrective action program.
- Corrective actions had not been implemented in a timely manner. Specifically, Bechtel did not meet any of its goals related to timeliness for the corrective action program. The average age of condition reports was 315 days, well above the target cycle time of 100 days. In addition, apparent cause evaluations exceeded the 45-day target, and root cause evaluations exceeded the 60-day target. Furthermore, the average age of corrective actions significantly exceeded established performance goals.
- Bechtel failed to follow through on implementing prior corrective action program improvement initiatives. For example, one prior improvement initiative was updated several times from 2008 through 2010, but was discontinued in October 2010. Focus on this issue began again in September 2014, but actions remain to be completed. Another initiative related to condition report cycle time was begun in 2011; however, this initiative was not implemented.

Our findings are consistent with ORP's October 2013 audit of Bechtel's Quality Assurance Program. ORP found major weaknesses in Bechtel's corrective action program and concluded that the program was not implemented in accordance with contract requirements. Specifically, ORP's review noted examples of failures to identify conditions adverse to quality, as well as inadequate condition report classification, corrective action planning and verification, and closure of condition reports. Some of the examples ORP identified potentially posed a threat to health and safety. Consequently, ORP issued two Priority Level 1 findings, the most adverse, directing Bechtel to develop Corrective Action Plans to address the two findings identified in ORP's audit report. The first finding was that Bechtel's overall Quality Assurance Program was not fully effective. The second finding was that Bechtel's Corrective Action Program was ineffective.

In addition to the specific Corrective Action Plans written in response to the findings, ORP directed Bechtel to develop an integrated, comprehensive Managed Improvement Plan to address the Level 1 findings and issues identified by ORP and other external reviewers. Accordingly, by March 2014, Bechtel had issued an extensive Managed Improvement Plan and two Corrective Action Plans to begin implementing corrective actions and improvements. ORP management informed us that not all approved corrective action plans have been implemented, and ORP had not yet verified implementation for key Priority Level 1 findings. During our audit, we confirmed ORP's findings and identified several other concerns involving timeliness of corrective actions and follow-through of prior improvement initiatives that may benefit from management's attention, as well.

## **Issues Managed Outside of the Corrective Action Program**

We identified issues that were managed and tracked outside of the corrective action program, including significant technical issues. Some issues identified through external assessments, self-assessments, and reports by workers were being managed through other processes such as the Action Tracking System (ATS) and the technical issues database. The ATS is to be used to track routine actions, and the technical issues database is to be used to track technical issues; however, according to Bechtel procedures, these systems should not be used in lieu of the corrective action program.

### **Tracking Issues in ATS**

Significant technical issues identified in an external review were managed through the ATS instead of the corrective action program. However, the issues were closed in ATS before they were actually resolved. Two examples of significant technical issues that were closed despite the fact that not all actions were completed were Inadequate Design of Mixing Systems and Mixing Vessel Erosion. While the issues were technically closed, we noted that Bechtel continued to work on these issues after the closure packages were closed. For example, Bechtel committed to completing small-scale testing in the closure package for the Inadequate Design issue after it was closed in 2010. The Department and Bechtel continue to work these technical issues through an agreed-upon path determined by the Secretary of Energy and a team of experts.

We also found that a major technical issue related to Inadequate Design of Mixing Systems was closed in 2010 without all needed actions being completed. This technical issue contained multiple ATS actions, some of which have been closed. However, the overall issue had not been resolved. According to a closure package for this issue, Bechtel and ORP identified that small-scale testing would need to be performed to determine with sufficient confidence that the vessels in the mixing system would comply with mixing requirements. At the time this package was closed, design confirmation had not been completed for the vessels, and there were unverified assumptions used to demonstrate vessel capability. Again, while the issues were closed, we found that since 2012, the inadequate mixing design issue has continued to be worked as a technical issue by a team comprised of Department and Bechtel personnel.

Another significant technical issue related to Mixing Vessel Erosion was managed outside of the corrective action program and was closed in 2008. However, the overall issue has yet to be resolved. Subsequent to the closure of this issue, in 2011, the Defense Nuclear Facilities Safety Board identified that the WTP project team had performed experimental testing to close the issue and validate the wear model. The Board further stated that the scope of that testing was limited and the results were flawed. Consequently, according to the Defense Nuclear Facilities Safety Board, experimental testing does not validate the relationships and assumptions used to establish the design wear rates. The Board also noted that inadequate wear allowances for vessels could result in component failures, which jeopardizes safety functions and could stop waste processing for indefinite periods, resulting in significant extensions in the time required to accomplish the facility mission. During the Board's review of wear allowance issues, the Department began developing a course of action to address wear design issues at the WTP. Subsequently, a plan agreed upon by the Secretary of Energy and his team in 2012 identified Mixing Vessel Erosion

as a technical issue, and additional actions are currently underway. Management asserted that although these issues were originally managed under an alternative, routine issue action tracking system, they are now managed under the corrective action program.

### **Tracking Issues in Technical Issues Database**

Bechtel used a technical issues database to track and close technical issues but did not always use the corrective action program to fully address the adverse safety or quality conditions, as required. Specifically, 15 of 45 technical issues we reviewed were not entered into the corrective action program, or the entry did not fully address the adverse condition. For example, one technical issue described a capacity modification needed for the demineralized water system; however, the issue was not entered into the corrective action program. In another example, a technical issue identified by an external assessment team noted that a spare melter should be assembled when the plant goes into operation to minimize risks associated with premature melter failure. This technical issue was also not entered into the corrective action program.

### **Tracking Self-Assessment Issues**

Issues identified through Bechtel's self-assessments were not always entered into the corrective action program, as required. We found that 15 out of 30 self-assessments identified safety or quality issues. However, condition reports were not generated or the issues were addressed outside of the corrective action process through the ATS. For example, 2 self-assessments conducted in 2012 on welding records identified a total of 22 welding record issues between them. In another example, a 2012 self-assessment identified numerous issues with piping and instrumentation diagrams for the High Level Waste facility pipeline and nozzle drawings. However, no condition reports were generated for these self-assessments.

Implicit in each of these examples, circumventing or not fully adhering to corrective action program requirements increases the risk that technical conditions adverse to quality will not be fully addressed or resolved. If managed through the corrective action program, verification of corrective actions and objective evidence to support closing an issue would be required, preventing closure until the issue is fully addressed.

### **Timeliness of Corrective Actions**

Bechtel had not implemented corrective actions or conducted cause evaluations in a timely manner, and backlogs of condition reports grew between August 2013 and August 2014. Moreover, Bechtel was not meeting any of its corrective action management goals related to timeliness. For example:

- As of August 2014, 10 of 13 apparent cause evaluations exceeded the 45-day target, and all 3 ongoing root cause/common cause evaluations were above the 60-day target.
- Bechtel's average condition report age has steadily increased. In August 2013, the average age of a condition report was 212 days; however, in August 2014, the average

age increased to 315 days. Both are significantly over the target cycle time of 100 days or fewer. Furthermore, in August 2013, there were 1,109 open condition reports, and in August 2014 there were 1,257 open reports.

- The age of corrective actions, known as the condition report action age, also showed a steady upward trend that significantly exceeded established performance goals. The following chart breaks down the average ages of different types of corrective actions as of August 2013 and August 2014, and it also provides Bechtel’s goal for each corrective action type.

<b>Average Age of Corrective Actions</b>			
<b>Type of Actions</b>	<b>Avg. Days as of August 2013</b>	<b>Avg. Days as of August 2014</b>	<b>Performance Goal/Days</b>
Non-remedial	198	252	55
Remedial	165	275	150
Interim	227	471	30
Investigative	181	285	45
Corrective Actions	207	229	90

Bechtel’s July 2014 common cause analysis determined that Bechtel management did not prioritize work resources to adequately address the number of condition reports being generated. It also concluded that the corrective action program work did not carry the same weight as work related to engineering, procurement, construction, and commissioning. Bechtel’s Managed Improvement Plan, which was issued in March 2014, called for elimination of the condition report backlog by October 2015. However, in an October 2015 Managed Improvement Plan Health Check report on Corrective Action Program backlogs, Bechtel reported that the backlog had continued to increase.

**Follow-through of Prior Improvement Initiatives**

Weaknesses with Bechtel’s corrective action program has been reported for years. Although Bechtel has acknowledged these weaknesses and developed multiple improvement plans, in several cases these initiatives were not fully implemented or sustained. For example:

- In August 2008, Bechtel developed the *WTP Corrective Action Program Improvement Implementation Plan* to help drive excellence in implementing WTP’s corrective action program. As improvements were realized and opportunities were identified, the plan was updated. The plan was updated several times from 2008 through 2010, but it was then discontinued in October 2010.
- In 2011, Bechtel issued the *Lean Report for the WTP PIER System Cycle Time and Effort Process Improvement Project*. However, this initiative had not been implemented as of July 2014.

- In 2013, Bechtel issued the *MAIC Report for the PIP to Reduce the Cycle Time for Issuing a PIRB-Approved Apparent Cause Evaluation on the WTP Project*, but it did not reduce the apparent cause evaluation cycle time and still had four remaining actions to be completed as of July 2014.

Furthermore, Bechtel does not always classify condition reports at the appropriate significance level. In a 2014 Bechtel self-assessment, Bechtel determined that 41 percent of the condition reports entered into the corrective action program needed to be reclassified to a higher significance level to align with established criteria. Classification of significance levels had been identified in prior assessments reported in 2011 and 2012, yet this issue continued to recur.

### **Path Forward**

In August 2014, Bechtel began 10 initiatives in direct response to issues associated with the corrective action program, including replacing its old corrective action tracking and control system with a new system in December 2014. Bechtel also revised 12 procedures related to the corrective action program, including procedures pertaining to cause analysis, condition report initiation, and condition report effectiveness review. In addition, resources were increased to enable effective implementation of the corrective action program, and efforts were undertaken to improve training, work off the backlog of corrections actions, and change the quality culture.

Although it is too early to draw conclusions on the efficacy of the corrective actions already initiated, the actions taken by both Department and Bechtel personnel represent important steps to improve these processes. However, we remain concerned about the corrective action program because of its importance and Bechtel's past history of ineffective improvement plans. We noted that Bechtel identified weaknesses in "safety culture" in 2014, including problems with following its own procedures, weaknesses in training, and concerns about management not valuing a rigorous corrective action program. Furthermore, the Department did not ensure that all technical issues and issues identified through self-assessments were entered into the corrective action program. Finally, the Department did not ensure that previous Bechtel initiatives to address corrective action program implementation problems were fully implemented or sustained.

### **RECOMMENDATIONS**

Construction of the \$12.3 billion WTP is an extremely complex project posing numerous difficult technical challenges. Accordingly, an effective corrective action program is essential to ensure that important quality and safety issues are resolved in a timely manner. Given the issues identified in this report and the fact that Bechtel had not always fully implemented or sustained corrective action improvement plans or recommended actions, we recommend that the Assistant Secretary for Environmental Management direct the Manager, Office of River Protection, to ensure that Bechtel take the necessary action to effectively manage and resolve issues with its corrective action program, to include:

1. Fully implementing the 16 items in the Managed Improvement Plan related to the corrective action program as well as fully implementing the corrective action plan associated with findings U-13-QAT-RPPWTP-001-F01 and U-13-QAT-RPPWTP-001-F02;
2. Entering all issues in the corrective action program, as required by implementing procedures and the Quality Assurance Manual; and
3. Placing a stronger emphasis on implementing corrective actions/cause analyses in a timely manner and significantly reducing the backlog of condition reports.

### MANAGEMENT RESPONSE

Management concurred with each of the report's recommendations and indicated that corrective actions had been initiated or were planned to address the identified issues. In particular, the Department's Office of Environmental Management (Environmental Management) prepared an oversight strategy and schedule for the WTP Managed Improvement Plan and other corrective action plans. To date, Environmental Management has completed 18 assessments in this area, with approximately 50 more planned through end of calendar year 2016. Environmental Management will periodically revisit the oversight strategy and schedule to ensure that the combination of the oversight and the Priority Level 1 corrective action plan assessments specifically assesses the implementation and effectiveness of the 16 Managed Improvement Plan actions. In addition, Environmental Management will transmit the final Office of Inspector General audit report to Bechtel and direct Bechtel to perform a review of past external and self-assessments, technical issues, improvement initiatives, and actions that may be inappropriately tracked in other action tracking systems. This will ensure that conditions adverse to quality are appropriately identified and entered into its Corrective Action Management Program for tracking, addressing, and verifying that the conditions are adequately addressed. Furthermore, Environmental Management will require that a prioritization process is implemented to ensure actions are taken to address conditions adverse to quality that may impact or have the potential to impact higher priority work. Environmental Management will also direct Bechtel to continue its efforts to address timeliness issues and reduce the backlog of condition reports and, if needed to address high priority issues, to increase resources allocated to the backlog.

### AUDITOR COMMENTS

Management's comments and planned corrective actions were responsive to our recommendations. Management's comments are included in Appendix 3.

Attachments

cc: Deputy Secretary  
Chief of Staff  
Manager, Office of River Protection

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

### **OBJECTIVE**

The objective of this audit was to determine whether the Waste Treatment and Immobilization Plant corrective action program was effective in managing and resolving issues.

### **SCOPE**

We performed this audit from September 2014 to February 2016, at the Department of Energy's (Department's) Office of River Protection and Bechtel National, Inc., (Bechtel) in Richland, Washington. The audit was conducted under the Office of Inspector General project number A14RL062.

### **METHODOLOGY**

To accomplish the audit objective, we:

- Researched and reviewed Department guidance related to corrective action/resolution;
- Researched and reviewed Bechtel policies and procedures related to corrective action management;
- Analyzed corrective action timeliness metrics;
- Reviewed external audits;
- Reviewed External Flowsheet Review Team issues;
- Obtained and reviewed the Managed Improvement Plan related to the corrective action program;
- Reviewed all 50 Technical Issue Evaluation Sheets (TIES) developed by Bechtel. The TIES contained technical issue summary sheets evaluated as being high significance. After a review of the 50 TIES, we identified 45 distinct technical issue summary sheets due to duplicate technical issue summary sheets being shown on TIES;
- Judgmentally sampled self-assessments conducted from 2012 through 2014. We reviewed the title of each self-assessment from a list of all self-assessments provided by Bechtel National and judgmentally selected 30 self-assessments to review further, based on the significance of the issue being assessed;
- Analyzed Project Issue Evaluation Reports; and
- Held discussions with officials from the Department's Office of River Protection and Bechtel National.

We conducted this performance audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our conclusions based on our audit objective. Accordingly, we assessed significant internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the Department's implementation of the *GPR Modernization Act of 2010* as it relates to our audit objective and found that the Department had established performance measures applicable to Bechtel's corrective action program.

Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not rely on computer-processed data to achieve the objective of our audit.

We held an exit conference with the Department on December 11, 2015.

## PRIOR REPORTS

- Audit Report on [\*Integrated Safety Management at the Office of River Protection\*](#) (OAS-L-10-07, July 2010). The audit found that the Office of River Protection had not always ensured that effective integrated safety management systems were maintained by its contractor. Even though its own reviews and those performed by external oversight organizations revealed a number of problems with contractor safety systems, the Office of River Protection had not always ensured that corrective actions were effective and that predictive analyses such as trending of findings were performed.
- Audit Report on [\*The Office of Civilian Radioactive Waste Management's Corrective Action Program\*](#) (DOE/IG-0736, August 2006). The audit found that the Corrective Action Program was not meeting all its goals for identifying, tracking, and resolving all conditions adverse to quality or safety that could affect the license application process. Specifically, the audit found conditions that had been reported in other tracking systems, in line management self-assessment reports, and by external review groups that had not been included in the Corrective Action Program system but should have been. Furthermore, corrective actions developed to respond to these conditions were not always timely and effective in resolving the problems identified.

## MANAGEMENT COMMENTS



Department of Energy  
Washington, DC 20585

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MEMORANDUM FOR RICKEY R. HASS  
DEPUTY INSPECTOR GENERAL FOR AUDITS  
AND INSPECTIONS  
OFFICE OF INSPECTOR GENERAL

FROM: MONICA C. REGALBUTO *Monica C. Regalbuto*  
ASSISTANT SECRETARY  
FOR ENVIRONMENTAL MANAGEMENT

SUBJECT: Management Response to the Office of Inspector General Draft  
Audit Report "Corrective Action Program at the Waste  
Treatment and Immobilization Plant"

The Office of Environmental Management (EM) appreciates the opportunity to review the Office of Inspector General (OIG) draft audit report regarding whether the Waste Treatment and Immobilization Plant (WTP) Project's corrective action program was effective in managing and resolving issues. EM considers a robust corrective action program to be vital to the successful design, procurement, and construction of WTP. EM agrees with, and has already begun taking appropriate actions to address OIG's recommendations as presented in the draft audit report.

As mentioned in the OIG's draft audit report, the Office of River Protection's (ORP's) October 2013 audit of Bechtel's Quality Assurance Program identified two Priority Level 1 findings describing significant concerns with the effectiveness of Bechtel's corrective action and quality assurance programs. The issues identified in the OIG draft audit report mirror many of the issues previously identified in EM audits.

As a result of these findings, in October of 2013, ORP directed Bechtel to develop corrective action plans and an integrated comprehensive Managed Improvement Plan (MIP) to address all systemic quality assurance program and implementation issues. WTP senior contractor management continues to be actively involved with the implementation of the MIP and the closure of the corrective actions associated with Bechtel's quality assurance and corrective action programs.

As a result of this effort, Bechtel has strengthened the WTP Project's nuclear safety and quality culture. Bechtel has also further leveraged independent external oversight and assistance to enhance the implementation of the MIP through monitoring the successful closure of corrective actions and associated findings.

However, consistent with EM's expectations, and as recommended in OIG's draft audit report, additional actions to improve the WTP corrective action program are prudent.



Attached is a summary of the actions completed thus far. In addition, I will direct the Manager, Office of River Protection to ensure that Bechtel take necessary actions to effectively manage and resolve issues with its corrective action program to address OIG's recommendations.

If you have any questions, please contact me or Mr. Kenneth G. Picha, Jr., Deputy Assistant Secretary for Tank Waste and Nuclear Material, at (202) 586-2003.

Attachment

**Attachment - Management Response to the Recommendations of the Office of Inspector General Draft Report on “Corrective Action Program at the Waste Treatment and Immobilization Plant”**

**Recommendations:**

The Department of Energy (DOE) Office of Inspector General (OIG) draft audit report contains three specific recommendations with respect to Bechtel National, Inc.’s (Bechtel’s) corrective action program, which are listed below. The DOE Office of Environmental Management (EM) agrees with these recommendations and provides a summary of the actions completed thus far as well as additional steps planned to address the recommendations.

**1. Fully implement the 16 items in the Managed Improvement Plan related to the corrective action program as well as fully implement the corrective action plan associated with findings U-13-QAT-RPPWTP-001-F01 and U-13-QAT-RPPWTP-001-F02.**

On October 28, 2013, the Office of River Protection (ORP) issued letter 13-ORP-0281 and audit report U-13-QAT-RPPWTP-001, *Bechtel National, Inc. Quality Assurance Program Requirements 3, 4, 7, 8, 15, and 16*, to Bechtel. The audit report identified significant performance issues associated with implementation of Bechtel’s quality assurance and corrective action programs and cited two Priority Level 1 findings regarding the lack of effectiveness of these programs. As a result of these findings, in letter 13-ORP-0281, ORP directed Bechtel to develop corrective action plans for each Priority Level 1 finding, and an integrated comprehensive Management Improvement Plan (MIP) to address all systemic quality assurance program and implementation issues.

EM staff have been and will continue to monitor Bechtel’s actions to implement both the Priority Level 1 finding corrective action plans and the MIP. Assessment reports have been and will continue to be issued documenting implementation of the Priority Level 1 finding corrective action plans. Once all corrective actions have been completed and EM has verified that they have been adequately implemented, EM will perform an effectiveness review (approximately 6 months after all corrective actions have been completed) to verify that the actions to address the findings are effective.

In addition, EM prepared an oversight strategy and schedule for the WTP MIP and other corrective action plans (Memo 15-WTP-0027, dated June 4, 2015). To date, EM has completed 18 assessments in this area, with approximately 50 more planned through end of calendar year 2016. EM will periodically revisit this oversight strategy and schedule to ensure that the combination of the oversight and the Priority Level 1 corrective action plan assessments specifically assesses the implementation and effectiveness of the 16 MIP actions. EM verification of these 16 MIP actions and the corrective action plans for audit findings U-13-QAT-RPPWTP-001-F01 and U-13-QAT-RPPWTP-001-F02 is expected to be completed by end of 3<sup>rd</sup> quarter of fiscal year (FY) 2016, and will be documented in assessment, audit, or surveillance reports.

**2. Enter all issues in the corrective action program, as required by implementing procedures and the Quality Assurance Manual.**

As part of its Corrective Action Management Program (CAMP) improvements, Bechtel has revised relevant procedures and conducted a formal requirement flowdown tracing from the Quality Assurance Manual Policy Q-16.1 *Corrective Action*, and the contractor requirements within DOE Order 226.1B, *Implementation of Department of Energy Oversight Policy*. EM subsequently verified that the revised CAMP procedures were aligned with these contractual requirements. These revised procedures, along with recent enhancements to Bechtel's Action Tracking System Guide, clearly define conditions requiring entry into the CAMP.

EM will transmit the final OIG audit report to Bechtel and direct Bechtel to perform a review of past external and self-assessments, technical issues, improvement initiatives, and actions that may be inappropriately tracked in other action tracking systems, such as the Action Tracking System and the technical issues database. This will ensure that conditions adverse to quality are appropriately identified and entered into its CAMP for tracking, addressing, and verifying that the conditions are adequately addressed. Bechtel will be directed to complete this task by the end of 2<sup>nd</sup> quarter FY 2016.

Following completion of this review, EM will perform an assessment of this effort, including reviewing the actions taken by Bechtel to verify that conditions adverse to quality were adequately entered into its CAMP. This EM review is expected to be completed by the end of 3<sup>rd</sup> quarter FY 2016.

**3. Place a stronger emphasis on implementing corrective actions/cause analyses in a timely manner and significantly reducing the backlog of condition reports.**

To address the underlying safety concern associated with this OIG recommendation, EM will require Bechtel that a prioritization process is implemented to ensure actions are taken to address conditions adverse to quality that may impact or have the potential to impact higher priority work. EM will also direct Bechtel to continue its efforts to address timeliness issues and reduce the backlog of condition reports and, if needed to address high priority issues, to increase resources allocated to the backlog. Bechtel will be required to implement this direction by the end of 2<sup>nd</sup> quarter FY 2016.

EM expects to perform an assessment of the effectiveness of Bechtel's efforts to prioritize and/or improve the overall timeliness of its implementation of corrective actions and reduce condition report backlog by the end of 4<sup>th</sup> quarter FY 2016.

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Washington, DC 20585

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