

SUPERIOR COURT OF WASHINGTON  
FOR BENTON COUNTY

JULIE M. ATWOOD,  
Plaintiff,

vs.

MISSION SUPPORT ALLIANCE, LLC,  
STEVE YOUNG, an individual, and  
DAVID RUSCITTO, an individual,  
Defendants.

Case No.: 15-2-01914-4

**DECLARATION OF JULIE ATWOOD  
IN SUPPORT OF PLAINTIFF'S  
SECOND AMENDED MOTION  
FOR SANCTIONS**

Noted for Hearing: May 12, 2017  
(ORAL ARGUMENT REQUESTED)

I, JULIE ATWOOD, am the Plaintiff in this matter. I make the following statement based on personal knowledge of the facts.

1. I have paid over \$36,000 in costs in this litigation, drawing from savings and retirement to do so. The costs of continuing this litigation is a hardship. I have limited resources, and they are being depleted.

2. I have been unemployed since September 19, 2013 except for some very limited temporary seasonal work. That day, after MSA's Employee Concerns Program Manager, Wendy Robbins, who cleared me of any wrongdoing in her investigation; Todd Beyers, MSA V.P. of Human Resources, told me MSA was terminating my employment and then gave me a letter to sign to resign in lieu of termination. Since that day, I have contacted other potential employers and Hanford contractors in an attempt to secure similar employment, but have been

1 unsuccessful in obtaining other employment. I believe that until this case is resolved, I will  
2 not be able to find work.

3 3. MSA is a \$3.4 billion dollar company. Attached as Exhibit 1 is a true and  
4 correct copy of MSA's Contract Management Plan, approved September 8, 2014.

5 I declare under penalty of perjury under the laws of the State of Washington that the  
6 foregoing is true and correct to the best of my knowledge.

7 DATED this 2<sup>nd</sup> day of May, 2017, at Seattle, Washington.

8   
9 \_\_\_\_\_  
Julie Atwood

**CERTIFICATE OF SERVICE**

I, Melanie Kent, certify under penalty of perjury under the laws of the State of Washington that on May 2, 2017, I served the document to which this Certificate is attached to the party listed below in the manner shown.

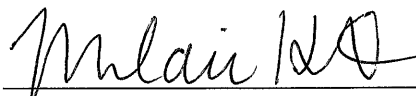
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*Attorneys for Defendants*



Melanie Kent  
Legal Assistant

# EXHIBIT 1

# **MISSION SUPPORT CONTRACT**

**Contract No. DE-AC06-09RL14728**

## **CONTRACT MANAGEMENT PLAN**

**Mission Support Alliance, LLC**



U.S. Department of Energy  
RICHLAND OPERATIONS OFFICE

Approved September 8, 2014

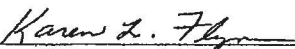
**RICHLAND OPERATIONS OFFICE  
CONTRACT MANAGEMENT PLAN**

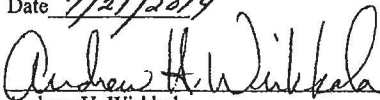
**MISSION SUPPORT CONTRACT**

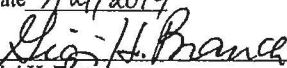
**Contract No. DE-AC06-09RL14728**

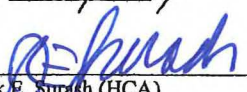
**July 2014**

**Concurrences:**

  
\_\_\_\_\_  
Karen L. Flynn  
Assistant Manager for Mission Support  
Richland Operations Office, (509) 376-7323  
Date 7/21/2014

  
\_\_\_\_\_  
Andrew H. Wirkkala  
Procurement Director  
Richland Operations Office, (509) 376-7271  
Date 7/21/2014

  
\_\_\_\_\_  
Gigi H. Branch  
Site Office Contracting Officer  
Richland Operations Office, (509) 376-7942  
Date 7/21/2014

  
\_\_\_\_\_  
Jack E. Surash (HCA)  
EM 50 (202) 586-3867  
Date Sep 8, 2014 *Approved*

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## ACRONYMS AND ABBREVIATIONS

AE	Acquisition Executive
AMB	Assistant Manager for Business and Financial Operations
AMMS	Assistant Manager for Mission Support
AMRP	Assistant Manager for River and Plateau
AMSE	Assistant Manager for Safety and the Environment
CA	Contracting Activity
CAO	Contract Administration Office
CMP	Contract Management Plan
CMT	Contract Management Team
CO	Contracting Officer
COR	Contracting Officer's Representative
CS	Contract Specialist
DEAR	Department of Energy Acquisition Regulation
DNFSB	Defense Nuclear Facilities Safety Board
DOE	Department of Energy
DOE-EM	DOE Environmental Management
DOE-HQ	DOE Headquarters
DOE-ORP	DOE Office of River Protection
DOE-RL	DOE Richland Operations Office
EM	Environmental Management
ESH&Q	Environment, Safety, Health, and Quality
ESPC	Energy Savings Performance Contract
EVMS	Earned Value Management System
FAR	Federal Acquisition Regulation
FDO	Fee Determining Official
FPD	Federal Project Director
FMD	Financial Management Division
FRAM	Functions, Responsibilities, and Authorities Manual
GFS/I	Government Furnished Service/Information
HASC	Hanford Analytical Services Contract
HCA	Head of Contracting Activity
HPMP	Hanford Integrated Programmatic Risk Management Program
ICMT	Integrated Contract Management Team
IEP	Integrated Evaluation Plan
IGE	Independent Government Estimate
IPT	Integrated Project Team
LIGO	Laser Interferometer Gravitational Wave Observatory
MSA	Mission Support Alliance (Contractor)
MSC	Mission Support Contract
NTE	Not to Exceed
PBI	Performance Based Incentive
PD	Program Director
PEMP	Performance Evaluation Management Plan



PFP	Plutonium Finishing Plant
PNNL	Pacific Northwest National Laboratory
PNSO	Pacific Northwest Site Office
PRC	Plateau Remediation Contract
RCCC	River Corridor Closure Contract
REA	Request for Equitable Adjustment
RIMS	RL Integrated Management System
RL	Richland Operations Office
SOW	Statement of Work
TFC	Tank Farm Contract
TOC	Tank Operations Contract
TPA	Tri-Party Agreement
WTP	Waste Treatment Plant

## CONTRACT MANAGEMENT PLAN MISSION SUPPORT CONTRACT

### Purpose of the Contract Management Plan

The purpose of this Contract Management Plan (CMP) is to provide guidance to Richland Operations Office (RL) employees involved with the management and administration of the contract number DE-AC06-09RL14728, Mission Support Contract (MSC). Such guidance should be a useful tool to help the Department of Energy (DOE) ensure that Mission Support Alliance, LLC, herein referred to as “Contractor,” and RL comply with all terms and conditions that govern the contract. This CMP was developed with the guiding principles that:

- It shall be a useful tool for administering the contract.
- It shall be an executive summary of the roles and responsibilities of the contracting parties.
- It shall identify who is responsible for various contract administration activities.
- It shall be flexible and adapt to changing circumstances.

This CMP does not include every action that RL must take to make the contract successful. Instead, it summarizes the higher-level requirements, deliverables, and tasks necessary, and describes the overall process with which the tasks are performed. It describes the various contract management processes and how they fit together, but does not contain all of the step-by-step details of those processes. For the most part, these details are contained in the RL Integrated Management System (RIMS) processes and procedures, and specific desk instructions and documents. Appropriate references to these details are included in the CMP. Familiarization with this CMP and its related references is vital to all RL employees involved in contract management, and each staff member involved in overseeing the MSC is required to read the [\*MSC Conformed Contract\*](#).

This CMP is intended solely to provide guidance to Government employees and should not be construed to create any rights or obligations on the part of any person or entity, including the Contractor and its employees. It is not intended to be either prescriptive or inclusive of all actions necessary to support and/or administer the contract.

### 1.0 Contract Summary and Background of the Scope of Work

Contractor name:	Mission Support Alliance, LLC (MSA)
Contract number:	DE-AC06-09RL14728
Contract title:	Mission Support Contract (MSC)
Performance period:	August 24, 2009 through May 25, 2019 (Notice to Proceed issued May 12, 2009, with transition period from May 26, 2009, through August 23, 2009)
Total contract price:	\$3.4B
Contract type:	Cost-plus-award-fee with performance incentives
Contractor key personnel:	Contractor key personnel are listed in contract clauses H.15, Key Personnel, and H.16, Safety and Security Key Personnel

The Hanford Site is located along the Columbia River in southeastern Washington State. The site covers 586 square miles and consists of a plutonium production complex with nine nuclear reactors and

associated processing facilities. Hanford played a pivotal role in the nation's defense for more than 40 years, beginning in the 1940s with the Manhattan Project. Today, under the direction of the U.S. Department of Energy officials, Hanford is engaged in the world's largest environmental cleanup project, with a number of overlapping technical, political, regulatory, financial, and cultural issues.

There are two DOE Federal organizations at Hanford. The mission of both organizations is environmental cleanup. The first organization, RL, employs officials responsible for ensuring nuclear waste and facility cleanup, and overall management of the Hanford Site; RL's mission is to restore the Columbia River corridor and transition the Hanford Central Plateau to a remediated state. The DOE Office of River Protection (DOE-ORP) employs officials responsible for cleanup of Hanford Site tank waste; ORP's mission is to retrieve and treat Hanford's tank waste and close the tank farms to protect the environmental integrity of the Columbia River. Each Office oversees separate contracts held by private companies. For purposes of this Contract, the land, facilities, property, projects and work performed and overseen by RL and ORP constitute the "Hanford Site."

The purpose of this contract is to provide direct support to DOE and its contractors with cost-effective infrastructure and site services integral and necessary to accomplish the Hanford Site environmental cleanup mission. The scope includes five primary functions as listed in Figure 1. MSC Summary Work Breakdown Structure below. The General Performance Requirements function represents those activities internal to the operation of the MSC and is not considered one of the five primary functions. In addition to these functions, the MSC will play a key role in ensuring that interfaces with and between Hanford Site customers (DOE Offices, Hanford Site contractors, etc.) that affect their scope of work are managed in a manner that encourages open and proactive communication, collaboration, and cooperation. The Contractor has the responsibility for determining the specific methods and approaches for accomplishing the identified work. This contract applies performance-based contracting approaches and expects the Contractor to implement techniques that emphasize safe, efficient, and measurable results.

**Figure 1. MSC Summary Work Breakdown Structure for the Key Functional Areas**

Safety, Security, & Environment	Site Infrastructure & Utilities	Site Business Management	Information Resources & Content Management	Portfolio Management	General Performance Requirements
<ul style="list-style-type: none"> <li>Safeguards &amp; Security</li> <li>Site Training Services &amp; HAMMER</li> <li>Fire and Emergency Response Services</li> <li>Emergency Operations</li> <li>Site Safety Standards</li> <li>Radiological Assistance Program</li> <li>Environmental Regulatory Management</li> <li>Public Safety &amp; Resource Protection</li> <li>Radiological Site Services</li> </ul>	<ul style="list-style-type: none"> <li>Analytical Services</li> <li>Biological Control</li> <li>Crane &amp; Rigging</li> <li>Motor Carrier Services</li> <li>Facility Services</li> <li>Fleet Services</li> <li>Railroad Services</li> <li>Roads and Grounds</li> <li>Utilities</li> <li>Sewer Systems</li> <li>Sanitary Waste Management &amp; Disposal</li> </ul>	<ul style="list-style-type: none"> <li>Real Property Asset Management</li> <li>Property Systems/ Acquisition &amp; Materials Management</li> <li>Sponsorship, Management &amp; Administration of Employee Pension and Other Benefit Plans</li> <li>EEOICPA/Workers Compensation</li> <li>External Affairs &amp; Other Interactions</li> <li>Courier &amp; Mail Services</li> <li>Reproduction, Correspondence Control, &amp; Multi-Media</li> </ul>	<ul style="list-style-type: none"> <li>Strategic Planning and Program Management</li> <li>Telecommunications</li> <li>Information Systems</li> <li>Content (Records) Management</li> </ul>	<ul style="list-style-type: none"> <li>Hanford Portfolio Planning, Analysis &amp; Performance Assessment</li> <li>Project Acquisition &amp; Support</li> <li>Independent Analysis &amp; Assessments</li> </ul>	<ul style="list-style-type: none"> <li>Project Management</li> <li>ISMS</li> <li>Radiation Protection</li> <li>Worker Safety &amp; Health Management</li> <li>Quality Assurance</li> <li>Beryllium</li> <li>Event Reporting &amp; Investigation</li> <li>Work-for-Others</li> <li>Interface Management</li> <li>Transition</li> <li>Business Administration</li> <li>Legal Support</li> <li>Internal Audit</li> <li>Employee Concerns</li> <li>Traffic Management</li> </ul>