

ATTACHMENT J.6

SMALL BUSINESS SUBCONTRACTING PLAN

SMALL BUSINESS SUBCONTRACTING PLAN

for

United States Department of Energy

Plateau Remediation Contract

Submitted by:

**CH2M HILL PLATEAU REMEDIATION COMPANY
Prime Contractor**

FISCAL YEARS 2009-2018

(Base and Option Period)

CONTRACT NUMBER DE-AC06-08RL14788

**Revision 4
December 30, 2014**

SMALL BUSINESS SUBCONTRACTING PLAN

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Prime Contract Number: DE-AC06-08RL14788
Item/Service: Plateau Remediation Contract

Total Amount of Contract (Including Options): \$5,696,680,278.00 per Section B, Table B.4-1 as of Modification Mod 371.

Period of Contract Performance: Award through September 2018 including option period.

Company Policy Statement

“It is the policy of the United States and CH2M HILL Plateau Remediation Company (CHPRC) that small business concerns, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small business concerns owned and controlled by socially and economically disadvantaged individuals, minority business concerns and women-owned small business concerns shall have the maximum practical opportunity to participate in the performance of government and commercial subcontracts awarded by CH2M HILL. It is CHPRC’s intention to aggressively pursue, wherever possible, subcontracting opportunities with small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged small business, minority business, and women-owned small business, as well as Historically Black Colleges and Universities and Minority Institutions in accordance with P.L. 99-66, Section 1207, and P.L. 100-180, Section 806.”

Vision

Diversity and commitment to small business subcontracting is a CH2M HILL management operating principle and a key element to our CHPRC strategy. Through diversity in our small business subcontracting, CH2M HILL provides vital links to the local/regional community, increases flexibility in meeting project goals and cost effectiveness, helps strengthen the local economy, creates new business opportunities, and supports best business practices. Per this Plan, CHPRC commits \$1.204B to small business concerns over the base and option period.

FISCAL YEAR 2009-2018

SMALL BUSINESS SUBCONTRACTING PLAN

1.0 Purpose of Plan

This CHPRC Fiscal Year (FY) 2009-FY2018 (5-year base plus 5-year option) Small Business Subcontracting Plan (FAR 52.219-9, “Small Business Subcontracting Plan”) promotes, develops, and implements, a progressive small business (SB), small disadvantaged business (SDB), small women-owned business (WOSB), HUBZone small business (HUBZone), veteran-owned small business (VOSB), and Service-Disabled Veteran-Owned (SDVO) business Program (collectively referred to herein as SB) subcontracting program. This Plan maximizes business opportunities for SB concerns to the extent practicable to meaningfully contribute to the plateau remediation scope and incentive objectives. The Plan also describes the approach in meeting the requirements for the Mentor-Protégé Program. The Plan is consistent with FAR 19.7, “Small Business Subcontracting Program,” in that this subcontracting plan covers the entire contract period (including option period); applies to this specific Plateau Remediation Contract (PRC); includes goals that are based on the offeror’s planned subcontracting in support of this Contract; addresses indirect costs; addresses Master Plan integration into the Small Business Plan; and describes the good faith effort to support these committed goals. Additionally, this Plan is consistent with FAR 52.219-9(c) in that the base contract is addressed separately from the option period.

2.0 Executive Summary

An objective of the U.S. Department of Energy (DOE) is to promote the use of small business in executing its mission activities, and providing to such concerns an opportunity to apply their expertise, in a meaningful way, to the work to be conducted under the PRC. Pursuant to this objective, it is a management philosophy and operating principle of CH2M HILL to be recognized as an industry leader in the incorporation and use of SB to gain overall project efficiency.

Base Period Approach

CHPRC established team members including nine¹ preferred pre-selected SBs with proven track records to support optimizing prime contract objectives and project delivery success including: a) East Tennessee Materials & Energy Corporation, Inc., a wholly owned subsidiary of Perma-Fix Environmental Services (M&EC/Perma-Fix) as a SB team member for waste support services, solid waste disposal support, planning integration, T-Plant facility management support, and Central Waste Complex support; b) ARES Corporation (ARES) for general engineering, managed task design support, nuclear/criticality and engineering expertise

¹ As of December 14, 2012, Cavanagh Services Group chose to shut down operations and personnel transitioned to CHPRC. As such, only 8 preferred pre-selected SB team members remained after this date.

supporting engineering design and reviews, vendor drawing clarification, criticality analysis, deactivation plans, operational startup, risk assessments, facilities design and upgrades, integrity assessments, D&D support, and nuclear safety support; c) Babcock Services, Inc., (Babcock) for planning/scheduling/estimating/ project controls/work planning/engineering/operations support and field management support; d) GEM Technology International Corp. (GEM Technology) for safeguards, information, and personnel security support, emergency preparedness, and nuclear material control; e) INTERA Inc. (INTERA) for general engineering services and risk management support; f) EnRep, Inc. (EnRep) for training and procedure development, chemical management, general engineering, and environmental regulation compliance support; g) HukariAscendent, Inc. (Ascendent) for general engineering support, nuclear safety, ISMS, and Environment, Safety, Health and Quality (ESH&Q) support; h) Project Services Group (PSG) for planning, scheduling, estimating, project controls, and work planning support; and i) Cavanagh Services Group, Inc. through December 14, 2012, for remediation services, hazardous waste support, transportation support and logistics management, and packaging, transport, and handling of fuels and nuclear materials. During the base period, CHPRC successfully exceeded the contract requirement of greater than 17% of contract price to small business. The actual performance was 28% of base period contract price. In addition, all of the SB goals for the base period of this contract were exceeded with the exception of HUBZone. Details of performance are delineated in Section 11.0 HUBZone.

Option Period Approach

For the option years FY2014-FY2018, significant changes were made to both the CHPRC acquisition strategy and to the calculation used to determine work performed by Subcontracted Small Business.

Highlights of the Option Period Strategy changes from the prior base period for the ~ 535 long term staff augmentation team include:

- Eliminated the concept and use of Preselect contractors.
- Hired long-term staff augmentation personnel previously provided by subcontractors.
- Maintained key Sludge core team.
- Maintained Nuclear Safety team.
- Maintained Risk and Modeling team with INTERA.
- Maintained corporate ICWEA support.

In addition, the option period strategy included:

- Construction Management BOA – Eliminated Fluor Federal Services cost reimbursed construction and awarded a subcontract for miscellaneous construction support services. SB BOA competitions for all remaining construction to the maximum extent possible.

- Established temporary Environment, Safety, Health and Quality/Project Controls/Engineering support Blanket Order Agreements (BOA) for short duration needs less than one year.
- Fixed price construction contracting to maximum extent.

Regarding calculation changes to determine work performed by Subcontracted Small Business, for the periods FY2014-FY2018, Other Hanford Contractors (OHC) procurement volume is no longer included in the procurement volume goals. Instead, the OHC procurement volume is included in the Contract Self-Perform ceiling requirement calculation. The reason for this change is that the OHC volume is predominately directed per the Prime Contract J.3 Table.

The base years FY2009-FY2013 included OHC in the calculation of the subcontracted procurement volume per initial DOE RFP instructions.

Finally, CHPRC is self-performing much of the work that was done through staff augmentation during the base period. This additional self-perform volume remains within the contract requirement to self-perform overall no greater than 65% of contract work.

Overall Ten Years

Key attributes of the CHPRC PRC Ten-Year SB plan include: 1) committing 21.15% (\$1.204 billion) of the Total Contract Price to SBs for the base and option periods combined; 2) objective that all SB goals delineated in this plan for the base and option periods will be met/exceeded (focus topic challenge will be HUBZone); 3) a Mentor-Protégé Agreement was established with PSG to perform planning, scheduling, estimating, project controls, and work planning support to enhance project management capabilities through December 30, 2013. A second Mentor-Protégé Agreement with RC Engineering and Construction Management was established in January of 2014; 4) committing 8.2% of planned subcontracted dollars to the SDB Participation Program for the base and option periods; and 5) a Small Business Subcontracting Plan consistent with FAR 52.219-9, “Small Business Subcontracting Plan,” requirements.

The CHPRC committed small business goals as a percent of planned subcontracting activity for the base contract and option periods combined, are as follows as contrasted with the 2007 original RFP requirements:

Component	2007 RFP Required Percent	CH2M HILL Commitment Percent
Small Business (SB)	41.3	49.3%
Small Disadvantaged Business	6.3	8.2%
Women-Owned SB	5.8	7.5%
HUBZone SB	2.2	2.2%
Veteran-Owned SB	1.3	3.5%
Service-Disabled Veteran-Owned SB	1.3	1.3%

3.0 Master Plan Incorporation

Pursuant to FAR 52.219-9(b) and (f), this Small Business Subcontracting Plan integrates and incorporates the attributes of a required Master Plan submittal defined as containing all the required elements of a subcontract plan.

4.0 Utilization of Small Business Concerns

Pursuant to FAR 19.702, “Statutory Requirements,” and FAR 52.219-8, “Utilization of Small Business Concerns,” CHPRC is committed to ensure that SB concerns shall have the maximum practicable opportunity to participate in performing PRC subcontracts for subsystems, assemblies, components, and related services as outlined in this plan. CHPRC has established procedures to ensure the timely payment of amounts due pursuant to the terms of subcontracts with SB concerns. CHPRC will carry out this plan in the awarding of subcontracts to the fullest extent consistent with efficient contract performance. CHPRC further agrees to cooperate in any studies or surveys as may be conducted by the United States Small Business Administration (SBA) or the awarding agency of the United States as may be necessary to determine the extent of the Contractor’s compliance with this clause. See the Small Business Outreach and Equitable Opportunity to Compete Section for further discussion.

5.0 Strategy for Small Business Involvement

A management philosophy of CH2M HILL is to be recognized as an industry leader in the incorporation and use of SB to gain overall project efficiency. Through various award-winning and well-recognized small business achievements, CH2M HILL has demonstrated an understanding of the valued aspects of an integral SB involvement strategy. Consistent with the DOE’s vision and goals, diversity and commitment to SB subcontracting is a CH2M HILL management operating principle and a key element to our PRC strategy. Through diversity in our SB subcontracting, CH2M HILL provides vital links to the local/regional community, supports strategy for workforce transition, increases flexibility in meeting project goals and cost effectiveness, helps strengthen the local economy, creates new business opportunities, and supports best business practices.

A key element of our SB strategy is the addition of an Acquisition Planning Manager whose focus is to interface with the projects and define subcontract requirements and proactively develop procurement strategies to not only support the requirements and goals outlined in this plan; but also to assure the appropriate contracting strategy is developed to optimize progress as lowest cost and risk to the government.

Another key element of our SB strategy is project management involvement. Each Project Manager/Buyer Technical Representative (BTR) is personally accountable for using SB’s within their area of responsibility. This is accomplished by integrating SB goals and targets into project planning and execution. Project Managers/BTRs are responsible for the successful execution of SB contracts and providing technical oversight and appropriate assistance, as required, ensuring

a successful contractual relationship with our SB subcontractors. The goals depicted in this subcontracting plan have been developed with the Project Manager and Procurement, and is supported by our estimating process.

The CHPRC strategic approach for affording SB maximum practical opportunity (FAR 19.702) to participate in PRC subcontracts within SB demonstrated capabilities is: 1) during base period, establish team member and preferred pre-select small businesses to perform specific PRC scopes of work delineated in Section 2.0; 2) performing thorough evaluations of SB capabilities against subcontracting plans and seek out equitable bidding opportunities to compete meaningful, varied, and complex PRC work scope to achieve small business objectives; and 3) targeted utilization of specific SB set-aside subcontracts for goods and services consistent with FAR 52.219-6, "Notice of Total Small Business Set-aside," such as engineering, design, and remediation services, temporary services, startup and testing, operational readiness, and risk assessments.

6.0 Self Performed Work Requirements

Pursuant to PRC Clause H.20, "Self Performed Work," the percentage of work self-performed during the base period by the large business CHPRC including AREVA and Fluor Federal Services, Inc. as described in FAR 9.6, "Contractor Team Arrangements," was 38% of total Contract Price (Contract requirement no greater than 65%). The remaining contractor team member (East Tennessee Materials & Energy Corporation, Inc., a wholly owned subsidiary of Perma-Fix Environmental Services [M&EC/Perma-Fix]), is a SB member. SB support will be via standard subcontracting arrangements and/or will be performed through competitive procurements to maximum extent possible.

As described in the Executive Summary, changes have been made for the option period which increases the Self-Perform Percentage during the last five years while maintaining the overall 10-year cumulative contract requirement of 65% or less self-performed.

The specific changes during the option period include:

- 1) CHPRC hired long-term staff augmentation personnel previously provided via subcontracting during the base period. This added labor volume has increased the CHPRC overall effort in the option period as a percent of total expenditures.
- 2) OHC volume was included in the Section 11.0 procurement goals in the base period. In the option period, this procurement volume driven by the J.3 Table directed services will be a part of the self-perform ceiling limitation of 65%.

Due to above changes in the acquisition planning for the option period, the FY2014-FY2018 percentage of work planned to be self-performed is estimated at ~68.8%. This includes self-performed work during the option period by the large business CHPRC including AREVA, as well as OHC services mandated by the J.3 Table.

For the overall 10-year cumulative period, CHPRC is forecasting the percentage of work planned to be self-performed at 48.8% (Contract requirement no greater than 65%) of Total Contract Price. In addition, CHPRC is planning 21.15% (\$1.204 billion) to be performed by small business subcontracts exceeding the 17% requirement. See table summary below:

*The \$1,204,750,743 shown on the following table is calculated using actuals for the base period and 49.3 % for the projected option period which would exceed the cumulative SB goals of 49.3%.

Category	Transition	Actual FY2009- FY2013 Base \$	FY2009- 2013 Base %	FY2014- 2018 option \$	FY2014- 2018 Option %	Transition –FY2018 Overall \$	FY2009- FY2018 Overall
Self-Performed	\$ 3,307,735.00	\$1,357,127,448.81	37.51%	\$1,427,687,592.74	68.81%	\$2,748,815,041.55	48.88%
Performed by Subcontracted Small Businesses		\$1,018,665,542.00	28.16%	\$186,085,201.36	8.97%	* \$1,204,750,743.36	21.15%
Total Contract Price	\$ 3,307,735.00	\$3,617,568,793.00		\$2,074,832,810		\$5,696,680,278.00	

7.0 Mentor-Protégé Agreements

Pursuant to PRC Clause H.30, “Mentor-Protégé Program,” and consistent with DEAR Subpart 919.70 - The DOE Mentor-Protégé Program and SBA Mentor-Protégé regulations, CHPRC will maintain a mentor-protégé (MP) agreement throughout the contract. In the base period, a MP agreement was established with PSG (DUNS 146380576) to perform planning, scheduling, estimating, project controls, and work planning support as a designated small disadvantaged, 8(a)-certified small business, to enhance its business abilities in the area of project management. PSG successfully graduated from the program in December 2013.

CHPRC entered into a new MP agreement with RC Engineering and Construction Management (RCECM) in January of 2014. This agreement is for a minimum of two years with the option to extend up to five years. RCECM provides project controls, engineering and support services as well as temporary services. They are a designated small disadvantaged, 8(a)-certified small, women-owned business.

8.0 Methods Used to Develop Small Business Goals

Pursuant to FAR 52.219-9 (d) (4), “SB Subcontracting Plan,” the method used to establish the subcontracting goals commences with CHPRC reviewing the detailed work scope requirements of the PRC and developing a detailed technical cost, and schedule baseline forecast for the PRC base and option periods. The technical/cost baseline includes forecasted subcontracting activities for the PRC scope. Subcontracted baseline activities are then reviewed for potential small business opportunities. The planning outcome of this methodology is quantified in the Goals – Percentages and Dollars, Small Disadvantaged Business Program Targets, and Rationale for Small Business Forecast sections of this Plan. CHPRC believes the goals outlined in this Plan are both realistic and attainable.

9.0 Methods Used to Identify Sources for Solicitation

CH2M HILL has won national recognition for its Small Business Program as delineated in the Strategy for Small Business Involvement Section of this Plan. As described in this Plan, and pursuant to FAR 52.219-9 (d) (5), CHPRC employs a Small Business Advocate who actively manages the program and assists employees in developing new sources of suppliers. Below are some of the key methods and resources we will use:

- Existing CHPRC subcontractor source lists
- Existing relationships with local firms
- CHPRC and DOE-sponsored trade fairs and conferences designed to attract additional small businesses
- Relationships with the local SBA office and business development offices, resulting in the identification of the best local sources available
- Local Chambers of Commerce
- Procurement Technical Assistance Center (PTAC)
- System for Award Management (SAM)
- Asset Suite Vendor Database
- National Contract Management Association (NCMA)
- Institute for Supply Management (ISM)
- Posting of solicitations on the internet
- VetBiz.gov

10.0 Potential Subcontracting Opportunities for Small Business

Pursuant to FAR 52.219-9 (d) (3), the below table identifies a general description of the principal types of supplies and services that could be subcontracted, and an identification of the SBs that may be considered for subcontracting opportunities. These opportunities supplement other planned SB activities noted throughout this Plan. The categories are for general work groupings only.

Subcontracting Items	Large Business	Small Business	SDB	WOSB	HUB Zone	Veteran	Dis. Vet
Office Supplies		X	X	X	X	X	X
Technical Services	X	X	X	X	X	X	X
Surv. & Maint.		X	X	X		X	
Construct Services	X	X	X	X			X
Temp. Empl. Svcs.		X	X	X	X	X	X
A/E Services	X	X				X	
Safety Equipment		X	X	X		X	X
Engineer Services		X	X	X	X	X	X
Materials	X	X	X	X	X	X	X
Planning/Scheduling		X	X	X		X	
Safeguards & Secur.		X	X	X			
Remediation Service		X	X	X	X	X	X

11.0 Goals – Percentages and Dollars Associated with Procurement Volume

Pursuant to FAR 52.219-9 (d) (1) and (2), CHPRC is committed to provide all materials, services, and supplies necessary to perform the statement of work as a prime contractor to the U.S. Department of Energy, Richland Operations Office (RL). The following outlines the CHPRC FY2009-FY2013 base and FY2014-FY2018 option period SB procurement volume forecast expressed as total SB dollars planned to be subcontracted and percentage goals expressed in terms of percentages of total planned subcontracting dollars.

CHPRC met all small business requirements and goals through the FY2009-FY2013 base period with exception of the HUBZone performance. The values depicted for this period represent actual award/modifications progress. Two significant changes were made to CHPRC acquisition strategy for the option period FY2014-FY2018.

- RL directed OHC support has moved from large business subcontracting percentages to self-perform percentages.
- Long-term staff augmentation subcontracts have moved from small business subcontracted to self-perform.

These two changes greatly reduced the forecasted procurement volume for the option period as contrasted to the base period as the majority of the prior ~535 long-term staff augmentation personnel were hired for the option period, and the OHC large business volume has been removed from the option period. The overall volume is also down significantly in the last five years driven by ARRA funding of \$1.3B during the base period.

The following chart shows cumulative socioeconomic statistical data for the period FY2009-FY2014.

*The \$1,202,827,946 shown in the following two tables depicts the minimum projected SB award goal of 49.3 % applied to the entire contract period.

CHPRC FY2014 Socioeconomic Stat Data

Data from PRC start 10/1/2008 through 9/30/2014

Contract-to-Date Actual Awards & Mods 10/1/2008 -9/30/2014				Projection to FY2018	
Reporting Category				Planned Subcontracting:	\$2,439,813,277
				Contract-to-date awards:	\$2,147,169,174
				Bal remaining to award:	\$292,644,103
	\$ Value	%	Goal %	Goal award\$	Bal to Goal
SB	\$1,077,630,951	50.19%	49.3%	* \$1,202,827,946	\$125,196,995
SDB	\$185,578,913	8.64%	8.2%	\$200,064,689	\$14,485,776
SWOB	\$211,652,692	9.86%	7.5%	\$182,985,996	-\$28,666,696
HUB	\$35,666,823	1.66%	2.2%	\$53,675,892	\$18,009,070
VOSB	\$125,382,703	5.84%	3.5%	\$85,393,465	-\$39,989,238
SDVO	\$60,906,401	2.84%	1.3%	\$31,717,573	-\$29,188,828
NAB	\$31,077,392	1.45%	N/A		
Large	\$580,734,558	27.05%	N/A	PRC clause H.20 small business requirement ≥ 17% of total Contract Price performed by SB.	
GOVT	\$2,170,959	0.10%	N/A		
GOVT CONT	\$482,866,522	22.49%	N/A		
EDUCATION	\$94,724	0.00%	N/A	Total Contract (mod 371):	\$5,696,680,278
NONPROFIT_	\$3,423,332	0.16%	N/A	17% rqmt:	\$968,435,647
FOREIGN	\$248,129	0.01%	N/A	SB actual:	\$1,077,630,951
Total	\$2,147,169,174	100.00%	N/A	Bal to rqmt	-\$109,195,303

The following chart depicts the FY2009-FY2014 contract period actual performance and the remaining planned option period FY2015-FY2018 subcontracting, resulting in a CHPRC commitment to meet/exceed all small business goals. This option period plan is aligned with the FY2014 Estimate-to-Complete submittal to RL. The total contract value represented in the Plan reflects the total contract value as of Modification 371.

		Contracts + Pos + Pcard - 10/1/2008-9/30/2018			
		Reporting Category			
					Goal
FY2009-2014	FY2015-2018		\$	%	%
\$ 1,077,630,951	\$ 125,196,995	SB	\$ 1,202,827,946 *	49.30%	49.3
\$ 185,578,913	\$ 14,485,776	SDB	\$ 200,064,689	8.20%	8.2
\$ 211,652,692		SWOB	\$ 211,652,692	8.67%	7.5
\$ 35,666,823	\$ 18,009,070	HUB	\$ 53,675,893	2.20%	2.2
\$ 125,382,703		VOSB	\$ 125,382,703	5.14%	3.5
\$ 60,906,401		SDVO	\$ 60,906,401	2.50%	1.3
\$ 31,077,392		NAB	\$ 31,077,392	1.27%	NA
\$ 580,734,558	\$ 167,447,108	LARGE	\$ 748,181,666	30.67%	NA
2,170,959	\$ -	GOVT	\$ 2,170,959	0.09%	NA
\$ 482,866,522	\$ -	GOVT CONT	\$ 482,866,522	19.79%	NA
\$ 94,724	\$ -	EDUC	\$ 94,724	0.00%	NA
\$ 3,423,332	\$ -	NONPROFIT	\$ 3,423,332	0.14%	NA
\$ 248,129	\$ -	FOREIGN	\$ 248,129	0.01%	NA
\$ 2,147,169,174	\$ 292,644,103	TOTAL	\$ 2,439,813,277	100	NA

Highlights:

- a) Based on prior discussion of changes, during the option period total procurement volume forecast to reduce from \$2.062B during the base period to \$377M (See Base Period and Option Period discussions below for clarification) during the option period.
- b) Sufficient small business volume has been awarded during the base period to cover WOSB, VOSB, and SDVO categories during the option period without need to award any contracts to these categories during the option period. The 10-year cumulative goals will be met with no further awards.
- c) The two sub-goals requiring significant SB award volume in option period are SDB and HUBZone. Concentrated effort will be made to identify and award to capable SDB and HUBZone companies.
- d) Small Disadvantaged Businesses (SDB)

To support the SDB goal during the option period, CHPRC has identified use of SDB companies to support scope execution. This includes companies such as Total Site Services, North Wind, MH Chew, Benegas Engineering, and Ojeda Business Ventures who provide engineering, environmental remediation and nuclear safety support. RC Engineering and Construction Services, as CHPRC's protégé, provides project controls, engineering and support services as well as temporary services. In addition, Ojeda provides construction and warehousing support; Indian Eyes provides rental equipment

and miscellaneous project support; and Pacific Supply and Safety provides materials/consumables.

Base Period FY2009-FY2013 (Actual)

Small Business Category	Actual Dollars Subcontracted	CHPRC SB Goal commitment	Percentage of total amount subcontracted
Total Subcontracted	\$2,062,328,719.00		
Total SB concerns	\$1,018,665,542.00	49.30%	49.39%
Total SDB concerns	\$176,273,701.00	8.20%	8.55%
Total WOSB concerns	\$198,356,469.00	7.50%	9.62%
Total HUBZone concerns	\$52,248,495.00	2.20%	2.53%
Total VOSB concerns	\$119,268,158.00	4.00%	5.78%
Total SDVO concerns	\$56,457,393.00	1.30%	2.74%

The table below shows the minimum dollars planned in the option period to meet the CHPRC 10-year SB goal commitment. The total dollars planned are for the option period. The percentages are expressed in terms of the 10-year goal.

Option Period FY2014-FY2018 (Planned)

Small Business Category	Planned Dollars Subcontracted	CHPRC 10-Year SB Commitment
Total Amount of Planned Subcontracting FY2014-FY2018	\$377,454,769.	
Total planned to be subcontracted to SB concerns	\$186,085,201.36	49.30%
Total planned to be subcontracted to SDB concerns	\$14,485,776.00	8.20%
Total planned to be subcontracted to WOSB concerns	\$0.00	7.50%
Total planned to be subcontracted to HUBZone concerns	\$18,009,069.00	2.20%
Total planned to be subcontracted to VOSB concerns	\$0.00	3.50%
Total planned to be subcontracted to SDVO concerns	\$0.00	1.30%

12.0 Small Disadvantaged Businesses Participation Program Targets

Pursuant to FAR 52.219-24, “Small Disadvantaged Business Participation Program - Targets,” and FAR 52.219-25, “Small Disadvantaged Business Participation Program - Disadvantaged Status and Reporting,” below is the CHPRC planned written Small Disadvantaged Business Participation Program Targets for the base and option period. The planned SDB goals are consistent with the North American Industry Classification System (NAICS) subsectors as determined by the U.S. Department of Commerce. The SDB targets will become part of the Contract under Section J.7 - Small Disadvantaged Business Participation Program Targets.

- (a) OFFEROR - CH2M HILL Plateau Remediation Company - Prime: AREVA Federal Services, LLC; Fluor Federal Services, Inc. (base period only); East Tennessee Materials & Energy Corporation, Inc. (base period only), a wholly owned subsidiary of Perma-Fix Environmental Services (M&EC/Perma-Fix) as a small business team member. No member of the Offeror's team is a small disadvantaged business, therefore, below table is left blank.

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage*
N/A	Subtotal	N/A	N/A

- (b) Subcontractors

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage*
238	Specialty trades	\$11,650,492.00	0.21%
236	Construction of Buildings	\$45,930,000.00	0.81%
484	Truck Transportation	\$ 1,300,000.00	0.02%
541	Professional, Scientific and Professional Services	\$28,852,000.00	0.51%
562	Waste Mgt and Remediation(562910) Remediation Services	\$56,571,197.00	1.00%
321	Wood Product Manufacturing (321991 Mobile Home Mfg)	\$ 8,000,000.00	0.14%
531	Real Estate (531190 Lessors of Other Real Estate Property)	\$ 3,300,000.00	0.06%
532	Rental and Leasing Services	\$39,341,000.00	0.69%
423	Merchant, Wholesalers, Durable Goods	\$ 3,870,000.00	0.07%
561	Temporary Services	\$1,250,000.00	0.02%
	Subtotal	\$200,064,689.00	

- (c) Total (A+B)

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage*
238	Specialty trades	\$11,650,492.00	0.21%
236	Construction of Buildings	\$45,930,000.00	0.81%
484	Truck Transportation	\$ 1,300,000.00	0.02%
541	Professional, Scientific and Professional Services	\$28,852,000.00	0.51%
562	Waste Mgt and Remediation(562910) Remediation Services	\$56,571,197.00	1.00%
321	Wood Product Manufacturing (321991 Mobile Home Mfg)	\$ 8,000,000.00	0.14%
531	Real Estate (531190 Lessors of Other Real Estate Property)	\$ 3,300,000.00	0.06%
532	Rental and Leasing Services	\$39,341,000.00	0.69%
423	Merchant, Wholesalers, Durable Goods	\$ 3,870,000.00	0.07%
561	Temporary Services	\$1,250,000.00	0.02%
	Subtotal	\$200,064,689.00	

* All percentages shown as a percent of the Total Contract Price of \$5,696,680,278. The \$200,064,689 planned for SDB Businesses equates to more than 8.2% of planned subcontracted volume as depicted in Sections 2.0 and 11.0 of this Plan.

13.0 Rationale for Small Business Forecast

The goals represent CHPRC procurement strategies and recognition of small business opportunities focused in the Pacific Northwest, while considering year-to-year procurement dynamics. The overall CHPRC procurement strategy is delineated in the Strategy for Small Business Involvement section of this Plan.

As recognized in FAR 19.705-4, “Reviewing the Subcontracting Plans,” each plan is evaluated based on similar acquisitions, proven methods of involving small business concerns, and relative success of methods. CHPRC believes the base and option years committed goals represent a challenging yet successfully achievable plan, given the work scope delineated in the RFP. This Plan strikes an optimum balance of self-perform versus subcontracted work expertise to exceed the PRC RFP requirements.

As CHPRC executes this PRC mission, the focus is representative of an environment of continued safe base operations, utilizing directed Hanford Prime contractors (MSA, Pacific Northwest National Laboratory, Washington River Protection Solutions,) who are historically large businesses, identifying qualified businesses to execute planned construction activities, and maximizing use of small businesses to successfully execute PRC mission objectives.

Subcontracts will be awarded after detailed scopes are developed and when the actual need arises. Prior to actual solicitations each respective “bid list” will include SB/SDBs as applicable. CHPRC has successfully met the SB goals for the base period FY2009-FY2013 with exception of prior discussed HUBZone, and will continue to subcontract work to the small business resources that CHPRC has developed working relationships with. CHPRC will make a concentrated effort to find additional HUBZone and SDB SBs to perform work in the option period FY2015-FY2018 to meet the targeted successful path in each small business sub-goal delineated in Section 11.0.

Highlights of targeted small businesses which have the capabilities to perform meaningful work in executing the PRC mission include:

Women-Owned Businesses

As delineated in this Plan, during the base period CHPRC utilized preferred women-owned small businesses to support scope execution. This included a) GEM Technology International for safeguards, information, and personnel security support, emergency preparedness, and nuclear material control; b) ENREP Inc. for training and procedure development and environmental regulation compliance support; and c) Cavanagh Services Group Inc.¹ for remediation services, hazardous waste support, transportation support and logistics management, and packaging, transport, and handling of fuels and nuclear material. In addition, CHPRC utilized other women-owned businesses including Total Site Services for mobile office support; Indian Eyes for equipment rental and miscellaneous project support; Blue Star Enterprise for drilling services; Peter and Keatts, Pacific Supply and Safety, Powers Equipment, J&D Sales, Tools 4 U Inc., EMI Filtration Products and Powers Equipment for equipment purchases; Monarch Water Systems for

potable water systems; HiLine Engineering, YASHGS, and North Wind, who could provide engineering, environmental remediation and nuclear safety, safety and health, operational readiness and facilities support.

During the option period no further awards are required to support the 10-year cumulative goal. However, CHPRC will continue to utilize a number of the above suppliers.

HUBZone Small Businesses

Several local companies previously identified as HUBZone suppliers during the base period lost the HUBZone status due to information published in the 2010 Census. CHPRC continues to actively search for suppliers of needed services that are HUBZone. Real Centric Solutions provides construction services and Terragraphics Environmental Engineering Inc. provides geological and hydrogeological support services. Both of these companies are HUBZone companies that have recently provided reliable services to CHPRC and we anticipate using them in the future. Tri-City Industrial provides safety equipment and supplies, and Acquisition Business Consultants, Inc. provides temporary services. Other companies identified at the National HUBZone conference will be considered and included in appropriate solicitations.

Veteran-Owned Small Businesses

As delineated in this Plan, during the base period CHPRC identified preferred pre-select veteran-owned small businesses (VOSB) to support scope execution. This included a) ARES for general engineering, managed task design support, nuclear/criticality and engineering expertise supporting engineering design and reviews, vendor drawing clarification, criticality analysis, deactivation plans, operational startup, risk assessments, facilities design and upgrades, integrity assessments, D&D support, and nuclear safety support, and b) HukariAscendent, Inc. for general engineering support, nuclear safety, ISMS, and ESH&Q support. In addition, CHPRC identified/utilized other VOSB possibilities including Tradewind Services, Energx, BNL Technical Services, Interim Tech Solutions, TC Program Solutions, Weirich Consulting, and Patriot Technical Consulting who could provide engineering, remediation, hazardous waste, facility, administration, consulting, and environmental support; B&K Supply, Diamond M, Horizon Distribution, and LANCS Industries for supplies; Clauss Construction for explosive demolition; and Directed Technologies Drilling Inc. for drilling services.

During the option period no further awards are required to support the 10-year cumulative goal. However, CHPRC will continue to utilize a number of the above suppliers.

Service-Disabled Veteran-Owned Small Businesses

During the base period CHPRC targeted SDVO small businesses in the execution of the PRC mission. SDVO businesses included Tradewind Services, Energx, BNL Technical Services, Weirich Consulting, and Operations Maintenance Excellence to provide engineering, remediation services, facilities support, environmental support, and consulting. Additional SDVOs include B&K Supply, Performance Pump, and Diamond M for supplies; and Clauss Construction for explosive demolition.

During the option period no further awards are required to support the 10-year cumulative goal. However, CHPRC will continue to utilize a number of the above suppliers.

Small Disadvantaged Businesses (SDB)

See Section 11.0.

Small Businesses

During the base period, CHPRC contracted with nine preferred pre-select team members and small businesses to support scope execution as delineated in Section 2.0. In addition, CHPRC utilized other small business including Watts Construction, Federal Engineers and Constructors (FEC), and Grant Construction, for construction support, sludge annex, soil remediation, structures demolition and dismantlement; E2 Consulting, BNL Technical Services, Freestone Environmental, Dade Moeller, ANTECH Corporation, North Wind, Meier, Mid-Columbia Engineering, Lucas Engineering, Vista Engineering, and G-Force Engineering to support engineering, remediation, facility administration, and environmental support; Blue Star, Stillwater, and Cascade Enterprises for well drilling support; Total Site Services and Pacific Mobile Structures for mobile office support; AVANTECH, Envirogen Technologies, Peters and Keatts, Rowand Machinery, Monarch Water Systems, Western Peterbilt, EMI Filtration, XRON Associates, and Powers Equipment as equipment/material suppliers. CHPRC stands committed to meet/exceed the committed goals.

14.0 Small Business Outreach and Equitable Opportunity to Compete

Pursuant to FAR 52.219-9 (d) (8), efforts that are being conducted to assure that SB concerns have an equitable opportunity to compete for subcontracts include:

- A. Outreach efforts to obtain sources:
 - (1) Contacting SB, SDB, WOSB, VOSB, SDVO, and HUBZone associations. (Buyers are encouraged to use directories and databases of federal, state, local, and private organizations to reach small businesses.)
 - (2) Contacting federal, state, local, and private SB development organizations.
 - (3) Attending and participating in procurement conferences, trade fairs, etc.
 - (4) Obtaining sources from the SAM and VetBiz.gov.
 - (5) Using the Internet to attract new sources.
 - (6) Compiling solicitations to facilitate SB participation in subcontracting opportunities. Ensure SB concerns have an equitable opportunity to compete for subcontracts.
 - (7) Participate in Hanford Small Business Council activities.

- B. Internal efforts to guide and encourage purchasing personnel:

- (1) Establishing, maintaining, and using SB source lists, guides, and other data for soliciting sources for subcontracts.
- (2) Providing communication, updates and training at bi-weekly Procurement staff meetings.
- (3) Maintaining a list of outreach activities attended

C. Outreach Events

- (1) Develop an annual list of outreach events and activities to attend and participate in.
- (2) Participate, or ensure participation of company representatives in SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns trade associations, seminars, business opportunity workshops, and outreach programs.
- (3) Strengthen relationships with SB and procurement trade associations and local/regional business development organizations including Tri-City Industrial Development Council.
- (4) Participate in the CHPRC Vendor Forums to showcase the PRC project and establish the foundation for a network of economic opportunity for small businesses.
- (5) Acquisition planning to include SB subcontracting opportunities.
- (6) Maintain an effective outreach program by sponsoring and attending regional and national procurement conferences and trade fairs to locate additional qualified SBs. Increase community awareness through participation in and attendance at community organization meetings (i.e., Chambers of Commerce, vendor forums and symposiums, etc.).
- (7) Interact with other CHPRC contractors, RL, and the Hanford Small Business Council. After meeting with vendors interested in subcontracting opportunities, forward vendor profiles to technical staff and procurement staff.
- (8) Meet one-on-one with vendors. Communicate information to procurement staff and management in the field related to the vendor's area of expertise.
- (9) Prepare and submit semi-annual Electronic Subcontracting Reporting System (eSRS) reports as required by FAR 52.219-9 on direct procurements to the RL Contracting Officer.
- (10) Attending or arranging for the attendance of company representatives at SB workshops, seminars, procurement fairs, trade fairs, and conferences.
- (11) Conducting or arranging for training of purchasing personnel regarding implementation of the SB subcontracting program.
- (12) Coordinating actions to participate in DOE's Mentor-Protégé Program.

D. Utilization of External SB Advocates to Conduct the SB Subcontracting Program. Work with:

- (1) SBA Procurement Center Representative.
- (2) SB Development Centers and Minority Business Development Centers.
- (3) Minority Supplier Development Councils.
- (4) Other SB organizations.

15.0 Indirect Costs

Pursuant to FAR 52.219-9 (d) (6), indirect costs are not included in the goals under this subcontracting plan because the baseline by Work Breakdown Structure is estimated as direct costs with no indirect cost rates or allocations.

16.0 Federal Flowdown Commitment

Pursuant to FAR 52.219-9 (d) (9), "Utilization of Small Business Concerns," CHPRC will include this flowdown requirement in all subcontracts that offer further subcontracting opportunities. CHPRC will require all subcontractors (except SB concerns) that receive subcontracts in excess of \$650,000 (\$1,500,000 for construction) to adopt a plan similar to the plan that complies with the requirements of this clause.

Such plans will be reviewed by comparing them with the provisions of Public Law 95-507, and ensuring that all minimum requirements of an acceptable subcontracting plan have been satisfied. The acceptability of percentage goals shall be determined on a case-by-case basis depending on the supplies/services involved, the availability of potential SB, SDB, WOSB, HUBZone, VOSB, SDVO small businesses, and prior experience. Once approved and implemented, plans will be monitored through the submission of periodic reports, and/or, as time and availability of funds permit, periodic visits to subcontractors' facilities to review applicable records and subcontracting program progress.

17.0 Use of Mandatory Sources of Supply or Services

Pursuant to FAR 52.208-9, certain supplies or services are required to be obtained from nonprofit agencies operated by the Committee for Purchase From People Who Are Blind or Severely Disabled under the Javits-Wagner-O'Day Act (JWOD), from the Defense Logistics Agency (DLA), General Services Administration (GSA), or the Department of Veterans Affairs (VA).

18.0 Price Evaluation Preference for HUBZone

Pursuant to FAR 52.219-4, "Notice of Price Evaluation Preference for HUBZone Small Business Concerns," CHPRC will provide an evaluation preference for a HUBZone proposal by adding a factor of 10% to the price of all offers, except offers from HUBZone concerns that have not waived the evaluation preference; or are otherwise successful offers from SB concerns.

19.0 Government Supply Sources

Pursuant to FAR 52.251-1, "Government Supply Sources," CHPRC has received from the RL Contracting Officer an authorization to use Government supply sources (e.g., GSA) in the performance of this contract. It is recognized that title to all property acquired by CHPRC under such an authorization shall vest in the Government unless otherwise specified in the contract, or is consistent with the provisions of the FAR clause entitled "Government Property," except its paragraphs (a) and (b), for all property acquired under such authorization.

20.0 Utilization of Environmentally Preferred Purchasing for Desktop or Laptop Computers or Monitors

Pursuant to PRC Clause H.43, when CHPRC purchases desktop or laptop computers or monitors for this contract, CHPRC will specify or deliver Electronic Product Environmental Acquisition Tool (EPEAT) registered products conforming to the IEEE (Institute of Electrical and Electronics Engineers, Inc.) 1680-2006 Standard, provided such products are available, are life-cycle cost efficient, and meet applicable performance requirements of EPEAT-registered computer products.

21.0 Reporting

Pursuant to PRC Clause H.40, "Electronic Subcontracting Reporting System (eSRS)," and FAR 52.219-9 (d) (10), and FAR 52.219.9 (j), CHPRC will:

- (i) Cooperate in any studies or surveys or submission of reports as may be required by the DOE or the SBA.
- (ii) Submit periodic reports so that the Government can determine the extent of compliance by CHPRC with this subcontracting plan. CHPRC will report formal actual performance toward SB goals to RL, on an annual basis via the Balanced Scorecard process. In the interim, Project Controls Monthly Reports will include small business performance. CHPRC will measure awards to SBs based on the total value of subcontracts and purchase orders placed during each fiscal year. In addition, from a SB reporting perspective, CHPRC will require each prospective subcontractor to submit a Representations and Certifications form denoting their business size, classification, and status (SB, SDB, WOSB, HUBZone, VOSB, SDVO), which will be validated per the SAM database. Each CHPRC subcontract award includes a vendor code. Monthly SB statistics will be generated based on information contained within those codes.
- (iii) Report SB socioeconomic achievement data via the eSRS system, on a semi-annual basis, as required.
- (iv) Ensure that the large business subcontractors agree to submit semi-annual reports to the eSRS system as required.

22.0 Records Management

Pursuant to FAR 52.219-9 (d) (11), the types of records that will be maintained to demonstrate the procedures adopted ensure compliance with the requirements and goals of this Subcontracting Plan include:

- (i) Source lists (e.g., Vendor Registration or SAM), guides, and other data that identify SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns.
- (ii) Organizations contacted in an attempt to locate sources that are SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns.
- (iii) Records held by procurement staff on competitive subcontract solicitations resulting in an award of more than \$150,000 indicating:
 - Whether SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns were solicited and,
 - If applicable, the reason award was not made to a SB concern. (if not, why not).
- (iv) Records of any outreach efforts to contact:
 - Trade associations.
 - Business development organizations.
 - Conferences and trade fairs to locate SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns.
 - Veterans service organizations.
 - Records of internal guidance and encouragement provided to buyers through workshops, seminars, training, etc.; and monitoring performance to evaluate compliance with the program's requirements.
- (v) On a contract-by-contract basis, records to support award data submitted by CHPRC to the government, including the name, address, and business size of each subcontractor.

23.0 Liquidated Damages – Subcontracting Plan

Pursuant to FAR 52.219-9 (i), FAR 52.219-16, and PRC Clause B.10, “Small Business Subcontracting Fee Reduction,” CHPRC recognizes that not making a good faith effort to meet subcontracting goals committed in this subcontracting plan, may invoke Clause B.10.

24.0 Plan Implementation

Pursuant to FAR 52.219-9 (e), CHPRC will perform the following functions to implement this plan effectively to the extent consistent with efficient cost-reasonable performance:

- (i) Assist SB concerns by arranging solicitations, time for preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. CHPRC will make reasonable efforts to give as many SB concerns as possible an opportunity to compete over a period of time.

- (ii) Provide adequate and timely consideration for use of SB concerns when deciding if CHPRC should perform the work or procure it from another source.
- (iii) Contact, counsel, and discuss subcontracting opportunities with representatives of small business concerns.
- (iv) CHPRC will require and rely upon the subcontractor's business size representations and certification (FAR 52.204-8) for SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns. HUBZone and 8(a) status will be verified by receipt of a SBA certification document or by accessing the list of certified HUBZone and 8(a) maintained by the SBA in the Dynamic Small Business Search or SAM database (FAR 52.204-7). Notice will be provided to subcontractors concerning penalties and remedies for misrepresentation of business status.

25.0 Administrator of Subcontracting Plan

Pursuant to FAR 52.219-9 (d) (7), the following individual has been named to administer this Subcontracting Plan:

Name: Janice Bartram
Title: Small Business Advocate
Address: 2420 Stevens Center Place
Richland, WA 99354
Telephone: 509.376.2553

Additionally, the Small Business Advocate's specific duties as they relate to the CHPRC Small Business Subcontracting Plan are as follows:

- A. Monitor subcontracting goal progress on a monthly basis and provide monthly assessment reports to the CHPRC procurement staff and quarterly to the RL Contracting Officer.
- B. Provide adequate and timely consideration of the potentialities of SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns when working with CHPRC field personnel in determining "make-or-buy" decisions.
- C. Ensure, in CHPRC acquisition of goods and services, that SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns are provided the maximum opportunity practicable to compete for subcontracted work and purchased materials within the framework of the CHPRC contract.
- D. Maintain an effective outreach program by sponsoring and attending regional and national procurement conferences and trade fairs to locate additional qualified SBs. Increase community awareness through participation in and attendance at community organization meetings (i.e., Chambers' of Commerce, vendor forums and symposiums, etc.) and direct SB solicitations. Ensure vendor accessibility to future subcontracting opportunities by monitoring and updating the external CHPRC procurement website.
- E. Interact with other CHPRC contractors, RL, and the Hanford Small Business Council. After meeting with vendors interested in subcontracting opportunities, forward vendor profiles to technical staff and procurement staff.

- F. Meet one-on-one with vendors. Communicate information to procurement staff and management in the field related to the vendor's area of expertise.
- G. Ensure the establishment and maintenance of records of the total dollar value of awards to SB, SDB, WOSB, HUBZone, VOSB, and SDVO concerns.
- H. Prepare and submit semi-annual eSRS reports as required by FAR 52.219-9 on direct procurements to the RL Contracting Officer.
- I. Developing and promoting company-wide policy initiatives that demonstrate the company's support for awarding contracts and subcontracts to SB concerns, SDB concerns, WOSB concerns, VOSB concerns, SDVO small business concerns, and HUBZone concerns.
- J. Ensuring the integrity of supplier information in the Hanford Vendor Registration or SAM through a series of controls that include a review of Representations and Certifications of new suppliers. Ensure that supplier NAICS codes and socioeconomic classifications are included in supplier descriptions.
- K. Monitor procurement performance, including credit card purchases to ensure that Contract Specialists and credit card users are encouraged to support small business programs. This includes providing small business source lists and new small business contacts.
- L. Monitoring the compliance of subcontractors responsible for subcontracting plan requirements under "flow down" provisions.
- M. Attending or arranging for the attendance of company counselors at SB workshops, seminars, procurement fairs, trade fairs, and conferences.
- N. Conducting or arranging for training of purchasing personnel regarding implementation of the SB subcontracting program.
- O. Ensuring that SBs are made aware of the Credit Card Program and how to participate in it.
- P. Coordinating the facility's activities during the conduct of compliance reviews by Federal agencies.
- Q. Coordinating actions to participate in DOE's Mentor-Protégé Program.

26.0 Approvals

THIS SMALL BUSINESS SUBCONTRACTING PLAN IS SUBMITTED BY:

Signature:

Typed Name: John A. Ciucci

Title: President and Chief Executive Officer

Date: December 30, 2014