

DOECAP AUDITING RADIOLOGICAL CONTROL

Preparing and Conducting a VIRTUAL Audit

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TOPICS

DOECAP Audit Preparation

State Agency File Review


Radiological Control Checklist

Facility Audit

Documents and Records Review

Summary

DOECAP AUDIT PREPARATION

- ▶ Obtain assignment as Radiological Control auditor
 - ▶ Ensure DOECAP training is current (Required Reading/
Rad Worker/HAZWOPER)
 - ▶ Check Radiological Material License (RML) and
amendments, such as:
 - ▶ RML License Conditions
 - ▶ RML limits and radioisotopes allowed
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DOECAP AUDIT PREPARATION -CONTINUED

- ▶ Access facility audit files on DOECAP SharePoint site
 - ▶ Review most recent DOECAP audit report
 - ▶ Past Findings/Observations and Closure of previous Findings
 - ▶ Review Radiological Control Manual and procedures
 - ▶ Review RML conditions and Surety Bond
 - ▶ Review facility input to current DOECAP Checklist
 - ▶ Review Radiation Protection Program

STATE AGENCY FILE REVIEW

- ▶ State Agency for file reviews (AR, TN, UT, or WA)
 - ▶ Access State Agency files via the State's website
 - ▶ Review past 1 to 3 years of records
 - ▶ If I was the previous RC auditor, I review just the past year
 - ▶ Note items of interest in the NOTES section of the DOECAP Checklist
 - ▶ Potential ongoing RML findings and enforcement actions
 - ▶ Document in the DOECAP Checklist for future RC auditors
 - ▶ Example of completed NOTES is coming up
- ▶ Follow-up with Facility Radiological Controls Manager on any Agency File Review questions

RADIOLOGICAL CONTROL CHECKLIST

- ▶ Based on a very specific criteria listed in the Radiological Control Manual and RML, and State Regulators, the RC checklist is straight forward and address:
 - ▶ Is there a written and approved RCM
 - ▶ Are there approved procedures
 - ▶ Are there an internal and external bioassay program
 - ▶ Are areas properly posted
 - ▶ Do the site use administrative and engineering controls
 - ▶ Are the records properly stored
 - ▶ Environmental Monitoring (surface/ground water, air, soil, vegetation)

VIRTUAL FACILITY AUDIT

- ▶ Review previous audit report for findings and observations
- ▶ Review corrective actions that closed the findings
 - ▶ Note that corrective actions are not required for observations
- ▶ Closeout or keep open previous audit findings based on provided evidence
- ▶ Review the Facility's responses in the DOECAP checklist
- ▶ Review Facility documents to confirm Facility responses
 - ▶ Facility procedures
- ▶ Develop follow-up questions based on the Facility's responses

VIRTUAL FACILITY AUDIT

- ▶ 30-Minute Interview with Facility POCs
 - ▶ Auditor questions are based on Facility's DOECAP Checklist responses, RML conditions, agency file and procedure reviews
- ▶ Example questions:
 - ▶ **Is there any waste on-site greater than 365 days**
 - ▶ **Were there any declared pregnant workers**


VIRTUAL FACILITY AUDIT VIA RML, RCM AND PROCEDURE REVIEWS

- ▶ Review facility supplied pictures to verify the above items

TYPICAL LINES OF QUESTIONING/REVIEW TOPICS

- ▶ Radiological Postings are conspicuous, consistent and appropriate for the hazard.
- ▶ Radiological labeling is conspicuous, legible and appropriate for the hazard.
- ▶ Radiological PPE is properly worn, stored, available and appropriate for the hazard.
- ▶ Engineering and Administrative controls are appropriate and focus on reducing the hazard following ALARA.
- ▶ Radiological Surveys are done following appropriate scheduling necessities to control hazards, using appropriate and calibrated equipment.
- ▶ Employees are fully cognizant of the radiological hazards in their workspace and how to apply ALARA.
- ▶ Employees are aware of the dose limits and where to access their accumulated dose totals.
- ▶ Review of dose records and other posted requirements are easily accessible/visible to all parties.

DOECAP RADIOLOGICAL CONTROL AUDITOR QUALIFICATIONS

- ▶ Auditors should have at minimum 10 years of radiological protection oversight experience.
 - ▶ Ideally auditors will have either DOE TQM qualification as a health physicist, or national certifications via NRRPT or ABHP or a bachelors/associates degree in the health physics field.
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ALARA EFFORTS

- ▶ Are sound radiation protection principles being utilized to achieve occupational doses and doses to members of the public and employees that are as low as is reasonably achievable (ALARA)?
- ▶ In review of exposure records, are there exposures occurring that could be avoided/lowered?
- ▶ Have there been improvements made to processes to lower exposures?
- ▶ Is ALARA noted in the RPP and controls in place to limit exposures below limits?

RADIATION PROTECTION PROGRAM (RPP)

- ▶ Is a documented review being performed by the company's radiological SME on an annual basis?
- ▶ Is a thorough documented review of all functional elements of the RPP performed no less frequently than every 3 years that includes program content and implementation?

ONSITE RECORDS REVIEW

- ▶ Liability and Closure Insurance
 - ▶ Is there documented and current financial assurance for environmental accidents and final closure?
 - ▶ Inspections
 - ▶ Are inspections conducted as required?
 - ▶ **Are corrective actions documented?**
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ONSITE RECORDS REVIEW

- ▶ Training
 - ▶ Does personnel training meet regulatory requirements
 - ▶ Do personnel training records indicate that initial and refresher training is current for the employee?
- ▶ **Preparedness and Prevention**
 - ▶ **Is radiological instrumentation and equipment tested and maintained as applicable?**
- ▶ **Are there any facility specific requirements**
 - ▶ **State inspections and notifications for RML**

SUMMARY

- ▶ A successful virtual DOECAP audit can be accomplished with:
 - ▶ DOECAP Audit Preparation – review the previous audit report, procedures, permits and the Facility’s DOECAP checklist responses
 - ▶ Reviewing State Agency Files – pending/ongoing enforcement actions
 - ▶ Completing the Environmental Compliance/Permitting Checklist
 - ▶ Conducting the 30-minute facility interview based on the above, and
 - ▶ Conducting a documents and records review to substantiate compliance

ANY EASY QUESTIONS?

