



Pre-Audit Process and Materials

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Contents



Cedar Breaks National Monument, Utah

Limitations

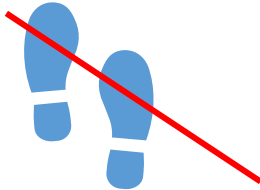
One Month

Two weeks

One week

Audit Time

Remote Audit Limitations



Cannot walk down
facility



Pictures or videos can
be requested



Rely on completed
paperwork

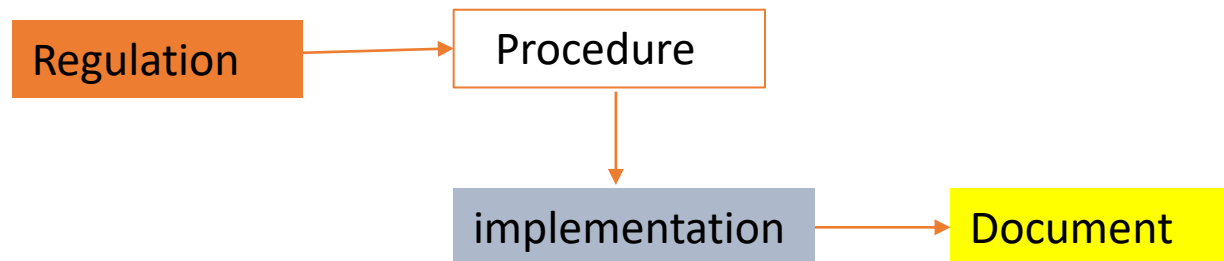


Interview point-of-
contact (POC)

Limitations of the Remote Audit

Audit limited to facility uploaded information in SharePoint Site

So, focus of remote audits is limited to document review



Information/records requests are very important

One Month Out

- Notification letter sent to site
- Can YOU make the time commitment needed?
 - Pre-audit phone call
 - Audit preparation
 - Two days for remote
 - Four days for on-site
 - If you CANNOT – tell DOCAP as soon as possible so alternative auditor can be found
- You need to prepare for each step in the audit cycle
 - Know your LOIs – they will guide your records request



Two Weeks Out

- **Pre-audit team phone call**
 - Verify focus area, time zones, agenda, etc.
 - Who do you send additional records requests to?
 - Who are your other auditors?
- **Ensure you can access the DOECAP websites!!**
- **Project Enhancement SharePoint Site:**
 - <https://projectenhancementcorp.sharepoint.com/sites/projects/AU21/DOECAP/SitePages/Home.aspx>
- **DOECAP Audit Report Website**
 - <https://doecapauditreports.projectenhancement.com/>

PEC SharePoint site

- Prior years audit materials
- Prior years audit reports
- Site will upload to either individual auditor folders or 2022 Audit Materials
- Site and Auditor Points-of-Contact list



DOECAP

DOECAP

Home

ASP Annual Training
Workshop Presentations

Calendar

Resources

Workshop Collaboration

Facility Usage Query link

Lab Assessments

TSDF Audits

Clean Harbors La Porte,
LLC - TX

Diversified Scientific
Services, Inc

EnergySolutions - UT

Perma-Fix Northwest

Unitech

Recent

DOECAP has a
vendors.

UPCOMING EVENT

ASP Annual Training
Workshop

This is a Department
captured in an

Perma-Fix Northwest

Name ▾

Audit Materials (2018-2022)

Audit Reports (2018-2022)

Auditor Folders

Perma-Fix NW Points of Contact.docx

SharePoint Site Audit Materials

DOECAP - Audit Materials (2018-2022) x 8 Ways to Take a Screenshot on x +

https://projectenhancementcorp.sharepoint.com/sites/projects/AU21/DOECAP/PermaFix%20Northwest/Forms/AllItems.aspx?id=%2Fsites%2Fprojects%2FAU21%2FDOECAP%2FPermaFix%20Northwest%2FAudit%20Materials%20%282018-2022... Search this library

Office 365



Home + New Upload Edit in grid view Share Copy link Sync All Documents

ASP Annual Training Wor...
Calendar
Resources
Workshop Collaboration
Facility Usage Query link
Lab Assessments
TSDF Audits

Perma-Fix Northwest > Audit Materials (2018-2022)

Name
2018 Audit Materials
2019 Audit Materials
2020 Audit Materials
2021 Audit Materials
2022 Audit Materials

Return to classic SharePoint

Perma-Fix Northwest > Auditor Folders

Name
Joe Pardue - Quality Assurance Management System
Melanie Myers - Transportation Management
Patty Hunt - Industrial and Chemical Safety
Pete Yerace
Rhonda Ford - Environmental Compliance
Susan Krenzien - Waste Operations
Tom Carver - Radiological Control

SharePoint Alert

- Set up an alert on the audit folder so when files are uploaded you can start reviewing

Alert me when items change

Delivery Method

Specify how you want the alerts delivered.

Send me alerts by:

- E-mail skrenzien@ieinc.net
- Text Message (SMS)
- Send URL in text message (SMS)

Change Type

Specify the type of changes that you want to be alerted to.

Only send me alerts when:

- All changes
- New items are added
- Existing items are modified
- Items are deleted

Send Alerts for These Changes

Specify whether to filter alerts based on specific criteria. You may also restrict your alerts to only include items that show in a particular view.

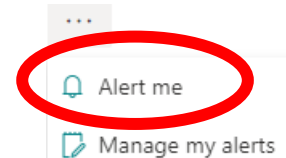
Send me an alert when:

- Anything changes
- Someone else changes a document
- Someone else changes a document created by me
- Someone else changes a document last modified by me

When to Send Alerts

Specify how frequently you want to be alerted. (mobile alert is only available for immediately send)

- Send notification immediately
- Send a daily summary
- Send a weekly summary



Last Audit Report



Summary ~ Page 3



Do you have any findings to close?

AUDIT SCOPE

As with onsite audits, the goal of a remote audit is to assess the TSDF's compliance, operational capabilities, and to confirm competency in the performance of contractual duties and tasks by using technology to review audited facility information, communicate with staff, observe activities and facilitate the audit process.

This audit covered a review of management systems and operational activities that need to be considered by each DOE site potentially utilizing the facility. The following areas were reviewed during this audit:

- Quality Assurance Management Systems (QA)
- Sampling and Analytical Data Quality (SA)
- Waste Operations (WO)
- Environmental Compliance and Permitting (EC)
- Radiological Control (RC)
- Industrial and Chemical Safety (IC)
- Transportation Management (TM)

Table 1 - Findings and Observations

Area of Concentration	Priority I	Priority II	Observations	Closed*	Open**
QA	0	0	0	0	0
SA	0	0	0	0	0
WO	0	0	0	0	0
EC	0	1	1	0	0
RC	0	0	0	0	0
IC	0	2	1	0	0
TM	0	0	0	1	0
Totals:	0	3	2	1	0

* Closed refers to those findings listed in prior audits which objective evidence has demonstrated there is no longer a deficiency.

** Open identifies those findings from prior audits which remain open at the time of this audit. An open item may be elevated to a higher priority if not properly addressed. Such instances will be accounted for in both Open and Priority columns.

Prior Year Audit Materials

- Find procedure list – *hopefully* it will have titles, number, and revision or date
- Look in auditor folders to see what information was used in the last audit



Northern Nevada Railroad Museum and Historic Landmark, Ely Nevada

DOECAP Audit Report Site

<https://doecapauditreports.projectenhancement.com/>

- Audit Information
- Findings and Observations
- Close Finding
- Interviews – NEW!!
- Site Sheets
- Checklist

Department of Energy

DOECAP Audit Reports Website

For Documenting and Creating DOECAP Audit Reports



[Audit Information](#) [Findings](#) [Observations](#) [Close Finding](#) [Site Sheets](#) [Checklist](#) [Evaluation Form](#) [Cost Tracking](#) [Audit Report](#) [Logout](#)

Logged In As: Patricia Hunt

Audit Facility:

Audit Information

Audit Program:

Audit Type:

Audit Location:

City:

State:

Report Type:

Starting Date:

Ending Date:

Audit Scope

Quality Assurance Management Sys (QA)

Complete Alternate

Sampling & Analytical Data Quality (SA)

Complete Alternate

Waste Operations (WO)

Complete Alternate

Environmental Compliance & Permitting (EC)

Complete Alternate

Radiological Control (RC)

Complete Alternate

Industrial & Chemical Safety (IC)

Complete Alternate

Transportation Management (TM)

Complete Alternate

*Closed refers to those findings listed in prior audits which objective evidence has demonstrated there is no longer a deficiency.

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Part II - Corrective Action Plan - Completed by the Facility

Immediate Corrective Action Taken:

Identified signs were replaced. In addition, the rest of the signs along the MW fence line were inspected and replaced as needed. A total of 7 signs were replaced.

Root Cause Analysis to Evaluate How and Why the Finding Occurred:


A similar issue had been previously identified by site QA during a Management Field Observation on March 4, 2019, and communicated to site management. At that time, multiple signs had been replaced and the site's supply of new signs had been exhausted. New signs had been ordered but had not been installed. During fact finding, site inspectors responsible for inspecting the signs were questioned and all communicated that although they felt the signs were not in great shape, they also felt they were legible from 25 feet as required by the RCRA Permit Site Inspection Plan.

Corrective Action(s) to Prevent Recurrence:

Condition Report 12345 was written to document this issue and track corrective actions. In addition to replacing the signs identified during the DOECAP audit, a list of qualified inspectors was obtained and communication was sent out to all employees qualified as Mixed Waste Inspectors to reinforce that subjective items (such as the condition and legibility of signage) should be identified and corrected well before the condition gets such that compliance to governing requirements is questionable.

Site Information

- Review site information and description sheets



Audit Information Findings Observations Close Finding Interview **Site Sheets** Checklist Evaluation Form Cost Tracking Audit Report Logout

Logged In As: Auditor - Patty Hunt Selected Audit: EnergySolutions, I

Audit Facility:

Audit Information

Audit S

Audit Program:

Audit Category:

Audit Location:

City:

State:

Report Type:

Starting Date:

Ending Date:

- Quality Assurance Management Sys (QA)
- Sampling & Analytical Data Quality (SA)
- Waste Operations (WO)
- Environmental Compliance & Permitting (EC)
- Radiological Control (RC)
- Industrial & Chemical Safety (IC)
- Transportation Management (TM)

Remote Start:

Remote End:

Onsite Start:

Onsite End:

Programs, Plans, and Procedures

29 CFR 1910.178 | Powered Industrial Truck

Date or Version

ES-SH-PR-608

Last Reviewed

1/18/2018

Were Changes Made Within the last 12 months?

No

29 CFR 1910.147(c)(1) | Lockout/Tagout

Date or Version

ES-SH-PR-110, Hazardous Energy Control (Lockout/T

Last Reviewed

10/1/2020

Were Changes Made Since the Previous DOECAP Audit?

No

29 CFR 1910.146(c) | Confined Space

Date or Version

ES-SH-PR-107, Confined Spaces

Last Reviewed

11/19/2018

Were Changes Made Since the Previous DOECAP Audit?

No

29 CFR 1910.120 | Hazard Communication Plan

Date or Version

ES-SH-PR-303, Hazard Communication

Last Reviewed

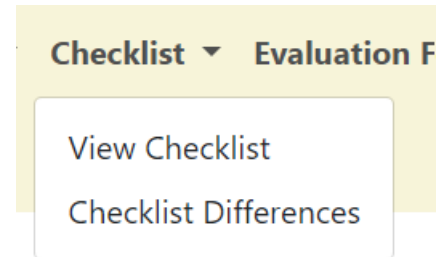
11/1/2018

Were Changes Made Since the Previous DOECAP Audit?

No

Checklist

- Checklist – completed by Site
- Differences highlighted
- Review auditor's notes from last year
 - Items not assessed
 - Possible problem areas



Prior AuditorComments (Read Only) ⋮	Current Auditor Comments ⋮	Prior Notes (Read Only) ⋮	Current Notes ⋮
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Checklist

- Check other “Frequency Identifiers” for LOIs you can answer
- Use auditor **comments** column to remind you of outstanding issues or requests
- Use auditor **notes** column to leave comments for next auditor



Ward Charcoal Ovens State Historic Park, Ely NV

Auditor's Checklist

LOI	Section	Sub Section	LOI Description	Frequency Identifier	Prior Site Response (Read Only)	Current Site Response	Prior Auditor Comments (Read Only)	Current Auditor Comments	Prior Notes (Read Only)	Current Notes
Waste Operations	14.1 (a) General	14.1 (a)	Does the facility have the necessary and applicable permits and licenses to perform the DOE operations for which they support? EC Primary (RCRA, TSCA, Radioactive Material License)	I				has two radioactive material licenses WN-10393 and WN-10508, both are in timely review. RCRA permit also in timely review.		
Waste Operations	14.1 (b) General	14.1 (b)	Does the facility control entry to the active portion of the facility at all times? Does the TSDF have a combination of adequate fencing, natural barriers, guarded gates, and/or 24-hour surveillance systems to guard against unknowing/unauthorized entry to the facility? 40 CFR 264.14	S				Acceptable. Guard controlled access. Fencing present around facility. LLOP-112, Facility Security, rev. 8/5/27/21. PFNW is surrounded by chain-link fence. Security Guard is on duty 24 hours a day, 7 days a week. Access Control is located near the main access gate. During times when the guard is making rounds, this gate is locked. MWOP 306, Rev 9. Mixed Waste Facility Inspections the weekly and monthly inspections include facility security and signs.		
Waste Operations	14.1 (c) General	14.1 (c)	Does the facility have "Danger – Unauthorized Personnel Keep Out" (or similar wording) signs at each entrance and at any other locations necessary that are visible from any approach and are legible from at least 25 feet away? 40 CFR 264.14	D	Yes	Yes	The permits and documents require Danger Unauthorized Personnel Keep Out signs, which have been evaluated in the past and noted to be visible from 25 feet. This was not evaluated during this remote audit.	Acceptable. Signs present and legible. Facility inspection items include signs and fencing.		

Other Sites

- Regulator websites (EPA, State, etc)
 - Permits and/or licenses
 - Inspection history
 - Violation history
- Facility/Corporation website



ALWAYS the first request

- Current procedure list – **with** titles, number, and revision or date (also known as secret decoder ring)
- Facilities upload only procedures that have changed since the last DOECAP audit
- This list is imperative if you are looking in old audit material folders
 - procedure numbers used as file names
 - titles change
 - Multiple auditor folders have copies
 - Not always easy to find procedure without opening every file

Requests

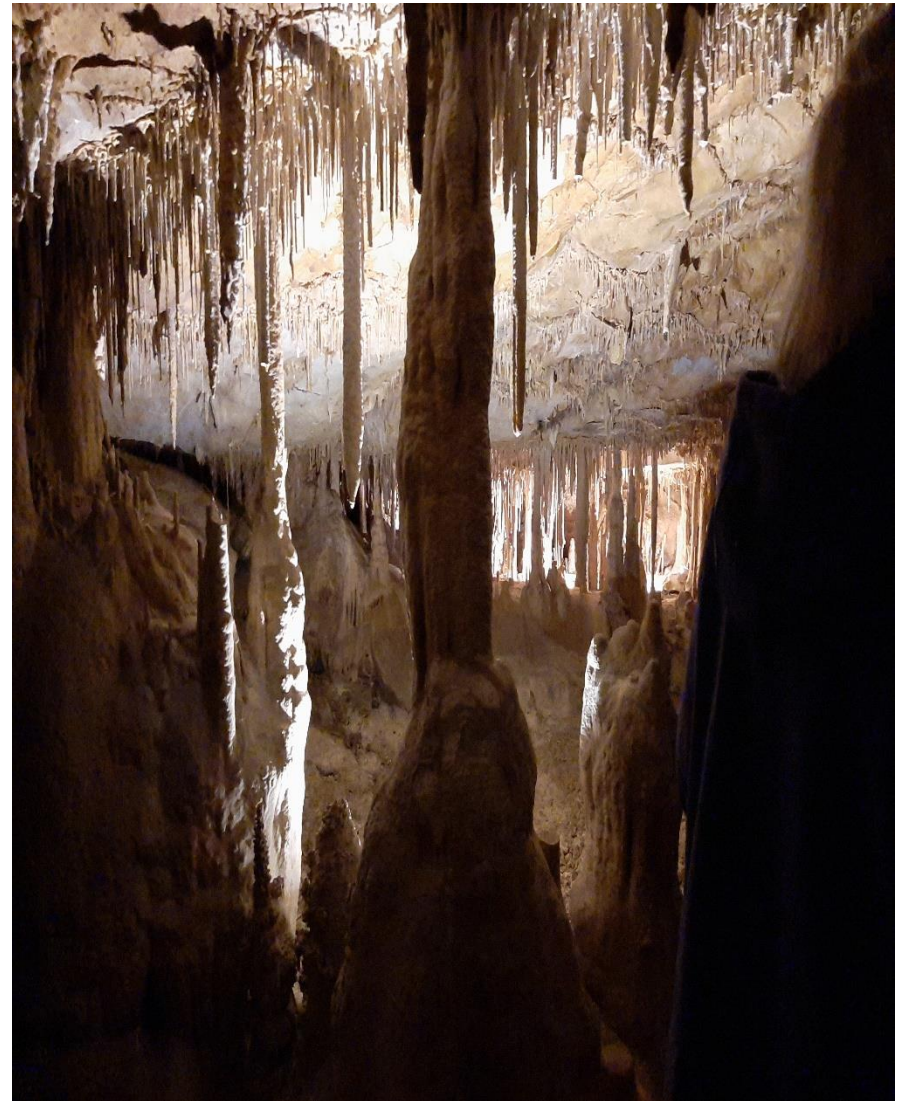
- Identify the documents you need
 - Request completed forms associated with procedures
 - ❖ Forms and procedures are not always uploaded together, and forms may be forgotten altogether if not appendices to procedures
 - Be as specific as you can
 - Reference procedures and form numbers
 - ❖ Waste profile (form WP-2021) per WP-003, *Profiling*
 - ❖ Waste Inventory per IN-002, *Waste Tracking*
- Send information request to Hannah Hidle or Audit Support Person identified on POC list

Typical Waste Operations Request

- What two treatments are most often conducted on DOE waste?
- Two DOE waste profiles with shipments within 2022, One shipment receipt, treatment, disposition records for each waste profile.
- Audit/surveillance reports regarding waste operations
 - Sometimes listed in Site Information Sheet
- Any surveillances and/or NCRs regarding waste operations (last 12 months)
- Daily, weekly, and monthly inspection reports for April 2022.
 - If discrepancies identified, associated corrective action follow-up.
- Current facility waste inventory that includes “age”, description and quantity of each waste received and method(s) and date(s) of its treatment, storage, or disposal.
 - Identify DOE waste on-site if possible
- Training reports for the following
 - Request by title used in procedure and identify procedure
- Any non-Conforming Shipments or discrepancy report(s) for the past 12-months

Give yourself time to review information received

- Reading or scanning procedures take time
- Many procedures reference others
 - Helps to have at least two monitors 😊
- Forms are not always attached and may take some time to find and/or review
 - Do they match the information required in the procedure?



Lehman Caves, Great Basin National Park



Audit Time!

Electronic Records

- Identify what electronic records or databases do you need to “see”
 - Request screen shots
 - Schedule time with virtual platform to have POC walk you through
- Need POC at computer with access to all parts of database and virtual platform
- Window/Shift/S – selected item screen save
- Alt/PrtScn – entire screen save

½ Hour Interview Time



- Considerations:
 - Do you need to close findings?
 - Will you be on-site the next week?
 - Are you missing requested documents?
 - ❖ Keep a list of everything you have asked for and cross off as you receive
 - Do you have additional information requests?
- Preparation
 - Have questions ready based on information already received
 - If you are screen sharing, ensure DOECAP facilitator knows which file or that you will be sharing your screen
- At the End:
 - Confirm outstanding information requests
 - Identify any new POCs you need to contact/schedule
 - Confirm POC appointments
- Remember time zone differences!!!

Other Auditors

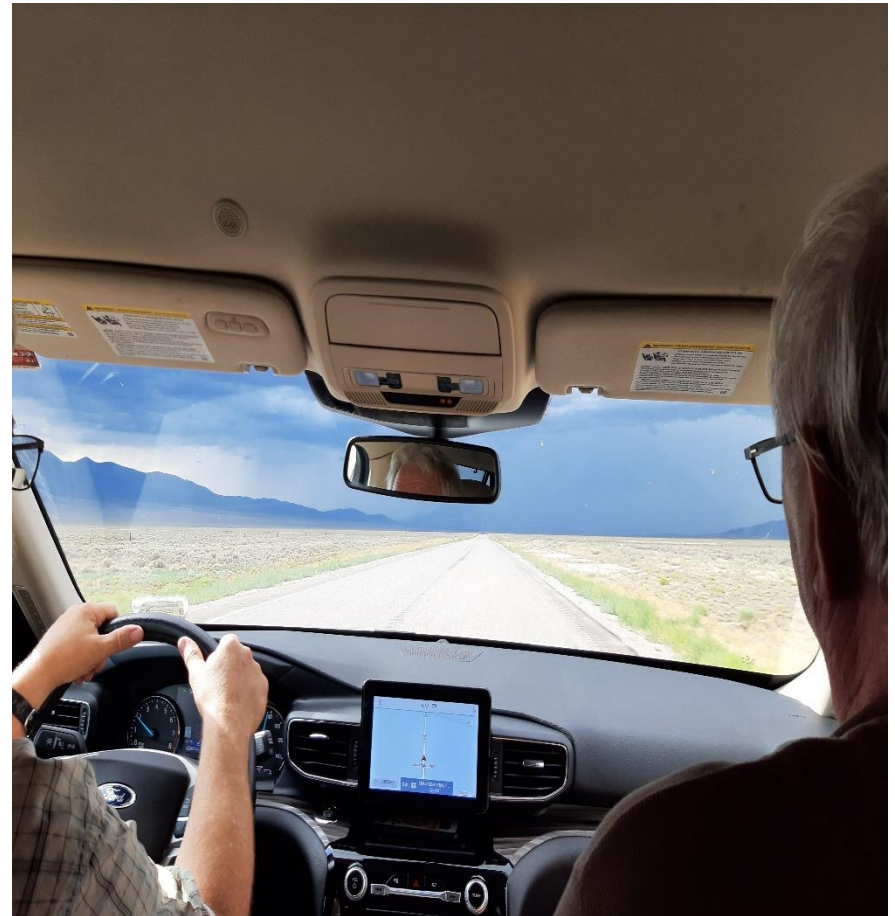
- May be requesting the same documents
 - Inspection reports
 - Area photographs
 - Training reports
- You **can** open and use files from other Auditor folders
- Listen to other Auditors interviews
 - If you have already requested the information
 - If you know what folder the information is already in
 - If you need the same information or a slight variation

On-Site Interviews

- NEW!
 - Usually Waste Operations, Industrial Safety and Health, and Lead Auditor
 - Interview Operations personnel and/or Supervisor
 - Have at least 5 questions ready
 - ❖ Nerves will come in to play, this is **NOT** a “gotcha” situation
 - ❖ Start with general information questions
 - ❖ Clarify a part of the operation you didn’t understand or was confusing to you
 - ❖ Key hold points
 - ❖ What paperwork are you responsible for?
 - Not procedure step-by-step - level of knowledge and training

Daily Close-out

- Who you talked to
- What you accomplished
- Any issues identified
 - finding or observation?
Can be indeterminate
 - What information request(s) are outstanding
- Any new information requests?
- What are you doing tomorrow?
- Schedule one-on-one time with POC?



Final Thoughts

- Preparation is key
- Get information requests in ASAP
- 30-minute interview - schedule other POC time

*“Before anything else,
Preparation is the key to success.”*

Alexander Graham Bell

Questions?

