The DOECAP Remote Audit

Navigating the DOECAP Checklist

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DOECAP
DEPARTMENT OF ENERGY
CONSOLIDATED AUDIT PROGRAM

Key Requirement

Access to Internet DOECAP Resources:

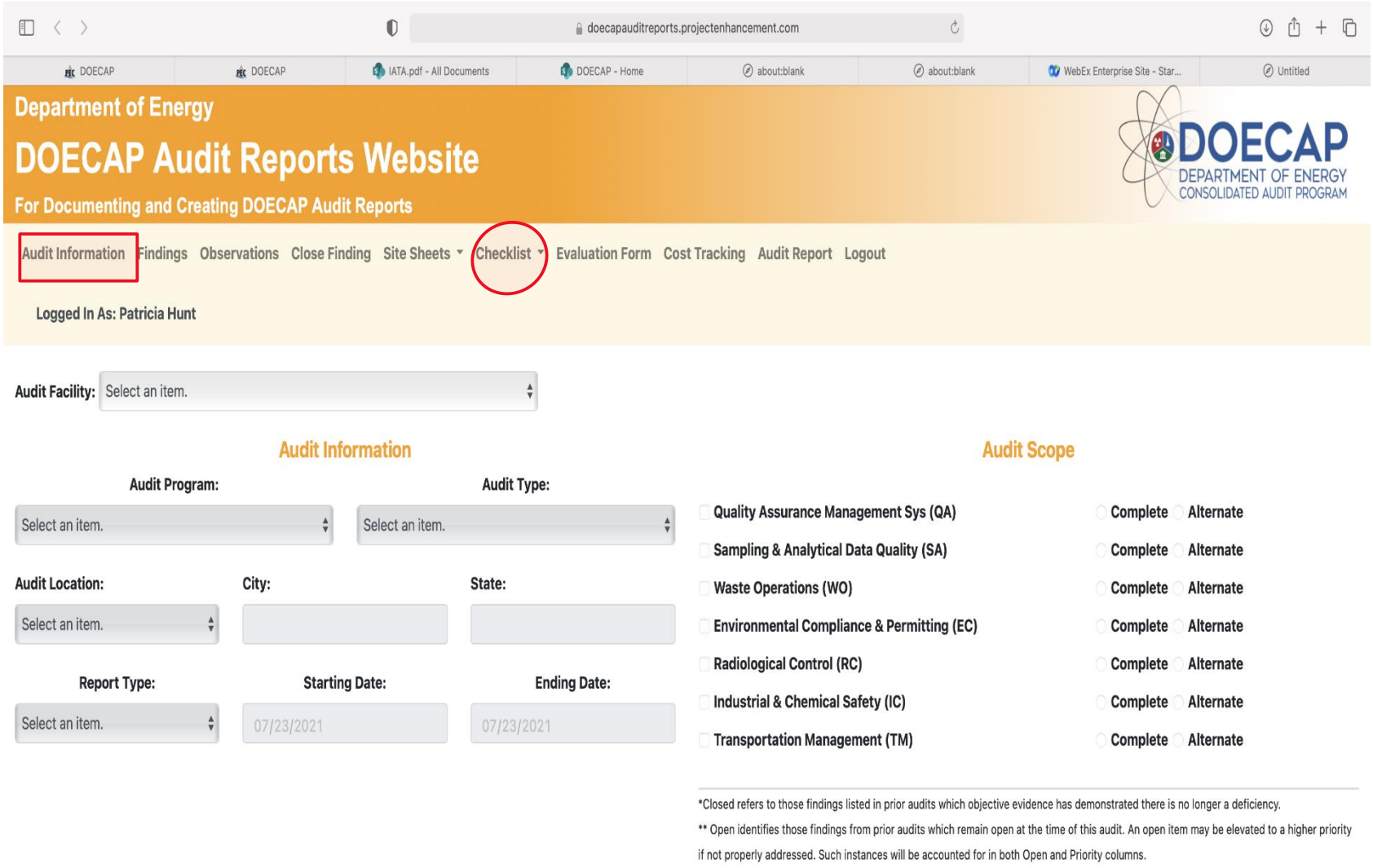
DOECAP Audit Report Site:

https://doecapauditreports.projectenhancement.com/pages/AuditInfo.aspx

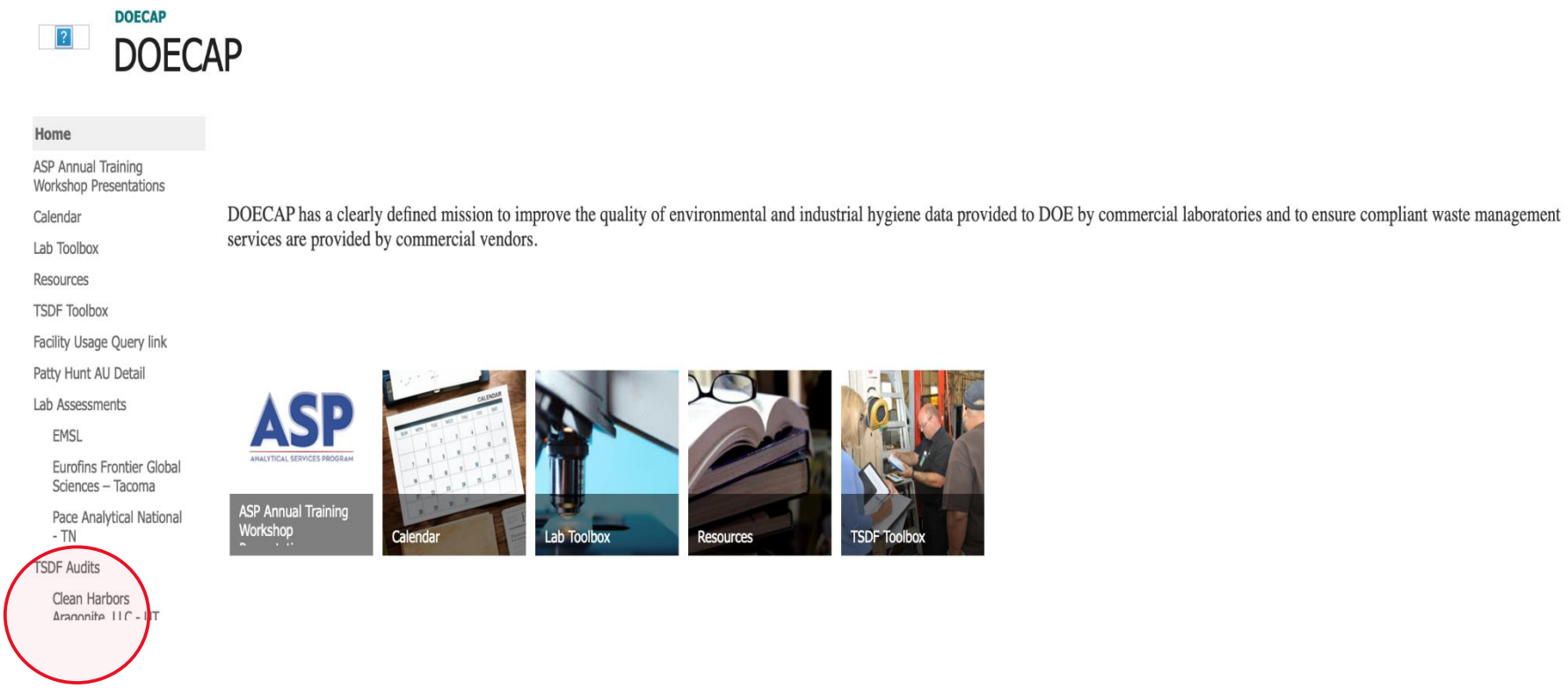
Project Enhanement DOECAP SharePoint Site :

https://projectenhancementcorp.sharepoint.com/sites/projects/AU21/DOECAP/SitePages/Home.aspx

DOECAP AUDIT REPORTS WEBSITE



Project Enhancement SharePoint Site



Limitations of the Remote Audit

Problem: The audit is limited to Information that the facility has uploaded to the SharePoint Site

So, focus for Remote Audits BY NECESSITY is limited –

Document Review Vs Boots on the Ground

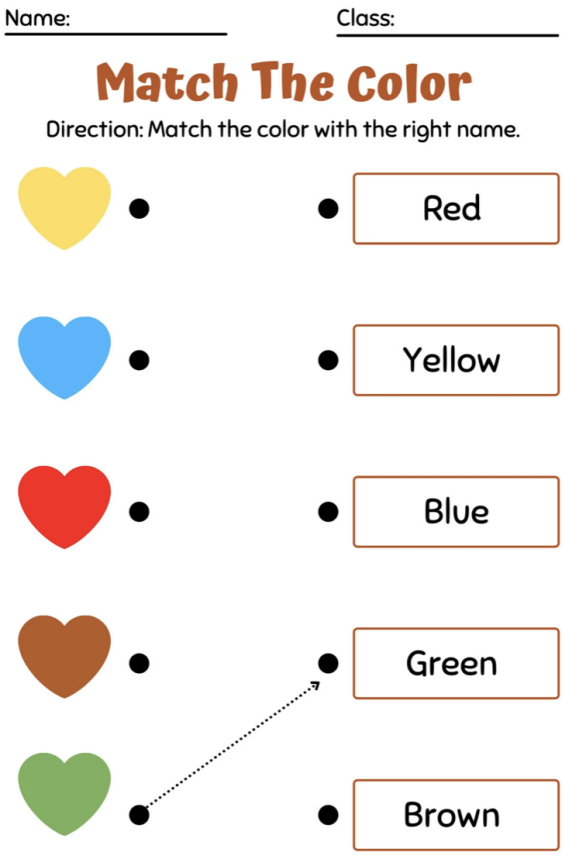
Solution: YOU !!! The quality of uploaded information is up to YOU!!!!!

Getting Started

1. Up to two weeks before the audit: Review the available information on DOECAP sites:

    1. The DOECAP SHAREPOINT SITE will be populated with information for the upcoming audit.
    2. The Facility should have already answered the questions on the Checklist for your functional area

Goal: Efficient Transfer of Information Share Point Documents to the Checklist

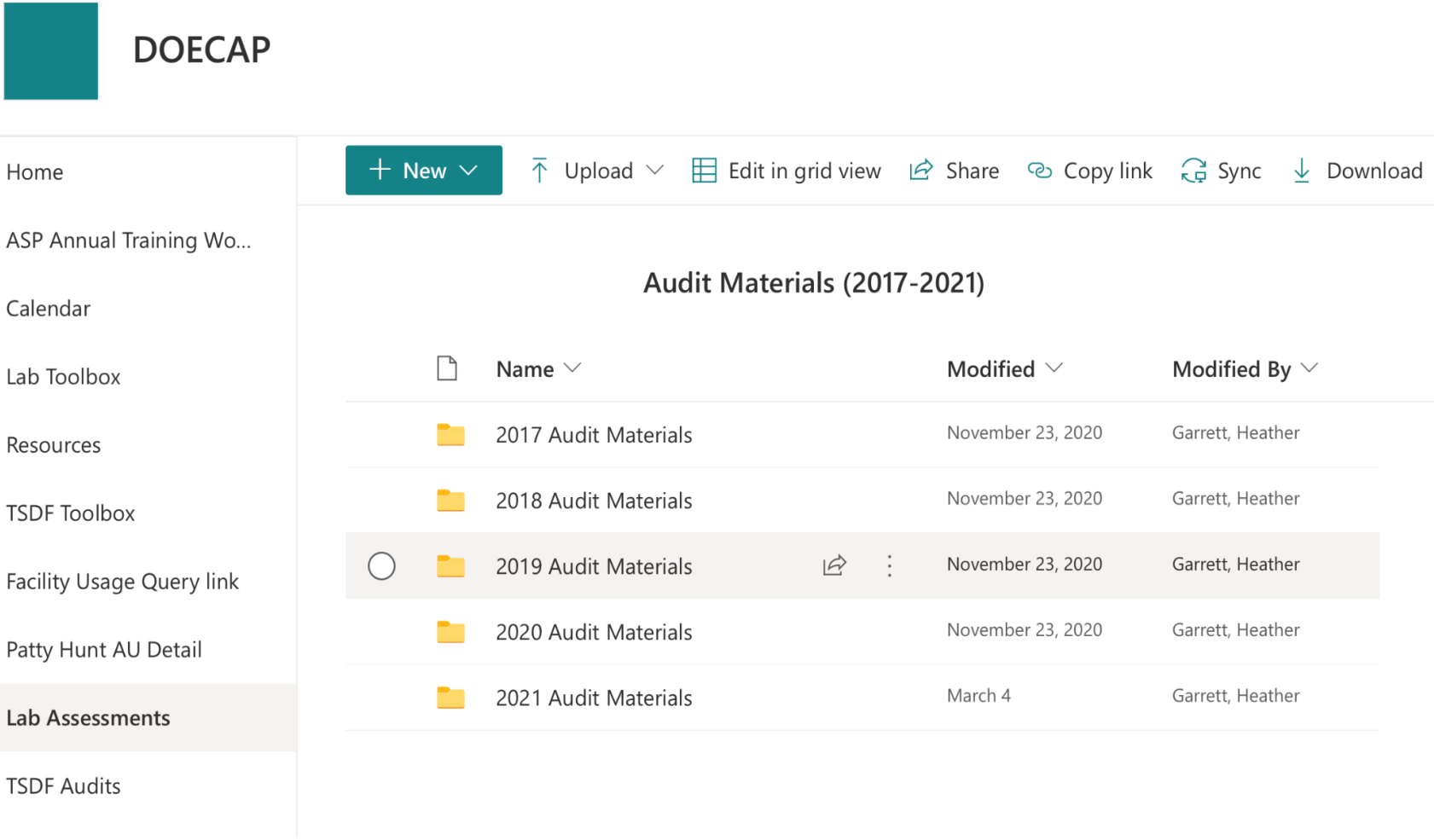


Obstacle: Navigating between Sharepoint Audit Documents and the Checklist

Tools:

- Access to Sharepoint/ Docushare information
- Checklist open and sorted to your Functional Area
- Pen and Paper/Notebook
- Access to Regulatory References

Auditor’s SharePoint Site



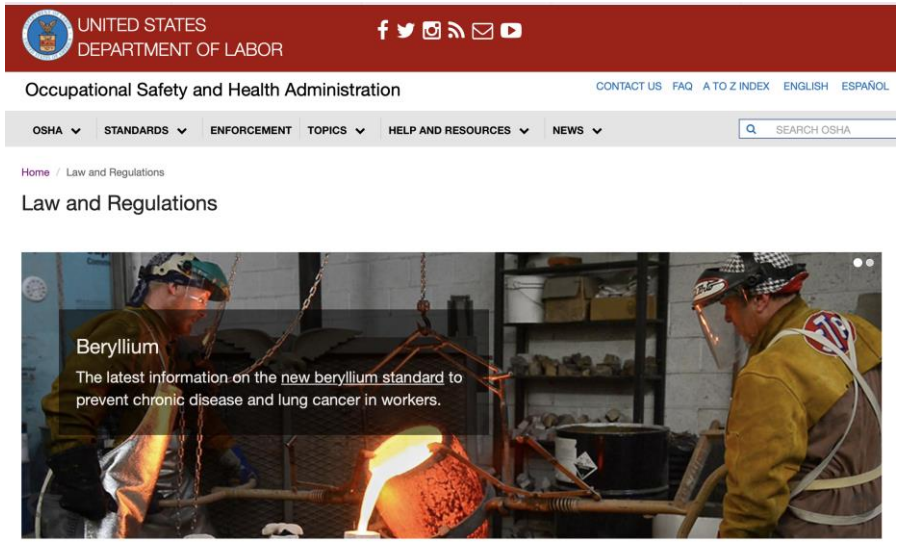
Auditor's Checklist

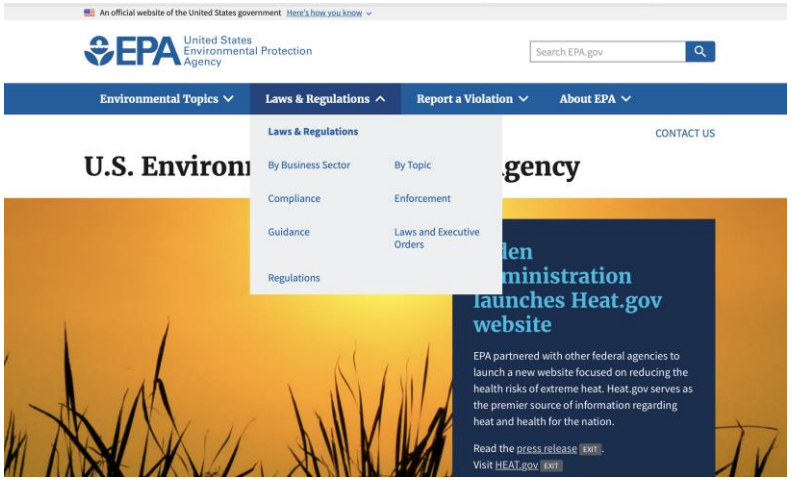
Section	Sub Section	LOI Description	Frequency Identifier	Prior Site Response (Re Only)	Current Site Response	Prior AuditorComments (Read Only)	Current Auditor Comments
18.1.1 (a) Basic Questions About The Material	18.1.1 (a)	Do materials (including samples) shipped from or received by the facility as hazardous materials meet the definition in 49 CFR 171.8, and is the facility registered with DOT? 49 CFR 171.8 and 49 CFR 107.608	R	Materials shipped and received at the ORSC meet the definition of Hazard Class 7, Radioactive Materials. All materials arriving at the ORSC must meet the requirements of procedure USG-ORSC-WAG. UniTech Services Group is registered with the DOT. Procedure USG-ORSC-WAG and the UniTech DOT Hazardous Materials Certificate have been uploaded to Sharepoint.	All permits are current	Reviewed the Registration- it is good until 2021	Reviewed the registration for DOT certificate of registration. Was renewed in 2021 and expires June 30. 2024. There is also a Tennessee Radioactive Waste License for delivery of radioactive materials T-TN-067-I2 , expiration date is 12/31/2021 Unitech is also registered with the Alliane for Uniform Hazmat Transportation procedures under USDOT consensus # 283376, expiration date June 30, 2021. This registration is for Highway Motor Carriers . Ask the question- how does this registration apply to Unitech ORSC in Oak Ridge Tennessee? Due dates for registration are tracked by Windows calendar Is Unitech the motor carrier for rad wastes coming in or out of Oak Ridge? No Answer Unitech ORSC does not perform any carrier functions.
18.1.1 (b) Basic Questions About The Material	18.1.1 (b)	Does the facility report outbound shipments of waste through an automated transportation management system? DOE Order 460.2A, Section 4.a(2)(a)	R	The ORSC does not report outboard shipments of waste through an automated waste transportation management system as the facility does not currently process DOE hazardous or nonhazardous waste.	No changes to program.	There is no requirement to use an automated waste transportation management system for this facility	no automated transportation management requirement
18.1.1 (c) Basic Questions About The Material	18.1.1 (c)	Are any shipments made by or on behalf of the facility done under an on-site transportation plan? NQA-1; DOE O 460.1C, Section 4.d	R	All required shipments requiring a transportation safety plan made by the ORSC are in accordance with UniTech procedure OP-041, Transportation Security Plan. Procedure UniTech OP-041, Transportation Security Plan has been uploaded to Sharepoint.	No changes to program.	Reviewed transportation Safety Plan- it is really a Security Plan, as this facility is not required to have a transportation security plan for the types of shipments that go out.	have there been any changes to the Transportation Security Plan since the last audit? No Reviewed the Transportation Security Plan OP-041, Rev. 2, dated 2/3/2015. Finding This Plan references the March 25, 2003 issue for 49 CFR part 172 Subpart I Security Plans. This section of the regulation was updated ob March 9, 2010. Specifically, the applicability section 172.802 (b) Applicability has significant changes which render the reference and the applicability statements in section 7 of the Procedure obsolete. These three requirements are not listed in the 2010 version. Section 7.0 Risk Assessment states that 49 CFR part 172.800(b) identifies seven criteria that may require a company to develop and implement a Transportation Security Plan. Unitech Services Group, Inc. (Unitech) qualifies under three cf the of the seven sub item criteria: (4) bulk hazardous material shipments, (5) non-bulk hazardous materials shipments exceeding 5000 pounds, and (7) Placarded Hazmat Shipments The 2010 updated version has been revised. The subsections referenced in Section 7.0 of the Procedure have been removed. There are now 16 subsections. The subsections that could apply: I15) International Atomic Energy Agency Code of Conduct , Category 1 and 2 materials, Nuclear Regulatory Commission Category 1 and 2 radioactive materials as listed in Table I ,appendix A to 10 CFR part 37, and Highway Route Controlled quantities as defined in 49 CFR 173.403. The facility seems to be aware, based on comments in last years checklist, that the requirements from 2003 are not in 172.800 (b) and that technically the facility is not required to have a transportation security plan.

Comments vs. Notes
Current vs. Prior Auditor

LOI	Section	Sub Section	LOI Description	Frequency Identifier	Prior Site Response (Read Only)	Current Site Response	Prior AuditorComments (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.		

Online Regulatory References





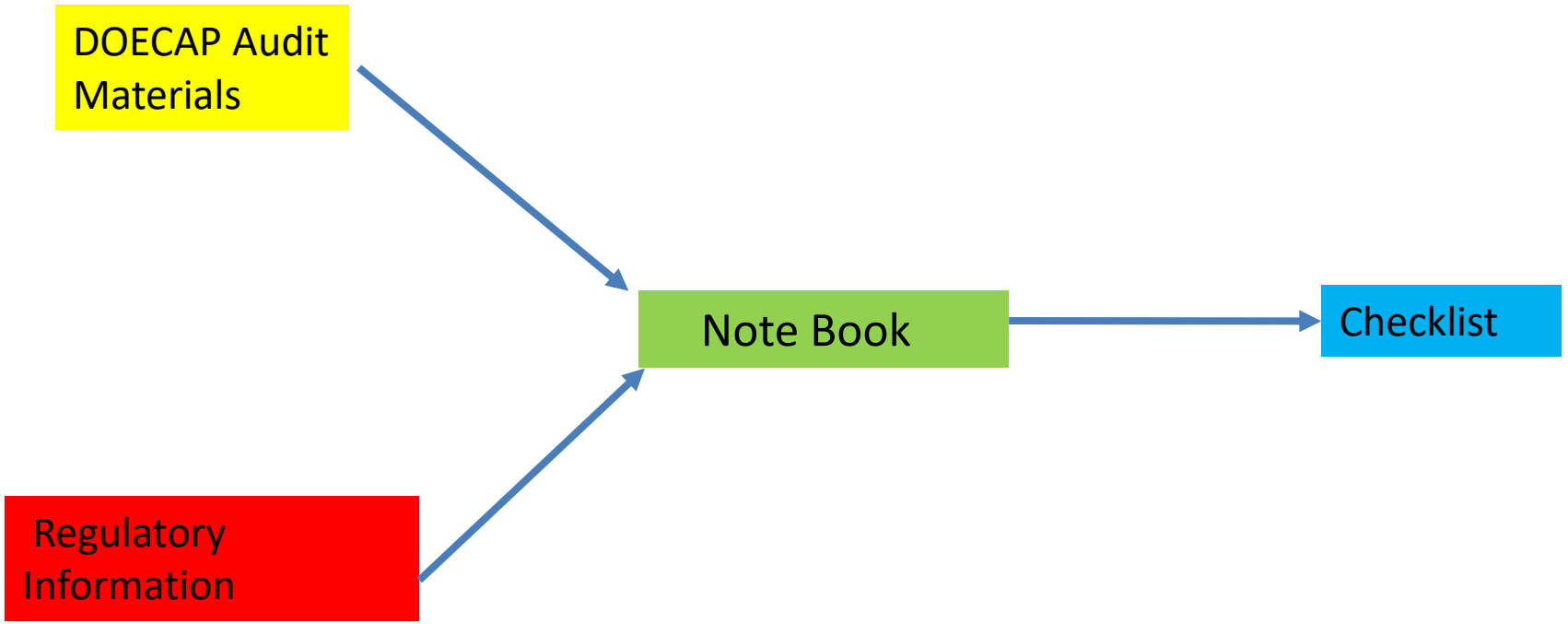
Audit Preparation Sessions

For each Document of interest

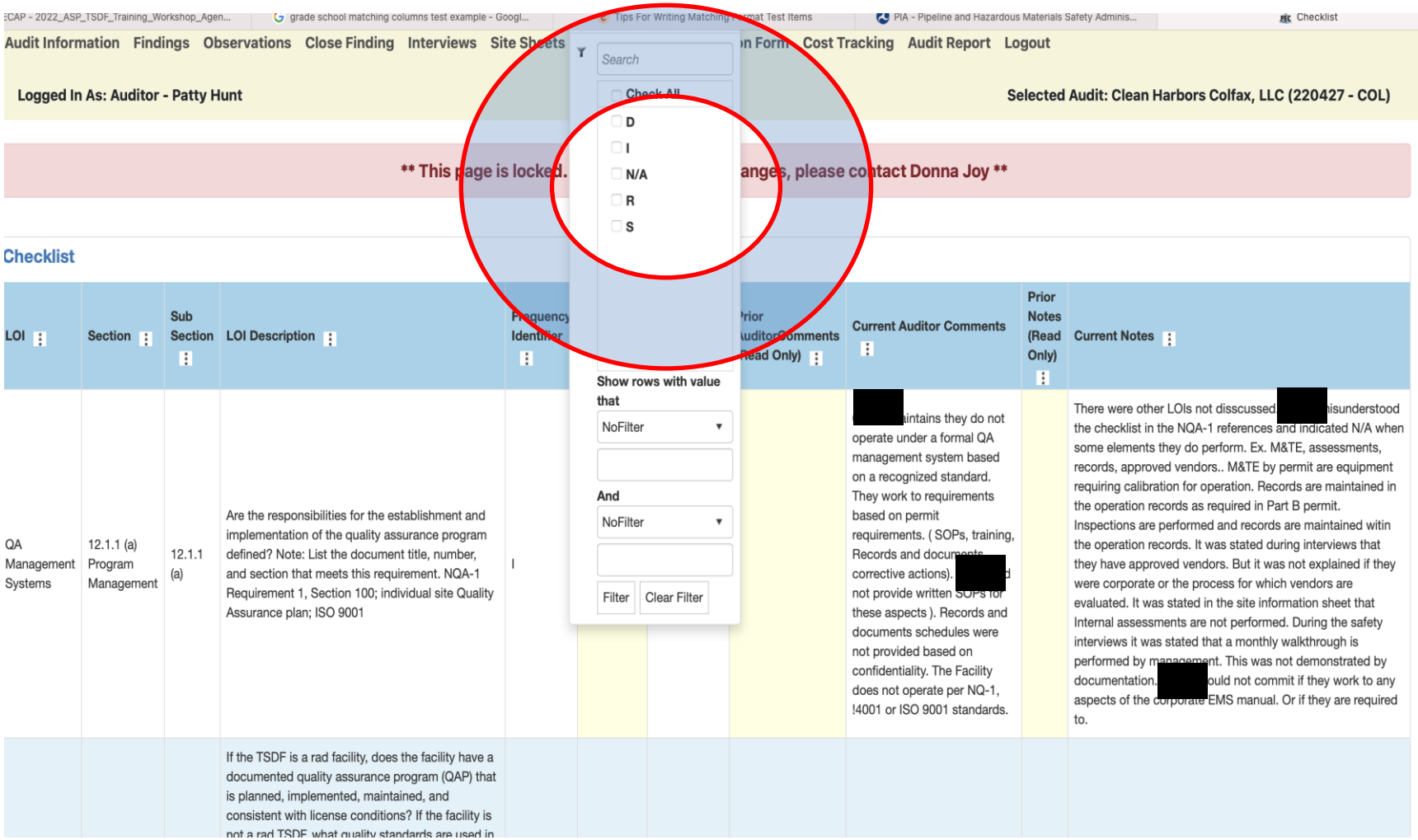
Harvest information in Notebook :

- Document ID and location in sharepoint
- For Procedures: Name, ID#, revision number, and issue date
- Any questions or pertinent information for the facility
- Regulatory reference

Moving Key Information to Checklist



Checklist Navigation Frequency Identifier



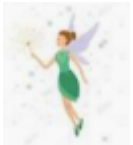
Unlucky Auditor: WHAT TO DO?

Finding very little information posted on DOECAP website?

Gather Information from:

- The other functional areas, previous year's audit
- Every permit or license from local regulatory authorities
- Company's website

Generate your own list of requests, based on the information gathered and checklist questions and send it off to Senior Analyst and Audit Support:



Hannah Hidle

What's on Your List?

- Chemicals in use/storage
- Industrial equipment
- Programs/Procedures
- Records/outputs
- And Photographs!!!

Chemical Hazards

Industrial Hazards

Programs/Procedures

What the auditor will determine:

- Procedure references are correct
- Procedure is implemented
- Training requirements are listed and staff training is current

Example: The Procedure References are Correct

Reference section of a Scaffold Safety Procedure

The procedure is applicable to all employees and contractors performing activities at the facility.

2.0 REFERENCES

2.1 29 Code of Federal Regulations (CFR) 1926, "Subpart L – Scaffolds."

2.2 29 CFR 1910.28, "Safety Requirements for Scaffolding."

2.3 29 CFR 1910.29, "Manually Propelled Mobile Ladder Stands and Scaffolds (Towers)."

2.4 EWOC-QA-003, "Quality Assurance Records."

3.0 GENERAL REQUIREMENTS

3.1 Definitions

3.1.1 Competent Person

One who is capable of identifying existing hazards and predictable hazards in the surrounding or working conditions which are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective action to eliminate them

Change in the OSHA Standard

November 2016 29 CFR Subpart D- Walking Working Surfaces was updated!

The references 1910.28 and 1910.29 were removed!

Example: The Procedure is Implemented

Job Safety Analysis (JSA) Procedure Excerpt

JSA Process

A JSA consists of:

1. Job Physical Requirements
2. Job Environmental Conditions
3. Personal Protective Equipment required
4. Sequence of Basic Job Steps
5. Potential Accident or Hazards associated with each step
6. Safe Job Practice for each step
7. A unique number identifying the JSA. Each JSA will be numbered as follows:
   Year, e.g. 2020
   JSA
   Next consecutive available number on the JSA log.
   The JSA number shall look like – JSA-2020-001.
   Maintain log electronically.

A Completed JSA:

Job Safety Analysis Worksheet

Number: JSA-2020-002	Task: **Cutting and Sizing** Effective Date: 7/20/2020 # of Pages 1 of 2 Department: Operations/Compliance

1. Equipment Operated: Diamond Wire Saw, Thermal Torches, Plasma Cutter, Welders

2. Environmental Conditions:

☒ Inside ☒ Outside ☒ Cold ☒ Heat ☐ Wet ☒ Dust ☐ Vapors/Mist
☒ Noise ☐ Vibration ☐ Other _____

3. Primary Job Functions & Position:

☒ Lifting ☒ Grasping ☐ Pushing ☐ Sitting ☒ Reaching ☒ Bending
☒ Kneeling ☒ Standing ☐ Pulling ☒ Squatting ☐ Other _____

4. Physical Demands: Continuously (C) 67-100% Frequently (F) 34-66%
Occasionally (O) 1-33% Not Applicable (N) 0%

Standing O Walking O Sitting N Pushing N
Pulling N Climbing O Stooping O Bending _F___
Kneeling O Reaching O Carrying 20 lbs. 50 ft distance)

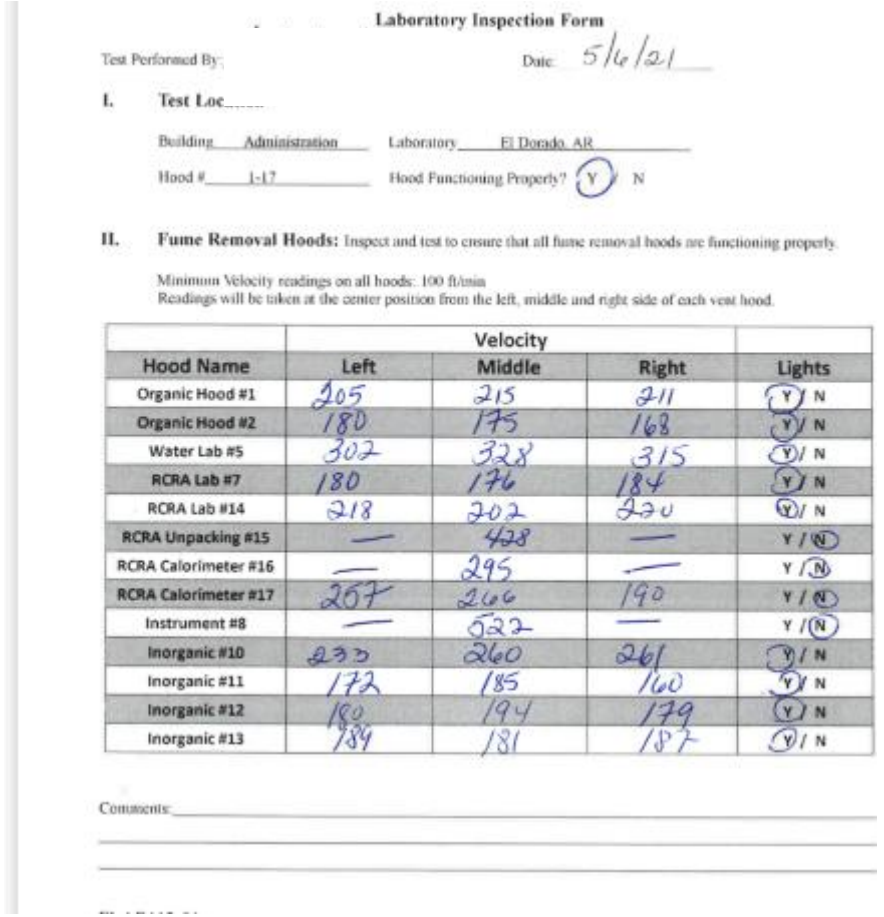
5. Potential Hazards: **Controlled By:**

☒ Impact	☒ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Caught on or between	☐ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Fall or Slip	☐ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Over Exertion	☐ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Burns	☒ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Respiratory	☒ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Heat Stress	☒ PPE	☐ Procedure	☒ Training	☐ Guards
☒ Eyes	☒ PPE	☐ Procedure	☒ Training	☐ Guards

Example Records/Outputs

Completed

- Hot work permits
- Confined Space Permits
- Inspections
- Maintenance



Laboratory Inspection Form

Test Performed By: Date: 5/6/21

I. Test Loc_____

Building Administration Laboratory El Dorado, AR

Hood # 1-17 Hood Functioning Properly? (Y) / N

II. **Fume Removal Hoods:** Inspect and test to ensure that all fume removal hoods are functioning properly.

Minimum Velocity readings on all hoods: 100 ft/min
Readings will be taken at the center position from the left, middle and right side of each vent hood.

	Velocity			
Hood Name	Left	Middle	Right	Lights
Organic Hood #1	205	215	211	(Y) / N
Organic Hood #2	180	175	168	(Y) / N
Water Lab #5	302	328	315	(Y) / N
RCRA Lab #7	180	176	184	(Y) / N
RCRA Lab #14	218	202	220	(Y) / N
RCRA Unpacking #15	—	428	—	Y / (N)
RCRA Calorimeter #16	—	295	—	Y / (N)
RCRA Calorimeter #17	267	266	190	Y / (N)
Instrument #8	—	522	—	Y / (N)
Inorganic #10	233	260	261	(Y) / N
Inorganic #11	172	185	160	(Y) / N
Inorganic #12	180	194	179	(Y) / N
Inorganic #13	184	181	187	(Y) / N

Comments:

Training Records

Training Records that the lucky auditor requests.

- For the procedures reviewed, ask for examples of staff training records- Risk Based
- If you have a completed confined space permit- ask for the training records for those listed
- Remember to ask about staff turnover impact on training

Final Thoughts

- Preparation Time is key
- Get assistance early for requests
- Time is short! You have a 30-minute interview for a two day audit
- Use the checklist to make your interview flow
- Watch your tone of voice and attitude