

# **Program Audit and Surveillances**

Nuclear Secured / Radiation Safety

NS-RS-PR-103, 0

Date Effective: 11 August 2019

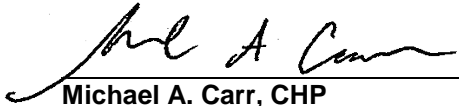
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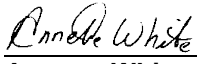
## History and Approvals


### History

Revision	Intent Y/N	Purpose description
0	Y	For Issue (Rebranded CS-RS-PG-004)

### Approvals

Owner:  8/5/2019  
 Michael A. Carr, CHP  
 Radiation Safety Officer Date

Reviewer:  8/8/2019  
 Annette White, MS, CIH  
 Industrial Hygiene Program Manager Date

Approver:  8/14/2019  
 Dutch Conrad  
 Senior Vice President Field and Staffing Services Date

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## 1. Purpose and Scope

The purpose of the procedure is to provide guidance for the performance of field surveillances and the annual program audit for the Nuclear Secured (NS) Radiation Protection Program (RPP).

### 1.1. Scope

This procedure applies to NS operations and activities involving radiation safety and regulatory compliance using the NS Radiation Protection Program (RPP).

## 2. References

- 2.1. ANSI/ASME NQA-1, *Quality Assurance Requirements for Nuclear Facility Applications*
- 2.2. AE-SH-PR-002, *Incident Reporting and Notification*
- 2.3. AE-QA-PR-16.1, *Corrective Action*
- 2.4. NS-RS-PG-001, *Radiation Protection Program*
- 2.5. NS-RS-PR-102, *Project Records Management*

## 3. General

### 3.1. Definitions

- 3.1.1. *Audit* – A comprehensive review of all aspects of the NS RPP implementation and documentation coordinated by the Radiation Safety Committee (RSC).
- 3.1.2. *Corrective Actions* – Actions taken to improve areas of poor performance or to eliminate causes of adverse trends in performance indicators identified during the program audit and surveillance processes.
- 3.1.3. *Surveillance* - Observation and review of specific operations and activities to evaluate the effectiveness of the NS RPP and personnel performance as measured against procedural and regulatory requirements, policies and industry standards.

### 3.2. Responsibilities

Depending on personnel qualifications and the size of the project, project personnel may be assigned multiple roles and/or responsibilities.

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3.2.1. NS Radiation Safety Officer

The NS Radiation Safety Officer (RSO) maintains and oversees the implementation of the NS RPP. The RSO shall ensure that radiation safety, radioactive materials management, and radiological operations procedures and programs are kept up to date such that they comply with current regulations and incorporate current and relevant industry practices and regulatory guidance.

3.2.2. Project Manager

The Project Manager (PM) is responsible for ensuring that the proper program procedures and programs are implemented on the project site as required by customer agreements and contracts. The PM is responsible for ensuring that these programs and procedures are properly incorporated into project specific plans and procedures and that a project records filing system is established. The PM is responsible for ensuring that the NS RPP and client programs and procedures, as applicable, are available for use by project personnel.

3.2.3. Project Health Physicist

The Project Health Physicist (PHP) is responsible for assisting the RSO in providing health physics support to the PM and Radiation Protection Supervisor (RPS). This includes technical support, to ensure procedural and regulatory compliance, and to ensure that the project-specific Data Quality Objectives (DQOs) are met.

3.2.4. Radiation Protection Supervisor

The Radiation Protection Supervisor (RPS) is responsible for implementing the NS RPP at the project location. The RPS manages and oversees the RPP and reports directly to both the PM and the RSO.

3.2.5. Project Personnel

All project personnel are responsible for following the project plans and procedures.

### 3.3. Precautions and Limitations

3.3.1. The performance of surveillances and the program audit will depend on the availability of active field project work.

3.3.2. Because of scheduling limitations and time constraints, field surveillances are not scheduled for field projects with planned durations of less than 3 months. For field projects greater than 3 months duration, field surveillances may be performed depending on the scope and nature of the project.

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## 4. Pre-Requisites / Requirements

- 4.1. An RSC audit shall be performed of the NS RPP at least every year and address the implementation of all program elements consistent with available field project work as applicable.
- 4.2. If there is no active or planned field work, the RSC audit may consist of a document review of prior project records (e.g., most recent), RP procedure review or be postponed at the discretion of the RSC and the RSO.
- 4.3. The RSC audit shall not exceed a maximum of 2 years since the prior audit.
- 4.4. All RSC audit and surveillance records generated shall be managed in accordance with NS-RS-PR-102, *Project Records Management*.

## 5. Procedure

### 5.1. Surveillances

- 5.1.1. Surveillances shall be performed on active NS projects on a monthly basis where the NS RPP has been implemented.
- 5.1.2. Surveillances shall be coordinated with project management and/or the site RPS.
- 5.1.3. Project-specific surveillances should focus on the main functional areas of Radiation Protection listed below and should include both field observation and a review of project documentation to evaluate procedural conformance and good radiological work practices.
  - RPP administration
  - Personnel monitoring
  - ALARA program
  - Radiation work permits
  - Surveys
  - Respiratory protection
  - Radioactive material control
  - Unconditional release of tools and equipment
  - Contamination control and area postings
  - Instrumentation
  - Environmental monitoring
  - Radioactive waste management

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5.1.4. Examples of surveillances include:

- Observation of field activities such as general radiation work practices, observation of personnel donning and doffing protective equipment, personnel frisking, RWP and access log review.
- Observation of survey performance and review of survey documentation.
- Observation of instrument QA checks and review of instrument calibration, set-up and QA records.
- General inspection of radiologically posted areas, area postings and housekeeping practices.
- Review of training records to ensure current and required training.
- Review of prior surveillance, audit and inspection findings and corrective actions.

5.1.5. Surveillances may be recorded on Attachment 7.1, Surveillance Report, or an equivalent form and reported to project management and the RSO.

5.1.6. As necessary, issue an incident report in accordance with AE-SH-PR-002, *Incident Reporting and Notification* depending on the surveillance findings.

## 5.2. RSC Audit

5.2.1. The RSC and/or RSO shall schedule and coordinate the RPP audit.

5.2.2. An audit team shall be identified of one or more individuals with experience and training commensurate with the scope of the audit.

5.2.3. The audit team should consist of personnel independent of the NS RPP management team as available or someone not assigned to the applicable field project being assessed.

5.2.4. The RSC audit shall involve a complete review of the RPP implementing procedures and all program elements listed in Section 5.1 as applicable.

5.2.5. Prior to performing the RSC audit, the audit team shall review project plans, implementing procedures and documentation to develop an audit plan and checklists.

5.2.6. The audit team shall make the necessary plans and notifications in order to coordinate with project management and ongoing activities. When possible, schedule the audit during activities of high priority or importance.

5.2.7. The audit team shall prepare a summary report, including any checklists, and submit the report to the Project Manager, RSO and the RSC.

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- 5.2.8. As necessary, issue an incident report in accordance with AE-SH-PR-002, *Incident Reporting and Notification* depending on the RSC audit findings.

### **5.3. Inspections**

- 5.3.1. NS shall afford reasonable time and opportunity for regulatory agencies to perform inspections of field operations and activities performed under the NS RPP.
- 5.3.2. NS shall afford reasonable time and opportunity for regulatory agencies to perform inspections of project RPP records.
- 5.3.3. While on-site, NS shall make all project personnel available for consultation with regulators in accordance with 10CFR19.14 and 10CFR10.15 on request or during normal work activities.

### **5.4. Corrective Actions and Responses**

- 5.4.1. Project management shall investigate and establish corrective actions and respond to any audit, surveillance or inspection findings within 30 days of being notified of any deficiencies unless a more prompt response is specified.
- 5.4.2. Any deficiencies shall be reported and tracked in accordance with AE-QA-PR-16.1, *Corrective Action*.
- 5.4.3. Follow-up surveillances shall be performed to verify that corrective actions have been implemented as specified and the deficiencies have been remedied.
- 5.4.4. Any necessary changes to the RPP as a result of any corrective actions shall be reviewed by the RSO and Radiation Safety Committee.

## **6. Records**

- 6.1. Surveillance Reports
- 6.2. Audit checklists and Reports
- 6.3. Regulatory Inspection Reports
- 6.4. Corrective Actions Response

## **7. Appendices and Forms**

- 7.1. Surveillance Report



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**Attachment 7.1**

**Surveillance Report**

<b>SURVEILLANCE REPORT</b>	
Project:	
Program Element / Functional Area Reviewed:	
<b>FINDINGS AND OBSERVATIONS</b>	
Document	Requirement:
	Observation:
Document	Requirement:
	Observation:
Document	Requirement:
	Observation:
Document	Requirement:
	Observation:
Performed by:	
<b>REVIEW AND APPROVAL</b>	
Corrective Actions:	
Project Manager:	
Date:	
RSO:	
Date:	