
**VISTA Technologies, Inc.
Radiation Safety Program**

PROCEDURE - 25

AUDITS



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AUDITS

Audits are used to evaluate the effectiveness of Vista staff and subcontractor project staff. The primary focus of the audit is in the implementation of the Nuclear Regulatory Commission (NRC) License, Vista Radiation Safety Program (VRSP) and Vista Safety and Health Program (VSHP), site-specific Health and Safety Plan (HSP), federal, state, and local regulations by either actual observation of field activities, or documented field activities, at Vista project work sites. The NRC License will be periodically reviewed (at least annually) for the content and implementation of the radiation safety program. These reviews concentrate on occupational health and safety, good health physics practices, license management, ionizing radiation protection health and safety protocols and procedures, and environmental programs and policies actually being used at a specific Vista project work site.

Audits may be scheduled by Vista management or the Vista Radiation Safety Officer (RSO) and may occur at any time and without prior notification to the Vista Project Manager (PM) and field personnel. Vista management, or the RSO, will designate the field health and safety auditors. The audit team participants will be comprised of Vista personnel not involved in work at the Vista project work site being audited. As needed, the Vista RSO will conduct a site-specific audit at a Vista project work site involving radioactive materials and/or radioactive contamination.

The Vista PM, On-site Radiation Protection Officer (ORPO), On-site Health and Safety Officer (OHSO), field personnel, and subcontractors are expected to cooperate fully at all times with the field audit team. The audit team should not impede the performance of work and should only communicate with the Vista RSO, PM, ORPO and OHSO.

Generally, the audit team inspects operations related to site control, Personal Protective Equipment (PPE), and other health and safety requirements to prevent workers' exposures to toxic chemicals and radioactive materials. Reviews of the VRSP's implementation in HSPs will also concentrate on adherence to procedures, adequacy of procedures, documentation of the program, and maintenance of As Low As Reasonably Achievable (ALARA) practices and policies. The audit team will use Attachment 63, "Site Health and Safety Audit" to document the audit.

Minor deficiencies are generally pointed out by the auditor to the Vista PM, ORPO and OHSO immediately. Major deficiencies, that are not immediate threats to health and safety, are deferred to a time when the deficiencies can be fully investigated, potential solutions explored, and an appropriate decision can be made on corrective actions.

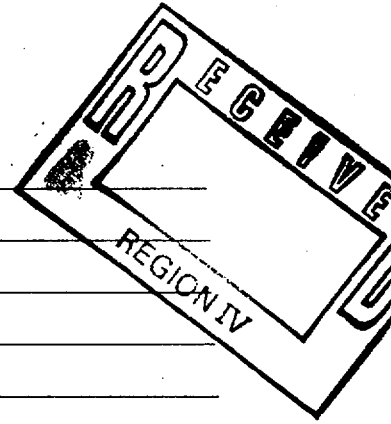
Auditors have the authority in instances of eminent danger or Immediately Dangerous to Life or Health (IDLH) conditions to stop work until the hazardous situation is corrected. At the end of the audit, the auditors will prepare a written report. Within one week, the written report will be distributed to the Vista PM. The PM will share the information with the project team members.

Lastly, Radiation Health and Safety Committee (RHSC) comprised of Vista senior management personnel will perform an annual audit of the VRSP. This audit may utilize consultants outside of Vista.

ATTACHMENTS

Attachment 63

SITE HEALTH AND SAFETY AUDIT



Date of Site Visit: _____ CTO Number: _____
 Project Name: _____
 Site Name/Location: _____
 Project Manager: _____
 On-Site Health and Safety Officer (OHSO): _____
 Protection Officer (ORPO): _____
 Auditor: _____

HEALTH AND SAFETY PLAN

	<u>Compliance</u>		<u>Comments Attached</u>	
	Yes	No	Yes	No
1. Is H&S plan available at Site	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are site personnel familiar with H&S Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Have site personnel signed H&S plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Does H&S plan cover all tasks scheduled for the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Is the hazard evaluation in H&S plan complete for all risks identified at the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is the H&S plan complete, including all necessary material?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Has the H&S plan been amended as needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Are personnel adequately supplied with PPE for associated levels of protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

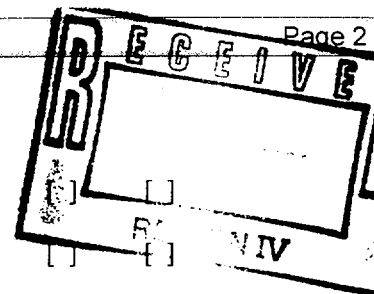
RESPIRATORY PROTECTION

1. Has site personnel been properly trained in the use and maintenance of respirators and SCBA units?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are records of respirator use and maintenance properly kept? (specify location)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are records of SCBA units use and maintenance properly kept? (specify location)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RADIATION SAFETY

1. Has RWP been explained:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Has training documentation been recorded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Has ALARA principle been outlined?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Attachment 63



SITE HEALTH AND SAFETY AUDIT

- | | | | | | |
|-----|---|--------------------------|--------------------------|--------------------------|--------------------------|
| 4. | Are exposure records updated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. | Are Vista RPP Procedures readily available? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. | Has the chain of responsibility been explained? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. | Has the Vista ALARA Philosophy been addressed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | Are the instrument calibrations up-to-date? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. | Have the Exposure precautions explained. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

AIR MONITORING EQUIPMENT

- | | <u>Compliance</u> | | <u>Comments Attached</u> | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| | Yes | No | Yes | No |
| 1. Is site personnel properly trained in air monitoring equipment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are records of calibration, use, and maintenance properly kept? (specify location) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

MEDICAL SURVEILLANCE

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Are site personnel in compliance with medical requirements? (Have form with current updates) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|--------------------------|

EMERGENCY PLAN

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Is emergency plan adequate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are emergency phone numbers and route to hospital posted in a conspicuous location? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Are enough personnel (at least two preferred) trained in First Aid and CPR? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Is First Aid, fire and monitoring equipment in good condition? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

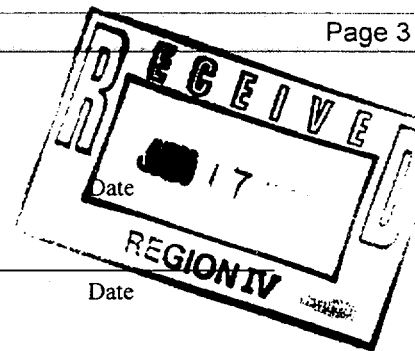
OTHER

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Are site control, set-up, and entry adequate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are decontamination procedures appropriate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do subcontractors have adequate H&S plan and follow it? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

I have received and reviewed this audit

Attachment 63

SITE HEALTH AND SAFETY AUDIT
Project Manager



Health and Safety Director

Date

Health and Safety Program Manager

Date

I prepared and submitted this document

Auditor

Date

Comments (Adequacies/Inadequacies)

Site/Location

Auditor

Date

CTO No.

Type of Project

Project Manager

OHSO

ORPO

Attachment 63

SITE HEALTH AND SAFETY AUDIT

