

RADIATION PROTECTION (RP)

OBJECTIVE

RP.1: The Site Office has oversight processes and procedures in place and has ensured that an effective and fully compliant radiation protection program (RPP) has been implemented at the site.

CRITERIA

1. The Site Office has developed and implemented processes and procedures to effectively oversee contractor performance in this functional area (DOE O 226.1A; NA-1 SD 226.1A).
2. The Site Contractor has submitted, and the Site Office Manager or designee has approved, a documented Radiation Protection Program (RPP) that complies with 10 CFR Part 835, the radiation protection rule, section 101. Changes to the RPP are submitted as required by section 835.101(g). (10 CFR Part 835, NA-1 SD 411.1-1C).
3. Site Office procedures and mechanisms ensure that the Site Contractor has prepared implementing mechanisms for the RPP that meet contract requirements and the commitments in each DSA and Technical Safety Requirement (TSR); (10 CFR Part 835, DOE O 226.1A; NA-1 SD 226.1A).
4. Site Office procedures and mechanisms ensure that the Site Contractor has an assessment plan for conducting internal audits and assessments of all functional elements of the RPP program content and implementation no less frequently than every 36 months. Reports of assessments and audits reflect an effective and mature RPP. Issues that are identified are managed, tracked, and effectively resolved (10 CFR Part 835, 10 CFR Part 830.120, DOE O 226.1A, NA-1 SD 226.1A).
5. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been *completed and are adequate, or a clear path to completion is indicated* (DOE O 226.1A; NA-1 SD 226.1A).
6. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

APPROACH

References:

- 10 CFR 830, *Nuclear Safety Management*
- 10 CFR 835, *Occupational Radiation Protection*
- DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*
- DOE G 441.1-1C, *Portable Monitoring Instrument Calibration Guide for Use with Title 10, Code of Federal Regulations, Part 835, Occupational Radiation Protection*

Record Review:

- Review Site Office RPP change, review, and approval procedures and resulting documentation. Review DSAs and TSRs for selected nuclear facilities.
- Review NNSA Site Office assessments and operational awareness information concerning the contractor RPP Review feedback and improvement reports including assessments, issues management, and management evaluations of the effectiveness of the program.

Interviews:

- Interview Site Office managers and staff personnel responsible for approval and oversight of the RPP.

Observations:

- If possible, observe Site Office oversight (other than facility representatives) of the Site Contractor's RPP including radiological work and operations; tour nuclear and radiological facilities; and observe radiation instrument use and calibration processes.
- Observe facility representative oversight of the Site Contractor's RPP.