

**U.S. MARINE CORPS LOGISTICS BASES
RADIOLOGICAL CONTROLS PROGRAM INSPECTION MANUAL**

**PROCEDURE 101 - OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND
INSPECTION PROTOCOL (Issue dated 28 Nov 2000 is replaced with this edition)**

101-1 PURPOSE

The Commander, MARCORLOGBASES, and management shall actively take part in oversight of activities allowed in Naval Radioactive Material Permits (NRMP) issued by the Naval Radiation Safety Committee, as authorized in the Navy Master Material License issued by the U.S. Nuclear Regulatory Commission (NRC). This procedure describes management's involvement and oversight of inspections, audits, and other on-site assistance related activities. This procedure is also intended to ensure the effective direction of activities, communication, and inspector objectivity during inspections and audits at U.S. Marine Corps facilities.

101-2 GENERAL

- A. Every level of management must clearly communicate its expectations regarding the duties of its subordinates, and the principles applied in the performance of duties related to inspections and audits.
- B. Only trained and appropriately qualified individuals, having the knowledge and aptitude to perform on-site activities independently, shall do so in a manner consistent with management expectations.
- C. The Logistics Radiation Safety Officer (LRSO) shall oversee on-site activities to ensure that the Command's expectations and goals are satisfied.

101-3 INSPECTION ADEQUACY

- A. To assess the adequacy of program guidance (e.g., inspection procedures, tools, and resources) and verify the adequacy of inspector performance, the LRSO must periodically conduct direct observation of on-site activities. Those on-site observations should assess the adequacy of program guidance, and the following individual performance attributes:
 - (1) Safety perspective and the application of safety principles during the conduct of on-site activities.
 - (2) The adequacy of technical training and preparation to conduct the on-site activity.
 - (3) Knowledge of applicable regulatory requirements, procedures, and guidelines (e.g., NRMPs, Title 10 CFR, Title 49 CFR, Marine Corps Orders, Inspection Manuals and Procedures, NUREGs and regulatory guides, industry codes and standards).
 - (4) Adherence to agency-wide regulatory positions, policies, and avoidance of personal interpretations and opinions. Inspector objectivity, considering inspector experience, technical expertise, site familiarity, industriousness, overall effectiveness, external and

PROCEDURE 101 - OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND INSPECTION PROTOCOL (Issue dated 28 Nov 2000 is replaced with this edition)

internal pressures, and differences of opinion based on valid technical merit. Objectivity is the extent to which the inspector implements the inspection program, interfaces with the public and conducts personal/organizational relationships in an unbiased manner, free from both partiality and antagonism toward other commands or Marines, civilians or vendors associated with a command, as evidenced by patterns of the inspector's actions.

- (5) Inspector demeanor, professionalism, and interpersonal skills (e.g., ability to communicate accurately and effectively with others).
 - (6) Effective inspection techniques, including in part, evidence of good preparation, a performance-based focus, emphasis on direct observation of activities, use of in-depth probing where appropriate, and sufficient emphasis on independently verifying provided information.
- B. Direct observation alone is not sufficient. The LRSO must take an active role in the on-site activities he oversees. He must engage his employees in open, two-way communication regarding their inspection or examination findings so that both parties fully understand the issues and the appropriate regulatory approach to those issues. By sharing their perceptions, opinions, and philosophies, employees will gain a better understanding of what the supervisor expects of them and the supervisor will gain valuable insights to the capabilities and shortcomings of the employees and the inspection program. Similarly, review of inspection reports, peer reviews, involvement in development of performance review conclusions, and feedback from the field can provide additional insights to the conduct, objectivity, and performance of inspectors and managers as well.
- C. When the LRSO finds instances of outstanding performance, superior technical expertise, continuing sound judgement, and professional behavior, employees should be considered for appropriate recognition. When instances of performance or conduct inconsistent with agency-wide positions or supervisory expectations are detected, or an inspector's objectivity is questioned, management is expected not only to hold the staff accountable for its actions, but also to address any staff developmental needs to prevent recurrence of the inappropriate action.

101-4 INSPECTION PROGRAM

- A. Mission. To ensure adequate protection for the public health and safety, the common defense and security, and the environment in the use of nuclear material in the Marine Corps.
- B. Type and Frequency.
 - (1) Announced, unannounced, and special requests.
 - (2) Initial, periodic, reactive, closeout.
 - (3) Periodic may range from 1-5 years.

**PROCEDURE 101 - OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND INSPECTION
PROTOCOL (Issue dated 28 Nov 2000 is replaced with this edition)**

- C. Inspection Plan. Inspections and audits are performance-based evaluations of a Command's implementation and compliance with Federal, Navy, and Marine Corps requirements, related to NRMP activities. Each program review shall begin at the highest level of operational control, and work its way down through subordinate levels of command to the user level. Special emphasis is given to deficient areas self-identified during internal audits performed by each Command, and to ensure the adequacy and completion of corresponding corrective actions. Site assistance will be given as necessary, and especially when asked by the host Commander. In addition to the external portion of the audit, inspectors shall also assess the adequacy of overall program guidance provided by the NRMP holder, higher headquarters, and supporting documentation, i.e., SI, TB, TI.
- D. Criteria.
 - (1) Enclosure (1), Program Review Checklist.
 - (2) Enclosure (2), Logistics Radiation Safety Officer Internal Audit Review Checklist.
 - (3) Regulations.
 - a. Basic (Part 30, RASP Manual).
 - b. Notices and training (Part 19).
 - c. Radiation protection (Part 20).
 - d. Program specific (TMs, TIs, SIs).
 - e. Transportation (Part 71, 49 CFR).
 - (4) NRMP conditions.

101-5 INSPECTION PROTOCOL

- A. Brief entrance meeting with management.
- B. Personnel interviews.
- C. Facility tour.
- D. Review records.
- E. Observe operations/permitted activities.
- F. Follow-up on open issues.
- G. Review event documentation.
- H. Determine/verify compliance.
- I. Document activities and findings.
- J. Summarize findings with appropriate RSO and technical staff.

**PROCEDURE 101 - OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND INSPECTION
PROTOCOL (Issue dated 28 Nov 2000 is replaced with this edition)**

K. Exit meeting with management, recommending courses of action as necessary.

101-6 INSPECTION DOCUMENTATION AND REPORTING

A. Field notes.

- (1) Command checklist.
- (2) Inspector notes.
- (3) Reference for documenting violations.
- (4) Reviewed by management.
- (5) Placed in facility inspection file.

B. Draft findings.

- (1) Documents inspection.
- (2) Document cited and non-cited violations.
- (3) Documents sound program achievements.
- (4) Signed by inspector.
- (5) Copy left with Commanding Officer or his designee.
- (6) Reviewed by LRSO, and peers.

C. Official assessment letter.

- (1) Official cover letter with an attachment of findings that documents inspection and results.
- (2) Establishes required actions and responsible parties.
- (3) Provides for management oversight of corrective actions.
- (4) Response required within 30 days.
- (5) Response must describe:
 - a. Reason for violation.
 - b. If denied, reason for denial.
 - c. Corrective actions (short and long term).
 - d. Date of full compliance.

**PROCEDURE 101 - OVERSIGHT AND OBJECTIVITY OF INSPECTORS AND INSPECTION
PROTOCOL (Issue dated 28 Nov 2000 is replaced with this edition)**

- (6) Response reviewed; if adequate acknowledge so, if not, request more information.
- (7) All discrepancies found during an inspection or audit shall be tracked to completion, and a record of corrective actions maintained for a minimum of three (3) years by the LRSO, and by the inspected Command RSO.
- (8) A copy of the official assessment letter and all related correspondence shall be placed in LRSO inspection file, and retained for three (3) years. The inspected Command RSO shall likewise retain the original official assessment letter and all related correspondence in the Command's inspection file for a minimum of three (3) years.

101-7 SIGNATURES AND ANNUAL REVIEW

I have read and understand the requirements associated with Procedure 101.

Name (Printed)

Signature

Date