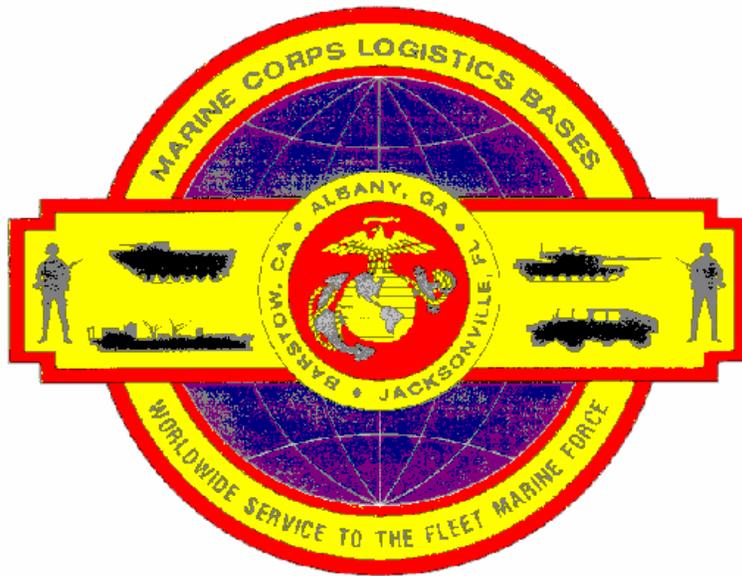


USMC
Radiological Controls Office



Program Review Checklist

SUMMARY SHEET

Date of Audit:

Name of person(s) who conducted the audit:

Areas Audited:

Personnel Interviewed:

Radiological Control Program Elements Reviewed:

- A. Management _____
- B. Storage & Use Areas _____
- C. Transportation _____
- D. Corrective Action Required _____
- E. Follow – up _____

Signature of Lead Auditor

Date

A. Management

		Y	N	N/O	N/A
1.	Has the Commander implemented a formal Radiological Control Program (RCP)? Ref: 10 CFR 20.1101(a); NAVSEA S0420-AA-RAD-010, sec 1.3.8.5; MCO 5104.3, para 7.f.2 Title/Date: _____				
a.	If not, provide the date that implementation is expected to occur.				
2.	Has the Commander designated a qualified Command Radiation Safety Officer (CRSO) and Alternate (ARSO) in writing? Ref: NAVSEA S0420-AA-RAD-010, sec 1.3.8.4; MCO 5104.3, para 7.f.1				
a.	If not, have individuals been designated for this position? (1) If not, provide a date when a designation will be made.				
3.	Has the CRSO & ARSO completed the RSO Course (S-4J-0016) at NAVSEADET RASO? Ref: NAVSEA S0420-AA-RAD-010, sec 2.2.1.1; MCO 5104.3, para				
a.	If not, when are they scheduled to attend training?				
4.	Are Radiation Protection Assistants (RPA) assigned in all appropriate areas? Ref: MCO 5104.3				
5.	Have RPAs been trained IAW NRMP and MCO 5104.3?				
a.	If not, when are they scheduled to attend training?				
6.	Have all users been trained IAW NRMP MCO 5104.3? Ref: 10 CFR 19; NAVSEA S0420-AA-RAD-010, sec 2.2.5.1; NRMP 10-67004-T1NP, T2NP, T3NP				
a.	If not, when are they scheduled to attend training?				
7.	Have emergency response personnel been trained on radiation hazards? Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.2.4; MCO 5104.3, para 7.f.3				
a.	If not, when are they scheduled to attend training?				
8.	Were physical inventories of permitted radioactive materials conducted and reconciled every six months, and maintained for one year to show gains and losses? Ref: 10 CFR 20.2103; NAVSEA S0420-AA-RAD-010, sec 2.6.2.2 & 2.6.2.3; NRMPs 10-67004-T1NP, 10-67004-T2NP, 10-67004-T3NP				
a.	Does the command inventory match the Albany inventory? (1) If not, are transfer documents available (MRO, WIR, DD1348)?				
b.	Were corrective actions established and implemented for discrepancies? (1) If not, explain why and provide the action to be taken to correct the discrepancies.				
c.	Are radioactive material inventories maintained pending disposal? Ref: 10 CFR 2103; NAVSEA S0420-AA-RAD-010, sec 2.6.2.2 & 2.6.2.3; MCO 5104.3, para 6.l				
d.	Does each inventory include: (1) Serial number of drift tube module? Ref: NRMP 10-67004-T1NP, T2NP				

Program Review Checklist

Management

		Y	N	N/O	N/A
	(2) Serial number of device? <small>Ref: NRMP 10-67004-T1NP, T2NP</small>				
	(3) Unit RUC/AAC and mailing address? <small>Ref: NRMP 10-67004-T1NP, T2NP</small>				
	(4) Radioisotope, Chemical and Physical Form, Activity, Date of Activity determination, location and custodian? <small>Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.2.2.a</small>				
9.	Were all permitted devices leak tested IAW NRMP requirements?				
a.	If not, list the devices and explain why.				
b.	Were actions taken to correct the leak test deficiency?				
	(1) Were messages sent to deficient units from their higher headquarters?				
	(2) Did the units reply within two weeks of receipt of the message?				
	(3) If not, list the units and explain why.				
c.	Were corrective actions established and implemented to correct future deficiencies?				
	(1) If not, when will they be established?				
d.	Are annual leak test records updated with the current results? <small>Ref: NRMP 10-67004-T1NP, T2NP</small>				
	(1) If not, when will they be updated?				
e.	Are the leak test wipes forwarded to MCLB Albany for analysis? <small>Ref: NRMP 10-67004-T1NP, T2NP</small>				
f.	If not, where were they analyzed? Provide address and POC.				
10.	Are personnel assigned to duties in which they receive occupational exposure given a radiation medical exam IAW NAVMED P-5055? <small>Ref: 10 CFR 20.1502; NAVSEA S0420-AA-RAD-010, sec 7.2.2</small>				
11.	Has an annual review of the RCP content and implementation been performed and reported to the Commander for approval? <small>Ref: 10 CFR 20.1101c</small>				
	(1) If not, when will program status be reported?				
12.	Has the RSO established internal audit and inspection procedures? <small>Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.1 & 2.6.12.4</small>				
	(1) If not, when will they be established?				
13.	Are internal audits and inspections conducted?				
a.	Are manuals and local instructions evaluated for accuracy with current requirements? <small>Ref: NRMP 10-67004-T1NP</small>				
b.	Every six months for RAM receipt and transfer records, and corrective actions? <small>Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.3</small>				
c.	Quarterly for NRMP compliance and transportation? <small>Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.3</small>				
d.	Were corrective actions and milestones established for each finding?				
	(1) If not, when will they be established?				
e.	Were corrective actions completed?				
	(1) If not, when will they be completed?				

		Y	N	N/O	N/A
f.	Are audits reported to the Commander and corrective actions tracked as appropriate?				
	(1) If not, when will they be completed?				
14.	Are records showing results of audits and surveys maintained and retained on file for a minimum period of 3 years? Ref: 10 CFR 20.2103(a)				
15.	Are surveys accurately documented? Ref: 10 CFR 20.2103, NAVSEA S0420-AA-RAD-010, sec 7.2.2				
16.	Are surveys sufficiently comprehensive? Ref: 10 CFR 20.1302; 10 CFR 20.1501				

B. Storage & Use Areas

		Y	N	N/O	N/A
1.	Are personnel aware of the requirement to prevent radioactive materials from entering the Defense Reutilization and Marketing Office (DRMO)? Ref: MCO 5104.3, encl (1), para 6.a; MCO P4400.105C				
2.	Are local SOPs or equivalent established for ongoing operations involving radioactive material, including management and handling of LLRW? Ref: 10 CFR 19.11 (1) If not, when will they be established?				
3.	Do local controls include requirements for:				
a.	Demilitarization? Ref: NRMP 10-67004-T1NP				
b.	Identification as containing radioactive material? Ref: NRMP 10-67004-T1NP				
c.	Issue and/or transfer control? Ref: NRMP 10-67004-T1NP				
4.	Is all RAM, including LLRW, stored in separate warehouse sections away from flammable materials, explosives, food products or other incompatible commodities? Ref: NAVSEA S0420-AA-RAD-010, sec 7.52				
5.	Is RAM secured against unauthorized use? Ref: NRMP 10-67004-T1NP				
6.	Are containers of RAM properly labeled? Ref: 10 CFR 20.1904				
7.	Are RAM storage areas posted with "CAUTION – RADIOACTIVE MATERIAL" signs? If applicable, are maintenance areas posted? Ref: 10 CFR 20.1902; NAVSEA S-0420-AA-RAD-010, sec 7.5.2				
8.	Are signs prohibiting smoking, eating and drinking posted in the RAM storage and use areas? Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.6.1				
9.	Are the following documents posted near the RAM storage and use areas? Ref: 10 CFR 19.11				
a.	Form NRC 3, Notice to Employees? Ref: 10 CFR 19.11(b), (c), (d)				

Program Review Checklist

Storage and Use Areas

		Y	N	N/O	N/A
b.	Section 206 of the Energy Reorganization Act of 1974? Ref: 10 CFR 21.6; NAVSEA S0420-AA-RAD-010, sec 2.4.3.a				
10.	Are copies of the following posted near the radioactive material storage area at a location frequented by all employees, or is a notice posted to describe the location of these documents and a POC:				
a.	10 CFR parts 19, 20, 21, 30 and 71? Ref: 10 CFR 19.1(b)				
b.	NRMPs? Ref: 10 CFR 19.11				
c.	Local SOPs? Ref: 10 CFR 19.11				
d.	OPNAVINST 6470.3 – Naval Radiation Safety Committee. Ref: NRMP 10-67004-T1NP				
e.	NAVMED P-5055, Radiation Health Protection Manual. Ref: NRMP 10-67004-T1NP				
f.	OPNAVINST 3100.6 Special Incident Reporting Procedures. Ref: NRMP 10-67004-T1NP				
g.	NAVSEA S0420-AA-RAD-010, Radiological Affairs Support Program Manual. Ref: NRMP 10-67004-T1NP				
h.	Title 49, Code of Federal Regulations, Part 171-180, “Hazardous Materials Regulations”. Ref: NRMP 10-67004-T1NP				
11.	Are RAM users familiar with applicable technical manuals? Ref: NRMP 10-67004-T1NP				
12.	Are leak tests performed prior to maintenance? Ref: NRMP 10-67004-T1NP				
13.	Are disposable gloves and other PPE worn as required? Ref: NRMP 10-67004-T1NP				
14.	Is the work area surveyed at the end of each day that maintenance operations are performed? Ref: NRMP 10-67004-T1NP				
15.	Are maintenance personnel trained in accordance with the requirements of applicable NRMPs? Ref: NRMP 10-67004-T1NP				

C. Transportation

		Y	N	N/O	N/A
1.	Are HAZMAT Employees as defined in 49 CFR, part 171.8, trained per 49 CFR, Subpart H – Training; including refresher training, testing, and documentation? Ref: NRMP 10-67004-T1NP				
	(1) If not, when will they be trained?				
2.	Have procedures been implemented to properly receive/open and to ship packages containing RAM? Ref: 10 CFR 20.1906				
	(1) If not, when will they be implemented?				
3.	Are surveys of outgoing and incoming shipment packages performed when necessary and the results documented? Ref: 10 CFR 20.1906				
4.	Are shipping files/records maintained for 3 years? Ref: 10 CFR Part 20, subpart L				
5.	Have radiation safety procedures been implemented for transporting licensed material within their own facility, unrelated to the use of public highways? Ref: 10 CFR 71.5; 10CFR 20.1101				
	(1) If not, when will they be implemented?				
6.	Have all shipping, receipt, and transfer transaction reports been submitted to COMMARCORLOGBASES? Ref: NRMP 10-67004-T1NP				
	(1) If not, when will they be submitted?				
7.	Are transportation records, including training records w/ test scores, maintained on file for the appropriate minimum time periods?				
a.	Hazmat Training - 3 years				
b.	Shipping records - 3 years				
c.	Receipt records - As long as the RAM is possessed and for 3 years after transfer or disposal.				
d.	Surveys - Indefinitely				

D. Corrective Action Required

E. Follow-Up