

EXHIBIT E

EXAMPLE RADIATION SAFETY PROGRAM ANNUAL REVIEW

1. INTRODUCTION

This form documents performance of the annual radiation protection program review required by the Rules and Regulations for Control of Sources of Ionizing Radiation, Paragraph RH-1004, "Radiation Protection Programs". The review consists of an evaluation of the program's content and implementation, evaluating it's effectiveness in complying with regulatory requirements and keeping radiation exposures to workers and the general public as low as reasonably achievable (ALARA). Records of annual review must be available for inspection by the Arkansas Department of Health.

License Name: _____

License No.: _____ Review Date _____

Auditor: _____
(name, title)

(signature)

Management Review: _____
(name, title)

(signature)

2. REVIEW HISTORY

A. Last review conducted on (date): _____

B. Any deficiencies noted?..... Yes No

C. Were corrective actions taken?.....Yes No N/A
(look for signs of recurrence)

D. Brief description of prior deficiencies, corrective actions taken: _____

3. ORGANIZATION AND SCOPE OF PROGRAM

- A. If the mailing address or permanent address changed, has the license been amended to reflect the change?N/A Yes No
- B. If ownership has changed or bankruptcy has been filed, was the Arkansas Department of Health notified?.....N/A Yes No
- C. Does the license authorize all sources and devices possessed?Yes No
- D. Do all temporary job sites meet regulatory definition.....Yes No
- E. If no to A., has the Department been notified?Yes No
- F. If the RSO has changed, has the license been amended to identify the new RSO?N/A Yes No
- G. Is the RSO meeting the duties and responsibilities for the position?Yes No
- H. Is company management appropriately involved with the radiation protection program and oversight of the RSO’s activities?Yes No
- I. Does RSO have sufficient time to perform all duties/responsibilities?.....Yes No
- J. Staffing sufficient to support to Radiation Protection Program?.....Yes No

4. DOSE LIMITS FOR MEMBERS OF PUBLIC

- A. Has a “members of the public” dose study been developed, submitted and approved by the Department?Yes No
- B. Have licensed activities changed during the year to increase likelihood of public dose limits being exceeded?Yes No
- C. If yes to B., has a new dose study been performed to demonstrate that compliance with dose limits is still being achieved?.....N/A Yes No

5. TRAINING PROGRAM

- A. All workers receive radiation awareness training?Yes No
- B. All gauge Authorized Users completed Department approved training ?.....Yes No
- C. Hazmat employee training and driver training provided to workers per 49 CFR Parts 172 and 177?Yes No

6. PERSONNEL MONITORING

A. If Personnel Monitoring is conducted:

- 1. Personnel monitoring badges worn properly and protected from heat, light and moisture when not being worn?Yes No
- 2. Personnel monitoring badges consistently stored with the control badge in a protected location when not in use?.....Yes No

3. Are badges exchanged in a timely fashion to ensure accurate dosimetry reports?.....Yes No
4. Any badges lost or damaged?Yes No
5. If yes to 4., was RSO immediately notified and record of worker's estimated dose provided to badge vendor and kept on file?Yes No
6. Any spare badges assigned to workers?Yes No
7. If yes to 6., were spare badges marked to identify worker it was assigned to, and vendor notified to add spare badge dose to worker's occupational exposure total?.....Yes No
8. Are dosimetry reports reviewed by the RSO upon receipt?.....Yes No
9. Are personnel monitoring records maintained on Department-issued or equivalent forms?.....Yes No
 - (a) Form Z "Cumulative Occupational Exposure History" completed for each monitored worker?Yes No
 - (b) Form Y "Occupational Exposure Record for a Monitoring Period" completed for each monitored worker?Yes No
10. For workers with declared pregnancies, records kept demonstrating embryo/fetus dose less than 500 mrem for gestation period?.....N/A Yes No
11. Annual and termination reports provided to workers? Yes No
12. Personnel monitoring records reviewed from (*dates*): _____ to _____
13. Highest annual dose: _____mR Date: _____
14. Occupational exposures within limits? Yes No
15. Do personnel monitoring records indicate that worker doses are ALARA? Yes No

B. If Personnel Monitoring is not conducted:

1. Has a dose study been performed and documented to confirm that personnel monitoring is not required?.....Yes No
2. Have licensed activities changed during the year to increase workers' radiation exposures (i.e., expanded work load)?Yes No
3. If yes to 2., has a new evaluation been performed to demonstrate workers' doses are likely to remain ≤ 500 mrem/yr?.....Yes No

7. POSTING AND LABELING

A. Following documents posted at permanent facility:

1. Emergency proceduresYes No
2. Department Form RH-11 ("Notice to Employees").....Yes No
3. Other documents listed in Paragraph RH-2802 unless other posted notice identifies where documents can be viewed.....Yes No

- B. Above documents posted in conspicuous location(s) to permit workers to observe them on way to/from work?Yes No
- C. Radiation signs:
 - 1. “Caution (or Danger), Radioactive Material” signs posted at permanent facility and where gauges are stored [unless documentation kept describing eligibility for exception]?Yes No
 - 2. “Caution (or Danger), Radiation Area” signs: Is manufacturers’ information kept on file to demonstrate that gauge radiation levels are too low to require posting of radiation area signs around gauge storage areas?.....Yes No
- D. Gauges bear durable, clearly visible labels w/ radiation symbol, “Caution (or Danger), Radioactive Material” warning, and sufficient information to permit individuals to avoid/minimize exposures?Yes No

8. SECURITY

- A. When not installed is each gauge provided a storage/transport container equipped with lock?Yes No
- B. Gauges kept secured against unauthorized access/removal when not installed? Yes No

9. OPERATING AND EMERGENCY (O&E) PROCEDURES

- A. Any revisions to O and E procedures made that have not been reviewed and approved by the Department?Yes No
- B. O and E procedures list correct phone numbers for RSO and the Department? Yes No
- C. O and E procedures accompany portable gauges at all times?.....Yes No

10. GAUGE TRANSPORTATION

- A. Only DOT-authorized packages used to transport gauges?Yes No
- B. Packages used to ship gauges properly marked and labeled per 49 CFR Part 172, Subparts D and E?Yes No
- C. Prior to shipment, transport containers inspected to ensure proper packaging, unimpaired physical condition of container and closure devices?Yes No
- D. Properly completed bill of lading and emergency response information provided for each gauge shipment?Yes No

11. GENERAL RULES OF USE

- A. Management and RSO emphasize to workers importance of maintaining doses ALARA?Yes No
- B. Observations of workers conducted to evaluate performance?.....Yes No
- C. Good work practices used by workers to minimize doses (i.e., time, distance, shielding, general use rules)?.....Yes No

12. LEAK TESTS

- A. Gauge sealed sources leak tested at required intervals?.....Yes No
- B. Leak tests conducted by authorized personnel following procedures approved by the Department?Yes No
- C. Leak test records include all information required by Paragraph RH-1212?Yes No
- D. Any sources found leaking, and, if so, was the Department notified?.....Yes No

13. GAUGE INVENTORY

- A. Gauge receipt and transfer/disposal records maintained?Yes No
- B. Gauges physically inventoried at quarterly intervals?.....Yes No
- C. Gauge inventory records document all necessary information?.....Yes No

14. GAUGE MAINTENANCE

- A. Copies of the manufacturer's operation/maintenance manuals maintained on file for reference?Yes No
- B. Manufacturer's procedures referenced and followed for routine cleaning and lubrication of gauges?Yes No
- C. Non-routine gauge maintenance performed in-house?Yes No
- D. If yes to C., is non-routine gauge maintenance conducted by authorized personnel following procedures approved by the Department?.....Yes No

15. RADIATION SURVEY INSTRUMENTS

- A. Has the meter been approved by the Department?.....Yes No
- B. Is there access to an equivalent back-up meter when the primary meter is out for calibration/repair?.....Yes No
- C. Is the meter calibrated annually and after repair by a licensed vendor, and are calibration records maintained?.....Yes No

16. RADIATION SURVEY INSTRUMENTS

- A. Annual surveys of installed gauges.....Yes No
- B. Survey of storage locations.....N/A Yes No
- C. Lock out surveysN/A Yes No
- D. Non-routine maintenance surveysN/A Yes No
- E. Receipt/shipping surveys.....N/A Yes No
- F. Survey at installation/relocationN/A Yes No
- G. Survey of gauge involved in an incidentN/A Yes No

17. RECORD KEEPING, NOTIFICATIONS & REPORTS

- A. All required documents maintained on file at permanent facility for duration?Yes No
- B. Did any incidents/emergencies occur since last review? Yes No
- C. If yes to B., was the response appropriate? (i.e., operator followed emergency procedures, required notifications/reports timely filed, cause of incident investigated, corrective actions taken & documented?..... Yes No

18. INDEPENDENT AUDITS/INSPECTIONS

- A. Any independent audits/inspections conducted since last internal audit (e.g, consultant or Department inspection)?Yes No
- B. If yes to A., summary of deficiencies identified and corrective actions _____

19. REVIEW DEFICIENCIES AND CORRECTIVE ACTIONS

- A. Summary of problems/deficiencies identified during this review _____

B. Description of corrective actions planned or taken: _____

C. Description of other recommendations for improvement: _____
