

APPENDIX S

ANNUAL RADIATION SAFETY PROGRAM AUDIT

As required by the Rules and Regulations, Paragraph RH-1004, all licensees must annually review the content and implementation of the Radiation Safety Program. The review must ensure the following:

- Compliance with Department and applicable DOT regulations and the terms and conditions of the license; and
- Occupational doses and doses to members of the public are ALARA.

The Applicant must develop and implement procedures for the required review or audit of the radiation protection program's content and implementation. Sub-Appendix S-1 contains an example audit that is a suggested guide to meet this requirement. Some sections of Appendix S may not be pertinent to every licensee or to each review or audit. For example, licensees do not need to address areas that do not apply to their activities, and activities that have not occurred since the last review or audit need not be reviewed at the next review or audit. Reviews or audits of the content and implementation of the radiation protection program must be conducted at least annually.

The Department encourages licensee management to conduct performance-based reviews by observing work in progress, interviewing staff about the Radiation Safety Program, and spot-checking required records. As part of their review programs, licensees should consider performing unannounced audits of authorized and supervised users to determine if, for example, Operating and Emergency Procedures are available and are being followed.

It is essential that once identified, violations and radiation safety concerns are corrected comprehensively and in a timely manner. The following three-step corrective action process has proven effective:

- Conduct a complete and thorough review of the circumstances that led to the violation.
- Identify the root cause of the violation.
- Take prompt and comprehensive corrective actions that will address the immediate concerns and prevent recurrence of the violation.

The Department's expectation is that Licensee's will promptly identify and initiate comprehensive correction of violations and deficiencies.