

State of Vermont Department of Health

Radioactive Materials Program

Procedure 3.1, Revision 0



Management of Allegations

Prepared By: _____ **Date:** _____

Reviewed By: _____ **Date:** _____

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0		

Radioactive Materials Program Procedure 3.1, Revision 0

Management of Allegations

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Management of Allegations

1.0 PURPOSE

1.1 Applicability

This procedure is to ensure that any allegation made against a licensee is properly addressed and to provide guidance to protect the identity of the alleged. Actions taken in response to an allegation include investigation, documentation, and enforcement, as appropriate. If, at any time, the need for criminal investigatory capacity is required, (for example thefts and/or terrorist activity, as described in Section 3.1.2) contact the Local Law Enforcement Agency (LLEA) and/or the Vermont State Police and/or other state and federal agencies such as the U.S. Federal Bureau of Investigation (FBI), as appropriate. The FBI should be notified if an event involves the possibility of theft or terrorist activities. The Vermont Department of Health (Department) shall promptly notify the Nuclear Regulatory Commission (NRC) Operations Center (301-819-5100) after contacting the appropriate LLEA and/or FBI in cases involving actual or attempted theft, sabotage, or diversion of radioactive materials as indicated in Appendix G of SA-300.

Commented [OF1]: NRC comment 39

Commented [SJ2R1]: We recommend referencing section 3.1.2, which provides a more detailed description of "criminal investigatory capacity," for clarity.

1.2 References

- 1.2.1 NRC Management Directive 8.8, "Management of Allegations."
- 1.2.2 NRC Inspection Manual Chapter 2800 "Materials Inspection Program."
- 1.2.3 SA-300, "Reporting Material Events."
- 1.2.4 Vermont Radioactive Materials Rule.

1.3 Files

- 1.3.1 All allegation-related documentation is to be maintained in a secured allegation file (AF) in the Radioactive Materials Program.
- 1.3.2 Allegation files are ~~padlocked~~ secured when not in use and access is controlled and limited to Radioactive Materials Program Staff who are actively using the particular case file. Electronic allegation files shall be limited to RMP staff required to address the allegation and authorized access to the electronically secured space.

Commented [OF3]: NRC comment 40

Commented [SJ4]: Sometimes VT uses the acronym and sometimes it uses full term—recommend choosing one for consistency

Commented [SJ5]: VT's response to Comment 40 states that "All documents are maintained only electronically where only Radioactive Materials Program staff have access." The highlighted language, however, makes it seem like the files are still

1.4 Definitions

- 1.4.1 Agency: The Radioactive Materials Program (RMP) of the Vermont Department of Health (Department).
- 1.4.2 Allegation: A declaration, statement, or assertion of impropriety or inadequacy associated with Radioactive Materials Program (RMP)