

VOLUME I

RADIOLOGICAL SAFETY PROGRAM

AND

QUALITY ASSURANCE PROGRAM

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NUCLEAR ENERGY SERVICES
RADIOLOGICAL SAFETY PROGRAM

Project Application 8561-220	Copy No	Assigned To
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APPROVALS

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REV NO	PREPARED BY	Project Manager	Radiation Safety Officer	President	
0	C.J. Marino 9/14/84	J. Marino 9/14/84	J. Marino 11/1/84	J. Marino 11/1/84	
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DOCUMENT NO. 82A8001

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RADIOLOGICAL SAFETY PROGRAM

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STATEMENT OF POLICY

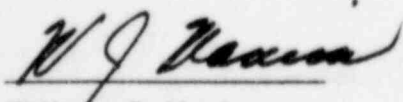
The Radiological Safety Program to be implemented by Nuclear Energy Services (NES), a Unit of Qualcorp, is defined in this Radiological Safety Program policy document (82A8001) and is accomplished through adherence to policies stated herein. The NES Radiological Protection Manual (82A8003), and associated procedures, will be used to implement and control this Program.

The Program applies to NES activities involving the processing, handling, usage, exposure to, transportation and disposal of radioactive materials. The usage of radiographic source materials, as defined in Title 10 Code of Federal Regulations, Part 34, is specifically exempt from the requirements and guidelines of this Program.

This Radiological Safety Program has been developed to be in compliance with the requirements of the U.S. Nuclear Regulatory Commission (NRC) and with specific NRC-issued licenses held by NES.

It is the explicit policy of NES to maintain exposure levels to its employees, exposures to the general public, and releases of radioactive materials to the environment at levels which are within NRC regulatory limits and "as low as reasonably achievable" (ALARA).

A Radiological Safety Committee (RSC) shall be formed and maintained to ensure compliance with and correct implementation of this Program. A Radiation Safety Officer (RSO) shall be appointed to oversee and provide direct control for the implementation of this Program. The RSO shall be a member of the RSC. The ultimate responsibility for verification that this Program is being properly administered shall be undertaken by the President of Nuclear Energy Services.



William J. Manion

President

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1. PROGRAM OBJECTIVES AND ORGANIZATION

1.1 POLICY CONSIDERATIONS

1.1.1 Scope Of Program

The Radiological Safety Program has been designed to protect individuals from exposure to radiation, radioactive materials, and general safety hazards associated with NES activities. The usage and control of radiographic materials is specifically exempt from the requirements of this Program.

The scope of this Program, as outlined herein, consists of the development of rules, practices, and procedures which shall keep radiation exposures and releases to the environment of radioactive materials to levels which are as low as reasonably achievable.

1.1.2 Program Organization

The Program has been organized along direct lines of communication between first line management and the Radiological Safety Committee (RSC), which oversees and controls all radiological activities. The RSC ensures the consistent application of this Program and enforcement of regulations across departmental boundaries.

1.1.3 Program Responsibilities

The overall management review governing the Program direction, and the response to all aspects of radiological safety are the direct responsibility of the President of NES. Through his office, NES is responsible to its clients, employees, the general public, and affected government regulatory agencies for the implementation of policies and procedures required by this Program.

A standing corporate Radiological Safety Committee (RSC) is responsible for technical decisions and review of NES policy. It is the responsibility of the RSC to provide recommendations to the President, who acts as RSC chairman. The RSC shall provide to NES Department and Project Managers guidance, recommendations, and rulings which shall govern the implementation of the Program. It is also the responsibility of the RSC to verify that its directives, procedures, and recommendations are carried out in practice.

1.2 REGULATORY BASIS

1.2.1 ALARA

The maintenance of occupational radiation exposures to levels "as low as reasonable achievable" (ALARA) has been specified by federal law in Title 10 of the Code of Federal Regulations, Part 20. Further ALARA guidelines have been specified in Regulatory Guides 8.10 and 8.8. A clarification of "reasonably achievable" exposure reductions has been documented in a variety of publications and federal position papers which equate a manRem of exposure to a dollar value. This approach and all applicable regulations shall be employed by NES in fulfillment of the requirements and intent of ALARA regulations. The setting of goal levels for exposure and pre-planning for exposure reduction efforts shall be enacted and enforced.

1.2.2 Regulatory Limits

The maximum levels of radiation exposure to the public and to radiation workers has been defined in 10CFR20. These levels shall in no case be exceeded. In addition, release levels of radioactive materials to the environment and exempt quantities have been specified in 10CFR20 and 10CFR30. The Radiological Safety Program shall detail the measures by which no individual shall be exposed to greater than these limits and by

which no quantity of radioactive material shall be released to the environment in excess of these limits.

A respiratory protection program shall be maintained in accordance with the requirements of 10CFR20 and ANSI-Z88.2.

In addition, specific regulatory restrictions to NES radiological activities shall be carried out in accordance with any and all NES licenses and permits; as well as corporate restrictions.

1.2.3 Recordkeeping

Records shall be kept in accordance with the requirements of 10CFR20 and 10CFR30.

These records shall be maintained to document and report the occupational exposure histories of all NES radiation workers, training of said workers, all other documentation as required by the aforementioned regulations; including those records specified in Section 2.1.4 herein.

1.2.4 Personnel Training

Radiation workers, as defined in 10CFR19, shall be trained in the potential hazards of and the methods of reduction of the hazards from radioactive materials. All training shall be documented and conducted in accordance with the requirements of 10CFR19 and associated NRC guidelines.

This training shall include personnel certification, where applicable, and annual re-training of personnel to maintain the required levels of proficiency in their work activities.

2. PROGRAM IMPLEMENTATION

2.1 RADIOLOGICAL SAFETY COMMITTEE

2.1.1 Organization

The RSC is a five (5) member standing committee. The members are appointed by the President of the NES Division and shall consist of two members from within NES and two members not otherwise associated with NES who are recognized experts in the health physics field. The fifth member and chairman of the RSC shall be the President of the NES.

These five members constitute a quorum wherein all committee decisions are made. They or their designees must be present for RSC functions as detailed in this document. The committee membership is listed below and shown in the organization chart in Figure 1-1.

William J. Manion
President
NES

Arnold Gunderson
Vice President, Engineering Service
NES

John R. May
General Manager, Waste Management Services
NES

Robert Ryan
Health Physicist
Rensaleer Polytechnic Institute

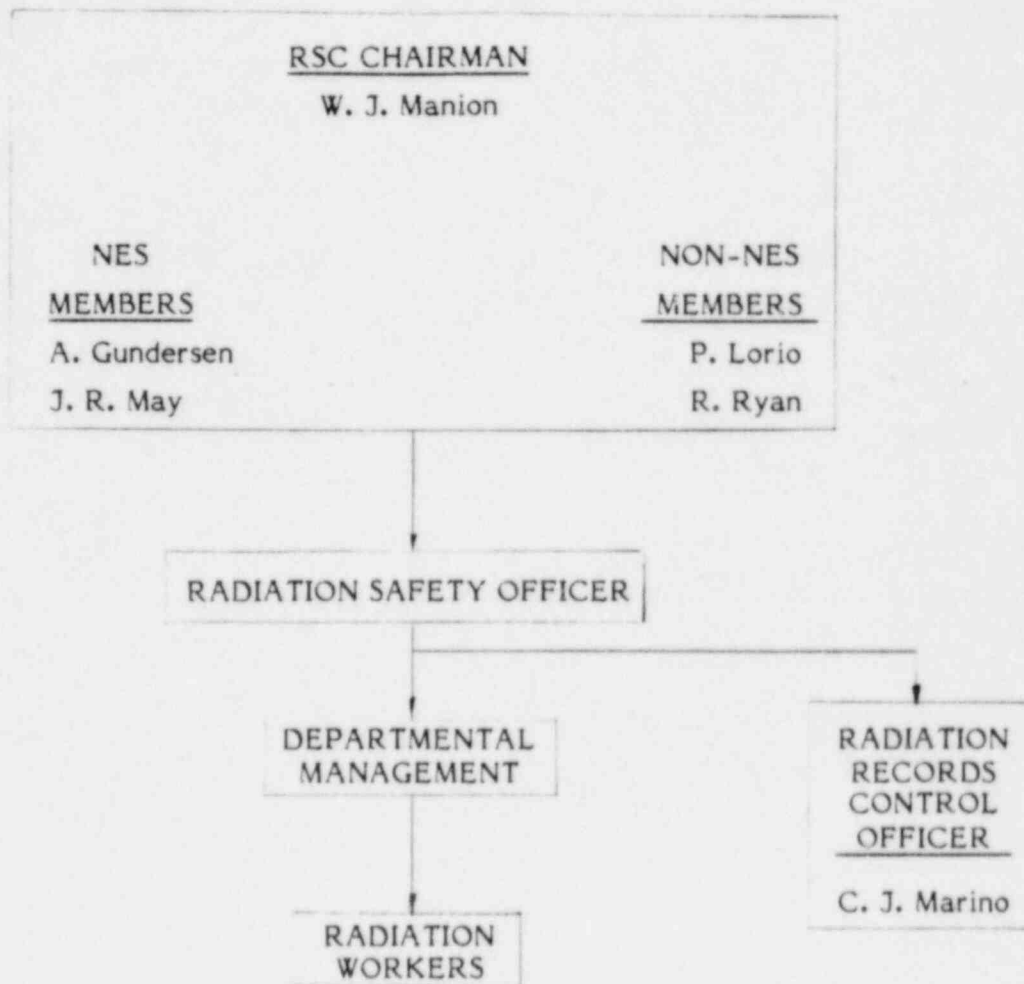
Phillip Lorio
Radiation Safety Officer
Columbia University

2.1.2 Functions Of The RSC

- A. The RSC shall review all NES activities which may involve radiological safety, as determined by the Chairman. The purpose of the review is to provide the expertise of the committee members in order to ensure compliance with applicable laws and regulations, and the NES Radiation Safety Program.

FIGURE I-1

RADIATION SAFETY COMMITTEE ORGANIZATION



- B. The RSC shall review proposed designs and modifications of NES facilities and practices as pertain to radiological safety.
- C. The RSC shall review potential or post-accident situations where matters of radiological safety are involved. The purpose of such action is to establish the preventative and/or corrective actions to be taken and to ensure implementation of said actions.
- D. The RSC shall oversee corporate adherence to the NES Radiological Protection Manual. This manual shall detail the requirements of the committee necessary to ensure compliance with this Radiological Safety Program. The manual shall specify all procedures and program actions to be employed in NES radiological activities. The RSO shall review and approve all changes to this manual and its associated procedures.

2.1.3 Initiation Of RSC Actions

- A. Any employee of NES may recommend that the RSC review specific radiological safety and/or health matters by contacting the RSO in writing. Managers and heads of applicable departments, shall review each request to determine if it involves matters of safety or health. If potential matters of radiological safety and/or health are involved, the document shall be submitted for RSC review through the RSO. When making a request for review, an indication of priority (high, routine, low) shall be given.
- B. The Chairman or his designee shall determine whether or not matters proposed for RSC action will be added to the RSC agenda. Documents or matters not placed on the agenda will be returned to originating parties with a memorandum indicating the reason for return or, in the case of documents, authorizing implementation without further action by the RSC.

- C. Documents or other matters determined by the Chairman or his designee to be within its purview, shall be assigned to a subcommittee of one or more members for detailed review or investigation. The findings of the subcommittee shall be presented to the RSC in accordance with the agenda. Person(s) chosen to make these presentations should have knowledge and/or experience in the area to be reviewed. The subcommittee may make the presentation either orally or in writing, as directed by the Chairman.
- D. As a minimum, the RSC shall meet once per calendar quarter. Otherwise, the RSC shall meet on the call of the Chairman.

2.1.4 Records, Reports And Notification

- A. RSC decisions shall be recorded for each matter brought before it in the minutes of the meeting and in memoranda to originators of individual matters.

The original of each document brought before the RSC and receiving final approval shall be stamped on the title/approval page with a stamp indicating RSC approval and providing a place for date of approval and Chairman's signature.

- B. Minutes of each RSC meeting shall be prepared and approved by the Chairman and maintained as a permanent record of proceedings.
- C. Originators of documents and other matters brought before the RSC shall be notified by memorandum of RSC action results. Copies of these memoranda shall be distributed as follows:
 - 1) RSC File.
 - 2) All RSC Members.
 - 3) NES personnel and departments affected.

- D. Reports of incidents, or of potential hazards, shall be distributed as directed by the Chairman. Such reports shall be identified, distributed and controlled as company confidential documents and shall not be disseminated to other than company personnel without specific approval of the Chairman in each case.
- E. The RSO, and the Chairman of the ESC, shall be notified by the most rapid means of the occurrence of any incident involving safety.

2.2 ALARA CONSIDERATIONS

The present basis for ALARA programs is stated in 10CFR20.1 (c) "Standards For Protection Against Radiation", which states licensees shall maintain exposures to radiation as far below the specified limits as is reasonably achievable.

Regulatory Guide 8.8 and 8.10 provide information relevant to attaining goals and objectives such that radiation exposures to personnel will be "ALARA".

The concept of maintaining occupational radiation exposures ALARA does not embody a specific numerical value at the present time. Rather, it is a philosophy that reflects specific objectives for radiation dose management in:

1. Establishing a program to maintain occupational radiation exposures ALARA;
2. Designing facilities and selecting equipment;
3. Establishing a radiation control program, plans, and procedures and;
4. Making supporting equipment, instrumentation, and facilities available

Using an adequate data base, including economic information, the criteria for keeping annual collective doses to personnel ALARA has been derived as a guideline in numerical terms as \$5,000. per manRem. Using that information, the criteria for meeting the provision of paragraph 20.1 (c) of 10 CFR Part 20 then takes the form of qualitative guidance (e.g., goals, objectives, and statements of good practice).

The relationship between radiation dose and biological effects is reasonably well known only for doses that are high compared with current annual dose limits and only when such doses are delivered at high dose rate. An ad hoc committee of the National Council on Radiation Protection and Measurements (NCRP) chose in 1959 to make the cautious assumptions that a proportional relationship exists between dose and biological effects and that the effect is not dependent on dose rate. Essentially, this amounts to the assumption of a nonthreshold linear dose-effect relationship and is hereby adopted as the NES baseline assumption.

The intent of NES is to provide a degree of training and awareness of ALARA needs to the personnel who can most directly achieve significant results. Several general principles shall be reiterated throughout the program:

- Merely controlling the maximum dose to individuals is not sufficient; the collective dose to workers at a worksite must also be kept as low as reasonably achievable.
- Caution should be taken such that actions to reduce radiation risks should not result in a significantly larger risk from other hazards.
- Good ALARA means good economics, as in avoidance of non-productive working time caused by restrictions on personnel working in radiation areas.
- Be aware that wide range in the collective radiation dose appears to be primarily a function of doses received by maintenance and operations. Breakdown of exposures by job category will identify generic and repetitive problems areas.

The RSC shall promote the following approaches:

1. Management incentives and requirements to maintain an ALARA program.
2. Involvement of ALARA performance by on-site operating personnel (organizational, maintenance, testing and health physics).
3. Methods for designers and engineers to improve the radiological environment by recognizing potential ALARA problem areas in the planning stages of new installations and during modifications of current designs.

4. The possible range of organizational structures which have been proven successful and may be adapted to individual needs.
5. Use of equipment and its adaptation in applications which are primarily for ALARA needs in cleanup and good housekeeping programs.

Several basic principles have been outlined by the NRC as guides for management personnel for their assistance during the decision and policy making process:

- A - Personnel would be made aware of management's commitment to keep occupational exposures as low as is reasonably achievable.
- B - Management should periodically perform a formal audit to determine how exposures might be lowered.
- C - Management should ensure that there is a well-supervised radiation protection capability with well-defined responsibilities.
- D - Management should see that workers receive sufficient training.
- E - The Radiation Safety Officer should be given sufficient authority to enforce safe operation.
- F - Modifications to operating and maintenance procedures and to NES equipment and facilities should be made where they will substantially reduce radiation exposures at a reasonable cost.

2.3 SPECIFIC PROGRAM DIRECTIVES

2.3.1 Personnel Occupational Exposure

Control of personnel exposure extends to direct ionizing radiation, airborne exposure, and internal deposition of radioactive materials for an individual. The Radiological Protection Manual (81A1070) shall establish a radiation work permit system, a respiratory protection program, and procedures required for the monitoring of radiation exposures. The establishment of detailed records shall enable trend analysis and potential reduction of exposures through administrative actions.

A system of personnel monitoring shall be established based on film badges, self-reading dosimeters, area monitoring, and bioassay of all NES radiation workers. The bioassay program shall, as a minimum, consist of a yearly whole body count and urinalysis for each NES radiation worker. Additional bioassay and monitoring techniques shall be employed as necessary should ingestion, inhalation, or unplanned radiation exposures be suspected or encountered.

All exposure reduction requirements shall be specified in the Radiological Protection Manual and its associated procedures. NES and those personnel under NES supervision in controlled areas shall wear the appropriate protective clothing as specified by procedure. Respiratory equipment shall be designated for use in all areas where a potential hazard exists. This equipment shall be NIOSH/MSHA approved for use in the atmosphere in question. Radiological surveys and sampling shall be conducted in accordance with approved procedures using the specific instrumentation designated in the Radiological Protection Manual. Calibration and certification of all equipment required shall be maintained at all times; at no time shall an uncalibrated or uncertified device be used by NES personnel.

2.3.2 Equipment And Area Control

All radioactive materials, including tools, records, and calibration sources shall be restricted to controlled areas as defined herein. Release from a controlled area shall be conducted in accordance with NES license criteria and the regulatory criteria specified in 10CFR20 and 10CFR30.

NES controlled areas shall be posted and maintained in accordance with the subject regulations and NES procedure. Access to these controlled areas shall be determined by the ambient radiation levels, the amount and degree of contamination, and the presence of specific types of radioactive material in these areas.



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All waste disposal, decontamination, and related radiological activities shall be controlled by NES procedure. This applies to all activities being performed both within NES controlled areas and for NES employees working at client's specified locations. This requirement shall not be deemed to supercede the radiological health and safety requirements of other corporations or government agencies.



QUALITY ASSURANCE PROGRAM
FOR THE
NES RADIOLOGICAL SAFETY PROGRAM

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1. INTRODUCTION

Quality Assurance actions to be implemented for the NES Radiological Safety Program are governed by two basic documents. They are:

1. The NES Radiological Safety Program (82A8001)
2. This Quality Assurance (QA) Program (82A8002)

This QA Program defines the policies and practices employed by Nuclear Energy Services in meeting the requirements of Title 10 Code of Federal Regulations Part 30 (10 CFR 30). Since this program applies to all radiological work performed by NES, it is not project specific.

This QA Program includes the organization, document approval, and quality assurance aspects of the Radiological Safety Program.

The usage of radiographic materials is specifically exempt from the requirements of this QA Program. Radiographic materials are controlled in separate NES documents and do not constitute part of the Radiological Safety Program referenced herein.

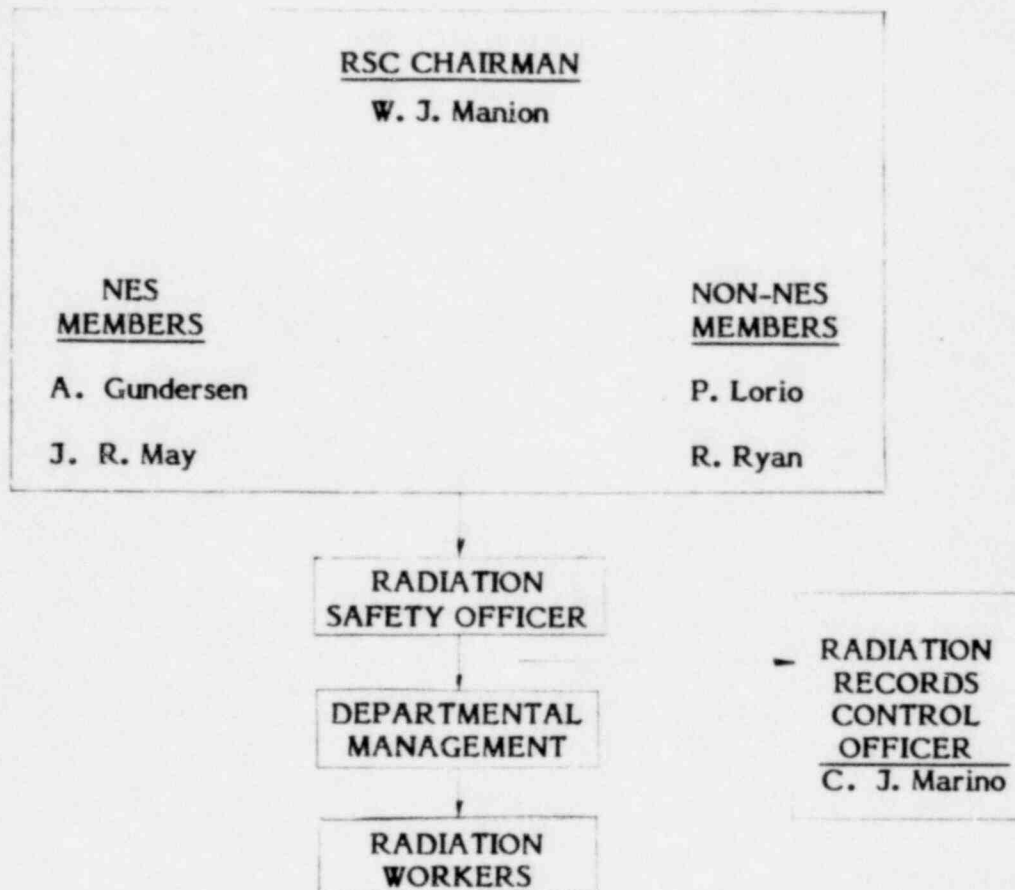
2. ORGANIZATION

This section describes the NES project organization for the Radiological Safety Program and delineates the authorities and responsibilities of key personnel involved in the program.

2.1 PROGRAM ORGANIZATION

The structural organization of the program is shown in Figure 2-1. The structure relates to the management and operation of the program including quality assurance policy and function.

FIGURE 2-1
PROGRAM ORGANIZATION



This organizational approach emphasizes the central control of the Radiation Safety Committee (RSC) and the direct control of the entire program by the President of NES. The program itself is defined in the Radiological Safety Program (82A8001).

2.2 PROGRAM RESPONSIBILITIES

2.2.1 Nuclear Energy Services

Overall management review and the governing of program direction, and response to all aspects of radiological workscopes are the direct responsibility of the President of NES. Through him, NES is responsible to its clients and affected government regulatory bodies for the implementation of policies and procedures referenced in this QA Program.

2.2.2 Corporate Radiological Safety Committee

The corporate Radiological Safety Committee (RSC) is responsible for technical decisions in the establishment of NES radiological safety policy. The RSC is also responsible for providing the President of NES and Project Managers with guidance, recommendations, and rulings which shall govern the implementation of the Radiological Safety Program. It is also the responsibility of the committee to verify that implementation of its directives, procedures, and recommendations are effected.

2.2.3 Radiation Safety Officer

The NES Radiation Safety Officer (RSO) gives approvals and audits findings. The RSO also reviews and approves reports dealing with any and all aspects of radiological activities in NES projects.

2.2.4 Additional Health Physics Personnel

These individuals are responsible for the quality of their assigned work in accordance with approved procedures, the NES Radiological Protection Manual, and this QAPP. It is the duty of every individual to report any condition which may adversely affect the quality of work and to recommend any change which may improve the quality of work and/or worker safety.

All personnel assigned by NES to a worksite are required to have demonstrated proficiency in the conduction of the assigned work. Training records and/or certificates of proficiency shall be maintained by the Radiation Records Control Officer (RRCO) in accordance with sections 4 and 5. All training of radiation workers shall be conducted in accordance with the requirements of 10CFR Parts 19 and 20.

Maintenance of proficiency and applicable certifications are the responsibility of the individual and of the Radiological Safety Committee.

2.3 COMMUNICATION GUIDELINES

Maintenance of adequate communications is a particular necessity for the Radiological Safety Program. All customer and U.S. Nuclear Regulatory Commission (NRC) correspondence with NES concerning radiological policy and events shall be addressed as follows:

NES Radiological Safety Committee
1000 Shelter Rock Road
Danbury, CT 06810

Telecopier: (203) 792-3168
Telephone: (203) 796-5000

Attention: Mr. J. R. May

All such communications shall be addressed by the committee in force and shall be copied to the President of NES as committee chairman.

Requests for personnel exposure records shall be made via the above address to Mr. C. J. Marino, RRCO.

3. PROGRAM DESIGN AND CONTROL

3.1 DESIGN CRITERIA

The program is designed around the following sets of documents:

- A. A corporate Radiation Safety Policy Statement by the President of NES.
- B. A Radiological Protection Manual issued by the RSC.
- C. All associated radiological procedures, guidelines, and RSC orders.

The corporate policy statement shall address the objectives and constraints of the program. It shall reference the documents and government regulations from which the RSC works, give direction to the committee and all NES employees who shall potentially be working in a radiation area and/or with radioactive materials. The usage of radiographic materials is specifically exempt from the requirements of this QA Program and those of the Radiological Safety Committee.

A Radiological Protection Manual shall be developed by the NES Radiological Safety Committee. The manual shall detail the requirements of the RSC and shall specify all associated procedures and implementing documents necessary to the fulfillment of program objectives.

All procedures specified in the Radiological Protection Manual shall be issued and maintained as controlled documents in accordance with the NES Document Control Procedure (80A9003).

3.2 CONTROL OF IMPLEMENTATION

Implementation of the Radiological Safety Program is primarily the responsibility of the President of NES as chairman of the Radiological Safety Committee. Through the RSC, the President promulgates and enforces the radiation safety policy of NES. The RSC in turn ensures enactment of all appropriate procedures and orders by direct interactions at the project management level via an RSO. All changes, additions, and alterations to the Radiological Protection Manual and any radiological procedure must be approved by the RSC prior to implementation, in addition to the standard approval cycle as specified in the NES Quality Assurance Manual.

3.3 PROGRAM REVIEW

Review of all training, recordkeeping, and of the program itself shall be performed by the RSC on an annual basis. Such a yearly review shall culminate in the issuance of a report on the state of affairs pertaining to the responsibilities of the RSC. This report shall be issued to the President of NES for his approval.

3.4 SPECIFIC PROGRAM REQUIREMENTS

3.4.1 Radiological Sampling

The accuracy of devices used for sampling radioactive liquids, solids, or gases, including the measurement of sample flow rates and/or volumes, is determined by the appropriate controlled procedure.

Frequency of sampling device calibration is also specified by procedure and is based upon the accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurements as required by procedure.

Testing is conducted to verify that sampling is representative by the collection and analysis of replicate or control samples or by comparison with published results.

Procedures for sample packaging, shipping, and storage provide for the maintenance of individual sample integrity. All samples shall be sequentially numbered; that numbering is to be controlled by the Radiation Records Control Officer in logbook form.

3.4.2 Standards

When available, National Bureau of Standards (NBS) certified radiological standards shall be used to determine efficiencies and to calibrate radiological counting and survey equipment.

When NBS standards are not available, standards traceable to NBS shall be used.

To the extent possible, reference standards and control samples shall be prepared in the same media and physical form as the unknown sample.

The minimum frequency for instrument calibration is twelve (12) months, although a six month interval is recommended. Instrument performance data is to be monitored by the user for indication of need. △

3.4.3 Performance Checks

Performance checks on survey and counting instruments shall be performed as needed and/or on a daily basis. Instrument performance checks should include:

- check-source measurement
- background measurement
- blind replicate samples (where appropriate)
- known analytical blanks for controls
- spiked samples as blind replicates (where appropriate)

3.4.4 Review, Analysis, and Reporting

Data shall be reviewed for consistency and accuracy. Unreasonable or inconsistent data shall be investigated and reported in writing as part of the data package, including any specific actions taken and conclusions reached.

3.4.5 Procurement

All equipment and materials procured for radiological use shall meet with the approval of the RSO or his designee. In addition, equipment and instrumentation requiring calibration shall be procured only from those companies or individuals who are approved by NES as signified by their listing on the NES Approved Vendor List (AVL).

3.4.6 Audits, Reports, and Records

All auditing, reporting, or record keeping activities shall be conducted as per the requirements of this QA Program and the Radiological Protection Manual (82A8003).

4. PROGRAM DOCUMENTS

This section sets forth the measures in effect at NES to ensure the complete and correct implementation of the Radiological Safety Program requirements as detailed in the NES Radiological Protection Manual. Table 4-1 identifies the documents by NES control number and title.

Enactment of these documents and their requirements are the responsibilities of the individuals designated. These documents shall be controlled and maintained in accordance with the requirements of the NES Document Control Procedure (80A9003).

TABLE 4-1

Document No.	Title
80A9003	NES Document Control Procedure
82A8001	Radiological Safety Program
82A8003	Radiological Protection Manual
82A8004	TLD Dosimetry Quality Assurance Program Plan
82A8005	Radiological Quality Assurance and Control Procedure
82A8006	Radiation Worker Handbook & Training Manual
82A8007	Instrumentation Maintenance Procedure
82A8008	General Radiological Survey Procedure
82A8009	Guidelines for Radioactive Waste Disposal
82A8010	Emergency Actions Procedure
82A8011	General Industrial Safety Procedure
82A8012	Radiation Work Permit Procedure
82A8013	Radiological Sample Shipment Procedure
82A8014	Airborne Safety Assurance Procedure
82A8015	Guidelines for Facility and Equipment Decontamination
82A8016	Receipt and Handling of Radiation Materials (RAM) Packages

5. RECORDS

This section sets forth the measures required by NES to assure that complete and sufficient records are maintained to furnish evidence of activities required to implement the Radiological Safety Program. Records shall be sent to the RRCO as generated, or quarterly as a minimum. Complete turnover of records at project completion shall be accomplished within one month after said completion. The records indicated in Table 5-1 and any and all other records required by the RRCO shall be delivered to the RRCO at that time.

Collection of these records is the responsibility of the project manager. Their retention and retrievability are the responsibilities of the RRCO, and shall be described fully in the Radiological Protection Manual.

All such records shall be assembled so as to prevent loss or deterioration. These records shall be kept in accordance with the requirements of the RSC, with license requirements, and to fulfill NRC directives.

TABLE 5-1
Radiological Records

1. Radiation Work Permit
2. RWP Request Form
3. Equipment Certification Form
4. Training Record (procedures)
5. Training Record (seminars)
6. Air Sample Survey Report
7. Personnel Exposure Evaluation Reports
8. Respirator Fit Test Record
9. NES Radiation Worker Training Certification
10. Personnel Decontamination Record
11. Equipment Decontamination Record
12. Field Survey Map
13. Field Survey Data Sheet
14. NRC Form 4 Data
15. NRC Form 5 Data

6. AUDITS

6.1 NES AUDITS

There shall be at least one audit on all projects where one of the following events has occurred:

- A. NES personnel received measurable occupational exposure
- B. Radiological sampling was performed
- C. Radioactive materials were disposed at a licensed facility

Additional audits may be performed at the direction of the RSO manager. The audits will verify compliance with the requirements of this NES QA and with the Radiological Protection Manual.

6.2 CUSTOMER/NRC AUDITS

Audits performed by entities outside direct control of NES shall be conducted in accordance with standard NES corporate policy concerning disclosures, privileged information, and by professional cooperation as per the instructions of the NES Radiological Safety Committee.