

Draft CAP for Finding C-3

Corrective Action Plan LBNL Integrated ES&H Management Inspection May 2009

Finding Statement #C-3: LBNL has not established and implemented sufficient radiation protection requirements in the areas of radiological work authorizations, contamination control, radiological postings and boundary control, technical basis documentation, and training, as needed to ensure adequate radiological safety consistent with all applicable requirements of 10CFR 835, *Occupational Radiation Protection*.

Manager Responsible for Correcting Finding:

Name: David J. Kestell Title: Radiation Protection Group Leader Phone Number: 486-7157 Email: DJKestell@lbl.gov
--

Root Causes:

1. RPG did not possess a program design procedure.
2. RPG did not perform a sufficiently rigorous gap analysis of 10CFR835 & 10CFR 835 Implementation Guide against RPG programs and available resources.
3. RPG did not possess a rigorous internal program assessment procedure.
4. The RPG assessment program was insufficiently rigorous to ensure adequate assessments and effective corrective actions.

Contributing Causes:

1. Guidance not used as fully-compliant program deemed too stringent and demanding for LBNL by previous EH&S management and necessary resources were unavailable.
2. No clear driver on matrix comparison therefore inadequate crosswalk.
3. Insufficient oversight to identify program deficiencies

Immediate/ Compensatory Actions:

C3-1. RPG Leader immediately reviewed the RPG procedures implicated in the HSS findings to determine a risk-based approach to developing revisions and incorporate HSS comments.

C3-2. RPG Leader held meeting with the RPG RCTs and HPs informing them of the results of the HSS review. At that staff meeting, he also directed all RCTs to walk their assigned spaces to ensure that signage (RMAs, Controlled Areas, etc) were properly posted in accordance with the current RPP and RPG-issued work authorizations.

Corrective Action Plan
LBNL Integrated ES&H Management Inspection
May 2009

RPG Corrective Actions:

CA1. RPG shall write a program design procedure

Deliverable to Close Corrective Action: The approved program design procedure.

CA2. **2-1:** RPG shall perform a gap analysis of 10CFR835 & 10CFR 835 Implementation Guide against RPG programs and available resources.

2-2: RPG shall develop a plan to implement the gap analysis.

2-3: RPG shall correct identified gaps in affected RPG procedures and programs

2-4: RPG shall implement revised procedures and programs.

2-5: RPG implementation shall be subject to an effectiveness review.

Deliverable to Close Corrective Action:

2-1: A documented gap analysis

2-2: An 18-month plan for complete implementation of 10CFR835 and a review of necessary resources to meet the needs of the strategic plan.

2-3: Revised radiation protection program procedures.

2-4: A fully compliant 10CFR835 program.

2-5: An effectiveness review.

CA3. RPG shall write an internal radiation protection program assessment procedure

Deliverable to Close Corrective Action: An internal radiation protection program assessment procedure.

CA4. RPG shall review the RPG assessment program as currently defined in the Technical Assurance Program against requirements to ensure adequate assessments and effective corrective actions.

Deliverable to Close Corrective Action: TAP that meets the assessment requirements of 10CFR835 in a rigorous manner.