

THE VALUE OF INDEPENDENCE



“The mission of the Department of Energy’s (DOE) Office of Environmental Management (EM) is the cleanup or closure of the Department’s facilities.... The radiological release of property must be conducted in a manner that is technically defensible and which meets the applicable Departmental requirements.” (Mark Gilbertson, July 2008). DOE/EM has stood up as an industry leader to advocate independent verification (IV) as the essential quality assurance step that ensures cleanup goals have been achieved.

REGULATORY FRAMEWORK

IV requirements are outlined in the recently issued DOE Order 458.1, Radiation Protection of the Public and Environment. Paragraph 4.k (9) states that “DOE Field Element Managers responsible for oversight of clearance processes must implement oversight duties to verify that the contractor assurance program is ensuring that the applicable radiological clearance requirements have been met. DOE must determine the type and scope of oversight activities necessary to independently verify compliance.” The key IV requirements are as follows:

- The graded approach to IV must be commensurate with the scope, complexity, and risk associated with the clearance action to ensure at a minimum that procedures, instruments, data and analysis, and documentation are adequate.
- Personal property releases must at a minimum include operational awareness of radiological survey procedures, instrumentation, methodologies, and techniques. Additional IV may be required for high-complexity releases or for contractors with a history of poor performance.
- All real property releases must include review of data and reporting and may also include independent surveys or sample analysis.
- Real property transferred to the public or managed by another agency requires the development of an IV plan and performance of IV surveys and sampling.

DOE Order 458.1 Paragraph 4.k (9)4 outlines the following criteria for an IV contractor:

- IV must be performed by DOE personnel not directly involved in the specific clearance action or by a contractor who is independent of the contractor conducting clearance activities, and IV personnel must:
 - Report directly to DOE
 - Have authority and freedom to report unresolved issues to the Field Element Manager
 - Be qualified or have knowledge and experience to oversee radiological clearance activities



WHY ORAU?

IV assures that the site was successfully remediated to the risk-based release criteria. The importance of properly implemented IV by a truly independent organization with experienced and knowledgeable subject-matter experts cannot be underestimated. As the primary IV contractor for DOE and the NRC for 30 years, ORAU has built a nationally renowned radiological survey program that has become the gold standard for decommissioning. ORAU's health physicists have performed independent radiological surveys at hundreds of sites of varying complexities across the United States. These IV efforts resulted in cost-effective assurance that the site was remediated to the defined release criteria.

The unique differentiator of ORAU, however, is independence. ORAU does not participate in projects that create potential or perceived conflict of interest or otherwise jeopardize the impartiality of verification work. This autonomy provides a greater assurance to stakeholders that the result obtained is untainted by commercial interests. Other benefits provided by ORAU include:



- Avoiding schedule delays and cost increases by identifying issues early in cleanup process
- Ensuring decontamination and decommissioning (D&D) plans and reports are technically sound
- Providing real-time corrective actions if areas of concern are identified
- Issuing solid and defensible documentation to validate compliance with cleanup requirements and avoid possible future litigation
- Enhancing public credibility and building stakeholder trust in environmental cleanup
- Assuring consistency in final status survey (FSS) procedures among multiple D&D projects
- Preventing an improper release of property that is not in regulatory compliance

The ultimate safety of buildings and lands released to the public is of paramount concern for DOE, the public, and future stakeholders of these properties. Our sole mission is to deliver true, accurate, and defensible results to our customer.

WORKING WITH ORAU

ORAU holds the GSA 899, Environmental Services schedule. Independent verification services can be procured under that schedule. In addition, ORAU holds a contract with DOE to manage the Oak Ridge Institute for Science and Education (ORISE), and funding can be sent to DOE via Memorandum Purchase Orders (MPO) or Inter-Entity Work Orders (IEWO). Both mechanisms are quick and easy to use.