

# U.S. Department of Energy's Consolidated Audit Program (DOECAP)

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#### **Presentation Outline**



- Program Overview
- Audit Checklists and Process

- Common Laboratory Findings
- DoD/DOE Joint Quality Assurance Manual
- Audited Laboratories



# Findings from DOE's Office of the Inspector General and GAO Reports



"Audit of DOE's Commercial Laboratory Quality Assurance Evaluation Program" (June 1995)

- Some laboratories were audited numerous times by a single DOE entity; others were never audited
- Evaluation methods varied significantly from one contractor to another
- Audit results were not shared between contractors

IG and GAO findings concluded reductions in DOE Auditing of Analytical Laboratory Services was needed

# What was DOE's Response? DOECAP

- Purpose
  - Eliminate/minimize audit redundancies
  - Standardize audit methodology, policies and procedures
  - Communicate Lessons Learned
  - Reduce overall Department risks/liabilities
- Involve all DOE line organizations/field operations
- Training auditors (Exams, auditors-in-training, Committee approval)
- Volunteer auditors -- DOE federal employees/ contractors (70 auditors)



### **DOECAP** Information



#### **Are DOECAP Audits Accreditations?**

- No Accreditations/Certifications
- Provides information to DOE program management line/field
  - risks/liabilities
  - laboratories performance improvements
  - determination whether to maintain DOE contractual agreements for analytical environmental services
  - thorough/comprehensive 3-day review with multiple disciplines evaluations
  - draft report at on-site close-out

DOECAP audits are at no cost to laboratories/waste facilities



### **DOECAP** Justification



- Laboratory: DOE Order 414.1D, Quality Assurance
  - Applies directly to GOCO and commercial laboratories that perform work for the DOE
- Quality Systems for Analytical Services (QSAS)
  - Establishes a single, integrated QA program for providers of laboratory services to DOE
  - Based on TNI (NELAC), Chapter 5 (based on ISO 17025) with gray boxes to address DOE specific requirements (radiochemistry, hazardous and radioactive materials management, NDA)
- TSDF: DOE Order 435.1, Radioactive Waste Management
  - Requires that DOE utilize DOE facilities to manage radioactive waste
  - However, if DOE chooses to use a non-DOE waste vendor, DOE must perform an annual qualification audit of the facility



# Results of Formalized DOE Auditing Program



#### 37 DOECAP Audits/Fiscal Year

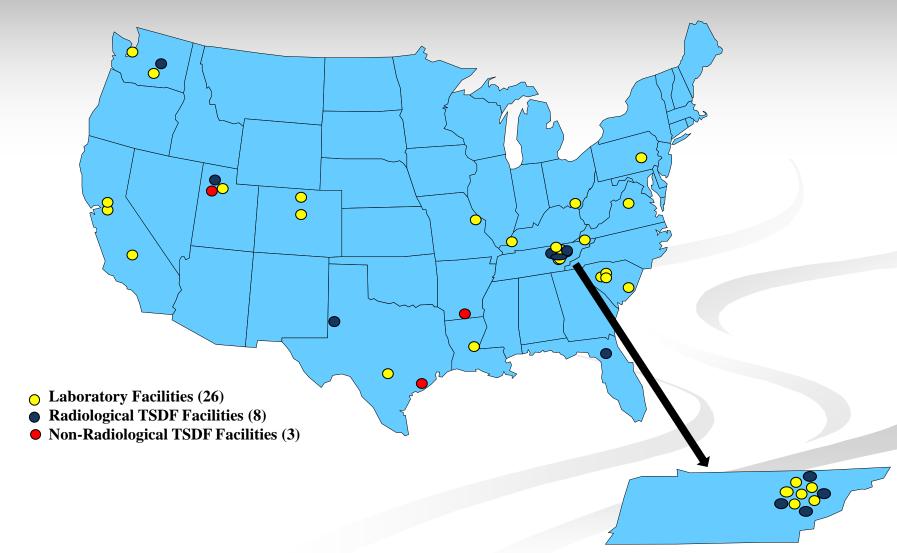
#### **FY11 DOECAP Auditing Activities**

- 26 Analytical Environmental Laboratories
  - 22 Commercial
  - 4 Government Owned Contractor Operated (GOCO)
- 11 Treatment, Storage & Disposal Facilities
  - 8 Radiological
  - 3 Non-radiological



### FY11 DOECAP Evaluated Laboratories and TSDFs







#### **Audit Areas**



#### **Laboratory**

- Quality Assurance & General Laboratory Practices
- Organic Analysis
- Inorganic Analysis
- Radiochemistry Analysis
- Laboratory Information
   Management Systems/EDD
- Hazardous and Radioactive Materials Management
- Aquatic Toxicity
- Non-Destructive Assay

#### **TSDF**

- Quality Assurance
- Sampling and Analytical Data Quality
- Waste Operations
- Environmental Compliance/Permitting
- Radiological Control
- Industrial and Chemical Safety
- Transportation Management



### FY 2011 Findings



- DOECAP conducted 37 audits in FY2011
- 85% of all FY2010 audit findings were closed during FY2011 audits:
  - 83% of the Lab findings
  - 89% of the TSDF findings
- New Findings Identified Lab & TSDF since 2006:

$$FY2006 = 269$$

$$FY2009 = 277$$

$$FY2007 = 374$$

$$FY2010 = 227$$

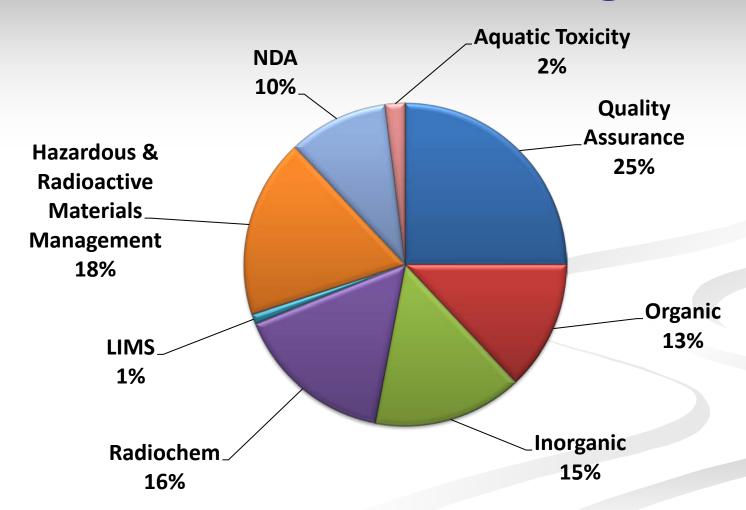
$$FY2008 = 216$$

$$FY2011 = 215$$



# Percent Distribution of FY 2011 Lab Findings







### Common Analytical Laboratory Findings



#### **Quality Assurance**

- Documentation does not meet requirements
- All required training has not been performed
- Proficiency Testing failures

#### Data Quality for Organic Analyses

- Inadequate performance of MDL studies
- Calibration is not being performed as required

#### Data Quality for Inorganic Analyses

- Inadequate SOPs or SOPs not followed
- Standards or Reagents expired or improperly labeled



### Common Analytical Laboratory Findings



#### Data Quality for Radiochemistry

- Reference library issues
- Verification and documentation failures
- Improper calibration issues

#### Laboratory Information Management System

- Spreadsheet calculations and locked cells
- Software verification and validation

#### Hazardous and Radiological Materials Management

- SOPs not followed when receiving and opening shipping coolers
- Failure to effectively implement evaluation process for waste brokers



# DoD/DOE Joint Quality Assurance Manual

- Quality Systems Manual for Analytical Services
  - DoD Benefits:
    - Expands radiochemistry methodologies
    - Sample residual and derived waste disposal, and
    - Laboratory worker Environmental Health and Safety practices
  - DOE Benefits:
    - Expands analytical methods tables
- Overall benefit to DoD/DOE is the consolidation of quality and technical requirements



### Laboratory Benefits



- Single approach to satisfy the quality and technical requirements of DoD/DOE
- Reduction in preparation time for laboratory audits
- Single Quality Manual that encompasses the DoD/DOE requirements
- Incorporation of current TNI standard and the requirements of DoD/DOE



# Fy11 Audited Laboratories DoD/DOE Jointly



#### **Audited Laboratories**

- \* BC Laboratories, Inc., Bakersfield, CA
- \* TestAmerica, Inc., Knoxville, TN
- \* Shealy Environmental Services, Inc., West Columbia, SC
- \* TestAmerica, Inc., St. Louis, MO
- \* GEL Laboratories, LLC, Charleston, SC
- \* TestAmerica, Inc., Arvada, CO
- \* TestAmerica, Inc., Richland, WA
- \* Davis and Floyd, Inc., Greenwood, SC
- \* ALS Laboratory Group, Fort Collins, CO
- \* American Radiation Services, Inc., Port Allen, LA
- \* ALS Laboratory Group, Salt Lake City, UT



## Fy11 Audited Laboratories DOE Audited Laboratories



Eberline Analytical Corporation, Oak Ridge, TN

B&W Radioisotope & Analytical Chemistry Laboratory, Lynchburg, VA

B&W Y-12 Analytical Chemistry Organization, Oak Ridge, TN

Radiological Materials Analysis Laboratory,

ORNL UT-Battelle, LLC, Oak Ridge, TN

Portsmouth Analytical Services, Piketon, OH

Caltest Analytical Laboratory, Napa, CA

Paducah Analytical Services, Paducah, KY



## Fy11 Audited Laboratories (cont)



Eberline Analytical Corporation, Richmond, CA

Materials & Chemistry Laboratory, Inc., Oak Ridge, TN

Southwest Research Institute, San Antonio, TX

Lionville Laboratory, Inc., Exton, PA

Shealy Consulting, LLC, Lexington, SC

Oak Ridge Institute for Science & Education, Oak Ridge, TN

CEBAM Analytical, Inc., Bothell, WA



### Laboratory Data Quality Review







## Unlabeled/Unknown Substance Discovered







### Observing Laboratory Worker 455

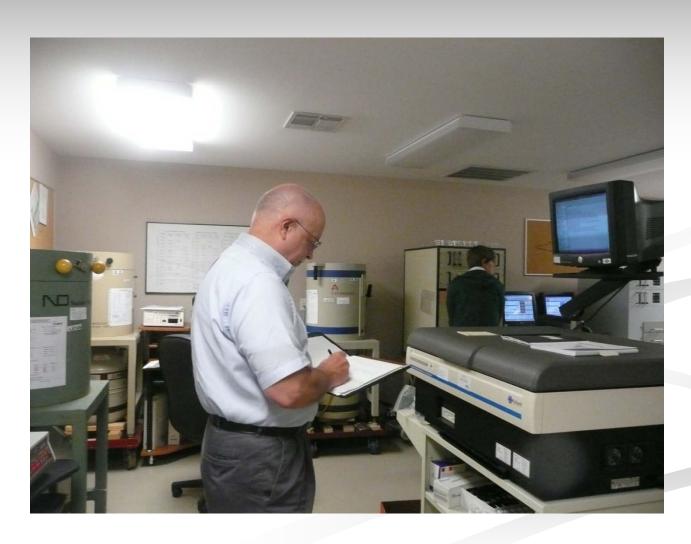






#### **Auditor at Work**







# DOECAP Program Team



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