

**INSPECTION ADMINISTRATIVE PROCEDURE**

**A-102**

**ANNOUNCED AND UNANNOUNCED INSPECTIONS  
AND RELATED INFORMATION REQUESTS**

March 21, 2003  
Revision 2

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
Verification and Confirmation Official

Concur: \_\_\_\_\_ Date: \_\_\_\_\_

---

This page intentionally left blank.

---

# **INSPECTION ADMINISTRATIVE PROCEDURE A-102, REV. 2 ANNOUNCED AND UNANNOUNCED INSPECTIONS AND RELATED INFORMATION REQUESTS**

## **1.0 PURPOSE**

This inspection procedure provides guidance for determining whether inspections will be announced or unannounced and, if necessary, to arrange to receive information in advance of performing the inspection.

## **2.0 POLICY**

The policy of the WTP Safety Regulation Division (OSR) inspection program is that inspections normally will be announced; however, with approval of the Safety Regulation Official (SRO), inspections may be unannounced if appropriate for the inspection area.

In general, during performance of an on-location inspection, inspection-related information requests should be processed informally (e.g., by telephone or in person) with more formal requests (documented by letter) only if necessary to obtain the information. If the inspection is announced, the OSR may determine obtaining key information related to a specific inspection area prior to or upon arrival on location may be necessary to conduct the inspection in an efficient and effective manner. In deciding if an information request is needed, the OSR should consider the impact a request will have on the Contractor and avoid requests resulting in major disruption of Contractor activities.

## **3.0 DEFINITIONS**

Announced Inspection: An inspection in which the OSR provides the River Protection Project Waste Treatment and Immobilization Plant (WTP) Contractor notification, usually one month in advance of the inspection.

Unannounced Inspection: An inspection in which the OSR does not notify the Contractor of the inspection until the inspector arrive at the inspection site.

## **4.0 GENERAL REQUIREMENTS**

### **4.1 ANNOUNCED INSPECTIONS**

The OSR should typically perform announced inspections to permit the Contractor to plan for inspections and avoid unnecessary impacts caused by multiple activities scheduled closely together. In addition, announcing inspections will assist the inspector in completing the objectives of an inspection by ensuring records or Contractor personnel are available when the inspector arrive at the inspection site.

Advance notification of the inspection should include only the approximate date, the broad subject area, and the number of inspectors. Examples of broad subject areas include electrical distribution system functional inspection, emergency preparedness exercise, startup testing, training, and operations. Specific inspection areas are not identified in advance. Advance notification may be made by a written communication, telephone call, or other communication with the appropriate level of management in the Contractor's organization.

If a Contractor requests deferral of an announced inspection, the OSR staff should consider the effect on the Contractor against the effect on the ability of the inspector to achieve their objective. The availability of OSR resources also should be considered.

After providing advance notification to the Contractor, the OSR may need information to prepare for the upcoming inspection. If requesting this information will indicate specific aspects of the inspection, the information should be requested close to the start of the inspection while providing sufficient time for the Contractor to gather the information. The OSR staff should usually request this information less than one month before the inspection.

## **4.2 UNANNOUNCED INSPECTIONS**

Under certain circumstances, the OSR may determine an unannounced inspection may be necessary to assess Contractor performance in an area where an announced inspection may result in providing the Contractor with the opportunity to prepare the area that will be inspected in a way that results in a non-representative inspection

In deciding when to perform an unannounced inspection, the inspector should avoid following inspection patterns and practices in such a way that a Contractor can predict when unannounced inspections will be performed. Inspection patterns may enable a Contractor to predict the time of inspections and thus prepare the working area, records, or other items for the inspection.

### **4.2.1 Patterns of Visits**

The OSR staff should schedule unannounced inspections at irregular intervals (within the constraints of inspection schedule requirements) to avoid patterns enabling the Contractor to predict the date of the inspection.

### **4.2.2 Patterns of Inspection Performance**

The inspection of the facility should start shortly after the inspector arrives at the inspection site to ensure the Contractor will not have the opportunity to prepare working areas, documents in use, and other items during the unannounced inspection,. The inspector should vary the order of onsite activities so the first several hours at the facility are not spent meeting with management and reviewing records. The inspector should process information requests and conduct required walk-through inspections or inspections of working areas as soon as practicable after arriving at

the site. When appropriate, the inspector may perform some of the inspection at times other than during the day shift.

### 4.3 INFORMATION REQUESTS

If the inspection is announced, the inspector may determine obtaining information related to a specific inspection area before or upon arrival may be necessary to conduct the inspection efficiently. In deciding if an information request is necessary, the inspector must consider the impact a request might have on the Contractor and avoid requests resulting in a major disruption in Contractor activities. The inspector should determine if the needed information is already available in the OSR office. If a request for information is deemed necessary or advantageous, the protocol detailed below should be followed.

For all formal information requests (where requests for documents or briefings are made in advance of an inspection), the Contractor should be contacted by the Verification and Confirmation Official (VCO) or the lead inspector (e.g., by telephone) and the request discussed and agreed upon. After initial contact, the request for information should be provided to the Contractor in writing in accordance with RL/REG-97-05, *Office of Safety Regulation Management Directive*, Management Directive 2.1, "Information Management." The letter should include the following:

#### 4.3.1 Document requests

- The name of the person contacted and the name of the OSR staff member who made the contact
- The reason for the request
- A clear description of the information needed
- The name of the person and/or the location where the information should be sent
- The date when the information is needed

#### 4.3.2 Briefing requests

- The name of the person contacted and the name of the OSR staff member who made the contact
- The reason for the briefing
- Key OSR and Contractor attendees

- A clear description of the information being addressed in the briefing
- The date and location of the briefing
- A discussion of the need to place any handouts in the Public Reading Room.

Attachments: None