

OFFICE OF INSPECTOR GENERAL U.S. ENVIRONMENTAL PROTECTION AGENCY

January 8, 2024

MEMORANDUM

SUBJECT: Notification:

Audit of the EPA National Center for Radiation Field Operations Preparedness

Project No. OA-FY24-0032

FROM: Nicole Pilate, Acting Director

Pollution Control and Cleanup

Office of Audit

TO: Joseph Goffman, Principal Deputy Assistant Administrator

Office of Air and Radiation

The U.S. Environmental Protection Agency Office of Inspector General plans to resume work on a previously cancelled audit regarding the EPA National Center for Radiation Field Operations', or NCRFO's, capability to respond to radiological incidents. The audit will have a slightly modified objective as compared to the objective for the cancelled audit that was started in fiscal year 2020. This audit is expected to be in the forthcoming OIG's oversight plan for fiscal year 2024. This audit addresses the following fiscal year 2024 top management challenge for the Agency: safeguarding the use and disposal of chemicals.

Our objective is to determine to what extent the EPA NCRFO has the capability—including appropriate management and internal control, resources, and staff qualifications—to successfully perform its roles and responsibilities in preparing for and responding to radiological incidents. For this audit, we plan to consider radiological incidents from two categories: radiological emergencies and assessments at sites contaminated with radioactive material. We plan to conduct work at the NCRFO; EPA headquarters, including the Office of Radiation and Indoor Air; and selected EPA regions, states, tribes, and local organizations. We will use applicable generally accepted government auditing standards to conduct our audit. The anticipated benefits of this audit include improved operational efficiency and greater human health and environmental protections.

We will contact you to arrange a mutually agreeable time to discuss our objective. At that time, we can discuss any concerns that you may have and answer any questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please provide the following information as soon as possible after receipt of this notification but no later than the date of the entrance conference:

- Documentation from all NCRFO projects that occurred from 2018 through the start of this audit.
 This should include detailed information for each project that the NCRFO conducted or incident
 that it responded to—for example, information on which staff were assigned to the project, the
 NCRFO's role in the project or response, the quality assurance project plan, and how much the
 project cost.
- All NCRFO policies and procedures, including internal and management control, for preparing for and responding to radiological incidents.
- Detailed fiscal year budgets from 2018 through 2024 that include all direct and indirect costs.
- List of equipment currently in the NCRFO's possession.
- Policies and procedures for obtaining and using emergency response equipment, if applicable.
- Documentation of the last two completed equipment inventories and reconciliations.
- Equipment utilization logs, if applicable.
- List of federal and nonfederal staff that were employed or contracted by NCRFO at any point from 2018 through the start of our audit. This list should contain the individual's title; position requirements; directorate; start date and end date, if applicable; whether they are or were part of the Radiological Emergency Response Team; and qualifications, such as degrees, trainings, and certificates.
- Posted NCRFO job announcements from 2018 through the start of our audit. Please provide the names of the hired individuals.
- List of all vacant positions, a description of the positions, and how long they have been vacant, if applicable.
- Any workforce and succession planning documents that the NCRFO has developed.
- All internal and external assessments, evaluations, and reviews, and their corrective action plans, if applicable, that occurred at the NCRFO from 2018 through the start of this audit. These may include but are not limited to Safety and Health Management System; Quality Management System; and Environmental Management System audits.
- Functional or mission statement for the NCRFO and its departments, including the Immediate Office, the Center for Radiation Preparedness and Response, and the Center for Planning and Training.

We respectfully note that the Inspector General Act of 1978, as amended, authorizes the OIG to have timely access to personnel and all materials necessary to complete our objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in a May 16, 2023, email to EPA employees, stated that the "agency and its employees have a duty to cooperate with OIG" and observed that "full engagement and collaboration between the OIG and EPA provides our agency with the opportunity to improve program performance and efficiency." If an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG, we will request that you immediately resolve the situation. Consistent with the Inspector General Act, we may report unresolved access matters to the administrator and to Congress.

We will post this memorandum on our public website at www.epaoig.gov. Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this audit should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the "OIG Hotline" webpage.

cc: Janet McCabe, Deputy Administrator

Dan Utech, Chief of Staff, Office of the Administrator

Wesley J. Carpenter, Deputy Chief of Staff for Management, Office of the Administrator

Elizabeth Shaw, Deputy Assistant Administrator, Office of Air and Radiation

Jonathon Edwards, Director, Office of Radiation and Indoor Air

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