

What to Know When Adding DOECAP-AP Accreditation to a DoD-ELAP Accredited Laboratory (Rev. December 2023)

True or False? DOE only wants radiological analysis performed at commercial laboratories. ANSWER: False. Of the accredited 23 laboratories in the DOE Consolidated Audit Program - Accreditation Program (DOECAP-AP), 12 laboratories perform routine and project specific non-radiological analysis. Many opportunities exist for non-radiochemistry laboratories to support projects involving routine compliance monitoring, site characterization, process control testing, and remediation for matrices such as drinking water, non-potable water, soil, tissue and/or air.

True or False? DOE only has a very small amount of non-radiological commercial laboratory contracts in play. ANSWER: False. There are 160 individual laboratory contracts around the country between commercial laboratories and the DOE. Currently, there are 47 contracts out of the 163 individual commercial laboratory contracts that total over \$44.5 million in annual spending for non-radiochemistry testing activity.

Is there a need for PFAS analysis by the DOE? YES. In keeping with recent developments in PFAS analysis requirements, as described within the Department's PFAS Strategic Roadmap: DOE Commitments to Action 2022-2025, the demand for PFAS analysis is anticipated to exceed current laboratory capacity in non-radiochemistry analytical needs. There will also be an increased need for mixed PFAS + radiological analysis.

My Laboratory already has DoD-ELAP accreditation. What will it take to increase my scope to include DOECAP-AP accreditation? ANSWER: Not as much as you think. Keep in mind that the combined DoD/DOE Quality Systems Manual (QSM) is utilized by both agencies. While the QSM does have some DOE only requirements, the majority of the QSM is shared. In other words, your DoD-ELAP accreditation meets approximately 92% of the DOECAP-AP accreditation criteria. The costs and specific details of adding DOECAP-AP to your list of federal agency accreditations is dependent on the laboratory's scope and the accrediting body pricing. The DOE sites and/or their Prime Contractors contract directly with laboratories and often use a "Best Value Approach" in their laboratory selection.

What about radioactive samples?

DOE sites must screen and declare if samples possess radioactivity prior to leaving the site. Sites that show samples to have levels of radioactivity can only contract those samples with a laboratory that possess a radioactive materials license. Laboratories that do not possess a license must properly screen, identify, log and handle suspected radioactive samples in accordance with Module 2 Section 9.1.6.c of QSM Version 6.0.

Please refer to this Table 1-1 which provides a summary of key differences between the requirements under QSM 6.0.

Note: All requirements are the same except where noted below

Table 1-1 DoD ELAP vs DOECAP-AP Accreditation Requirements

QSM 6.0 requirement for Non-Radiochemistry Testing	DoD ELAP (QSM 6.0)	DOECAP-AP (QSM 6.0)	Comments
Assessor time to add DOECAP-AP	DoD ELAP accreditation is in place.	Add approximately 0.5 to 1.0 days (4 to 10 hours) to assess DOE Only requirements and M2 Section 9, HRMM requirements.	Billed rates for accreditation and travel costs are to be established between the laboratory and the accrediting body

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QSM 6.0 Requirement for Non-Radiochemistry Testing	DoD ELAP (QSM 6.0)	DOECAP-AP (QSM 6.0)	Comments
			selected by the laboratory.
M1 4.7.3.a:	DoD ELAP requirement is to notify AB in writing.	(DOE-only requirement) The laboratory shall also submit this information in writing to all impacted DOE Customers. DOECAP requirement is to notify AB and all impacted DOE customers in writing.	Minimal impact for non-radiological testing laboratories.
M2 5.2.1; 5.2.1.a-f:	This is not a requirement under DoD ELAP.	DOECAP requirement for technical manager including duties and responsibilities.	Minimal impact for non-radiological testing laboratories.
M2 5.2.2; 5.2.2.a-i:	This is not a requirement under DoD ELAP.	DOECAP requirement for quality manager including duties and responsibilities.	Minimal impact for non-radiological testing laboratories.
M2 6.2.8:	This is not a requirement under DoD ELAP.	DOECAP-AP requirement for technical manager educational and experience qualifications.	Minimal impact for non-radiological testing laboratories.
M2 6.2.9:	This is not a requirement under DoD ELAP.	DOECAP-AP requirement for quality manager educational and experience qualifications.	Minimal impact for non-radiological testing laboratories.
M2 6.3.4.f:	This is not a requirement under DoD ELAP.	DOECAP-AP requirement for a laboratory safety inspection program.	This is critical to DOE operational safety and the protection of the worker, the environment, and the public.
M2 6.6.2.f M2 6.6.2.f.vii: date opened.	M2 6.6.2.f; 6.6.2.f.i-vi are requirements under DoD ELAP. M2 6.6.2.f.vii is not a requirement under DoD ELAP.	Additional DOECAP-AP requirement to include date opened in the required records for services and supplies that may affect the quality of environmental tests.	Minimal impact for non-radiological testing laboratories.
M2 7.2.1.2.c.ii.g-h:	M2 7.2.1.2.c.ii.g-h are not requirements under DoD ELAP.	Additional items to be included or referenced in the instructions for all accredited methods.	Minimal impact for non-radiological testing laboratories.

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QSM 6.0 Requirement for Non-Radiochemistry Testing	DoD ELAP (QSM 6.0)	DOECAP-AP (QSM 6.0)	Comments
M2 7.2.1.2.e:	M2 7.2.1.2.e is not a requirement under DoD ELAP.	DOECAP-AP requirement for the laboratory to track authorized departures from procedures and periodically evaluate if a formal procedure appropriate	Minimal impact for non-radiological testing laboratories.
M2 7.4.23.c:	M2 7.4.23.c is not a requirement under DoD ELAP.	DOECAP-AP requirement for the have records of the disposal of samples, digestates, leachates and extracts or other sample preparation methods and what is required in those records. Note: Further instructions on waste management and disposal are contained in M2 section 9.0 of QSM v6.0.	Minimal impact for non-radiological testing laboratories.
M2 8.2.1.a.xxxii-xxxiii:	M2 8.2.1.a.xxxii-xxxiii are not requirements under DoD ELAP.	Additional DOECAP-AP requirements to be addressed in the quality manual.	These plans are critical to DOE operational safety and the protection of the worker, the environment, and the public.
M2 8.2.3.a:	M2 8.2.3.a is not a requirement under DoD ELAP.	DOECAP-AP requirement to adopt TNI 2016 V1M2 4.2.8.3 requirement.	Minimal impact for non-radiological testing laboratories.
M2 8.4.5:	M2 8.4.5 is not a requirement under DoD ELAP.	DOECAP-AP requirement for records disposal procedures.	Minimal impact for non-radiological testing laboratories.
M2 8.8.7:	M2 8.8.7 is not a requirement under DoD ELAP.	DOECAP-AP requirement for the laboratory QA program to identify the required internal distribution of internal audit reports and all related records.	Minimal impact for non-radiological testing laboratories.
M2 8.9.6:	M2 8.9.6 is not a requirement under DoD ELAP.	DOECAP-AP requirement to include laboratory radiation health and safety, radioactive hazardous waste, and radioactive materials management functions in management reviews, where applicable.	No impact for non-radiochemistry laboratories.
M2 8.9.8:	M2 8.9.8 is not a requirement under DoD ELAP.	DOECAP-AP requirement for the laboratory QA program to identify the required internal distribution of management review reports and all related records.	Minimal impact for non-radiological testing laboratories.

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QSM 6.0 Requirement for Non-Radiochemistry Testing	DoD ELAP (QSM 6.0)	DOECAP-AP (QSM 6.0)	Comments
M2 Section 9.0 Hazardous and Radioactive Materials Management and Health and Safety Practices (DOE-Only Requirement) 9.1 9.2 9.3 9.4 9.5 9.6	M2 Section 9.0 is not a requirement under DoD ELAP.	DOECAP-AP HRMM requirements.	Section 9.1 is not applicable to non-radiochemistry testing. No impact for non-radiological testing laboratories.