

## **10 CFR Part 71 QA Program for Industrial Radiography Licensees**

### **1.0 Organization**

The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with Kooney X-Ray, Inc. Design and fabrication shall not be conducted under this QA Program. The QA Program is implemented using the following organization:

**Radiation Safety Director** - Responsible for procurement of equipment.

**Radiation Safety Officer** - Responsible for quality assurance and radiation safety.

The Radiation Safety Officer is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, test and operating status, and recordkeeping.

### **2.0 Quality Assurance Program**

The management of Kooney X-Ray, Inc. establishes and implements this QA Program. Training, prior to engagement, for all QA functions is required according to written procedures. QA Program revisions will be made according to written procedures and with management approval. The QA Program will ensure that all defined QA procedures, engineering procedures, and specific provisions of the packaging design approval are satisfied. The QA Program will emphasize control of the characteristics of the package which are critical to safety.

The Radiation Safety Officer shall assure that all radioactive material shipping packages are designed and manufactured under a QA Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after January 1, 1979. This requirement will be satisfied by receiving a certification to this effect from the manufacturer of the package.

### **3.0 Document Control**

All documents related to a specific shipping package will be controlled through the use of written procedures. All document changes will be performed according to written procedures and approved by management.

The Radiation Safety Officer shall assure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

#### **4.0 Handling, Storage, and Shipping**

Written safety procedures concerning the handling, storage, and shipping of packages for radioactive material will be followed. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed. Work instructions will be provided for handling, storage, and shipping operations.

#### **5.0 Inspection, Test, and Operating Status**

Inspection, test, and operating status of packages for radioactive material will be indicated and controlled by written procedures and shall conform to those items identified in 10 CFR Part 34. Status will be indicated by tag, label, marking, or log entry. Status of nonconforming parts or packages will be positively maintained by written procedures.

#### **6.0 Quality Assurance Records**

Records of package approvals (including references and drawings), procurement, inspections, tests, operating logs, audit results, and records of shipments will be maintained. Descriptions of equipment, written procedures, and records of personnel training and qualifications will be retained for three years beyond the date the activity ends, for which this QA Program was developed.

These records will be maintained in accordance with written procedures. The records will be identified and retrievable. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

#### **7.0 Audits**

Established schedules of audits of the QA Program will be performed using written check lists. Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once per year. Audit reports will be maintained as part of the quality assurance records. Members of the audit team shall have no responsibility in the activity being audited.

## **10 CFR Part 71 QA Program for Industrial Radiography Licensees**

### **1.0 Organization**

The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with Kooney X-Ray, Inc. Design and fabrication shall not be conducted under this QA Program. The QA Program is implemented using the following organization:

**Radiation Safety Director** - Responsible for procurement of equipment.

**Radiation Safety Officer** - Responsible for quality assurance and radiation safety.

The Radiation Safety Officer is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, test and operating status, and recordkeeping.

### **2.0 Quality Assurance Program**

The management of Kooney X-Ray, Inc. establishes and implements this QA Program. Training, prior to engagement, for all QA functions is required according to written procedures. QA Program revisions will be made according to written procedures and with management approval. The QA Program will ensure that all defined QA procedures, engineering procedures, and specific provisions of the packaging design approval are satisfied. The QA Program will emphasize control of the characteristics of the package which are critical to safety.

The Radiation Safety Officer shall assure that all radioactive material shipping packages are designed and manufactured under a QA Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after January 1, 1979. This requirement will be satisfied by receiving a certification to this effect from the manufacturer of the package.

### **3.0 Document Control**

All documents related to a specific shipping package will be controlled through the use of written procedures. All document changes will be performed according to written procedures and approved by management.

The Radiation Safety Officer shall assure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

#### **4.0 Handling, Storage, and Shipping**

Written safety procedures concerning the handling, storage, and shipping of packages for radioactive material will be followed. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed. Work instructions will be provided for handling, storage, and shipping operations.

#### **5.0 Inspection, Test, and Operating Status**

Inspection, test, and operating status of packages for radioactive material will be indicated and controlled by written procedures and shall conform to those items identified in 10 CFR Part 34. Status will be indicated by tag, label, marking, or log entry. Status of nonconforming parts or packages will be positively maintained by written procedures.

#### **6.0 Quality Assurance Records**

Records of package approvals (including references and drawings), procurement, inspections, tests, operating logs, audit results, and records of shipments will be maintained. Descriptions of equipment, written procedures, and records of personnel training and qualifications will be retained for three years beyond the date the activity ends, for which this QA Program was developed.

These records will be maintained in accordance with written procedures. The records will be identified and retrievable. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

#### **7.0 Audits**

Established schedules of audits of the QA Program will be performed using written check lists. Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once per year. Audit reports will be maintained as part of the quality assurance records. Members of the audit team shall have no responsibility in the activity being audited.