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Alpha-Omega Services, Inc.

Where Quality Means Exceeding Expectations

January 8, 2008

Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

CHANGE IN POINT OF CONTACT

Due to the departure of Cary Hedger from Alpha-Omega Services, Inc., please change our point of contact for the Model 5979 Package Certificate of Compliance and the related Quality Assurance Program direct all communications to:

Troy Hedger, CEO/Vice-President
Alpha-Omega Services, Inc.
9156 Rose Street
Bellflower, CA 90706

In addition, the enclosed copy of our Quality Assurance Program, document PR9000 Rev C, reflects the proposed edits to reflect the change in personnel as follows:

1. Section 1.3 - Changed "President" to "CEO or his designee"
2. Section 1.4.9 - Changed "President" to "CEO or his designee"
3. Figure 1.1 - Removed Cary Hedger

Regards

Troy Hedger
CEO, Vice-President

Enclosure: Proposed Quality Assurance Program PR9000 Rev C document

9156 Rose Street • P.O. Box 789 • Bellflower, California, U.S.A. 90706
Customer Service (800) 346-7894 • (562) 804-0604 • Fax: (562) 804-0610
www.alpha-omegaserv.com

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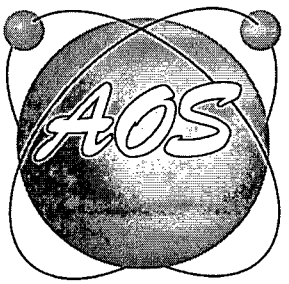
Alpha-Omega Services, Inc.



PR9000

Quality Assurance Program

Radioactive Material Packaging

Quality Assurance Program
Radioactive Material Packaging

1.0 Organizations and Responsibilities

1.1 Alpha-Omega Services, Inc. is responsible for the establishment and maintenance of a Quality Assurance Program covering the organization's activities pertaining to the design, fabrication, assembly, testing, use, maintenance, and repair of all shipping packages containing radioactive materials for which AOS is a registered user or owner.

1.2 An organization chart of Alpha-Omega Services, Inc. is shown on Figure 1.1 indicating those positions within the organization having primary Quality Assurance responsibilities described in subsequent portions of this program.

1.3 The CEO or his designee has the following responsibilities:

1.3.1 Communicate to all responsible organizations and individuals that 1) implementing and enforcing QA policies, and 2) establishing and maintaining QA procedures and manuals are mandatory requirements.

1.3.2 Resolve disputes involving quality that arise from a difference of opinion between QA/QC personnel and personnel from other functions.

1.3.3 Initiate and approve the Quality Assurance Program.

1.3.4 Require an annual review and assessment of the effectiveness of the Quality Assurance Program.

1.3.5 Approve all changes to documents and specifications that are included in the Quality Assurance Program.

1.4 The Quality Assurance Manager has the following responsibilities in relationship

to the Quality Assurance Program.

1.4.1 Develop and maintain the Quality Assurance Program and associated Standard Operating Procedures.

1.4.2 Conduct an annual review and assessment of the effectiveness of the Quality Assurance Program.

1.4.3 Insure that a proper training program is included as part of the operations of the organization in accordance with AOS Radioactive Material Packaging Standard Operating Procedure PR9002 Personnel Training.

1.4.4 Is responsible for the monitoring of all activities performed under the Quality Assurance Program. Possess the authority to stop any work, which fails to conform to the appropriate quality requirements.

1.4.5 Insure that any subcontracted work is performed to quality plan that is consistent with that approved for use by AOS.

1.4.6 Insure that all pertinent quality information is included on drawings, specifications, procedures, and procurement documents.

1.4.7 Is responsible for initiation and maintenance of operation procedures as required by the Quality Assurance Program.

1.4.8 Is responsible for maintaining those records required by the program pertaining to packaging design, construction, testing, maintenance, repair, and shipping. And, shall make said records available to those authorized to inspect them.

1.4.9 Apprise the CEO or his designee of the effectiveness of the Quality Assurance Program.

1.5 The Field Engineer is responsible for completing those records related to the shipping of radioactive materials in packaging that are the responsibility of AOS, as required by the Quality Assurance Program.

Quality Assurance Matrix

Radioactive Material Packaging

Implementing Procedure	Title	Regulatory Position
PR9000	Quality Assurance Organization	1
PR9000	Quality Assurance Program	2
PR9002	Personnel Training	2
PR9003	Package Design Control	3
PR9004	Procurement Document Control & Purchased Materials, Equipment, and Services Control	4
PR9009	Instructions, Procedures, and Drawings	5
PR9001	Document Control	6
PR9004	Procurement Document Control & Purchased Materials, Equipment, and Services Control	7
PR9019	Receiving and Inspection of Incoming Material	7
PR9005	Identification of Materials, Parts, and Components	8
PR9014	Control of Special Processes	9
PR9013	Internal Inspection	10
PR9015	Test Control	11
PR9007	Measuring and Test Equipment Control	12
PR9008	Handling, Storage, and Shipping Control	13
PR9005	Identification of Materials, Parts, and Components	14
PR9010	Non-Conforming Materials, Parts, or Components	15
PR9011	Corrective and Preventive Action	16
PR9012	Quality Assurance Records	17
PR9006	Audits	18

Table 1.1

ALPHA-OMEGA SERVICES, INC ORGANIZATIONAL CHART

Radioactive Material Packaging

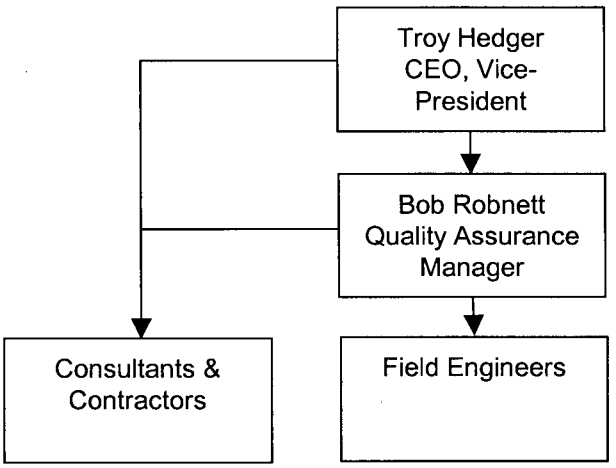


Figure 1.1

2.0 Quality Assurance Program

2.1 The Quality Assurance Program has been established and implemented by Alpha-Omega Services, Inc. according to the organization described in Section 1.0. This program emphasizes control over those features of the shipping packaging designed, constructed, tested, and/or used by AOS, which perform safety related functions. To ensure that this control is provided, the QA program is executed in accordance with those programmatic requirements described in the following sections of this plan. All Quality Assurance functions are initiated and implemented by qualified personnel. All components, structure and systems as established by FM9101 Maintenance Inspection Check List, in combination with these written procedures are to ensure all matters related to safety are adequately covered.

2.2 Revisions to the Quality Assurance Plan are documented in accordance with AOS Radioactive Material Packaging Standard Operating Procedure PR9001 Document Control.

2.3 The Quality Assurance Program ensures that all defined quality control procedures, engineering procedures, applicable regulations, and specific provisions of the packaging design approval documents are satisfied.

2.4 An indoctrination and training program has been established as described in AOS Radioactive Material Packaging Standard Operating Procedure PR9002 Personnel Training such that:

2.4.1 Personnel responsible for performing quality-related functions are instructed as to the purpose, scope, and implementation of the Quality Assurance Procedures and instructions.

2.4.2 Personnel performing quality-affecting activities are trained and qualified in the principles and techniques of the activity being performed.

2.4.3 The scope, objectives, and method of implementing the indoctrination and training program are documented.

2.4.4 Proficiency of personnel performing quality-affecting activities is maintained by retraining, reexamination, and/or recertification.

3.0 Package Design Control

3.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9003 Package Design Control establishes measures to ensure that the applicable codes, standards, regulatory requirements, inspection and test criteria, operational and maintenance requirements, handling and storage are translated into drawings, specifications, and procedures.

3.2 All design documents (i.e. specifications, drawings and procedures) are reviewed and approved to indicate satisfaction of said requirements in accordance with AOS Radioactive Material Packaging Standard Operating Procedure PR9003 Package Design Control.

3.3 AOS Radioactive Material Packaging Standard Operating Procedure PR9001 Document Control establishes measures for controlling design document preparation, review, distribution, and revision.

3.4 AOS Radioactive Material Packaging Standard Operating Procedure PR9003 Package Design Control describes measures to establish design verification criteria.

4.0 Procurement Document Control

4.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9004 Procurement Document Control & Control of Purchased Material, Equipment, and Services establishes measures to ensure that safety-related and quality assurance requirements are contained in the appropriate procurement

documents.

4.2 AOS Radioactive Material Packaging Standard Operating Procedure PR9004 Procurement Document Control & Control of Purchased Material, Equipment, and Services establishes measures to ensure suppliers and contractors are qualified and approved prior to use.

5.0 Instructions, Procedures and Drawings

5.1 AOS has established a system of documented instructions, procedures and drawings pertaining to all quality activities to include:

5.1.1 Activities important to safety are prescribed and accomplished in accordance with approved instructions, procedures, and drawings in accordance with AOS Radioactive Material Packaging Standard Operating Procedure PR9009 Instructions, Procedures, and Drawings.

5.1.2 A matrix of procedures to comply with the 18 criteria of SUBPART H to CFR Part 71 are listed in Table 1.1.

5.1.3 Inclusion of inspection steps to allow for quality control inspections of work in progress.

5.1.4 Quantitative and qualitative acceptance criteria for determination that all quality activities relating to safety are met.

6.0 Document Control

6.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9001 Document Control establishes procedures to control the creation, issuance, distribution, and change of documents, which prescribe all activities affecting quality.

7.0 Control of Purchased Materials, Equipment, & Services

7.1 The Quality Assurance Manager evaluates all suppliers to determine their ability to comply with the appropriate parts of SUBPART H to CFR Part 71, as described in AOS Radioactive Material Packaging Standard Operating Procedure PR9004 Procurement Document Control & Control of Purchased Material, Equipment, and Services, as necessary.

7.2 AOS has established a receiving and inspection program to verify that the delivered materials, equipment or services are in compliance with the procurement documents as described in AOS Radioactive Material Packaging Standard Operating Procedure PR9019 Receiving and Inspection of Incoming Material.

7.3 The Quality Assurance Manager shall assess and document the effectiveness of the control of quality by contractors and subcontractors at intervals consistent with the importance, complexity, and quantity of the product as described in AOS Radioactive Material Packaging Standard Operating Procedure PR9004 Procurement Document Control & Control of Purchased Material, Equipment, and Services.

8.0 Identification/Control of Materials, Parts & Components

8.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9005 Identification and Control of Materials, Parts, and Components establishes measures for the identification and control of materials, parts, and components. These measures ensure identification and traceability as required throughout the fabrication, installation, and use of the item.

9.0 Control of Special Processes

9.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9014 Control of Special Processes establishes measures to ensure that special

processes (i.e. welding, heat treating, etc.) are controlled and accomplished by qualified personnel, using qualified methods, in accordance with the appropriate codes, standards, and regulations.

10.0 Internal Inspection

10.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9013 Internal Inspection establishes a program for inspection of all activities affecting quality to verify conformance to the documented instructions, procedures, and drawings.

11.0 Test Control

11.1 As required the AOS shall establish and implement specific testing programs to assure that all testing required to demonstrate performance of specific packaging components are identified, documented, and performed as described in AOS Radioactive Material Packaging Standard Operating Procedure PR9015 Test Control.

12.0 Control of Measuring & Test Equipment

12.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9007 Measuring and Test Equipment Control establishes a program for the control of measuring and test equipment inspection.

13.0 Handling, Storage & Shipping

13.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9008 Handling, Storage, and Shipping Control establishes measures to control, in accordance with instructions, handling, storage, shipping, cleaning, maintenance, and preservation of materials and equipment to be used in packaging.

14.0 Inspection Test, and Operating Status

14.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9005 Identification and Control of Materials, Parts, and Components establishes measures to indicate the status of inspections, tests, and maintenance.

15.0 Control of Non-Conforming Materials, Parts or Components

15.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9010 Non-Conforming Materials, Parts, or Components establishes measures to control materials, parts, and components that do not conform to requirements to prevent their inadvertent use or installation.

16.0 Corrective Action

16.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9011 Corrective and Preventive Action establishes a system to ensure deficiencies, deviations, defective material and equipment, and any other nonconformances which affect quality are identified and corrected.

17.0 Quality Assurance Records

17.1 All Quality Assurance records shall be maintained and retained in accordance with AOS Radioactive Material Packaging Standard Operating Procedure PR9012 Quality Assurance Records and 10 CFR §71.135.

18.0 Audits

18.1 AOS Radioactive Material Packaging Standard Operating Procedure PR9006 Audits establishes a comprehensive annual audit of the AOS Quality Assurance Program to verify compliance with all applicable regulations, codes, standards, and all aspects of the quality assurance program.