

NEUTRON PRODUCTS inc

22301 Mt. Ephraim Road, P. O. Box 68
Dickerson, Maryland 20842 USA
301-349-5001 FAX: 301-349-5044
e-mail: neutronprod@erols.com

June 23, 2008

ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Re: Neutron Products inc. Quality Assurance Program
Approval No. 0121
Neutron's request for Renewal dated August 21, 2007

Dear Sir:

Enclosed are four (4) pages of our Quality Assurance program renewal, originally submitted on May 16, 2008, which have been edited for clarity. We request that these pages, numbers 14, 18, 19 and 20, replace the pages that you currently have.

We look forward to receiving the requested renewal. If there are any questions regarding the replacement of these 4 pages, please let me know.

Sincerely,
Neutron Products inc.



Jerry L. Fogle
Q A Manager Radioactive Transportation

JLF

0004

- 4.2.5 For persons performing special processes requiring certification by a standards setting organization, the QA Manager Radioactive Transportation shall obtain and document proof of certification, including the period and terms of the certification's validity.

4.3 Design Control

- 4.3.1 Prior to the design, redesign, modification, or changes/revisions of any packaging which falls within the scope of this program occurring after the effective date of this revision, a documented procedure shall be established and maintained for design control.

- 4.3.2 This procedure shall address control of:

4.3.2.1 The design process, including:

- measures to ensure that packaging designs are reviewed to emphasize critical parameters that can be controlled by test or inspection;
- identification of test and inspection criteria and quality standards; and,
- document and data control for all drawings and specifications to assure that:
 - design documents and data are checked, reviewed and approved;
 - revisions to the design process shall be reviewed by an independent reviewer in the same manner as the original design process;
 - documents and data are issued and distributed to all appropriate parties;
 - obsolete documents and data are withdrawn from use in such a way as to prevent their inadvertent use;
 - master and original copies are controlled; and,
 - current "as-built" configurations are documented and such documents are controlled and maintained.

4.3.2.2 Control of design input, including

- measures to assure that appropriate codes and standards are used in the design of packaging;
- that all design parameters, e.g., shielding, heat transfer, and decontamination are properly considered at all steps in the design process; and,

- appropriate references to applicable programs, procedures, regulations, codes, standards, etc.
- identification of pertinent personnel and their responsibilities and authorities
- information necessary to accomplish the required task in sufficient detail as to assure an acceptable result
- identification of hold points, i.e., steps in a process where work is halted to allow for inspection or testing before continuing, and witness points, i.e., steps in a process which shall be directly observed by QA/QC personnel
- quantitative and/or qualitative acceptance criteria used to verify that the activity has been accomplished safely in accordance with the prescribed procedure. Acceptance criteria shall be derived from the applicable Certificate of Compliance and/or design documents.

Note: Quantitative criteria include: dimensions, tolerances, dose rates, weights, and other properties which can be measured. Qualitative criteria include conditions, such as, "free from defect," or workmanship samples which are evaluated by inspection and comparison.

- occupational and radiation safety requirements
- record generation and maintenance requirements

4.5.4 In general, procedures, drawings, and instructions shall be prepared by individuals who are knowledgeable of the pertinent processes, requirements, etc. Procedures may undergo several internal and/or external critiques and rewrites prior to the review required under Sec. 4.5.5

4.5.5 All procedures, instructions, drawings, and other documents which fall within the scope of this section including, but not limited to: special process procedures, inspection plans, calibration procedures, test procedures, and manufacturing plans (especially witness and hold points) shall undergo review and approval. The review shall include:

- A review of content to verify compliance with applicable Certificates of Compliance, design documentation, and other applicable criteria, and that the document is otherwise adequate for its intended purpose. This review shall be conducted by at least one individual knowledgeable of the relevant documents and processes; and,
- A review of content to verify compliance with applicable regulations and this QA program and the Radiation Safety Program. This review shall be conducted by

the QA Manager Radioactive Transportation and/or the appropriate Radiation Safety Officer.

At least one reviewer shall be independent of the individuals who authored the document.

- 4.5.6 Final review and approval of a document shall be indicated by dated signature of the individual(s) conducting the review on the cover or drawing block of the original. The QAMRT, or his qualified designee, shall always perform final review and approval.
- 4.5.7 No procedure, instruction, or drawing shall be distributed or used without valid approval signatures.
- 4.5.8 Revisions to procedures, instructions, and drawings shall undergo the same review process, by individuals employed in the same job functions, or their equivalents.

Note: In addition to the review required under this section, an independent review of certain procedures by the Radiation Safety Committee may be required under the Radiation Protection Program.

4.6 Document Control

- 4.6.1 This Quality Assurance Program, its implementing procedures, and other documents within the scope of this program shall be subject to document control to assure that the most current revision of any pertinent document is available at the point of use and that obsolete documents are withdrawn. These documents shall include, but are not necessarily limited to:
 - this program,
 - design documents, including: drawings, specifications, and fabrication instructions,
 - operating, maintenance, and modification procedures,
 - inspection and test procedures,
 - all procedures specifically prescribed by this program, and,
 - documents related to the disposition of nonconformances.
- 4.6.2 A documented procedure shall be established and maintained for document control, such that:

- Documents which have not undergone review and approval pursuant to Sec. 4.5 are not distributed for use;
- Each document clearly identifies its revision number and effective date;
- All copies of documents distributed for use are identified by a stamped control number;
- Any "uncontrolled" copies issued for other purposes are clearly marked, "UNCONTROLLED COPY;"
- Obsolete originals and control copies are retrieved from their point of use. Obsolete originals and control copies shall be destroyed or clearly marked "OBSOLETE". (An archive copy is retained in accordance with Sec. 4.17.) For control copies sent off-site, a written communication to the individual or organization to whom they were distributed advising them that the document is obsolete, is no longer valid for use, and should be destroyed or returned, is an appropriate alternative; and,
- A master list of document status including the current revision and effective date and the location of all control copies shall be maintained.

4.6.3 Procurement documents shall be controlled in accordance with Sec. 4.4.

4.7 Control of Purchased Material, Equipment and Services

4.7.1 The procurement process includes the following steps, as applicable:

- Development of a request for quotation in accordance with Sec. 4.4.
- Review and approval of the RFQ
- Identification of prospective vendors, including preliminary assessment of their QA program's compliance with applicable criteria of 10CFR71, Subpart H.
- Distribution of RFQ to prospective vendors
- Preliminary evaluation of quotation
- Selection of vendors for audit and inspection
- Vendor (and sub-vendor) evaluation including as applicable, inspection of the vendor's facility, review of their QA program and applicable procedures, and survey of the vendor's quality related records