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RECORD #60

TITLE: ...Scope of QA Programs for Transport Packages Pursuant to
10 CFR 50, Appendix B

FICHE: 25535-041

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file

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

JUNE 21, 1984

IE INFORMATION NOTICE NO. 84-50: CLARIFICATION OF SCOPE OF QUALITY ASSURANCE PROGRAMS FOR TRANSPORT PACKAGES PURSUANT TO 10 CFR 50, APPENDIX B

Addressees:

All nuclear power reactor facilities holding an operating license (OL) or construction permit (CP).

Purpose:

To help eliminate any confusion as to the applicability of the quality assurance provisions of Appendix B, 10 CFR 50 to certain transport packages for which a quality assurance program is required by the provisions of 10 CFR 71. It is expected that addressees will review the information provided in this notice for applicability to their program. Suggestions contained in this information notice do not constitute NRC requirements and therefore, no specific action or written response is required.

Background:

Pursuant to 10 CFR 71.12(b), 71.14(b), and 71.16(c)(2), licensees who transport or deliver to a carrier for transport certain transport packages are required to have an NRC-approved quality assurance (QA) program. Such a program must have been approved as satisfying the applicable provisions of 10 CFR 71 Subpart H (formerly Appendix E). An applicant's request for such a program approval must be in accordance with 10 CFR 71.101(c). Also, pursuant to 10 CFR 71.101(b) [formerly 10 CFR 71.51], each licensee must establish, maintain, and execute a quality assurance program that satisfies each of the applicable criteria of Subpart H. Under the provisions of 10 CFR 71.101(f), however, a licensee may utilize a QA program which has already been approved pursuant to 10 CFR 50, Appendix B, provided that the QA program is established, maintained and executed with regard to transport packages. Therefore, an Appendix B program is acceptable in lieu of one approved specifically under Subpart H.

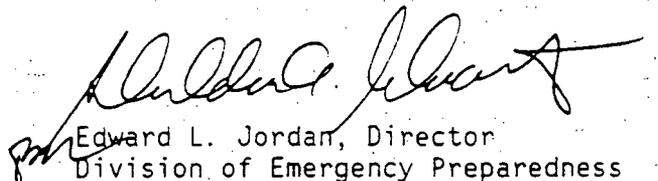
Discussion:

Past inspections of transportation activities and the associated QA programs of nuclear utilities have sometimes revealed a generic inadequacy regarding implementation by licensees of Commission-approved, 10 CFR 50, Appendix B, QA programs for transport packages. Specifically, this inadequacy usually is evidenced by nonexistent or deficiently written QA audits for transport packages. Apparently some licensees have erroneously concluded that the previous

NRC approval of the 10 CFR 50, Appendix B, program implies fulfillment of the implementing QA requirements for transport packages, without reservation.

Several of the criteria of 10 CFR 50, Appendix B, or 10 CFR 71, Subpart H, are programmatic (e.g., control of measuring and test equipment, document control). For these criteria, the associated implementing procedures may sometimes be common for both transport packaging and nontransport activities. Certain other aspects, however, are distinctly packaging related (e.g., procedures controlling procurement of packaging; preparation of packaging for use, loading, and unloading the packagings; maintenance of the packaging, QA records, audits, checklists). Consequently, the utility QA program must include and address all of the applicable elements for transport packages to meet the intent of 10 CFR 71.101(f). Licensees should not automatically assume that such implementing procedures developed for Appendix B are adequate for transport packages unless such procedures do, in fact, address transport packages.

Recipients of this notice should review the information discussed for possible applicability to their quality assurance program for transport packages. No written response to this information notice is required. If you desire additional information regarding this matter, contact the Regional Administrator of the appropriate NRC regional office or this office.


Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

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Attachment:
List of Recently Issued IE Information Notices

Attachment
IN 84-50
June 21, 1984

LIST OF RECENTLY ISSUED
IE INFORMATION NOTICES

Information Notice No.	Subject	Date of Issue	Issued to
84-49	Intergranular Stress Corrosion Cracking Leading to Steam Generator Tube Failure	06/18/84	All power reactor facilities holding an OL or CP
84-48	Failures of Rockwell International Globe Valves	06/18/84	All power reactor facilities holding an OL or CP
84-47	Environmental Qualification Tests of Electrical Terminal Blocks	06/15/84	All power reactor facilities holding an OL or CP.
84-46	Circuit Breaker Position Verification	06/13/84	All power reactor facilities holding an OL or CP.
84-45	Reversed Differential Pressure Instrument Sensing Lines	06/11/84	All power reactor facilities holding an OL or CP
84-44	Environmental Qualification Testing of Rockbestos Cables	06/08/84	All power reactor facilities holding an OL or CP
84-43	Storage and Handling of Ophthalmic Beta Radiation Applicators	06/07/84	All medical licensees
84-42	Equipment Availability for Conditions During Outages Not Covered by Technical Specifications	06/05/84	All power reactor facilities holding an OL or CP
84-41	IGSCC in BWR Plants	06/01/84	All BWR reactor facilities holding an OL or CP
84-40	Emergency Worker Doses	05/30/84	All power reactor facilities holding an OL or CP; research and test reactor and fuel cycle licensees

OL = Operating License
CP = Construction Permit