

To: United States Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555

Attention: The Director

From: Babcock & Wilcox Company
Radiography Section
Mount Vernon, Indiana 47620

TITLE

Quality Assurance Requirements and Measures for Transportation Packaging (10CFR71) as Applied to Industrial Radiography at the Babcock & Wilcox, Mount Vernon, Indiana site. NRC License #13-11317-01.

INTRODUCTION

The following information is intended to show compliance with 10CFR71 as applied to industrial radiography performed at the Babcock & Wilcox, Mount Vernon, Indiana site. The information will demonstrate that Quality Assurance procedures will be followed and also the persons responsible for such compliance.

I. ORGANIZATION

The final responsibility for Quality Assurance program compliance as defined in Part 71 rests with the Babcock & Wilcox, Mount Vernon, Indiana site.

The Quality Assurance program shall not cover the design and fabrication of radioactive material shipping packages, since this responsibility rests with the manufacturer of such packages. The Quality Assurance program is carried out through the enclosed organizational chart, with the Mount Vernon Radiation Safety Officer as the responsible individual for administration, training and document control.

The handling, storing, shipping, inspection and operating functions of all packages will be under the direct supervision of the Mount Vernon Radiation Safety Officer or his assistant, and will be assisted by radiographers of the Mount Vernon site.

II. QUALITY ASSURANCE PROGRAM

The management of the Babcock & Wilcox, Quality Control Section, establishes and implements the Quality Assurance program. Proper training has been established and implemented according to Part III of the Babcock & Wilcox, Mount Vernon site, Radiation Safety Manual. Revisions to these training procedures will be made with management approval. The Q.A. program will ensure that all defined Q.A. procedures for compliance with provisions in 10CFR71 are satisfied. The main concern of the Q.A. program is with items critical to safety.

1593 260

The Babcock & Wilcox, Mount Vernon site, Radiation Safety Officer will ensure that all radioactive material shipping packages used by this site and fabricated after July 1, 1978 are approved by the Nuclear Regulatory Commission. Approval will be indicated by a Certificate of Compliance from the NRC received from the package manufacturer.

79121701/2

III. DOCUMENT CONTROL

Documents relating to each specific shipping package will be stored and controlled for proper retrieval. Changes to documents or procedures will be by written procedure and approved by management. The Mount Vernon Radiation Safety Officer will ensure that compliance is in accordance with the latest revised procedures.

IV. HANDLING, STORAGE AND SHIPPING

The written safety procedures in the Mount Vernon Radiation Safety Manual, Part III, Procedures 1 and 6, will be followed for handling, storage and shipping of all packages. No shipments will be made until the Mount Vernon site Radiation Safety Officer or his assistant are satisfied that all procedures have been followed and so noted in the documents.

Only Mount Vernon qualified radiographic personnel shall be involved in the critical handling, storage and shipping operations.

V. INSPECTION, TESTS AND OPERATING STATUS

Inspection, test and operating status of packages for certain special form radioactive material will be indicated and controlled by written procedures. Status will be indicated by tag, label, marking or log entry. Status of nonconforming parts or packages will be positively maintained by written procedures.

Radiography personnel shall perform the regulatory required inspections and tests in accordance with written procedures. The Radiation Safety Officer shall ensure that these functions are performed.

VI. RECORDS

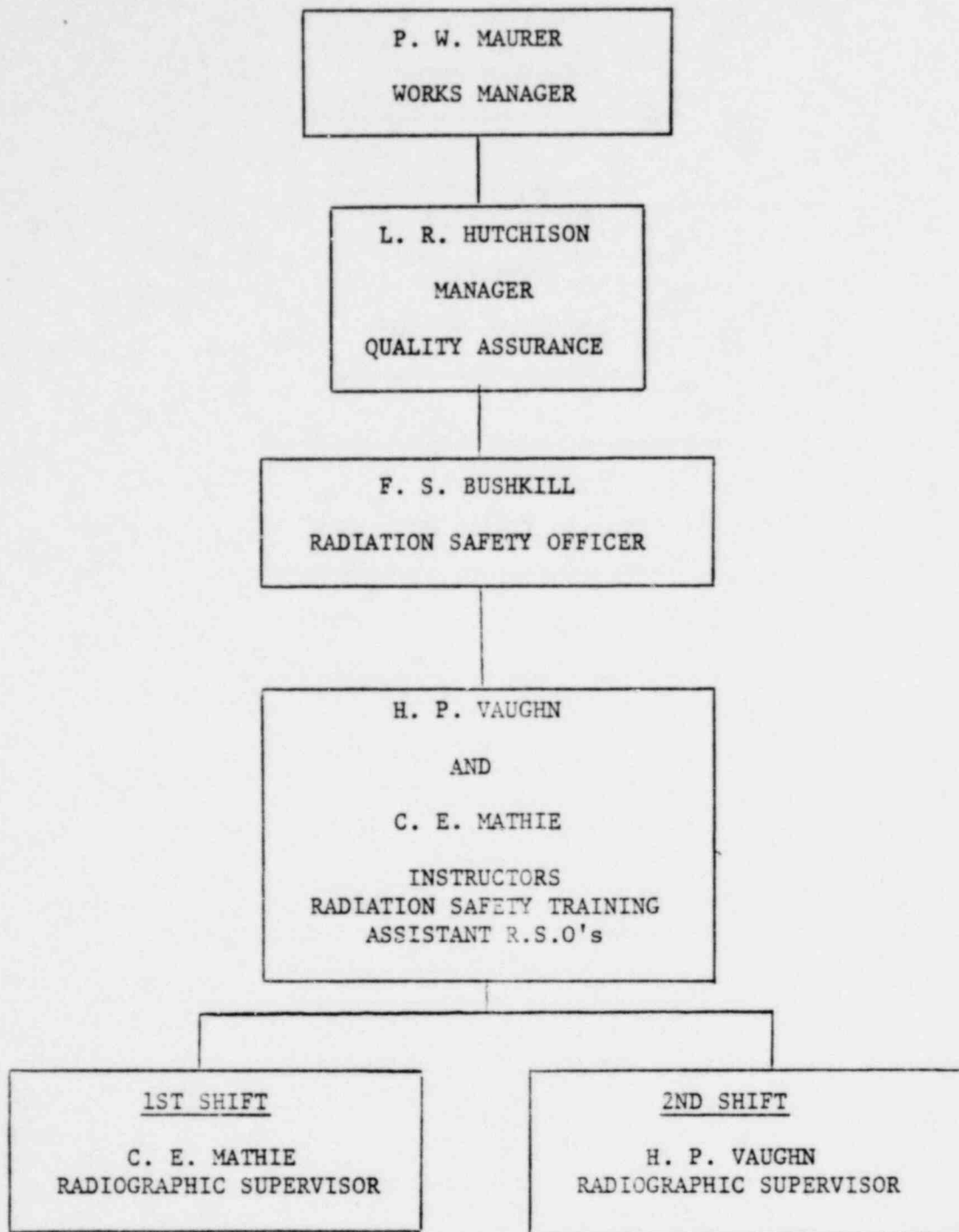
All record pertaining to shipments and receipt of packages will be maintained. The procedures followed are part of the Mount Vernon Radiation Safety Manual, Part III.

Procedures that apply are:

Procedure 1, item 6; Procedure 2, items 1, 2, 2.2 and 3;
Procedure 3, item 1; Procedure 4, items 1 and 2; Procedure
6, items 1, 2, 3 and 4; and Procedure 7.

VII. AUDITS

Established schedules of audits of the Q.A. 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.



RADIATION SAFETY ORGANIZATIONAL

1593 262

CHART

FIGURE I