Subject: Quality Control For Radioactive Material Shipping Containers and Exposure Devices

The Following procedure has been prepared to comply with 10 CFR Part 71 "Packaging of Radioactive Material for Transport and Transportation of Radioactive Material Under Certain Conditions." Activities included within the Quality Assurance (Q.A.) Programs are:

I. ORGANIZATION

Quality Assurance (Q.A.) supervision within Oklahoma Testing Laboratories shall be structured in accordance with this management chart:

Oklahoma Testing Laboratories
M.A. Witte, P.E. President

General Manager
M.A. Witte
Chief Engineer

Manager Q.A. Program
Jerry Nowell
Radiation Safety Officer

As shown, Mr. Witte is Chief Engineer of Oklahoma Testing Laboratories. He is general manager of the Radiography Program. Jerry Nowell manages the Q.A. program. He is a ASNT Level III radiographer and serves as the Radiation Safety Officer. The final responsibility for the Q.A. program for Part 71 requirements rests with Oklahoma Testing Laboratories.

II. QUALITY ASSURANCE PROGRAM

Mr. Witte regulary assesses the scope, status, implementation, and effectiveness of the Q.A. program to assure that the program is adequate and complys with 10 CFR Part 71, Appendix E criteria.
Q.A. Manuals and revisions thereto will be provided to all personnel of the Q.A. program.

We are doing industrial radiography and the design and construction of shipping containers is not a part of our business.

III. Measures have been established to control the issuance of documents such as NRC Regulations, including changes thereto, which prescribe all activities affecting quality. Changes shall be reviewed and approved in the same manner as the original items were reviewed and approved.

Changes in the conditions specified in the license require regulatory approval before implementation.

IV. INSPECTION, TESTS AND OPERATING STATUS

Inspection of activities affecting Q.A. has been assigned to the Supervisor of Q.A., as shown in item I (above). This supervisor has the responsibility and authority to verify conformance with specifications, procedures and any pertinent special instructions.

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Inspection, tests and operating status of packages for 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.

V. CONTROL OF MEASURING & TEST EQUIPMENT

Measuring and testing devices used in Q.A. shall be maintained in good working condition, calibrated and adjusted to maintain accuracy within acceptable limits.

VI. HANDLING, STORAGE AND SHIPPING

Handling, storage, shipping, cleaning and preservation of items used in transportation shall be accomplished within environments and procedures to assure such items are in such conditions commensurating with acceptable safety practices.

Written safety procedures concerning the handling, storage and shipping of packages for special form 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.

Radiography personnel shall perform the critical handling, storage and shipping operations.

VII. QUALITY ASSURANCE RECORDS

The Q.A. record system provides evidence of observing activities affecting quality assurance. The records shall include information on package approvals (including references and drawings), procurement, inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written procedures will also be maintained.

Q.A. records shall be filed within the radiography record system and retained for three (3) years.

VIII. AUDITS

On an annual basis, the General Manager shall require a comprehensive audit of the Q.A. systems to verify compliance with 10 CFR Part 71 and to determine effectiveness of the Q.A. program.

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Results of the audit shall be documented and reviewed by the supervisors of activities being audited.

Management shall impliment follow-up action for correction and re-audit of deficiencies discovered by the audit.