P. 10 CFR 71 QA Program for Using Sealed Sources

1. Organization:

The final responsibility for the Quality Assurance Program for Part 71 Requirements rests with Chicago Bridge and Iron Company. Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the organization shown in Figure ".

The Radiation Protection Officer or Assistant Radiation Protection Officer is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

2. Quality Assurance Program:

The management of Chicago Bridge and Iron Company establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagement in these functions, is required according to written instructions. QA Program revisions will be made with management approval. The QA Program will ensure that all defined QC procedures, engineering procedures, and specific provisions of the package design approval are satisfied. The QA Program will emphasize control of the characteristics of the package which are critical to safety.

The Radiation Protection Officer or Assistant Radiation Protection Officer shall assure that all radioactive material shipping packages are designed and manufactured under a Quality Assurance Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after 1 July 1978. This requirement can be satisfied by receiving a certification to this effect from the manufacturer.

3. Document Control:

All documents related to a specific shipping package will be controlled through the use of written procedures and all document changes will be approved by management.

The Radiation Protection Officer shall insure that all QA functions are conducted in accordance with the latest applicable documents.

271 205

12931

7907020 326

4. Handling Storage and Shipping:

Written safety instructions concerning the handling, storage and shipping of packages for certain special form radioactive material will be followed. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed according to instructions in the Radiation Safety Manual.

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

5. Inspection, Test and Operating Status:

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

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

6. Quality Assurance Records:

Records of package approvals (including references and drawings), inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written instructions will also be maintained.

These records will be maintained in accordance with written instructions. The records will be identifiable and retrievable. A list of these records, with their storage locations, will be maintained by the Radiation Protection Officer.

7. Audits:

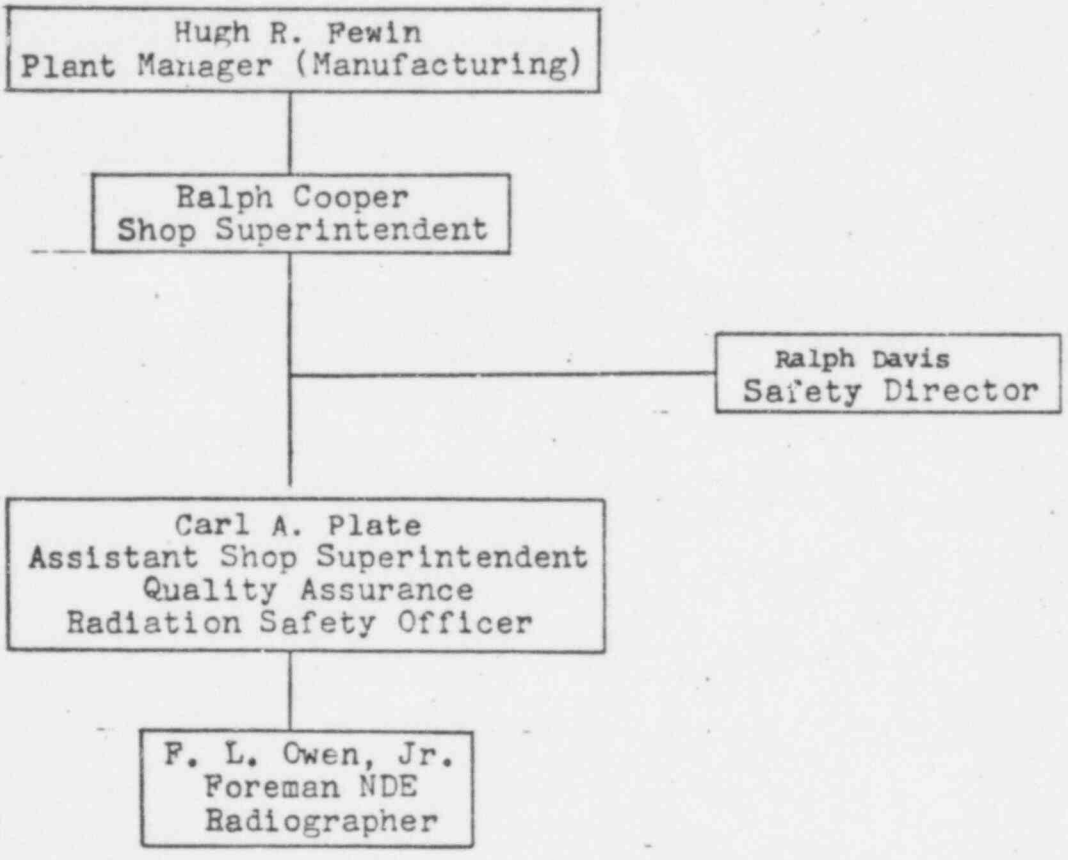
Established schedules of audits of the Quality Assurance Program will be performed using written check lists. Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. The audits will be dependent on the safety significance of the 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.

271 206

12931

Figure 1

Overall Organizational Structure



271 207

12931