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Pan American World Airways, Inc.
Aerospace Services Division
Occupational Medicine and Environmental
Health Services
Kennedy Space Center, Florida 32899

15 May 1979
5-15-33 (9-9.1)

71-0096

Mr. Charles E. MacDonald, Chief
Transportation Branch
Division of Fuel Cycle and
Material Safety, NMSS
Washington, D. C. 20555

SUBJECT: PAN AMERICAN WORLD AIRWAYS, INC. QA PROGRAM

REFRS: 1) 10 CFR 71.51
2) NRC letter dated 27 April 1979; Safe Study
3) Telecon between Mr. J. Spraul, NRC, and Mr. K. K. Martin, Pan American Health Physics, on 14 May 1979

Relative to the referenced letter and telecon, Pan American World Airways, Inc. (PAA), is requesting a 180-day extension commencing 27 May 1979 for submittal of a revised application describing the QA Program to be utilized by the licensee to meet the requirements of 10 CFR 71.51.

The requested extension is necessary, in part, as a result of impending changes to the status of PAA as a licensee. The following is provided as background information regarding such changes.

As discussed with members of your staff prior to PAA's QA program submittal on 26 June 1978, and as reaffirmed during the referenced telecon with Mr. Spraul, PAA provides health physics services under contract to NASA and the USAF at Kennedy Space Center/Cape Canaveral Air Force Station (KSC/CCAFS), Florida. NASA/KSC and the USAF at CCAFS have permanent, approved radiation protection programs currently in force in their locations. As part of the contractual health physics services to NASA/USAF, PAA is charged with the implementation of those programs.

NASA/KSC has submitted an application to the NRC for a Byproduct Material License of Broadscope for NASA operations on KSC/CCAFS. Upon issuance of the NASA/KSC license, it is PAA's intent to transfer all radioactive materials currently maintained under the PAA license to the NASA/KSC license. (It should be noted that all radioactive materials maintained by PAA are government

property.) This action will eliminate the necessity for PAA to maintain the subject QA Program as a licensee of the NRC. It is anticipated that NASA/KSC will be issued their broad-scope license within the 180-day extension period requested.

At the present time PAA does not possess, nor does it expect to possess, Type B, large quantities, and fissile materials. If any such materials are to be acquired by PAA for the benefit of the government, their acquisition will be contingent upon them being transported in manufactured containers which have been constructed under an NRC approved QA program. In all cases, PAA will require a written certification from the transferring licensee for each shipping container.

Your consideration of the above request will be appreciated.

Nettie M. Dunn, M.D.
Medical Director
Chairman, PAA Radiation
Safety Committee

RKM/gat

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Pan American World Airways, Inc.
ATTN: Dr. Nettie M. Dunn
Kennedy Space Center, FL 32899

Gentlemen:

This refers to your application dated June 26, 1978 requesting approval of your Quality Assurance (QA) program as meeting the QA program requirements of 10 CFR §71.51.

In connection with our review, we have determined that your proposed QA program does not meet the requirements of Appendix E to 10 CFR Part 71. To assist you in revising your application, we have enclosed a sample QA program for industrial radiography licensees dated April 2, 1979.

Please submit seven copies of your revised application within 30 days of the date of this letter. If you have any questions regarding this request, please contact Mr. Jack Spraul at (301) 492-7741.

Sincerely,

Charles E. MacDonald, Chief
Transportation Branch
Division of Fuel Cycle and
Material Safety, NMSS

Enclosure:
Sample QA Program

April 2, 1979
(Revision 1)

10 CFR PART 71 QA PROGRAM

FOR INDUSTRIAL RADIOGRAPHY LICENSEES

1. Organization

The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with (Company Name). Design and Fabrication shall not be conducted under this QA Program. The QA Program is implemented using the following organization:

Note: The Organizational Chart as used in the license application should be presented. It may be advisable to designate the Radiation Safety Officer as the responsible individual for the Part 71 QA Requirements.

The Radiation Safety 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 and operating status and record keeping.

2. Quality Assurance Program

The management of (Company Program) establishes and implements this QA Program. Training, prior to engagement, for all QA functions is required according to written procedures. QA Program revisions will be made according to written procedures 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 Safety Officer shall assure that all radioactive material shipping packages are designed and manufactured under a QA Program approved by Nuclear Regulatory Commission for all packages designed or fabricated after the effective date of the QA Program. 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. All document changes will be performed according to written procedures approved by management.

The Radiation Safety Officer shall insure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

4. Handling Storage and Shipping

Written safety procedures 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. Work instructions will be provided for handling, storage, and shipping operations.

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 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.

6. Quality Assurance Records

Records of 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.

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

7. Audits

Established schedules of audits of the QA 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.