A DIVISION OF NUCLEAR & STEEL

ROP

## Gamma Industries

RECEIVED

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June 11, 1979

U.S. HUG. PAR REG. COMMISSION MSS MAIL SECTION

Mr. Charles E. MacDonald
U.S. Nuclear Regulatory Commission
Transportation Branch
Division of Fuel Cycle and
Material Safety, NMSS
Washington, D. C. 20555



Dear Mr. MacDonald:

Please refer to your letter dated May 30, 1979.

- 1. Your letter refers to "asterisked" items. Since no asterisks can be found in your letter, may it be assumed that your reference is to the "X" inserted in numerous places on a checklist which can be identified by a designation in the upper right corner Docket No. 71-0010.
- This leads us back to questions which were presented early last year and have been discussed with you on several occasions.

## WHAT DO YOU WANT?

- 3. You will recall that the end result of QA documentation desired for radiography licensees was a "stereotyped" two page document. This was determined ONLY after in very long and frustrating effort.
- 4. Is there a possibility that a very simple document is what you require in lieu of the eight page Quality Assurance program submitted on May 29, 1978?
- 5. In the event that I prepare full documentation suggested by your check list, it is my estimate that the complete document will be numerous procedures which will fill several two inch three ring binders. Preparing this will require

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several man-months of effort. (I will also add my opinion that this would be wasted effort because in 25 years of manufacturing containers for shipping radioactive materials there is no evidence that the Gamma Industries Quality Assurance Program has not been acceptable. This is based upon no transportation incidents resulting from poor QA or manufacturing during ten of thousands of shipments on a world wide basis.)

6. My last comment to your letter, please reconsider the mandatory 30 day response requirement while we determine precisely what is required and then give sufficient time to prepare the materials.

Sincerely,

GAMMA INDUSTRIES

Harry O. Richardson

President

HDR/ds