

MAYNARD STEEL QUALITY ASSURANCE PROGRAM
PERTAINING TO TRANSPORTATION PACKAGING FOR
TRANSPORTATION OF BY-PRODUCT MATERIAL
AS REQUIRED BY 10 CFR 71

I. PURPOSE OF QUALITY ASSURANCE PROGRAM:

- 1.0 Maynard Steel Casting Company establishes this Quality Assurance Program to assure that all requirements for control procedures and package design, as required by 10CFR71 and approved by the Nuclear Regulatory Commission, shall be implemented.
- 2.0 The program shall assure that specific control procedures will be formulated and followed whenever a shipping package containing by-product material is received by, or is shipped from, Maynard Steel Casting Company.

II. ORGANIZATION:

- 1.0 The final responsibility for the Quality Assurance Program for Part 71 Requirement rests with Maynard Steel Casting Company. No design and fabrication shall be conducted under this program. The organization of the program shall be as listed on the organization chart listed in this document.
- 2.0 The Radiographic Administrator shall be responsible for the overall administration of the program, training, certification and document control.
- 3.0 The Radiographer shall be responsible for handling, storing, and shipping, inspection, testing, operating and record keeping.
- 4.0 The Personnel Department shall be responsible for auditing the Quality Assurance Program, including the functions of the Administrator and Radiographers. Audits shall be conducted at least once per year, except in those years when no transfer of radioactive material is made to or from the Maynard Steel facility. The Personnel Dept. shall be independent from and have no responsibility to the Radiography facility.

Specifically, the following areas shall be included in the audit:

- 4.1 All procedures listed in the program are followed (Sections III, IV, V, and VI.)
- 4.2 Current certification of Radiographers
- 4.3 Current certification of Shipping package being used (Certified by Supplier).

- 4.4 Current certification of instrument calibration.
- 4.5 Radiation Survey Report of Transportation Package.
- 4.6 Radiographic log book entrees pertaining to receipt and shipment of radioactive material to or from facility.
- 4.7 All records of purchase and shipment of radioactive materials to or from facility.
- 4.8 Assure that all pertinent records are on file in the Radiographic facility files and that they are in a readily retrievable status.

III. QUALITY ASSURANCE PROGRAM:

- 1.0 The management of Maynard Steel Casting Company establishes and implements this Quality Assurance Program.
- 2.0 All by-product material received by, or sent out from Maynard Steel shall be shipped in an N.R.C. approved shipping package.
- 3.0 Only shipping packages owned and supplied by certified suppliers shall be used for transportation of by-product material by Maynard Steel Radiographic facility.
- 4.0 All shipments transferred as in (2.0) above shall be tagged, identified and marked in accordance with 10CFR71 requirements.
- 5.0 Prior to receipt, or shipment by Maynard Steel, of a shipping package supplied by a certified supplier a certification from the supplier will be furnished to Maynard Steel stating that all regulations pertaining to design, and engineering, identification, labeling, and all other items required have been approved by the N.R.C. and that said package is capable of transporting the specified by-product material safely and in accordance with N.R.C. criteria. The supplier certification and copies of all shipping instructions shall be filed at the Maynard Steel Radiographic Facility and shall be readily retrievable.
- 6.0 Transfer at Maynard Steel of by-product material into, or out of, the shipping package shall be done by a certified radiographer in accordance with suppliers recommended procedure, and instructions as stated in the operating manual of the Maynard Steel By-Product License.

7.0 Shipping precautions and procedures:

- 7.1 Incoming or outgoing shipments containing product material shall be monitored with a calibrated survey meter to ascertain that radiation level is acceptable. The survey results shall be entered in the log book of the Radiographic Facility.
- 7.2 Visual inspection shall be made to package to ascertain if any physical damage of package is evident. Results of findings shall be recorded in log book of Radiographic Facility.
- 7.3 Visual inspection shall be made to package to ascertain that all labels, markings and identification are present as required by N.R.C. regulation. Entry of findings shall be entered in log book of Radiographic Facility.
- 7.4 All records required shall be readily retrievable.
- 7.5 Any shipping container arriving at the Maynard Steel facility which shall be found not to meet all N.R.C. criteria for shipping packages shall be placed undisturbed in safe storage in the Radiographic Facility and the N.R.C. immediately notified. The package will remain undisturbed until specific instructions are received from the N.R.C. as to proper action to be taken. The facility Radiographer will maintain security of package until N.R.C. instructions are forthcoming.
- 7.6 No transfer of by-product material to or from a shipping package, or receipt, or shipment of a shipping package shall be made to or from the Maynard Radiographic Facility except under the direct supervision of a qualified Radiographer and with full knowledge of the Administrator.
- 7.7 All transfers of by-product material shall be in accordance with step by step standard procedures as stated in the Maynard Steel Radiographic operating manual which is part of the Maynard Steel By-Product License.
- 8.0 The administrator shall be notified whenever a shipping package is received by, or sent out from, Maynard Steel.
- 9.0 The administrator shall ascertain that said shipments are in compliance with requirements of 10CFR71 and the Maynard Quality Assurance Program for Transportation Packaging.

- 10.0 The administrator shall enter statement in the Maynard Radiographic Facility log book that compliance has been met.
- 11.0 No change may be made in this program without approval of the Administrator, and unless final approval is made by the Nuclear Regulatory Commission.

IV. DOCUMENT CONTROL:

- 1.0 All documents pertaining to the transfer to or from Maynard Steel Casting Company shall be under the surveillance and control of the Administrator of the program. The following documents shall be included:
 - 1.1 Purchase order for replacement source.
 - 1.2 Shipping papers (bill of lading)
 - 1.3 Certification of packaging (from certified supplier)
 - 1.4 Radiation survey report of incoming or outgoing package Status tags, labels and marking in conformance to requirements.
 - 1.5 Entry in Radiographer Log Book pertaining to installation or removal of source material to shipping container.
- 2.0 The above documents are to be kept on file in the Radiographers Facility and readily accessible for inspection.

V. HANDLING, STORAGE AND SHIPMENT:

- 1.0 Only storage and shipping containers manufactured and/or furnished by certified suppliers of By-Product material will be used to transfer by-product material to or from Maynard Steel facilities.
- 2.0 A shipment will not be received by, or sent from, Maynard facilities until a certification is received from said supplier of by-product material stating that the container being used is in complete compliance with requirements of 10CFR71.
- 3.0 Upon receipt of By-Product material, the package will be inspected for damage, radio-activity and a radiation survey report made.
- 4.0 Actual transfer of By-Product material to or from the container shall be made in accordance with step-by-step procedure listed under Section IX of the Maynard Steel Operating and Procedures for Radiography - March, 1978, which forms part of the current license.

13133

484 027

- 5.0 All of the critical handling, storage and shipping operations shall be performed by certified radiographic personnel.
 - 6.0 All by-product containers received by, or sent from, Maynard Steel shall be surveyed for safe limits of radiation and inspected for proper markings in compliance with requirements of 10CFR71.
- VI. Immediately following a shipment to or from the Maynard Steel Radiography facility, an audit will be made by the Personnel Department to assure that all necessary documents are on file in the Radiography Department.

MAYNARD STEEL CASTING COMPANY
ORGANIZATION CHART OF Q. A. PROGRAM
(10CRF 71.51)

