



QUALITY ASSURANCE PROGRAM FOR RADIOGRAPHIC OPERATIONS
IN ACCORDANCE WITH 10 CFR PART 71

Policy: It is the policy of WALWORTH COMPANY-Columbus Plant to perform Industrial Radiography conforming in all respects to the applicable requirements of the United States Nuclear Regulatory Commission, Title 10, Chapter 1, Code of Federal Regulations-Energy, Rules and Regulations. Conformance to these regulations must be achieved through the efforts of all individuals up to and including plant management.

A formal program for the control and assurance of radiographic operations in accordance with 10 CFR Part 71 has been established at my direction and is in effect. It is a basic management policy that the decision making function on the acceptance of quality in regard to equipment and safety shall be independent of the authority of those responsible for production.

The established program for the Control and Assurance of RADIATION SAFETY has been recorded in this document which has the full endorsement and support of plant management.

Richard Delynko
R. Delynko
Radiation Safety Officer

Per:

E. N. Plesz
E. N. Plesz
Manager of Quality Assurance

Endorse By:

P. T. Curry
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Plant Manager

Scope: Management Responsibilities and Information Relating to the Radiographic Quality Assurance Program.

Purpose: This program outlines the duties and responsibilities for Management in the Administration of the Radiographic Quality Assurance Program. Specific details concerning the actual implementation of the program are found in Sections A and B of the Operating and Emergency Procedures.

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Responsibility: The final responsibility for this program rests with Walworth Company-Columbus Plant. The Radiation Safety Officer is responsible for administration of the total program, including training, certification, direct supervision of safety functions, inspection and auditing, and document control. Radiographers are responsible for handling, storing, monitoring, inspection and record keeping of sources used. The Organizational Chart (Attached) illustrates the structure of the Radiographic Department.

1 0 QUALITY ASSURANCE PROCESS:

- 1.1 The management of Walworth Company - Columbus Plant has instituted this program to govern the procedures outlined in the "Operating and Emergency Procedures":
Section A - "Instructions to Radiography Personnel".
Section B - "Management Responsibilities and Information Relating to the Radiographic Quality Assurance Program".
- 1.2 All changes/revisions to these procedures will only be made with written approval of the Radiation Safety Officer.
- 1.3 Receipt, changing and disposal of sources will only be performed by the Radiation Safety Officer (as designated on the NRC License) in accordance with the "Operating and Emergency Procedures".
 - 1.3.1 Procedures used to effect such operations shall be defined by the manufacturer, provided that his QA Program has been approved by the Nuclear Regulatory Commission.
 - 1.3.2 The Radiation Safety Officer is responsible for obtaining certification to this effect from the manufacturer.
 - 1.3.3 The Radiation Safety Officer is responsible for controlling these operations in accordance with the approved methods of the "Operating and Emergency Procedures".

2.0 DOCUMENT CONTROL:

- 2.1 All documents related to a specific receipt, changing, and disposal of a source(s) will be controlled in accordance with Section B, Chapter XII of the "Operating and Emergency Procedures".

2.2 Documents shall only be changed in accordance with written approval of the Radiation Safety Officer.

3.0 HANDLING STORAGE AND SHIPPING:

- 3.1 Radioactive sources are controlled from initial receipt until shipment is made in accordance with the procedures set forth in Section B, Chapter XII of the "Operating and Emergency Procedures".
- 3.2 No shipment of radioactive material will be made until the Radiation Safety Officer has assured that all tests, certifications, final inspections, and acceptances have been completed.
- 3.3 Authorized Radiographic Personnel only shall handle the material.

4.0 INSPECTION, TEST AND OPERATING STATUS:

- 4.1 The Radiation Safety Officer is responsible for determining that all source devices are correctly tagged, labeled and properly logged.
- 4.2 Any shipping container that is damaged or otherwise different in physical structure than approved for use shall be held by the Radiation Safety Officer, and not processed until the steps in paragraph 5.0 are followed.
- 4.3 All required tests and inspections shall be carried out and documented by the Radiation Safety Officer or by qualified personnel under his direct supervision.

5.0 NONCONFORMING MATERIAL:

- 5.1 Any source, material or container which fails to conform to specified requirements for any quality characteristic shall be identified as "Nonconforming".
- 5.2 Nonconforming material shall be immediately "Tagged" and not put into service until disposition is made and properly documented by the Radiation Safety Officer.
- 5.3 Disposition shall take two forms:
- 5.3.1 Notify the manufacturer of the nonconformity- take necessary steps to correct per manufacturer's written authorization.

Note: This can only be done if the nonconformity is of a nature that can be corrected on site.

5.3. Notify the manufacturer of the nonconformity - take necessary steps to have the nonconforming material replaced or otherwise brought into compliance by the manufacturer.

Note: This may include securing the material for manufacturer's review and notification to the Nuclear Regulatory Commission.

- 5.4 In no instance shall nonconforming materials be put into service until such time as proper disposition has been made and it has been released by written authorization.
- 5.5 The Radiation Safety Officer is responsible for assuring that all documentation is complete, accurate and properly filed.

6.0 QUALITY ASSURANCE RECORDS:

- 6.1 Records of package approvals (including references and drawings), procurement, inspections, tests, operating logs, audit reports, personnel training and qualifications, surveys, and records of source shipments will be maintained as per Section B, Chapter XIV of the "Operating and Emergency Procedures". Equipment profiles and specific procedures shall also be maintained.
- 6.2 All records will be maintained in accordance with Section B, Chapter XIV of the "Operating and Emergency Procedures". These records shall be identifiable, retrievable and maintained by the Radiation Safety Officer.

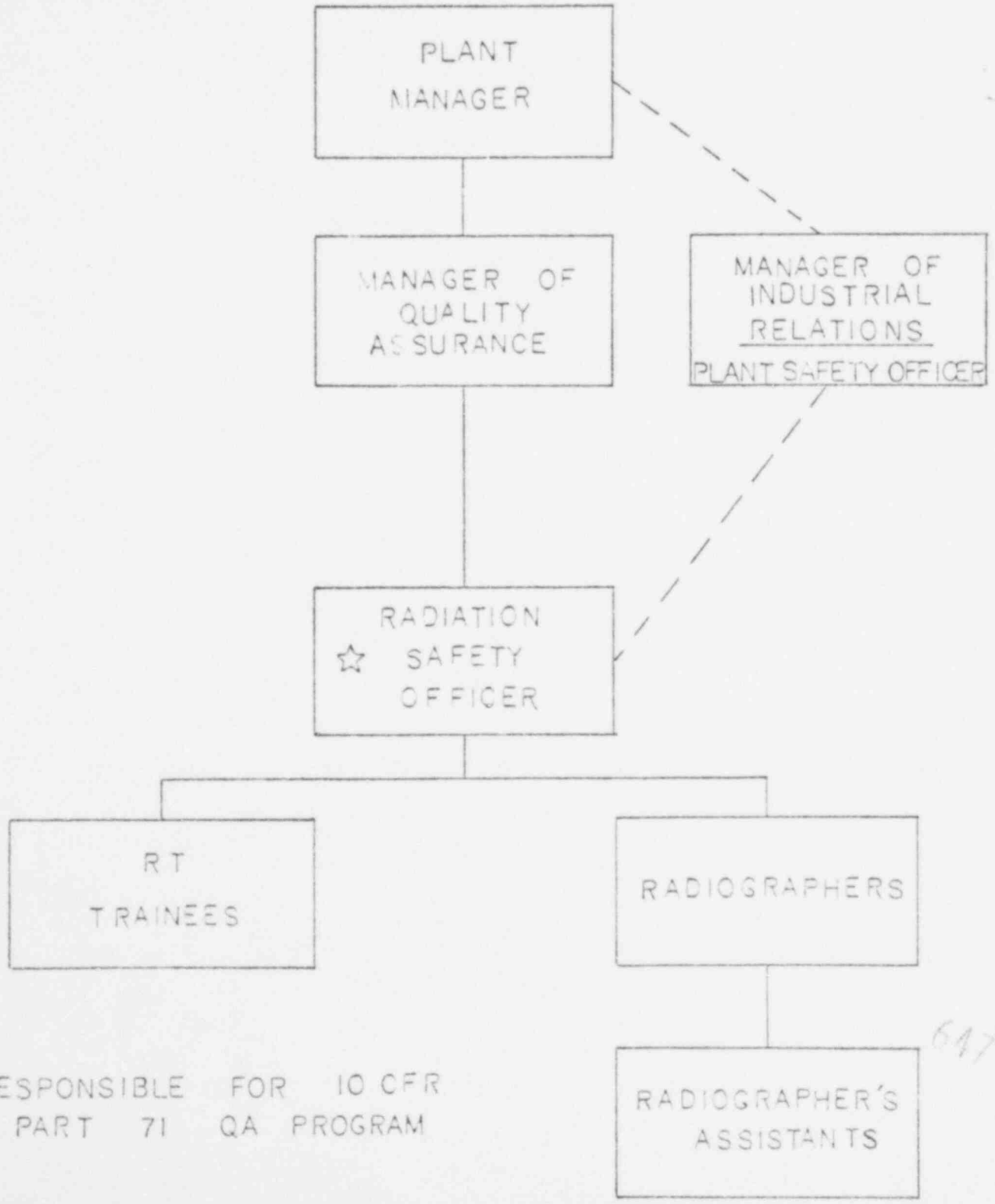
7.0 AUDITS:

- 7.1 Audits of the Q.A. Program will be performed in accordance with Section B, Chapter XIII C.
- 7.2 Results will be maintained and reported to the following plant management:
- A. Radiation Safety Officer
 - B. Quality Assurance Manager
 - C. Plant Engineer
 - D. Plant Safety Officer
 - E. Other personnel as may be required by specific circumstance.

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- 7.3 Corrective action shall be taken as determined by the Radiation Safety Officer and results of corrective action taken documented and signed off.
- 7.4 Each activity shall be audited at least yearly with special emphasis placed on the safety significance of the activity and the results of the audit itself.
- 7.5 Audit reports will be maintained by the Radiation Safety Officer as part of the quality assurance records.

RADIOGRAPHIC DEPARTMENT ORGANIZATIONAL CHART



★ RESPONSIBLE FOR 10 CFR
PART 71 QA PROGRAM

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