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

JUL 19 1979

FCTR:RHO
71-0092

Eastman Kodak Company
ATTN: Mr. R. F. Scherberger
Building 320 - Kodak Park
Rochester, NY 14650

Gentlemen:

This refers to your application dated June 20, 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 need the information identified in the enclosure to this letter. Please submit seven copies of your response to the enclosed request for additional information within 30 days following receipt of this letter. Also, based on your interest in our acceptance criteria as discussed by our Mr. Fred Liederbach with your Mr. E. Scott Harter during a telephone call on May 25, 1979, we are pleased to enclose a copy of our acceptance criteria dated April 2, 1979 (Rev. 1) for your information.

If you have any questions regarding this request, please contact Mr. Fred Liederbach at (301) 492-7741.

Sincerely,

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

Enclosures:
1. Request for Additional Information
2. Acceptance Criteria

501 310

7908080386

EASTMAN KODAK COMPANY (71-0082)

Request for Additional Information

Clarify your application to provide a clear commitment that trained, experienced, qualified radiographers, as opposed to sales and marketing personnel, are responsible for handling, storage, shipping, inspection, test and operating status, and record keeping; and for overseeing the student radiographers in the safe use of radioactive sources. It is not clear whether your Marketing Education Specialist (who is also your Radiation Safety Supervisor) is a trained, experienced, qualified radiographer. Individual resumes need not be submitted provided the above commitment is made.

501 311

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 shall 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.