

The Honorable John Tower  
 United States Senate  
 Washington, D. C. 20510

SEP 20 1978

R B Minogue  
 R Smith  
 G A Arlotto  
 R M Bernero  
 R F Barker  
 P D R  
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 L V Gossick  
 W Dircks, EDO  
 SECY 78-1279  
 C E MacDonald, NMSS  
 D A Nussbaumer, NMSS  
 M L Sapp  
 Central File  
 SD ALPHA Files  
 SD r/f  
 R J Doda  
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 Transportation

Dear Senator Tower:

I am pleased to respond to your request, which was received by the Commission September 5, 1978, concerning a letter from Mr. D. J. Walzel, President of Ultrasonic Specialists, Inc., Houston, Texas, requesting assistance in removing Appendix E to 10 CFR Part 71 from the Commission's regulations.

The requirements for QA (Quality Assurance) programs apply to persons who are subject to 10 CFR Part 71; thus, they apply to shippers of fissile material and Type B quantities of other radioactive material. Radiography shipments usually fall into the Type B category and, therefore, the QA requirements for shippers apply to radiography licensees (as well as to all other licensees who ship fissile material or Type B quantities of other radioactive material). The Commission encourages the use of a graded approach in establishing QA programs; therefore, the QA programs required for radiography are correspondingly less complex than those required for other packaging and transportation activities involving more significant quantities of radioactive material.

Mr. Walzel's original letter to the Secretary of the Commission is being considered in conjunction with a petition for rulemaking, PRM 71-7, by Non Destructive Testing Management Association, et al. A number of other radiographer-licensees have expressed concern over the effort required to implement QA programs for their packaging and shipping activities. All of these comments are being considered, at the present time, in the Commission's determination of this petition.

If I can be of any further assistance, please let me know.

Sincerely,

(Signed)  
 William J. Dircks  
 Deputy Executive Director  
 for Operations

- Enclosures:  
 1. Federal Register Notice, 42 FR39364  
 2. Incoming letter dated 8/2/78

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(SEE PREVIOUS YELLOW FOR CONCURRENCES)

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TASK NO.: PRM 71-7

OFFICE ▶	SD:TPSB RFBarker	SD:MSS	SD:DES GAArlotto	SD:DIR R B Minogue	CA	EDO
SURNAME ▶	RJDoda:sac	RMBernero	GAArlotto	R B Minogue		
DATE ▶	9/12/78	9/13/78	9/14/78	9/15/78	9/17/78	