10CFR71 QUALITY ASSURANCE PROGRAM QUALITY ASSURANCE REQUIREMENTS

1. SCOPE:

The requirements of 10CFR Part 71 apply to Yuba Heat Transfer Corporation when radioactive material is delivered to a carrier for transport or transported by Yuba Heat Transfer Corporation outside the facilities described in the N.R.C. Byproduct Material License 35-13735-01.

2. ORGANIZATION:

The Vice President of Product Engineering and Quality Assurance reports to the President of the Company. He is responsible for the Company's Quality Assurance Program.

The Radiation Safety Officer is responsible for mouitoring all activities concerning the use and shipment of radioactive material. He has the authority and organizational freedom to assure that all activities concerning the use and shipment of radioactive materials are done in accordance with the Material License and 10CFR Part 71. A diagramed Organization Chart (Attachment A) follows the last page of this manual.

3. QUALITY ASSURANCE PROGRAM:

This Quality Assurance Program has been established and implemented at Yuba Heat Transfer Corporation's facilities as described in the Material License. The operating procedure portion of the Material License establishes the frequency of training for all personnel involved with handling, shipping and storage of radioactive material.

This Quality Assurance Program and any associated Quality Assurance procedures will be controlled in accordance with procedures found in Section 1 of the Quality Control System Program Manual.

The Quality Assurance Program applies to the design, fabrication, assembly, testing, use, and maintenance of transportation packages. Certification from the supplier will be considered sufficient evidence of compliance for areas not under the direct control of Yuba Heat Transfer Corporation such as design, fabrication, assembly, initial testing, repair and modification.

DOCUMENT CONTROL:

The Radiation Safety Officer is responsible for assuring that all documents pertaining to a specific container are maintained in accordance with the Material License. This procedure may not be changed except by 8-13-79 A addendum to the Material License. Charges to the Material License will be approved by the Vice President of Product Engineering and Quality Assurance and will be done in accordance with the controls in Section I of the Quality Control System Program Manual.

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5. HANDLING, STORAGE AND SHIPPING:

The Radiation Safety Officer is responsible for assuring that handling, storage and shipping are done in accordance with established procedures. Safety restrictions concerning the handling, storage and shipping of radioactive material have been established in the operating procedure portion of the Material License and will be followed. Shipments will not be made unless all tests, certifications, acceptances and final inspections have been completed. Critical handling, storage, and shipping operations are performed by the Radiographers, at the direction of the Radiation Safety Officer.

6. INSPECTION, TEST AND OPERATING STATUS:

The Radiation Safety Officer is responsible for the inspection and test of all shipping containers used by the Company. The regulatory required inspections and tests will be performed by the Radiographers at the direction of the Radiation Safety Officer. Inspection, test and operating status will be controlled as indicated in the Material License. Current status will be indicated by entry in the Byproduct Materials Shipping/ Receiving Inspection Log. In the event a non-conforming item is found. a complete record will be maintained by the Radiation Safety Officer of the events concerning the non-conforming item and its eventual disposition.

7. QUALITY ASSURANCE RECORDS:

Records of shipping package approval, inspections, tests, operating logs, audit results, personnel training and qualification, and records of shipment will be maintained by the Radiation Safety Officer. The records of personnel training and qualification will be maintained as required by the Material License and Yuba General Instruction 150. The Byproduct Material Shipping/Receiving Inspection Log will serve as the list for the 8-13-79 A records required to be on hand. The records are properly identified and are readily retrievable.

8. AUDITS:

Audits of the Quality Assurance Program will be performed using written checklists. Audit schedules will be established with the frequency of the audits dependent on the safety significance of the item being audited. All phases of the Quality Assurance Program will be audited a minimum of once per year. Audit reports will be evaluated and deficient areas corrected. Audit reports and results will be reported to the Material Review Board and maintained as part of the Quality Assurance Records. C-13-79 A Members of the audit team shall have no responsibility in the activity being audited.

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