

PDR 71-0265



DEPARTMENT OF THE NAVY
USS SPERRY (AS-12)
APO SAN FRANCISCO 96601

IN REPLY REFER TO
AS12:LAF:rre
9639
Ser 04/724
22 AUG 1979

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From: Commanding Officer, USS SPERRY (AS 12)
To: Nuclear Regulatory Commission
SUBJECT SECTION
Subj: Quality Assurance for Packaging of Radioactive Material
Ref: (a) Nuclear Regulatory Commission ltr FCTR:RHO 71-0265
of 5 Jul 79
(b) SPERRYINST 9900.4
Encl: (1) Changes to SPERRYINST 9900.4

1. In accordance with reference (a) the following changes to reference (b) are submitted:

a. Add the following to the end of paragraph 4.a., ".....and will insure all QA Functions are conducted in accordance with latest applicable changes to documents."

b. In paragraph 4.e., after the words "reference (d)", delete "utilizing enclosure (2)."

c. Delete paragraphs 6.a. thru 6.f, 7, and 8 and replace with new paragraphs in enclosure (1).

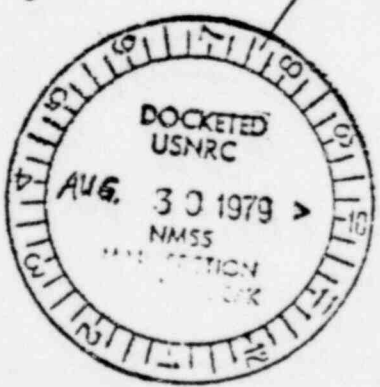
d. In paragraph 9 delete paragraphs 9.a. thru 9.b. and renumber 9.c. as 9.a.

e. Replace reference (b), enclosure (1), with "Organizational Structure" in enclosure (1).

2. This provides all information and makes all changes requested by reference (a).

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d. All personnel engaged in the operation (i.e. Packaging, Source Changing) of the Model 650 Source Changer are required to successfully complete the Non-Destructive Testing of Metals Course, Class C administered at Service Schools Command, San Diego, California.

e. An individual shall be designated as a Radioactive Material Shipping Petty Officer by the Commanding Officer in accordance with article 5135 of reference (e). This assignment shall be designated in writing after the successful completion of a qualification examination approved by the Radiological Controls Officer and the Commanding Officer. The Radioactive Material Shipping Petty Officer shall be responsible for shipping Tech-Ops Model 650 Source Changer in accordance with the requirements of reference (d).

5. Document Control

a. The Radiographic Safety Officer shall ensure that certificates of compliance have been issued by the Nuclear Regulatory Commission for each shipping package utilized and that the command is properly registered to use the package.

b. The shipping package shall be controlled in accordance with reference (c) and (e).

6. Handling, Storage, and Shipping

a. Established safety restrictions concerning the handling, storage and shipping of packages containing radioactive sources will be followed.

b. Shipments will not be made unless all tests, records and final inspections have been completed.

c. Work instructions will be provided for handling, storage, and shipping operations.

d. The Senior Radiographer and radiographers are responsible for the critical (important to safety) handling, storage and shipping operations.

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Enclosure (1)

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7. Inspection, Test, and Operation Status

a. The status of nonconforming parts or packages will be positively maintained by established written procedures.

b. The inspection, test, or operation status will be indicated by tag, label, marking or log entry.

c. The Senior Radiographer and radiographers will be responsible for the critical inspection, test, and operating activities. The Quality Assurance Officer shall ensure that these functions are performed.

8. Quality Assurance Records

a. The Radiographic Safety Officer will:

(1) Maintain records of package approvals (including references and drawings), inspections, tests, records of qualifications of personnel and descriptions of procedures and equipment.

(2) Maintain records in such a way as to be identifiable and retrievable.

(3) Maintain a list of the required records and their storage locations.

b. The Radiological Controls Officer will:

(1) Maintain operating logs, records of shipments, records of qualifications of personnel and descriptions of procedures and equipment.

(2) Maintain records in such a way as to be identifiable and retrievable.

(3) Maintain a list of the required records and their storage locations.

c. The Senior Radiographer will maintain records of audits results.

9. Audits

a. The Repair Officer will:

- (1) Ensure establishment of audit schedules.
- (2) Ensure results of audits are reported to the following.
 - (a) Commanding Officer
 - (b) Radiographic Safety Officer
 - (c) Senior Radiographer
 - (d) Radiological Controls Officer
 - (e) Repair Officer
- (3) Perform audits whose scope shall include all records listed in reference (c) and section 8 of this instruction, and records of the Radiological Controls Division, as required by section 8 of this instruction, each activity will be audited once a year by an auditor having no responsibility in the activity being audited. R-5 and R-7 Division will not conduct audits.
- (4) Maintain records of audit reports as part of the Radiographer records.
- (5) Assure that identified deficient areas are corrected.

b. Audit deficiencies will be documented on an audit Deficiency/Discrepancy Report Correction Form (QA Form 14) and forward to the Radiological Controls Officer and Senior Radiographer who will determine corrective action to be taken within fourteen (14) days.

c. The Senior Radiographer will:

- (1) Evaluate and correct deficient areas as identified by the QA Form 14, and any other areas as considered necessary for the safe use, handling, and maintenance of shipping packages.

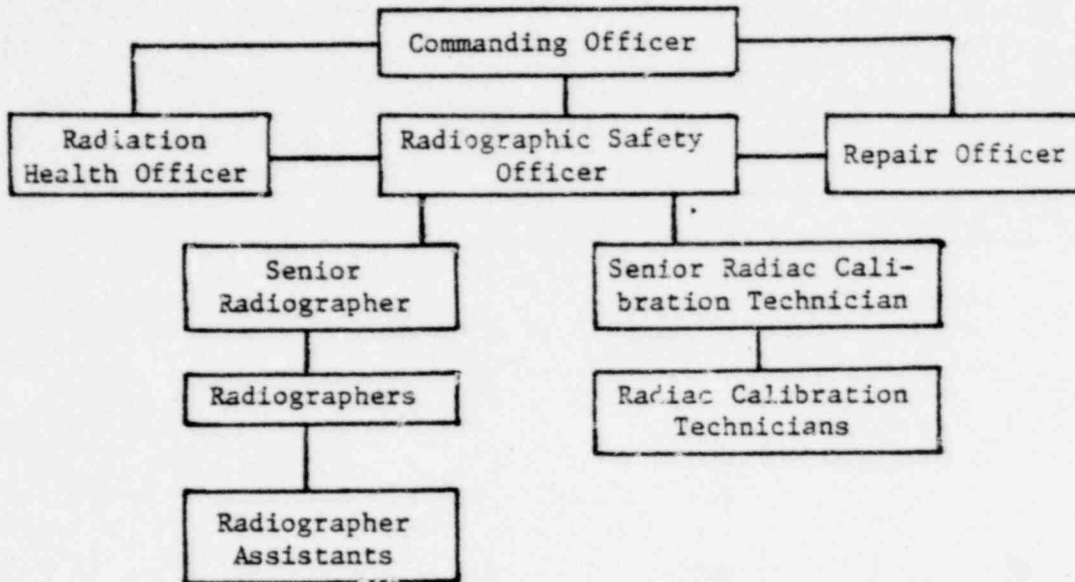
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Enclosure (1)

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Organizational Structure

1. The Chain of Command aboard USS SPERRY (AS-12) for utilization of sealed sources for Radiography and Radiac Calibration is as follows:



2. The Chain of Command aboard USS SPERRY (AS-12) for the custody of sealed sources is as follows:

