

71-0092



October 24, 1989

Charles E. MacDonald, Chief
Transportation Branch
Division of Safeguards and
Transportation, NMSS
Nuclear Regulatory Commission
Washington, D.C. 20555



Subject: Renewal of Quality Assurance Program for
Radioactive Material Packages No. 0092
(Docket No. 71-0092)

Eastman Kodak Company requests renewal of our Quality Assurance Program for Radioactive Material Packages at our Industrial Radiography Training Center. This program is required by Subpart H of 10 CFR Part 71. An updated copy of our program and a check covering the renewal fee of \$150.00 are enclosed.

If you have any questions regarding this request for renewal, please contact me.

Sincerely,

John H. Heyer

John H. Heyer
Radiation Safety Officer

Eastman Kodak Company
Health and Environment Laboratories
Rochester, N.Y. 14652-3615
Phone: 716-722-6942

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QUALITY ASSURANCE PROGRAM

EASTMAN KODAK COMPANY

Industrial Radiography Operation

At Marketing Education Center (MEC)

4545 East River Road

West Henrietta, New York, 14650-0811

October 24, 1989

Prepared by:

John H. Heyer
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1. ORGANIZATION

The final responsibility for the Quality Assurance Program required by 10 CFR 71 rest with the Eastman Kodak Company. Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented by the staff of MEC's Radiography Training Center under the guidance of the Radiation Safety Officer. An organization chart covering this relationship is shown in the Appendix. The ultimate responsibility for the implementation of the Quality Assurance Program detailed herein rests with the Program Director of the Health Sciences Division.

The Radiation Safety Officer is responsible for providing technical advice as regards to overall administration of the program, training and certification, document control, and performs auditing to meet the criteria of 10 CFR 71.

The Radiation Safety Coordinator is responsible for handling, storing, shipping, inspecting, testing, operating status and record keeping, and for overseeing the student radiographers in the safe use of radioactive sources. The qualifications for this position include successful completion of a course that has been approved by the NRC for "Initial Training" (as defined in 10 CFR Part 34 - Appendix A).

2. QUALITY ASSURANCE PROGRAM

The management of Eastman Kodak Company establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagement in these functions, is required according to written procedures. QA Programs 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 Quality Assurance Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after July 1, 1978. 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 assure 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.

The Radiation Safety Coordinator shall perform or supervise critical handling, storage and shipping operations.

5. INSPECTION, TEST, AND OPERATING STATUS

Inspection, tests 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.

The Radiation Safety Supervisor shall perform or supervise 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), 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 Quality Assurance Program will be performed using written checklists. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once per year. Written audit reports will be prepared and reported to management. Deficiencies will be clearly noted in the audit reports and corrected. 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.

ORGANIZATION CHART

