

QUALITY ASSURANCE PROGRAM

10 CFR Part 71

INDUSTRIAL RADIOGRAPHY LICENSE 29-03405-02

1. ORGANIZATION:

The final responsibility for the Quality Assurance Program for Part 71 requirements rests with Branch Radiographic Labs., Inc. Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the following organization:

- a. Radiographer's Assistants and Radiographers are responsible to the Radiographic Supervisor. The Radiographers are responsible for handling, storage, shipping, inspection, test, operating status and record keeping.
- b. The Radiographic Supervisor is responsible to the Manager of Quality Assurance. The Radiographic Supervisor is also designated the Radiation Safety Officer and is responsible for Part 71 Quality Assurance requirements. The Radiation Safety Officer is responsible for overall administration of the program, training and certification, document control and auditing.
- c. The Manager of Quality Assurance is responsible to the President.

2. QUALITY ASSURANCE PROGRAM:

The management of Branch Radiographic Labs., Inc. 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 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 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 ensure 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 Iridium 192 and Cobalt 60 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 procedure. 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), 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. Results of audits will be maintained and reported to management. Audit reports will be evaluated, and deficient areas 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. Audits will be on a six (6) month frequency.

Overall responsibility for performing internal audits shall be entrusted to the Corporate Radiation Safety Officer. At intervals not to exceed six (6) months, the Corporate Radiation Safety Officer shall conduct audits at all field operation sites. This audit will encompass all aspects of radiation safety under the limits of the written license, including all functions covered by CFR 10 Part 71.

Audits performed at locations directly under the supervision of the Corporate Radiation Safety Officer shall be conducted by the Vice President of Field Operations.

Responsibility for overseeing and review of the audit program and performance of the auditors shall be born by the President of Branch Radiographic Labs., Inc. at intervals not to exceed one (1) year.