

DEPARTMENT OF THE NAVY

NAVAD SEA SYSTEMS COMMAND DETACHMENT RADIOLOGICAL AFFAIRS SUPPORT OFFICE (RASO)

PORKTOWN VA 23 0 15 des

USNRQ NOV 2 0 1989 >

MAIL SECTION DOCKET CLERK

US Nuclear Regulatory Commission Division of Safeguards and Transportation Transportation Branch Washington, DC 20555

DOCKLIED

USWRD

NOV2 2 1989 >

MAIL SECTION

DOCKET CLERK

IN REPLY REFER TO

5104/04697 Ser 11/ 1201 16 NOV 1989

Gentlemen:

Renewal of USS SIMON LAKE (AS 33) Quality Assurance Program Approval No. 0261 is requested per enclosure (1).

Sincerely,

ROY H. SMITH BY DIRECTION

Enclosure:

(1) USS SIMON LAKE 1tr 9900 Ser AS-33/REP 1802 of 3 Nov 89

Copy to: CNO (OP-45) COMSUBLANT (N442) COMSUBRON 14 USS SIMON LAKE (AS 33)

File Establish

N102

8911270158 891116 PDR ADOCK 07100261



DEPARTMENT OF THE NAVY

USS SIMON LAKE AS-33 FPO NEW YORK, NY D0536-2500

> 9900 Ser AS-33/REP 1802

From: Commanding Officer, USS SIMON LAKE (AS-33)

To: Director, Office of Nuclear Material, Safety and

Safeguards, NMSS, U.S. Nuclear Regulatory Commission,

Washington, DC 20555

Via: Officer in Charge, Naval Sea Systems Command Detachment,

Radiological Affairs Support Office

Subj: APPLICATION FOR APPROVAL OF QUALITY ASSURANCE PROGRAM FOR

RADIOACTIVE MATERIAL PACKAGES ASSOCIATED WITH RADIOGRAPHY

Ref: (a) Nuclear Regulatory Commission, Washington, DC

ltr SGTB: GMB 71-0261 of 6 Oct 89

Encl: (1) Draft of USS SIMON LAKE (AS-33) Instruction 9893.18

1. In accordance with reference (a), enclosure (l) is provided for review and approval and supersedes previously approved program under Docket Number 71-0261.

2. Present terms and conditions under Docket Number 71-0261 will be complied with until approval is granted and received on NRC Form 311 Quality Assurance Program approval.

3. An exemption of the application fee is provided for by 10 CFR 170.11.

G. M. CRAHAN

Copy to: COMSUBLANT COMSUBRON 14



DEPARTMENT OF THE NAVY

USS SIMON LAKE AS-33 FPO NEW YORK, NY 19535-2500

> SIMONLAKEINST 9893.1B AS-33/REP

USS SIMON LAKE (AS-33) INSTRUCTION 9893.1B

Subj: QUALITY ASSURANCE PROGRAM FOR RADIOACTIVE MATERIAL SHIPPING PACKAGES ASSOCIATED WITH RADIOGRAPHY

Ref: (a) Title 10, Code of Federal Regulations, Part 71.
(b) OPNAVINST 6470.3 Navy Radiation Safety Committee

Encl: (1) Definitions

(2) Quality Assurance Program

(3) Packaging QA Record Retention Program

(4) QA Program Audit Checklist

1. Purpose: To established and maintain an auditable QA program for shipping packages for radioactive material associated with radiography.

2. Cancellation: SIMONLAKEINST 9893.1A

- 3. <u>Background</u>: Reference (a) established the requirement for SIMON LAKE to execute the subject QA program and state the required attributes of the program.
- 4. Scope: This instruction applies only to shipping packages intended for use with radioactive material associated with radiography. It specifically does not apply to shipping of radioactive materials associated with Naval Nuclear Propulsion Plants.
- 5. Procedures: Enclosure (1) lists definitions of terms as used herein. Enclosure (2) hereby establishes the basic QA program for Simon Lake for procurement, use, and maintenance of packages designed to transport radioactive materials associated with radiography. "QA" comprises all planned and systematic actions necessary to provide adequate confidence that a system or component will perform satisfactorily in service. The QA program contained herein is approved by the Navy Radiation Safety Committee.
- 6. Action: The Radiation Safety Officer (RSO), under the supervision of the Repair Officer, shall implement, execute and maintain this QA program as outlined in enclosures (2), (3), and (4). The Radiation Safety Officer shall ensure that transportation and receiving activities meet the requirements of 10CFR 71.101. (This requirement is satisfied by obtaining certification from package suppliers, Certificates of compliance NRC Form 618 and materials license NRC Form 374.) This instruction shall be reviewed by the expiration date indicated in block 3 of the Quality Assurance Program approval (NRC Form 311). Updates to program will be submitted for approval to the Navy

SIMONLAKEINST 9893.1B

Radiation Safety Committee for approval prior to its expiration to ensure continuity. Any change to this instruction or its procedures shall require prior approval of the Navy Radiation Safety Committee in accordance with reference (b), via the chain of command an NAVSMA Detachment, Radiological Affairs Support Office.

G. M. CRAHAN

Distribution: (SIMONLAKEINST 5216.1H)

List I

Definitions of Terms

- 1. Carrier: A person employed in the transportation of packages or property by land or water as a common, contract, or private carrier, or by civil aircraft.
- 2. Containment System: The component of the packaging intended to retain the radioactive material during transport.
- 3. Conveyance: Any vehicle, aircraft, vessel, or freight container, or hold, or defined deck area of an inland waterway craft or seagoing vessel.
- 4. Package: The packaging together with its radioactive contents as presented for transport.
- 5. Type B Package: A type B package together with its radioactive contents. On approval, a type B package design is designated by NRC as B(U) unless the package has a maximum normal operating pressure of more than $100~\rm lb/sq$ in gauge or a pressure relief device which would allow the release of radioactive material to the environment under tests specified in 71.73 (hypothetical accident conditions), in which case it will receive a designation B(M). B(U) refers to the need for unilateral approval of international shipments; B(M) refers to the need for multilateral approval.
- 6. Packaging: The assembly of components necessary to ensure compliance with the packaging requirements of Part 71. It may consist of one or more receptacles, absorbent materials, spacing structures, thermal insulation, radiation shielding and devices for cooling or absorbing mechanical shocks. The vehicle tie down system and auxilliary equipment may be designated as part of the packaging.
- 7. Special form radioactive material: Radioactive material which satisfies the following conditions:
- (a) It is either single solid piece or is contained in a sealed capsule that can be opened only by destroying the capsule.
- (b) The piece or capsule has at least one dimension not less than 5 millimeters (0.197in); and
 - (c) It satisfies the test requirements of 71.75.
- 8. Specific Activity: The radioactivity of the radionuclide per unit mass of that nuclide. The specific activity of a material in which the radionuclide is essentially uniformly distributed is the radioactivity per unit mass of the material.

SIMONLAKEINST 9893.1B

- 9. Transport Index: The dimensionless number (rounded up to the first decimal place) placed on the label of a package to designate the degree of control to be exercised by the carrier during transportation. The transport index is determine as follows:
- (a) The number expressing the maximum radiation level in millirem per hour at one meter from the external surface of the package.
- 10. Type A quantity: A quantity of radioactive material, the aggregate radioactivity of which does not exceed A_1 , for special form radioactive material or A_2 for normal form radioactive material, where A_1 , and A_2 are given in Appendix A of part 71 or may be determined by procedures described in Appendix A of Part 71.
- 11. Type B quantity: A quantity of radioactivity material greater than a type A quantity.
- 12. Uranium-Depleted.
- (a) Depleted uranium Uranium containing less uranium 235 than the naturally occurring distribution of uranium isotopes.