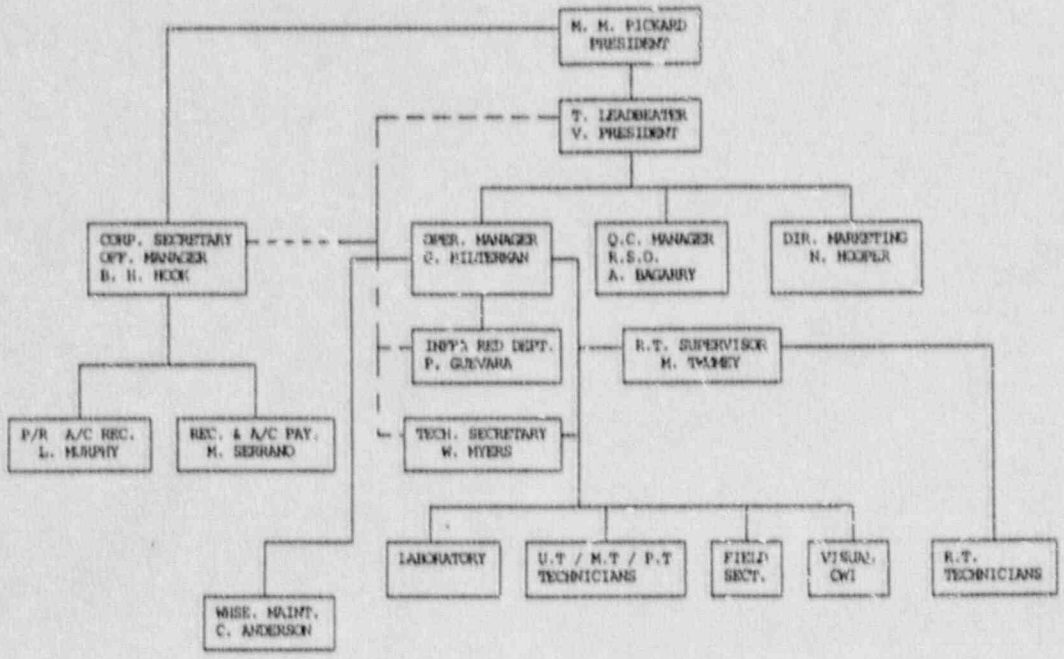
MMP-QC-NRC
REV 0
DATE 11/16/89

10CFR71 QA PROGRAM

FOR INDUSTRIAL RADIOGRAPHY

1.0 ORGANIZATION

The final responsibility for the Quality Assurance Program for Part 71 Requirements rests with M.M.P. Quality Inspections, 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:



MANAGEMENT APPROVAL

Maurice M. Pickard, President — 11-29-89 Date

Tony Leadbeater, Vice President — 11-29-89 Date

Alex A. Bagarry, III, Radiation Safety Officer — 11-29-89 Date

The Radiations Safety Officer is responsible for overall administration of the program, training and certification, document control and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

2.0 QUALITY ASSURANCE PROGRAM

The management of M.M.P. Quality Inspections, 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 January 1, 1979. This requirement can be satisfied by receiving a certification to this effect from the manufacturer.

3.0 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 insure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

4.0 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.

Radiography personnel shall perform the critical handling, storage and shipping operations.

5.0 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 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.

Radiography personnel shall perform the regulatory required inspections and test in accordance with written procedures. The Radiation Safety Officer shall ensure that these functions are performed.

6.0 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.

7.0 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. 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. 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.