UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 31 1980

FCTC:RHO
71-0164

Massachusetts Institute
of Technology
ATTN: Mr. Lincoln Clark, Jr.
138 Albary Street
Cambridge, MA 02139

Gentlemen:

We have evaluated your revised quality assurance program, SAR Chapter 11, submitted with your August 5, 1980 letter to satisfy the requirements of 10 CFR §71.51.

It is the staff's position that the description of the quality assurance program for packaging and transportation of radioactive material include a complete discussion of how the applicable requirements of Appendix E to 10 CFR Part 71 will be satisfied. Even though some of these requirements may be covered in Technical Specifications and other government regulations, they should be included in the quality assurance program. Accordingly, please revise Chapter 11 of the SAR to address the enclosed request for additional information and submit seven copies of the revised program within 60 days following receipt of this letter.

If you have any questions regarding this request, please feel free to contact Mr. Jim Conway at (301) 492-7741.

Sincerely,

Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and Material
Safety, NMSS

Enclosure:
Request for Additional
Information

MASSACHUSETTS INSTITUTE OF TECHNOLOGY (71-0164)

Request for Additional Information

1A. Provide an organizational chart(s) which identifies the organizational elements which function under the control of the QA program.

2A. Describe the QA responsibilities of each organizational element identified in the response to question 1A.

3A. Identify the level of management that is responsible for establishing MIT's QA policies, goals, and objectives.

4A. Describe the qualification requirements for the position of Director of Reactor Operations.

5A. Provide a statement that designated QA individuals have the responsibility and authority, delineated in writing, to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material.

8A. Describe how disputes involving quality, arising from a difference of opinion between designated QA/QC personnel and other department personnel, are resolved.

9A. Provide a statement that training and experience for all QA functions will be required and accomplished in accordance with established procedures.

11A. Provide a statement that individuals or groups responsible for design verification are other than the original designer and the designer's immediate supervisor. In exceptional circumstances, the designer's immediate supervisor can perform the verification provided:

(1) The supervisor is the only technically qualified individual.

(2) The need is individually documented and approved in advance by the supervisor's management.

(3) QA audits cover frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.

13A. Provide a statement that procurement documents identify the applicable 10 CFR Part 71, Appendix E requirements which must be complied with and described in the supplier's QA program. This QA program or portions thereof shall be reviewed and concurred with by qualified personnel prior to initiation of activities affected by the program.

14A. Provide a statement that procurement documents identify the documentation (e.g., drawings, specifications, procedures, inspection and fabrication plans, inspection and test records, personnel and procedure qualifications, and chemical and physical test results of material to be prepared, maintained, and submitted to the purchaser for review and approval.

15A. Provide a statement that procurement documents identify those records to be retained, controlled, and maintained by the supplier, and those delivered to MIT prior to use or installation of the hardware.

16A. Provide a statement that procurement documents contain MIT's right of access to supplier's facilities and records for source inspection and audit.

22A. Provide a statement that measuring and test equipment is identified and traceable to the calibration test data.

23A. Provide a statement that measuring and test instruments are calibrated at specified intervals based on the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement.

24A. Provide a statement that measures are taken and documented to determine the validity of previous inspections performed when measuring and test equipment is found to be out of calibration.

25A. Provide a statement that reference and transfer standards are traceable to nationally recognized standards; or, where national standards do not exist, provisions are established to document the basis for calibration.

28A. Provide a statement that departure, arrival time, and destination of a package will be established and monitored to a degree consistent with the safe transportation of the package.

29A. Provide a statement that bypassing of required inspections, tests, and other critical operations is procedurally controlled under the cognizance of the Director of Reactor Operations.