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Attachment

Shipping Container Inspection (yearly) form
 Radioactive Material Transfer Report (Figure 3)
 Management Audit - Radiation Safety Officer

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1.0 ORGANIZATION

The final responsibility for the Quality Assurance Program for Part 71 requirements rests with Peabody Testing/X-Ray Engineering Company. 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. The Radiation Safety Officer is responsible for overall administration of the Program, training and certification, document control, and auditing.
- b. Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

2.0 QUALITY ASSURANCE PROGRAM

The management of Peabody Testing/X-Ray Engineering 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 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.

Written procedures and instructions for implementing the Quality Assurance Program are contained in the Radiation Safety Program.

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.

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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 handling, storage, and shipping operations.

5.0 INSPECTIONS, TEST AND OPERATING STATUS

Inspections, 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 tests 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.

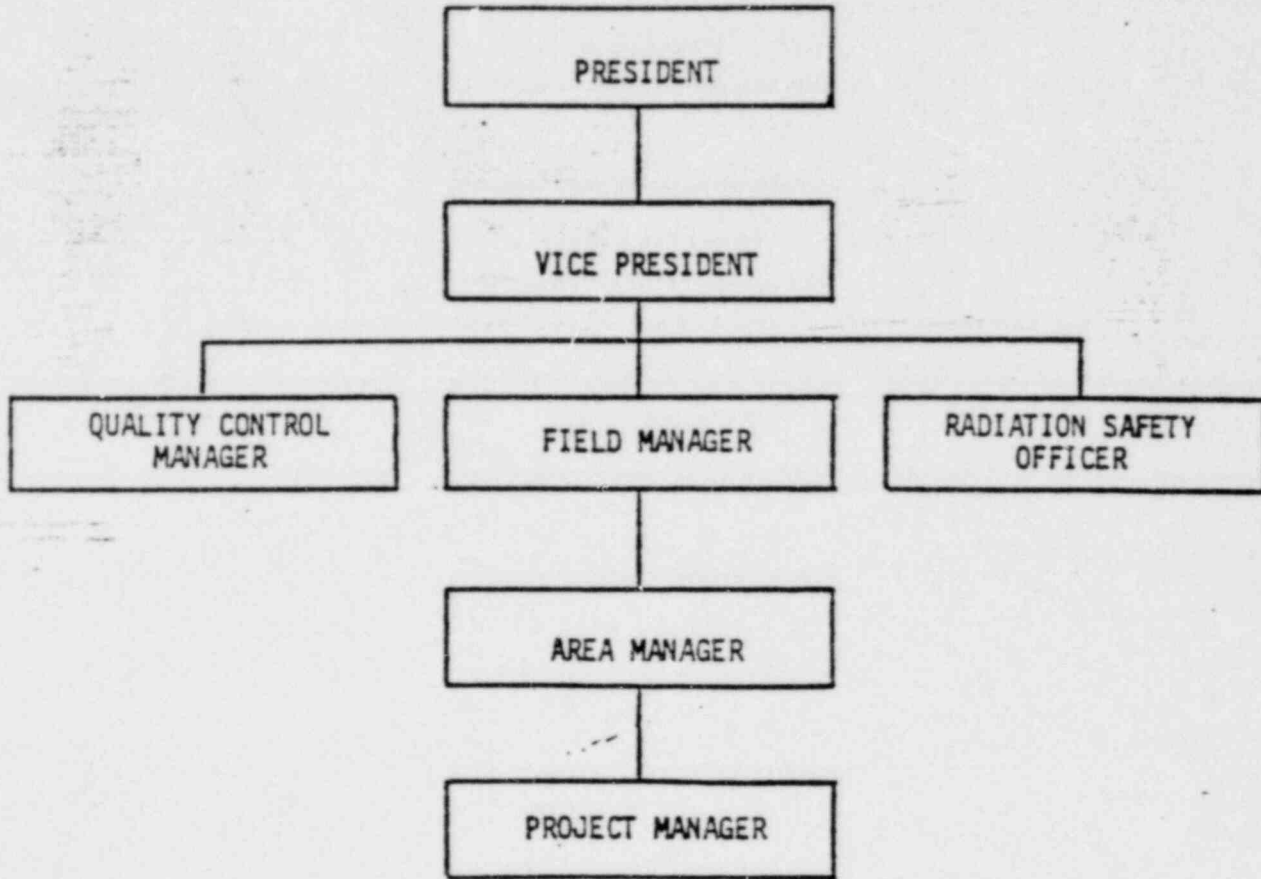
7.0 AUDITS

Audits for verification of compliance with the Quality Assurance Program will be conducted as described below:

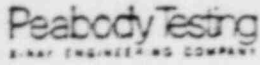
- a. Each completed "Radioactive Material Transfer Report" form (see Radiation Safety Program) will be reviewed by the Radiation Safety Officer, or his designee, when it is received. This review will check for proper completion of all appropriate portions of the form.
- b. At least once each year, each shipping container will be checked for damage, proper labeling, and identification.
- c. Management shall conduct periodic audits (not to exceed yearly) on the Radiation Safety Officer for compliance with the program's procedures. Audit will be conducted using the Quality Assurance Program's Management Audit Form (attached).

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. Personnel performing audits shall have no direct responsibility in the activity being audited.

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QUALITY ASSURANCE PROGRAM FOR



SHIPPING CONTAINER INSPECTION (YEARLY)

Assignee _____ Date Due _____

Shipping Container Model No. _____ S/N _____

Location _____

Special Instructions _____

	<u>Accept</u>	<u>Repaired</u>	<u>Replaced</u>
1. Condition of Container	_____	_____	_____
2. Danger Peligro Cargo Aircraft Labeling	_____	_____	_____
3. Attached Package Certification (IAEA)	_____	_____	_____
4. Radioactive Material Special Form N.O.S. Labeling	_____	_____	_____
5. Type B Labeling	_____	_____	_____
6. Package Certificate Labeling (same as Model or Identification No.)	_____	_____	_____
7. Inside Thermal Barrier	_____	_____	_____
8. Inside Polyurethane Filler	_____	_____	_____
9. Attach Ring Seal	_____	_____	_____
10. Container Locking Device (bolt or clip)	_____	_____	_____

Remarks _____

Designated Representative _____ Date _____

All shipping containers shall conform to the requirements of DOT and 10 CFR Part 71.

QUALITY ASSURANCE PROGRAM
 MANAGEMENT AUDIT

Radiation Safety Officer _____ Date _____

1. Copy of the Quality Assurance Program on file _____
2. The Quality Assurance Program is adequately established and implemented _____
3. Records of inspection (yearly) for shipping containers being maintained _____
4. Records of "Radioactive Material Transfer Reports" (figure 3) maintained _____
5. Is adequate control of shipping containers being maintained _____
6. Are audit results being reported to management _____
7. Management's inspection of at least one (1) shipping container for compliance with program requirements. (If additional containers are inspected use reverse side)

Shipping Container Model No. _____ S/N _____

Location _____	Accept	Poor	Defective
a. Condition of container	_____	_____	_____
b. Danger Peligro Cargo Aircraft Labeling	_____	_____	_____
c. Package Certification (IAEA) attached	_____	_____	_____
d. Radioactive Material Special Form N.O.S. Label	_____	_____	_____
e. Type B Labeling	_____	_____	_____
f. Package Certificate Labeling (same as model or Identification No.)	_____	_____	_____
g. Inside Thermal Barrier	_____	_____	_____
h. Inside Polyurethan Filler	_____	_____	_____
i. Attach Ring Seal	_____	_____	_____
j. Container Locking Device (bolt or clip)	_____	_____	_____

Remarks _____

- No items of non-compliance found
 Areas of non-compliance found

Audit Performed By _____ Title _____

RSO _____

Letter of corrective action for areas of noncompliance issued on

 (Date)

Shipping Container Model No. _____ S/N _____

Location _____	Accept	Poor	Defective
a. Condition of container	_____	_____	_____
b. Danger Peligro Cargo Aircraft Labeling	_____	_____	_____
c. Package Certification (IAEA) attached	_____	_____	_____
d. Radioactive Material Special Form N.O.S. Label	_____	_____	_____
e. Type B Labeling	_____	_____	_____
f. Package Certificate Labeling (same as model or Identification No.)	_____	_____	_____
g. Inside Thermal Barrier	_____	_____	_____
h. Inside Polyurethan Filler	_____	_____	_____
i. Attach Ring Seal	_____	_____	_____
j. Container Locking Device (bolt or clip)	_____	_____	_____

Remarks _____

Shipping Container Model No. _____ S/N _____

Location _____	Accept	Poor	Defective
a. Condition of container	_____	_____	_____
b. Danger Peligro Cargo Aircraft Labeling	_____	_____	_____
c. Package Certification (IAEA) attached	_____	_____	_____
d. Radioactive Material Special Form N.O.S. Label	_____	_____	_____
e. Type B Labeling	_____	_____	_____
f. Package Certificate Labeling (same as model or Identification No.)	_____	_____	_____
g. Inside Thermal Barrier	_____	_____	_____
h. Inside Polyurethan Filler	_____	_____	_____
i. Attach Ring Seal	_____	_____	_____
j. Container Locking Device (bolt or clip)	_____	_____	_____

Remarks _____

RADIOACTIVE MATERIAL TRANSFER REPORT

JOB SITE _____ DATE _____

ISOTOPE _____ CAPSULE S/N _____ CURIES _____

EXPOSURE DEVICE

MAKE _____ MODEL _____ S/N _____

TRANSFERRED FROM _____ TO _____

REASON FOR TRANSFER:

NEW SOURCE REQUESTED SOURCE RETURNING MALFUNCTIONING OR DAMAGED

LIST ANY MECHANICAL DEFECTS OR MALFUNCTIONS _____

SHIPMENT PREPARED BY _____ AUTHORIZED BY _____

SHIPPING CONTAINER

Container shall be a Type B designed to meet with the requirements of DOT.

- | | |
|---|--|
| 1. Shipping Container S/N _____ | 6. Labeled with "Radioactive Material Special Form N.O.S." _____ |
| 2. Condition of Shipping Container _____ | 7. Labeled with "Type B" _____ |
| 3. Danger Peligro Cargo Aircraft Only Label Affixed _____ | 8. Shipping Label Affixed _____ |
| 4. Package Certification or Approval Affixed _____ | 9. Radioactive Yellow Labels Affixed _____ |
| 5. Labeled with Package Certificate (Model or Identification No.) _____ | Type of Label: Yellow II <input type="checkbox"/> |
| | Yellow III <input type="checkbox"/> |

SURVEY OF MATERIAL PRIOR TO SHIPMENT

SURFACE OF EXPOSURE DEVICE _____ MR/HR AT 36" _____ MR/HR

SURFACE OF CONTAINER _____ MR/HR AT 36" _____ MR/HR

SURVEY OF MATERIAL AS RECEIVED

SURFACE OF CONTAINER _____ MR/HR AT 36" _____ MR/HR

SURFACE OF EXPOSURE DEVICE _____ MR/HR AT 36" _____ MR/HR

DATE RECEIVED _____ RECEIVED BY _____

(Shipper complete top half of report and ship with exposure device. Individual receiving material complete bottom (survey of material as received) and return by mail to originator (jobsite) with a copy to the RSO.



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

SEP 9 7 1979

FCTC:RHO
71-0064

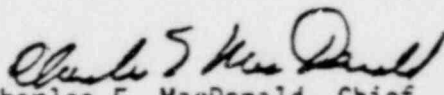
Peabody Testing/X-Ray Engineering Co.
ATTN: Mr. Tom W. Cuthbertson
1118 Chess Drive
Foster City, CA 94404

Gentlemen:

Enclosed is Quality Assurance Program Approval for Radioactive Material Packages No. 0064, Revision No. 0.

Please note the conditions included in the approval. In particular, the attachment identified on page i of the application is not included as part of your QA program.

Sincerely,


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

Enclosure:
As stated



QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES

0064

REVISION NUMBER

0

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2, the Quality Assurance Program identified in Item 5 is hereby approved. This approval is issued to satisfy the requirements of Section 71.51 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME

Peabody Testing/X-Ray Engineering Company

3. EXPIRATION DATE

November 30, 1984

STREET ADDRESS

1118 Chess Drive

4. DOCKET NUMBER

71-0064

CITY

Foster City

STATE

CA

ZIP CODE

94401

5. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S)

August 24, 1979

6. CONDITIONS

- A. Activities conducted under applicable criteria of Appendix E of 10 CFR Part 71 to be executed with regard to transportation packages by November 1, 1979.
- B. The shipping activities authorized by this approval are procurement, maintenance, repair, and use. All other shipping activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from package suppliers that these activities were conducted in accordance with an NRC-approved QA program. It shall remain the responsibility of the licensee-user that all transportation activities meet the requirements of 10 CFR §71.51.
- C. The attachment identified on page i of the application is not included as part of your QA program.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

SIGNATURE

Charles E. MacDonald

DATE

SEP 07 1979

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

POOR ORIGINAL

Model No. 6717-B Packaging
USA/6717/B

AUG 04 1980

Addressees: w/encl

Ltr dtd:

Argonne National Laboratory
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9700 South Cass Avenue
Argonne, IL 60439

Lawrence Livermore Laboratory
ATTN: Mr. Stephen Chin
P.O. Box 808
University of California
Livermore, CA 94550

Argonne National Laboratory
ATTN: Mr. R. U. Curl
P.O. Box 2528
Idaho Falls, ID 83401

Metals Testing Company, Inc.
ATTN: Mr. John H. Leins, Sr.
P.O. Box 213
South Windsor, CT 06074

Daniel International Corporation
ATTN: Mr. Ronald N. Prewitt
Daniel Building
Greenville, SC 29602

Midstate Testing Laboratory
ATTN: Mr. Thomas J. Keilman
7943 New Jersey Avenue
Hammond, IN 46323

Department of the Navy
ATTN: Mr. R. L. Seacat
Norfolk Naval Shipyard
Portsmouth, VA 23709

~~Peabody Testing/X-Ray
Engineering Company~~
ATTN: Mr. Tom W. Cuthbertson
1118 Chess Drive
Foster City, CA 94404

GEO
CONSTRUCTION TESTING
1118 CHESS DRIVE
FOSTER CITY, CA. 94404

Gamma Industries
ATTN: Mr. Harry D. Richardson
P.O. Box 2543
Baton Rouge, LA 70821

Source Prod. & Equip. Co., Inc.
ATTN: Mr. R. F. Dicharry
625 Oxley Street
Kenner, LA 70062

General Dynamics
ATTN: Mr. R. H. Surprenant
Eastern Point Road
Groton, CT 06340

Space Science Services, Inc.
ATTN: Mr. Donald A. Grier
P.O. Box 20126
Orlando, FL 32814

Gulf Nuclear, Inc.
ATTN: Mr. Walter P. Peoples, Jr.
P.O. Box 58865
Houston, TX 77058

Twin City Testing & Engr. Lab.
ATTN: Mr. Howard T. Schulze
662 Cromwell Avenue
St. Paul, MN 55114

18988