

QUALITY ASSURANCE PROGRAM

1. INTRODUCTION

Under the provisions of U. S. Nuclear Regulatory Commission Materials License No. 09-17121-02 dated 25 September 1979, the Naval Coastal Systems Center, Panama City, Florida 32407, is authorized the use of Radioisotope Thermoelectric Generators (RTGs) as a power source for Environmental Monitoring Systems (EMS) located on a free-standing platform, 12 miles off-shore from Panama City, Florida (known locally as Stage I). In accordance with 10 CFR and 49 CFR, the Naval Coastal Systems Center, Panama City, Florida, is also authorized to transport or deliver to a common carrier these generators. Operations performed relative to the RTGs include:

- a. Handling
- b. Shipping and receiving
- c. Storage
- d. Operation
- e. Maintenance of the RTGs and their shipping containers

2. QUALITY ASSURANCE ORGANIZATION

The ultimate responsibility for the Quality Assurance (QA) Program for part 71 rests with the Commanding Officer, U. S. Naval Coastal Systems Center, Panama City, Florida 32407. The Radiation Protection Officer is responsible for overall administration of the program, training and certification, document control, inspections, record keeping, and auditing. The Commanding Officer, Naval Coastal Systems Center, under the guidance of the Radiation Protection Officer, will be responsible for handling, shipping, receiving, storage, maintenance, and operation of the RTGs.

3. QUALITY ASSURANCE PROGRAM

The Radiation Protection Officer will establish and implement the QA Program. Program revisions will only be made with his approval. The program will ensure that all operations involving the RTGs are performed in accordance with applicable NRC, DOT, and U. S. Naval Regulations, as well as NRC License No. 09-17121-02 and the specific provisions of Certificate of Compliance No. 4888. The QA Program emphasizes control of the administrative and operational matters which are critical to safety. Controls have been established to ensure that operations involving the RTGs are conducted in accordance with the regulations, license and Certificate of Compliance noted above. Design, fabrication, and procurement of the RTGs and their shipping containers will not be conducted under this program.

Enclosure (1)

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4. DOCUMENT CONTROL

All documents related to the RTGs and their shipping containers (e.g., Certificates of Compliance, Manufacturers' RTG Operation and Maintenance Manuals) will be controlled and maintained by the Radiation Protection Officer. All revisions and changes will be processed by him, and he will ensure that current editions of the documents are on file. The Radiation Protection Officer shall ensure that all evolutions are conducted in accordance with latest applicable changes to these documents.

5. HANDLING, STORAGE, AND SHIPPING

Written safety procedures concerning the handling, storage, and shipping of the RTGs will be followed. These procedures include NRC License No. 09-17121-02 and the manufacturers' RTG Operation and Maintenance Manuals. Packaging will be in accordance with Certificate of Compliance No. 4888. Marking and labeling will be in accordance with 49 CFR. Shipping papers will be prepared as specified in 49 CFR.

The RTGs and shipping containers will be inspected for abnormal wear, defects, and damaged components to ensure that no damage has been sustained which would significantly reduce the effectiveness of the package and prevent the package from satisfying applicable licensing standards. Necessary repairs will be made in accordance with the manufacturers' specifications. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed.

Maintenance of the RTGs and shipping containers will be conducted, repairs made, and components replaced in accordance with the manufacturers' recommendations. Modifications to components of shipping packages which exist to comply with 10 CFR 71 design criteria will not be made without prior NRC approval.

6. INSPECTION, TEST, AND OPERATING STATUS

Inspection and test status of the RTGs and their shipping containers will be controlled and recorded by the Radiation Protection Officer. Operating status is not applicable. Status will be indicated by tag, label, marking, or log entry.

The Radiation Protection Officer will ensure that the required inspection and tests are conducted and properly recorded.

7. QUALITY ASSURANCE RECORDS

NRC Certificate of Compliance No. 4888 (including references and drawings) and records of tests, inspections, audits, personnel training and qualifications, and RTG shipments will be maintained. A technical description of the RTGs, the manufacturers' RTG Operation and Maintenance Manuals,

and procedures pertinent to RTG activities will also be maintained by the Radiation Protection Officer. They will be kept in such a manner as to be easily identifiable and readily retrievable.

8. AUDITS

All activities performed under this QA Program will be audited at least annually. Audits of the QA Program will be performed at the direction of the Operations Officer and by individual(s) having no responsibility for the area(s) being audited. Any deficiencies found during these audits will be corrected promptly. The results will be maintained and reported to the Operations Officer after each RTG shipment, implant, and recovery. Audit reports will be maintained as part of the Quality Assurance Records.

9. COMMAND RELATIONSHIPS

Figure 1 is the Naval Coastal Systems Center, Panama City, Florida, organizational chart. Those personnel involved with the 10 CFR 71 QA Program are outlined by heavy fencing.

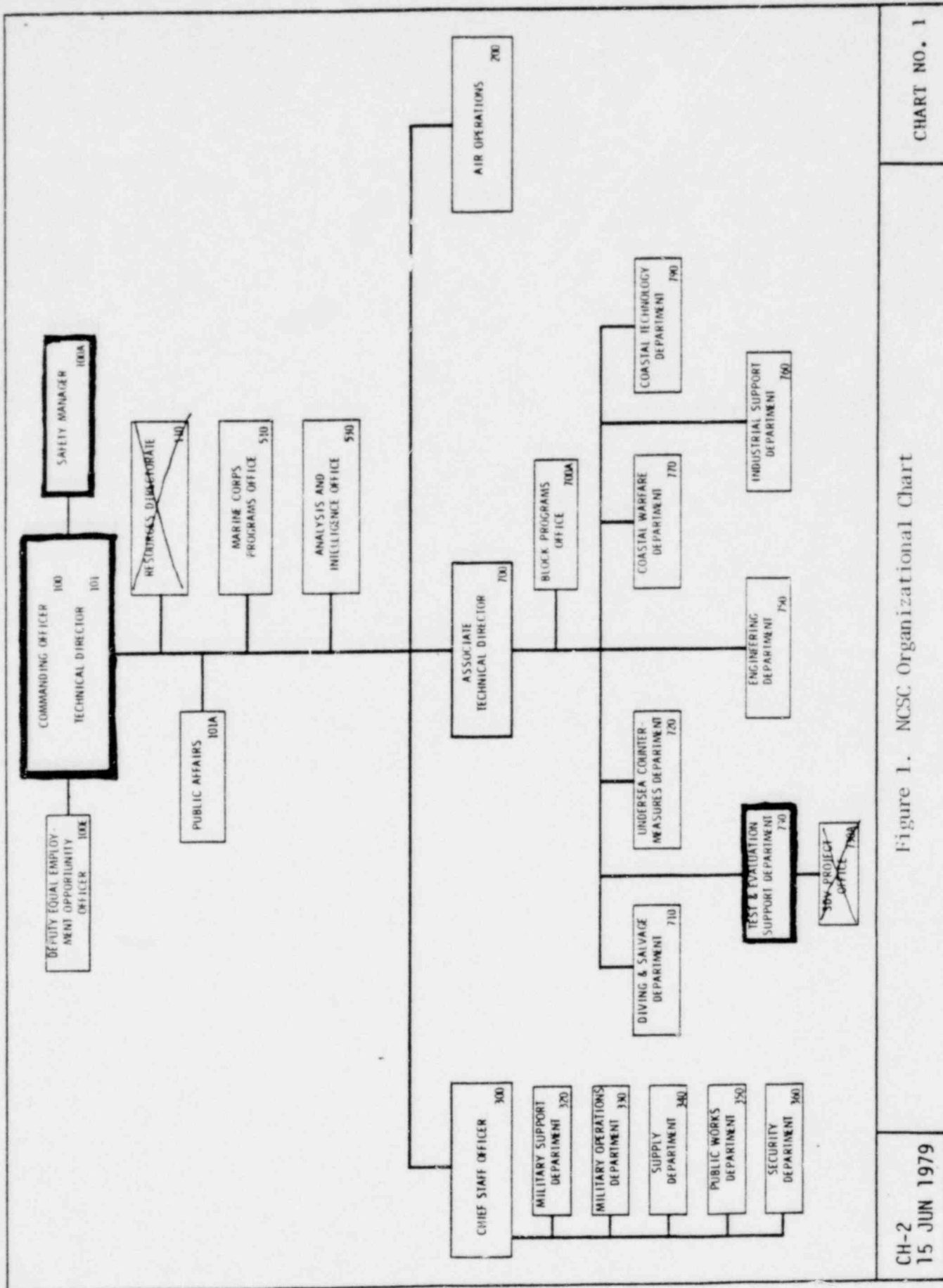


CHART NO. 1

Figure 1. NCSC Organizational Chart

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