CERT. # P16 \$888610 LOC # 213-81 CMC# 238-81



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

MAR 2 3 1931

NAVY, DEPARTMENT OF THE USS PROTEUS (AS 19) FPO SAN FRANCISCO CA 96601

04-18041-01

Gentlemen:

In our letter of November 26, 1980, we noted that your transportation activities may not be in accordance with 10 CFR Fart 71.

Please indicate in the appropriate box below the status of your transportation activities and return to me within thirty (30) days from the date of this letter.

Sincerely,

Charlie Strag Den

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

11.11

We do not deliver to a carrier for transport licensed material in excess of 20 Ci per package.

We already have an NRC approved QA program, approval number _____.

XX

An application for approval of a QA program and registration for package design(s) have been submitted under separate cover.

Signed: 60. KINETAN, LIJG, USN

Position: Radiographic Safety Officer

Date: 21 APRIL 1981

ENCLOSURE (1)





DEPARTMENT OF THE NAVY

PROTEUSINST 9900.4 AS19:02:es

24 APR 1981

USS PROTEUS INSTRUCTION 9900.4

- Subj: Quality Assurance Program for the Packaging of Radiographic Material for Transport and Transportation of Radiographic Material under Certain Conditions (10CFR71)
- Ref: (a) U. S. Nuclear Regulatory Commission Materials License 04-18041-01
 (b) Code of Federal Regulations Title 10, Part 71 (10CFR71)
 (c) Code of Federal Regulations Title 49

Encl: (1) Radioactive Material Packaging Quality Assurance Program

1. <u>Background</u>. PROTEUS is authorized by reference (a) to use certain radioactive materials aboard PROTEUS and tended vessels and in areas where PROTEUS is operating. In the course of exercising this authorization some of these materials are shipped to and from civilian suppliers who are likewise licensed by the NRC to provide these materials. A recent revision to reference (b) requires the development of a program to establish, maintain and execute a quality assurance program satisfying each of the applicable criteria specified in reference (b), Appendix E, "Quality Assurance Criteria for Shipping Packages for Radioactive Material", and satisfying any specific provisions which are applicable to the licensee's activities, including procurement packaging.

2. Action. This instruction provides for procedures necessary for the satisfactory establishment and execution of the quality assurance program for use in packaging, shipment, and transportation of licensed materials by PROTEUS.

3. <u>Scope</u>. This instruction applies to all radioactive materials covered by reference (a). As an end user it is not intended that PROTEUS engage in the manufacture of alteration of shipping packages. Rather, this program is designed to ensure that the quality of shipping packages received is as initially certified by the supplier and is maintained while such packages are in the custody of PROTEUS. This instruction is not to be construed, in any case, as a relaxation of the requirements in reference (a) or other directives of higher authority.

4. Intent. The intent of this instruction is to place the burden of compliance for shipping, transporting, and receipt of licensed material on the individuals utilizing and responsible for those sources. Consequently the Radiological Controls Officer (RCO) and Radiographic Safety Officer (RSO) have received the major portion of document responsibles. Likewise

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they have been tasked with audit requirements to ensure they periodically evaluate the functioning of their organization and it's record keeping procedures. This procedure also allows the RSO to serve as Radiographic Material Packaging Quality Assurance (RMPQA) Officer, but places additional document maintenance and audit responsibilities upon him if this be the case. Additionally when the RSO serves as RMPQA Officer; auditor(s) with no direct responsibilities to licensed materials must be certified to conduct semiannual and receipt/shipping audits. Their independence from by-products material responsibilities is crucial to the success of the RMPQA Program.

McColley

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