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TO: Telecopier Number 301-492-0260

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Company USNRC Transportation Branch

FROM: Name Daniel Griffin R&D

Date 2/27/90

SPECIAL INSTRUCTIONS:

$150.00 fee will be made out and sent today, fast turn around would be much appreciated

Thank you.

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PROFESSIONALS IN THE SCIENCE OF TESTING

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February 27, 1990

10 CFR Part 71 QA Program
for Industrial Radiography and
Sealed Sources

1. Organization
The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with National Certified Testing Laboratories.Design and Fabrication shall not be conducted under this QA Program.The QA Program is implemented using the following organization.

The RPO 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 and operating status and recordkeeping.

2. Quality Assurance Program
The management of N.C.T.L. establishes and implements this QA Program. Training,prior to engagement,for all QA 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 RPO shall assure that all radioactive material shipping packages are designed and manufactured under a QA Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after January 1, 1979. This requirement will be satisfied by receiving a certification to this effect from the manufacturer or supplier of the package.

3. Document Control
All documents related to a specific shipping package will be controlled through the use of written procedures. All documents changes will be performed according to written procedures approved by management.

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

4. Handling, Storage, and Shipping
Written safety procedures concerning the handling, storage, and shipping of packages for 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.

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5. Inspection, Test, and Operating Status
Inspection, test, and operating status of packages for 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.

Note: 10 CFR Part 34 identifies specific inspections and tests to be conducted during use and maintenance.

6. Quality Assurance Records.
Records of package approvals (including references and drawing), procurement 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 identified and retrievable. A list of these records, with their storage location, will be maintained by RPO.

7. Audits
Established schedules of audits of the QA Program will be performed using written check lists. 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.