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1.0 APPENDIX H - OA PROGRAM FOR TRANSPORTATION OF RADIOACTIVE MATERIALS

1.1 INTRODUCTION

- 1.1.1 This appendix identifies Cherne Contracting Corporation's Quality Assurance Program for the transportation of radioactive materials in accordance with 10 CFR Part 71. Cherne Contracting Corporation is licensed under 10 CFR Part 34 for the use of IR-192 for purposes of industrial radiography.
- 1.1.2 This appendix is applicable to any transportation package containing an IR-192 source in excess of 20 ci. delivered to a carrier.
- 1.1.3 Cherne Contracting Corporation activities with respect to transportation packages includes: use, handling, inspection and maintenance. Design, fabrication, assembly and testing of transportation packages is by others. However, responsibility for compliance with Part 71 requirements is with Cherne Contracting Corporation for those transportation packages which it utilizes and delivers to a carrier.

1.2 QA PROGRAM

- 1.2.1 This QA Program identifies the administrative controls to be followed to assure all requirements for transportation packages are being met. Written procedures needed for implementation of this program are identified in the Radiation Safety Manual. Control of this Appendix, including revisions, will be as stated in Section 1.0 of the Radiation Safety Manual.
- 1.2.2 Attached to this Appendix is a matrix identifying the requirements of this QA Program with the corresconding implementing procedures of the Radiation Safety Manual.
- 1.2.3 The OA Manager has overall administrative responsibility for this program. The Radiation Safety Office shall have specific implementing responsibility at each site, including training and certification of personnel, document control, and ensuring mailufacturers design and QA program control.

1.3 ORGANIZATION

1.3.1 The organization and responsibilities for this Program is identifed in the Cherne Contracting Corporation Radiation Safety Manual, Section 1.0.

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1.4 DOCUMENT CONTROL

- 1.4.1 Measures will be established to assure that documents relating to procurement, handling, storage, shipping and inspection of transportation packages are controlled. Changes to documents will be performed in accordance with written procedures.
- 1.4.2 The Radiation Safety Officer shall assure that QA functions are conducted in accordance with the latest approved requirements.

1.5 HANDLING, SHIPPING AND STORAGE

- 1.5.! Measures shall be established to assure that handling, shipping, and storage requirements ae completed and implemented in accordance with procedures prior to release of shipments.
- 1.5.2 Radiographers will implement the necessary activities.

1.6 INSPECTION

- 1.6.1 Measures shall be established to assure that appropriate inspections are completed and accepted prior to delivery of transportation packages to a carrier. The appropriate records shall be completed to indicate the inspection acceptance.
- 1.6.2 Nonconforming items shall be positively identified by use of status tags to prevent inadvertant use.
- 1.6.3 Radiographers will perform all necessary inspections directed by the Radiation Safety Officer.

1.7 RECORDS

- 1.7.1 A system shall be developed to assure appropriate : cords are maintained, identified, and easily retrievable.
- 1.7.2 The Radiation Safety Officer shall be responsible for implementing the records system in accordance with written procedures. These procedures shall identify the types of records under this program including manufacturer's Certificate of Compliance and reference drawing.

1.8 AUDITS

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1.8.1 Measures shall be established to assure compliance to this program through audits utilizing written checklists.

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1.8.2 Audits shall be conducted at least once a year luated and corrected. Auditors shall have no r area audited.		
1.8.3 Management shall be informed of audit results.		

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10 CFR 71 Appendix F QA Program Requirement	Radiation Safety Manual Applicable Implementing Procedure
1) QA Program Control	Section 1.0
2) Document Control	Section 1.0
3) Personnel Training	Section 2.0
4) Handling of Transporation Packages	Section 7.0, 9.0
5) Storage of Transporation Packages	Section 6.0
6) Shipping of Transportation Packages	Section 9.0
7) Inspection	Section 9.0, 11.0
8) Records	Section 3.0
9) Audits	Section 13.0