



Engineering Support Services • Certified Welding Inspection
Third Party Inspection • Non Destructive Examination

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QUALITY ASSURANCE PROGRAM

FOR

USE, MAINTENANCE AND REPAIR OF PACKAGES DESIGNED TO
TRANSPORT RADIOGRAPHIC EXPOSURE DEVICES

MAIN OFFICE

KC Inspection, Inc.

4835 Colt Street

Unit C

Ventura, California

93003

(805) 658-6558

PREPARED BY

Richard Carlson

DATE 2/9/93

APPROVED BY

Richard Carlson

DATE 2/11/93

AUTHORIZED BY

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DATE 2/11/93

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QUALITY ASSURANCE PROGRAM

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QUALITY ASSURANCE PROGRAM

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Ventura, CA 93003

1.0 ORGANIZATION

1.1 The final responsibility for the Quality Assurance Program for Part 71 requirements rest with **KC Inspection, Inc.**. 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:

1.1.1 The Radiation Safety Officer is responsible for overall administration of the Program, training and certification, document control, and auditing.

1.1.2 Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping

2.0 QUALITY ASSURANCE PROGRAM

2.1 The management of **KC Inspection, Inc.** will 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 QA 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.

2.2 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.

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



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3.0 DOCUMENT CONTROL

- 3.1 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.
- 3.2 The Radiation Safety Officer shall insure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

4.0 HANDLING, STORAGE AND SHIPPING

- 4.1 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.
- 4.2 Radiography personnel shall perform the handling, storage and shipping operations.

5.0 INSPECTION, TEST AND OPERATING STATUS

- 5.1 Inspection, 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.
- 5.2 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.



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6.0 QUALITY ASSURANCE RECORDS

- 6.1** 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.
- 6.2** 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

- 7.1** Audits for verification of compliance with the Quality Assurance Program will be conducted as described below:
 - 7.1.1** Each completed **"Radioactive Material Transfer Report"** form (attached) 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.
 - 7.1.2** The Radiation Safety Officer, or his designee, will conduct periodic inspection of shipping containers for damage, proper labeling and identification.
 - 7.1.3** Management will conduct periodic audits on the Radiation Safety Officer for compliance with the Program's procedures.
- 7.2** Results of audits will be maintained. Audit reports will be evaluated and deficient areas corrected. Personnel performing audits shall have no direct responsibility in the activity being audited.



QUALITY ASSURANCE PROGRAM

ORGANIZATIONAL STRUCTURE

Kelly Gaston
President

Richard Graig
Vice President

Kelly Gaston
Radiation Safety Officer

Richard Graig
Alternate Radiation Safety Officer

Tom W. Cuthbertson
Outside Consultant
(R.S. Consultant)

Radiographers

Radiographers'
Assistant

Trainee
Radiographers

**USE, MAINTENANCE AND REPAIR OF SHIPPING CONTAINERS
FOR RADIOACTIVE MATERIAL**