March 27, 1980
(Revision 2)

10 CFR PART 71 QA PROGRAM

FOR INDUSTRIAL RADIOGRAPHY LICENSEES

1. Organization

The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with (Company Name). Design and Fabrication shall not be conducted under this QA Program. The QA Program is implemented using the following organization:

Note: The Organizational Chart as used in the license application should be presented. It may be advisable to designate the Radiation Safety Officer as the responsible individual for the Part 71 QA Requirements.

The Radiation Safety Officer 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 (Company Program) 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 Radiation Safety Officer 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.

3. Docment Control

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.

The Radiation Safety Officer 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 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.

Radiography personnel shall perform the critical handling, storage, and shipping operations.

5. Inspection, Test, and Operating Status

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.

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.

6. Quality Assurance Records

Records of package approvals (including references and drawings), 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. At list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

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.

APPENDIX

NOTICE OF VIOLATION

Diamond H Testing Company
Chubbuck, Idaho 73018

Docket No. 030-32202
License No. 11-27316-01

During an NRC inspection conducted on January 25-26 and February 10, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

> 10 CFR 71.12 states, in part, that a general license to transport licensed material, or to deliver licensed material to a carrier for transport, applies only to a licensee who has a quality assurance program approved by the Commission as satisfying the provisions of subpart H of 10 CFR Part 71; has a copy of the specific license, certificate of compliance, or other approval of the package; and submits in writing to NRC, prior to the first use of the transport package, the licensee's name, license number, and package identification number.
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> Contrary to the above, as of February 10, 1993, the licensee routinely transported licensed material and delivered licensed material to a carrier for transport under the general license without having a quality assurance program approved by the Commission, and the licensee had not submitted in writing to the NRC, prior to the first use of the transport packages, the licensee's name, license number, and package identification numbers.
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> This is a Severity Level IV violation (Supplement V).

Pursuant to the provisions of 10 CFR 2.201, Diamond H Testing Company is hereby required to submit a written statement or explanation to the Regional Administrator, Region IV, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 1st day of April, 1993