

71-0771



**Longview Inspection -  
Gulf Coast Group, Inc.**

HOUSTON DIVISION

JANUARY 03, 1994

MR. ROBERT L. BAER, CHIEF  
OFFICE OF NUCLEAR SAFETY  
& SAFEGUARDS  
U.S. NUCLEAR REGULATORY COMMISSION

DEAR MR. BAER,

I AM REQUESTING A QUALITY ASSURANCE PROGRAM FOR OUR COMPANY. THIS PROGRAM WOULD BE APPLICABLE FOR LONGVIEW INSP. INC. NATIONWIDE.

I HAVE ENCLOSED INFORMATION THAT HOPEFULLY WILL BE SUFFICIENT FOR YOUR REQUIREMENTS. THE FEE FOR THIS PROGRAM HAS ALREADY BEEN SUBMITTED, AND IF YOU SHOULD REQUIRE ANY ADDITIONAL INFORMATION, PLEASE CALL ME AT (713) 453-0486.

BEST REGARDS

LLOYD A. GRAY  
CORPORATE RADIATION SAFETY DIRECTOR

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cert# 2775 977 287

1. ORGANIZATION

THE FINAL RESPONSIBILITY FOR THE QUALITY ASSURANCE PROGRAM FOR PART 71 REQUIREMENTS RESTS WITH LONGVIEW INSP. INC. THE DESIGN AND FABRICATION OF RADIOACTIVE MATERIAL SHIPPING PACKAGES SHALL NOT BE CONDUCTED UNDER THIS QUALITY ASSURANCE PROGRAM.

THE ORGANIZATIONAL CHART IS AS FOLLOWS:

PRESIDENT-----JIM TREAT  
VICE PRESIDENT-----PETER SCANELL  
COMPTROLLER-----RAY SMITH  
CORPORATE RAD. SAFETY DIRECTOR-----LLOYD A. GRAY

A. STATEMENT OF FACT

THE CORPORATE RADIATION SAFETY DIRECTOR IS RESPONSIBLE FOR THE OVERALL ADMINISTRATION OF THE PROGRAM. DELEGATION OF AUTHORITY TO THE RADIATION SAFETY OFFICERS FOR DUTIES SUCH AS TRAINING AND CERTIFICATION, DOCUMENT CONTROL, AND AUDITING.

THE RADIOGRAPHERS ARE RESPONSIBLE FOR HANDLING, STORING, SHIPPING, INSPECTION, TEST, OPERATING STATUS AND RECORD KEEPING.

2. QUALITY ASSURANCE PROGRAM

THE MANAGEMENT OF LONGVIEW INSPECTION INC. 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 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 QUALITY ASSURANCE PROGRAM APPROVED BY THE NUCLEAR REGULATORY COMMISSION FOR ALL PACKAGES DESIGNED OR FABRICATED AFTER JANUARY 1979. THIS REQUIREMENT CAN BE SATISFIED BY RECEIVING A CERTIFICATION TO THIS EFFECT FROM THE MANUFACTURER.

3. DOCUMENT 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 TEST, 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, SHIPPING AND STORAGE OPERATIONS.

5. INSPECTION, TEST AND OPERATING STATUS

INSPECTION, TEST AND OPERATING STATUS OF PACKAGES FOR CERTAIN SPECIAL FORM RADIOACTIVE MATERIAL WILL BE CONDUCTED 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 TEST 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), INSPECTIONS, TEST, OPERATING LOGS, AUDIT RESULTS,

PERSONNEL TRAINING AND QUALIFICATIONS AND RECORDS OF SHIPMENTS WILL BE MAINTAINED. DESCRIPTIONS OF EQUIPMENT AND WRITTEN PROCEDURES SHALL ALSO BE MAINTAINED.

THESE RECORDS WILL BE MAINTAINED IN ACCORDANCE WITH LONGVIEW'S 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. AUDITS

ESTABLISHED SCHEDULES OF AUDITS OF THE QUALITY ASSURANCE PROGRAM WILL BE PERFORMED USING WRITTEN CHECKLISTS. THE RESULTS OF AUDITS WILL BE MAINTAINED AND REPORTED TO MANAGEMENT. AUDIT REPORTS WILL BE EVALUATED AND DEFICIENT AREAS CORRECTED. THE AUDITS PERFORMED BY THE CORPORATE RADIATION SAFETY DIRECTOR WILL BE CONDUCTED AT EACH LONGVIEW FACILITY AT LEAST ONCE A YEAR. RADIOGRAPHY CREW AUDITS WILL BE PERFORMED BY THE RADIATION SAFETY OFFICER QUARTERLY. AUDIT REPORTS WILL BE MAINTAINED AS PART OF THE QUALITY ASSURANCE RECORDS.