

Professional Quality Testing Co.

P.O. Box 327
New Kensington, PA 15068
Phone (412) 337-9810

Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pa. 19406-1415

Date: 1/12/94

ATTN: Mr. Tony Kirkwood

RE: Docket No. 030-31072
License No. 37-28367-01
Routine Inspection No. 93-001

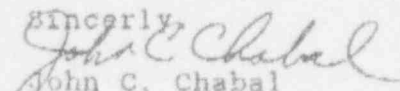
Dear Mr. Kirkwood:

Violation A. Professional Quality Testing Co. has a quality assurance program which is part of the license. Amersham has sent us a certificate of compliance for the Techops 660 to be used as a shipping package. Also they informed us that it was already registered with the NRC and we did not have to re-register it. Contrary to the above, since my conversation with you I am preparing to register with the NRC in Washington D.C. This will be accomplished within the next three days from the date of this letter.

Violation B. Inaccordance with 10 CFR 34.25, a sealed source shall not be put into use until leak tested. Professional Quality Testing Co. did not use the source. It was in a source changer and was ready to be shipped back to Amersham. In the future, we will ship the source back to Amersham prior to the leak test coming due.

Should you have any further questions or needed information please contact as soon as possible. Thank you.

Sincerely,


John C. Chabal
RSO

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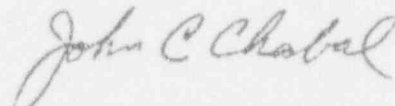
January 13, 1994

Mr. Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. MacDonald:

In accordance with 10 CFR 71.12 (c).(3), Professional Quality Testing Co., License No. 37-28367-01, requests to be registered as a user of Tech/Ops, Inc. Model 660 Package Identification Number USA/9033/B(U), under terms of Certificate of Compliance Number 9033 issued to Tech/Ops, Inc., Burlington, MA.

Sincerely,



John C. Chabal
Radiation Safety Officer

JCB/mh

9402100021

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10CFR71 QA PROGRAM

FOR INDUSTRIAL RADIOGRAPHY LICENSEES

1. Organization

The final responsibility for the Quality Assurance Program for Part 71 Requirements rests with Professional Quality Testing. Design and fabrication of radioactive material shipping package shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the organizational chart attached.

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, operating status and record keeping.

2. Quality Assurance Program

The management of Professional Quality Testing Co. establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagement in these functions, is required 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 1 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 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), 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.

7. Audits

Established schedules of audits of the Quality Assurance Program will be performed using written checklists. 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.

- III. Radiation Detection and Measurement (2 hours)
 - A. New Instrumentation
 - B. Use of radiation survey instruments
 - 1. Operation
 - 2. Calibration
 - 3. Limitations
 - C. Survey techniques
 - 1. Check potential "trouble spots"
 - 2. Meter malfunctions - what to do
 - D. Use of personnel monitoring equipment
 - 1. Film badges
 - 2. Pocket dosimeters
 - 3. Rate alarms
- IV. Radiographic equipment to be used (2 hours)
 - A. Recent or anticipated changes or modifications of equipment or procedures
 - B. Remote handling equipment
 - C. Storage containers
- V. The requirements of pertinent Radiation Safety Standards and applicable regulations (2 hours)
 - A. Regulations of the U. S. Nuclear Regulatory Commission
 - 1. "Standards for Protection Against Radiation" 10-CFR-20
 - 2. "Licenses for Radiography and Radiation Safety Requirements for Radiographic Operations" 10-CFR-34
 - 3. "Notices, Instructions and Reports to Workers; Inspection" 10-CFR-19
 - B. Conditions of the company's NRC License
 - C. Licensing and regulation by NRC Agreement States
 - D. Other pertinent regulations
 - 1. Occupations Safety and Health Administration
 - E. Recent or anticipated changes in the above

4. Maintain continuous surveillance or security of the restricted area to make certain no one enters this area during the exposure. The radiographer is responsible for making any necessary adjustments in the restricted area so that the allowable radiation levels will not be exceeded.
5. At end of exposure, retract source into unit. To positively determine that the source is in the safe position, the radiographers must make a radiation survey of the exposure device 360 degrees and the entire length of the source tube after each exposure to confirm that the source is in the shielded position. The radiation survey should yield the same results as the survey performed prior to removal of the device from the storage area. Note: A higher radiation level could indicate that the source did not return to the storage position. If this should happen, the radiation emergency procedures shall be followed. The Self Locking should return to locked position at the end of each exposure.
6. Depress lock plunger. Note: On the Gamma Century A-2-A, and Gammatron 100A units turn crank handle back (counter-clockwise) and depress lock plunger.

D. Dismantling the Radiographic Equipment

1. Survey the entire length of the source tube to doubly ensure that the source has not remained in the tube. Return to the exposure device and re-survey 360 degrees.
2. Disconnect control cable from the local assembly, swing the connector end of the control cable at a right angle to the end of the "pigtail" and disconnect. Insert safety plug in the lock assembly.
3. Disconnect source tube from the exposure device and insert the safety plug. For Techops 660 & 680 rotate selector ring from operate to lock.
4. Re-survey the device and record results on the Radiation Survey and Utilization Record.
5. Return the exposure device to the appropriate storage location and lock.
6. Read and record your dosimeter reading.

ITEM 10.2

Instrument Types - Make & Model No.	Victoreen 492
Number Available	2 Victoreen
Radiation Detected	Gamma & X- Ray
Sensitivity Range (mr/hr)	0-1000 mr/hr

Instrument calibration procedures:

Radiation survey meters will be calibrated every three (3) months and after each instrument servicing by an approved representative.

Rate Alarms.....Amersham Tanrasoo or NRC approved supplier

Calibration annually

Alarms shall be checked daily for battery & audio.