

EMPIRE SOILS INVESTIGATIONS, INC.  
5 KNABNER ROAD  
MECHANICVILLE, N.Y. 12118

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PROCEDURE ES-RS-104  
DECEMBER 1990

10CFR72 QA PROGRAM  
FOR INDUSTRIAL RADIOGRAPHY

1. Organization

The final responsibility for the Quality Assurance Program for part 71 Requirements rests with Empire Soils Investigations. 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:

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 Empire Soils Investigations 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 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, acceptance, 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

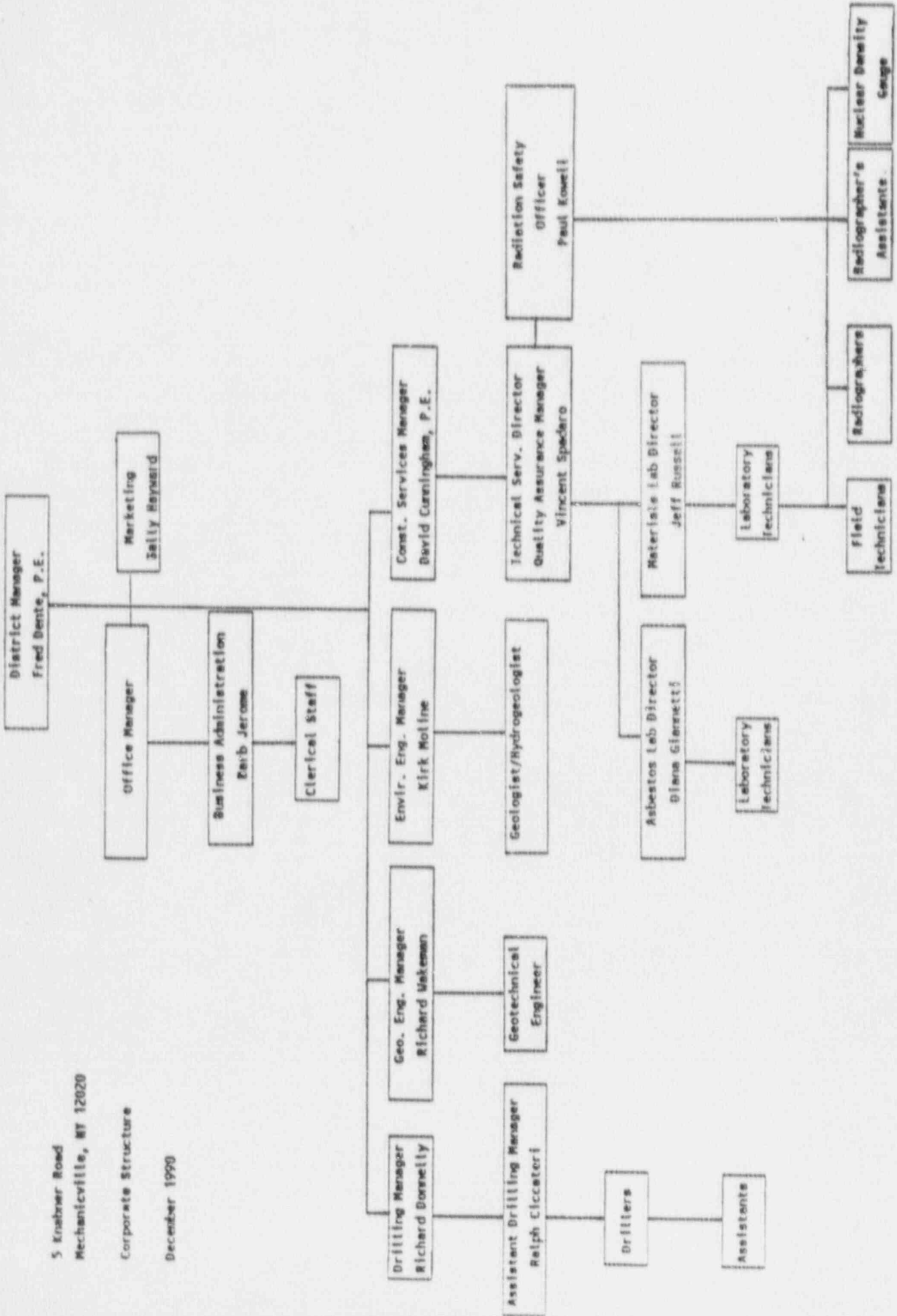
Records of package approvals (including references and drawings), inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written procedures will also be maintained.

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. 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 based 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.

Eastern District Organization Chart\*



5 Knabner Road  
 Mechanicville, NY 12020  
 Corporate Structure  
 December 1990

\*Refer to Organization Chart "Quality Assurance Program" for further definition of QA/QC responsibilities.