

LONG ISLAND LIGHTING COMPANY  
10CFR71 QUALITY ASSURANCE PROGRAM  
FOR INDUSTRIAL RADIOGRAPHY

1. ORGANIZATION

The final responsibility for the Quality Assurance Program for Part 71 Requirements rests with Long Island Lighting Company. Design and fabrication of radioactive material shipping packages shall fall under the manufacturer's Quality Assurance Program. The LILCO Quality Assurance Program is implemented using the following organization:

The NDE Section Supervisor is responsible for the supervision of the radiographic personnel, Level II inspections, and reported to directly by the Radiation Safety Officer.

The Radiation Safety Officer is responsible for overall administration of the program, training and certification, document control, and Level I inspections.

The radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

Note: refer to the attached Organization Chart.

2. QUALITY ASSURANCE PROGRAM

The Manager of the LILCO Corporate Quality Assurance Department 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.

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.

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**

Compliance with this Quality Assurance Program will be determined through a bi-level internal inspection system.

Level I Inspections

Level I inspections shall be performed on a quarterly basis of radiographic personnel to evaluate their performance and compliance to operation and safety procedures. Level I inspections shall be performed by the Radiation Safety Officer or designee.

Level II Inspections:

Level II inspections shall be performed on an annual basis to assure maintenance of all records within the Radiographic Operations and Safety Program. Level II inspections shall be performed by an inspection team designated by the Quality Control/NDE Section Manager, and have no responsibility in the activities being reviewed.

For both Level I and Level II inspections, a completed copy of inspection checklists and any attachments shall be maintained on file by the Radiation Safety Officer. Any corrective action replies shall also be filed with the applicable inspection checklist.

# LONG ISLAND LIGHTING COMPANY NDE SECTION ORGANIZATION CHART

