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January 24, 1994

10 CFR PART 71 QA PROGRAM
FOR INDUSTRIAL RADIOGRAPHY AND
SEALED SOURCES

1. Organization

The final responsibility for the Quality Assurance (QA) Program for Part 71 Requirements rests with COMO Tech Inspection. Design and Fabrication shall not be conducted under this QA Program. The QA Program is implemented using the following organizations.

Note: The Organizational Chart as used in the license application should be presented for organizational elements, e.g. (procurement quality assurance, radiation safety) functioning under the QA program including principal contractors should be identified.

The Radiation Safety Officer (RSO) is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers or the RSO assistants are responsible for handling, storing, shipping, inspection, test and operating status and record-keeping.

2. Quality Assurance Program

The management of COMO Tech Inspection establishes and implements this QA Program. Training, prior to engagement, for all AQ 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 (RSO) 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 or supplier of the package.

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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 Office (RSO) 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 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.

5. Inspection, Test, and Operating Status

Inspection, Test, and operating status of packages for 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.

Note: 10 CFR Part 34 Identifies specific inspections and tests to be conducted during use and maintenance.

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. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer (RSO).



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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 area 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.

Raymond E. Hiersche Sr.
Raymond E. Hiersche Sr.
Vice President

**QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2, the Quality Assurance Program identified in Item 5 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME Como Tech, Inspection		3. EXPIRATION DATE March 31, 1994	
STREET ADDRESS P.O. Box 292		4. DOCKET NUMBER 71-0669	
CITY DeSoto	STATE KS	ZIP CODE 66016	

5. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S)
March 13, 1989

6. CONDITIONS

- Activities authorized by this approval: procurement, maintenance, repair, and use to be executed with regard to transportation packages in special form. All other activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from package suppliers that these activities were conducted in accordance with an NRC-approved QA program. It shall remain the responsibility of the licensee-user that all transportation activities meet the requirements of 10 CFR §71.101.
- Records for each shipment of licensed material as required by 10 CFR §71.91(a) must be retained for a period of 3 years.



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Charles E. MacDonald
FOR THE U.S. NUCLEAR REGULATORY COMMISSION
Charles E. MacDonald

APR 05 1989