

RETURN TO 396-SS PDR

71-0447



DEPARTMENT OF THE NAVY
SHORE INTERMEDIATE MAINTENANCE ACTIVITY CHARLESTON
NAVAL BASE
CHARLESTON, SOUTH CAROLINA 29408-5950



9091
Ser 01/0394

12 MAR 1986

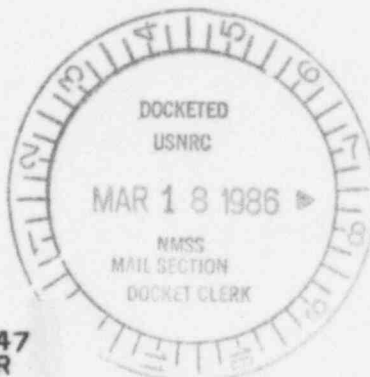
United States
Nuclear Regulatory Commission
Attn: Mr. Len Gordon
Washington, DC 20555

Gentlemen:

Your letter FCTC:LLG 71-0447 of 3 March 1986 terminated our transport and receipt capabilities because of lack of valid Quality Assurance Program approval. Our letter 4730 Ser 03/1373 of 28 August 1985 forwarded SIMA's program for your approval. As per phone conversation with Mr. Len Gordon on 11 March 1986, this letter was not received by your office. Enclosed is a copy of our 28 August 1985 letter and our Quality Assurance Program for approval to correct this deficiency.

W. G. Earnest
W. G. EARNEST
Lieutenant Commander, U.S. Navy
Commanding Officer

Encl:
(1) SIMACHASNINST 9091.2 of 7 October 1985



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DEPARTMENT OF THE NAVY
SHORE INTERMEDIATE MAINTENANCE ACTIVITY CHARLESTON
NAVAL BASE
CHARLESTON, SOUTH CAROLINA 29408-5950

SIMACHASNINST 9091.2
03:cda
07 OCT 1985

SHORE INTERMEDIATE MAINTENANCE ACTIVITY CHARLESTON INSTRUCTION 9091.2

Subj: QUALITY ASSURANCE PROGRAM REQUIREMENTS FOR SHIPMENT OF
RADIOACTIVE SOURCES USED IN GAMMA RADIOGRAPHY

Ref: (a) U.S. Nuclear Regulatory Commission License Number 31-19047-01 issued to
Shore Intermediate Maintenance Activity, Charleston on 29 Aug 79
(b) SIMACHASNINST 9091.1
(c) U.S. Nuclear Regulatory Commission Rules and Regulations, Code of Federal
Regulations, Transportation (Parts 100 to 199)
(d) U.S. Nuclear Regulatory Commission Rules and Regulations, Title 10 -
Energy, Part 71, Packaging of Radioactive Material for Transport and
Shipment of Radioactive Material under Certain Conditions.
(e) COMNAVSURFLANTINST 9090.1

Encl: (1) Check List for Packaging and Shipment of Radiographic Sources
(2) Inspection Check Lists 1, 2, 3, and 4 of enclosure (12) of SIMACHASNINST
9091.1
(3) Audit Forms 15-1, 15-2, and 15-3, enclosure (15) of SIMACHASNINST 9091.1

1. Purpose. To promulgate the minimum precautionary measures to be utilized in the shipment of Radioactive Sources used in Gamma Radiography from the Shore Intermediate Maintenance Activity (SIMA), Charleston to a vendor licensed by the U.S. Nuclear Regulatory Commission to receive Radioactive Materials in accordance with references (a) through (e).

2. Discussion

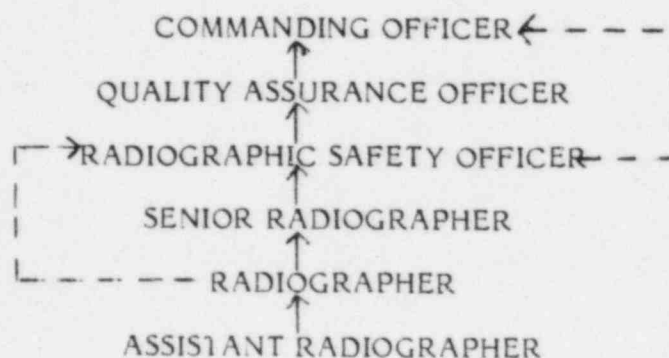
a. Radioactive Isotopes are capable of inflicting serious bodily harm if used improperly or without regard to safety.

b. All shipments or transfers of Radioactive Materials over public areas, including shipments made with private or government vehicles, must comply with the appropriate Federal, State, and local transportation requirements. This instruction is provided to ensure SIMA Charleston complies with references (a) through (c) with regards to the shipment of Radioactive Sources.

c. When questions arise concerning this instruction or referenced instructions, clarification may be obtained from the Radiographic Safety Officer.

3. Organization. The final responsibility for the Quality Assurance (QA) Program for compliance with this instruction and references (a) through (e) rests with SIMA Charleston. Design and fabrication shall not be conducted under this program. The QA Program is implemented using the Chain of Command as shown below:

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The broken lines indicate a provision for direct access up the Chain of Command in matters involving safety.

4. Quality Assurance Program

a. The Commanding Officer shall establish and implement this program upon approval.

b. The Radiographic Safety Officer is responsible through the Chain of Command for the overall administration of the QA Program, training, and certification of Radiographers and Radiographic Assistants, document control, and conducting audits as required by reference (b). The Senior Radiographer is responsible for completion of all required documentation and maintenance of all required records. The Radiographers are responsible for the handling, storage, shipping, inspections, test and operating status, and record keeping of Radioactive Sources.

c. Training of all Radiographic personnel on Radiation Safety and the requirements of the U.S. Nuclear Regulatory Commission shall be conducted, at a minimum, once a month and annually all Radiographic personnel shall be required to be tested on the above training. The training and examination is to be administered by the Radiographic Safety Officer.

5. Document Control. The Certificate of Compliance for the Radiographic Exposure Device, Radiographic Source Changer/Shipping Container, and the Special Form Encapsulated Source used by the Radiographic personnel at SIMA Charleston shall be maintained by the Radiographic Safety Officer. No modification or alterations to this equipment shall be accomplished by this Command.

6. Handling, Storage, and Shipping

a. The procedures contained in reference (b) concerning the handling, storage, and shipping of Radiographic Sources shall be strictly adhered to. Shipments shall not be made until all tests, certifications, acceptances, and final inspections have been completed.

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b. Only qualified Radiographers as defined in reference (b) shall accomplish the required handling, storage, and shipping operations.

7. Inspection, Test, and Operating Status

a. Inspection, test, and operating status of packages of Radiographic Sources shall be indicated and controlled by the written procedures contained in reference (b) and documented on the forms contained in enclosure (2). The status shall be indicated by tag, label, marking, or log entry. The status of nonconforming packages shall be positively maintained by written procedures contained in reference (b).

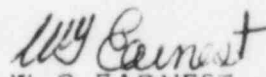
b. Only qualified Radiographers shall perform the regulatory required inspections and tests in accordance with references (a) through (e). The Senior Radiographer shall supervise performance of the required inspections and tests. The Radiographic Safety Officer shall ensure compliance.

8. Quality Assurance Records

a. Records of package approval, procurement, inspection, test, operating logs, audit results, personnel training and qualifications, and record of shipment shall be maintained in accordance with references (b) and (d). The Radiographer is responsible for maintenance of the records.

b. These records shall be maintained in an auditable manner so as to be readily identified and retrieved. The Radiographic Safety Officer shall maintain a list of the records and storage locations.

9. Audits. Established schedules of audits of the QA Program shall be performed utilizing the prepared audit forms of enclosure (3). Results of the audits shall be maintained and reported to the Quality Assurance Officer. Audit reports shall be conducted yearly unless otherwise required. Audit reports shall be maintained as part of the Quality Assurance records. Members of the audit team shall have no responsibility to the Nondestructive Laboratory.


W. G. EARNEST

Distribution
List A

DOCKET NO. 71-0447
CONTROL NO. 26641
DATE OF DOC. 03/12/86
DATE RCVD. 03/18/86
FCUF _____ PDR ☒
FCAF _____ LPDR _____
WM _____ I&E REF. ☒
WMUR _____ SAFEGUARDS _____
FCTC ☒ OTHER _____

DESCRIPTION:

reference their
Quality Assurance
Program Termination
and letter of 08/28/85
and telephone conv 03/11/86
03/18/86 INITIAL Ccc