

RETURN TO 356-SS

71-0676



COTTON HOUSTON, INC.
A PIPELINE SERVICE COMPANY



April 20, 1989

Director
Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: DOT Type B Package Approval
(Cotton Houston, Inc., License No. 42-26823-01)

Dwar Sir:

We would like to be registered as users of the following listed,
DOT Type B Transport Containers:

<u>Package Identification</u>	<u>Certificate No.</u>
Steel overpack drum	USA/6717/B(U)
Century S	USA/9135/B(U)
Spec Model 2T	USA/9056/B()
Model 680	USA/9035/B(U)
Model 660	USA/9033/B(U)
Model 650 Changer	USA/9032/B(U)
Model 533, 616, & 644	USA/0154/S

We have enclosed copies of the Certificates of Competent Authority
for the containers. Further we have enclosed a copy of our QA
Program for Transport Containers for your approval.
Pursuant to 10 CFR 170-31, we have enclosed the required fee of \$150.00.

Should you need additional information please contact me.

Respectfully,

Robert L. Cotton
President

RLC:pn

Enclosures

FEE EXEMPT

Log	Apr 89-2
Remitter	
Check No.	4287
Amount	1150
Fee Category	10B
Type of Fee	App
Date Check Recd	4/20/89
Date Complete	4/26/89
By	[Signature]

P. O. BOX 38972

HOUSTON, TEXAS 77238-8973

OFFICE: (713) 448-1065

FAX: (713) 448-3616

8905170112 890420
PDR ADOCK 07100154
PDR

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SECTION
VIII

TITLE

QA PROGRAM FOR SHIPPING CONTAINERS

QUALITY ASSURANCE PROGRAM
FOR
TRANSPORT CONTAINERS

COMPANY

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SECTION VIII	TITLE QA PROGRAM FOR SHIPPING CONTAINERS	
<p>1.0 <u>ORGANIZATION</u></p> <p>1.1 <u>Radiation Safety Director</u> - It shall be the responsibility of the Radiation Safety Director to ensure that the Q/A program for shipping containers is effectively executed. Any changes in the program, or additional procedure implementation due to regulatory requirements, shall be the responsibility of the Radiation Safety Director.</p> <p>1.2 <u>Radiation Safety Officer</u> - It shall be the responsibility of the Radiation Safety Officer to ensure the inspection of shipping containers is performed and that deficiencies are corrected. He shall be personally responsible for inspecting shipping containers on a quarterly basis and shall make a record of such inspections. He shall notify the Radiation Safety Director of deficiencies that require the acquisition of additional equipment or labels and shall see that these deficiencies are corrected.</p> <p>1.3 <u>Radiographer</u> - It shall be the responsibility of the radiographer to inspect shipping containers on a daily basis. Any deficiencies shall be reported to the Radiation Safety Officer to be corrected. Radiographers shall be appointed by the Radiation Safety Officer and shall be trained in the method of inspection for shipping containers.</p> <p>2.0 <u>QUALITY ASSURANCE PROGRAM</u></p> <p>2.1 <u>Operating Procedures</u> - The following procedures shall be adhered to when operating or using transport containers.</p> <p>2.1.1 Only authorized personnel shall be allowed to use the transport containers.</p> <p>2.1.2 Inspection of the devices shall be performed in accordance with 2.2 below.</p> <p>2.1.3 The nut and bolt running through the bolt ring shall be secured to ensure the top is secure.</p> <p>2.1.4 The container shall then be secured on the vehicle by running a piece of chain through the handle and attaching it to an intergral part of the vehicle. This chain shall then be locked with a pad-lock.</p> <p>2.2 <u>Inspection Procedures</u> - The following procedures shall be adhered to when inspecting transport containers.</p> <p>2.2.1 Only authorized personnel shall be allowed to inspect transport containers.</p>		
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	<p>2.2.2 The overall condition of the transport container shall be inspected to ensure that it is not visibly damaged.</p> <p>2.2.3 All components shall be inspected for proper and secure fit.</p> <p>2.2.4 Locks shall be inspected to ensure that they operate properly and hold securely.</p> <p>2.2.5 Bolt rings and nut and bolt locks shall be checked to ensure that they work properly.</p> <p>2.2.6 Inner packing (overpack) shall be checked to ensure it is in place and not damaged.</p> <p>2.2.7 Labels shall be inspected to ensure that they are not worn off and that they are legible.</p> <p>2.2.8 Handles shall be inspected to ensure that they are attached securely and are not in need of repair.</p> <p>2.2.9 Containers shall be checked to ensure that source plugs and dust covers are in good condition and are in place on the device before it is used.</p> <p>2.2.10 Radiation levels shall be checked when a new source is placed into the container, as well as on a daily basis by the radiographer.</p> <p>2.3 <u>Maintenance and Repair Procedures</u> - The following procedures shall be adhered to in order to ensure proper maintenance and repair of transport containers.</p> <p>2.3.1 Maintenance and repair shall only be performed by personnel authorized to do so.</p> <p>2.3.2 Maintenance, and any necessary repair, shall be performed on at least a quarterly basis.</p> <p>2.3.3 Any severe package damage (ie., punctures, holes in the package, etc.) shall be repaired. If the damage is severe enough that repair is not possible the package shall not be used.</p> <p>2.3.4 If a problem is found with a lock, it shall be corrected, or the lock shall be replaced before the device is used.</p> <p>2.3.5 Bolt rings, nuts and bolts shall be oiled. Any thread damage shall be repaired, or the part shall be replaced.</p>		
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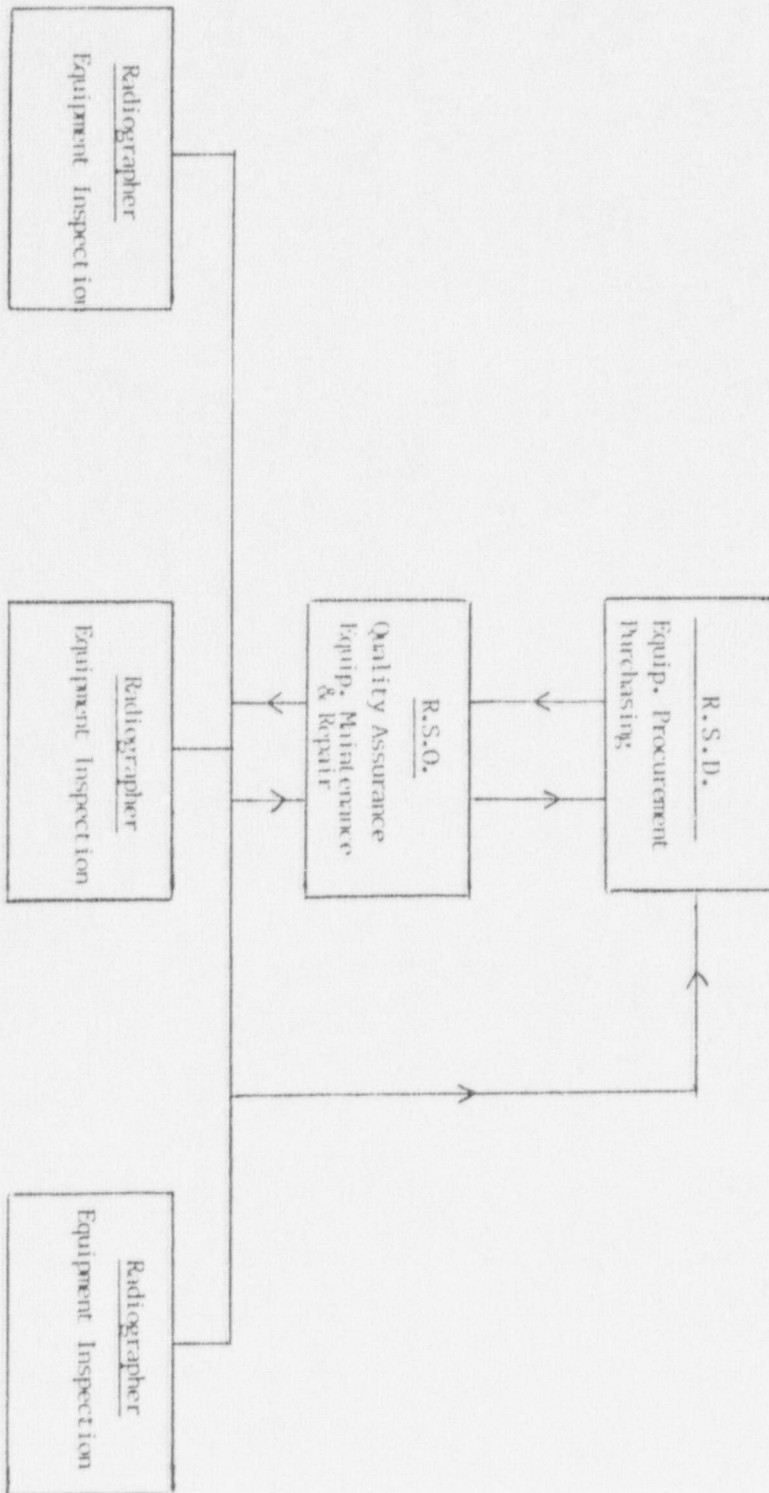
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	2.3.6	Inner packing shall be inspected and, if necessary replaced.
	2.3.7	If labels are not legible, they shall be replaced.
	2.3.8	Handles that are not securely attached shall be repaired before the device is used.
	2.3.9	If source plugs or dust covers are missing, or if they are in bad condition, they shall be replaced before the device is used.
	2.3.10	If radiation levels exceed permissible levels the device shall have additional shielding added, or be re-positioned on the vehicle in order to bring levels into acceptable limits.
2.4		<u>Packaging, Loading and Unloading of Transport Containers -</u> The following procedures shall be followed when packaging a container and when loading and unloading containers. 2.4.1 Packaging, loading and unloading of transport containers shall only be performed by personnel authorized to do so. 2.4.2 Containers shall be checked to ensure proper inner packing. 2.4.3 The exposure device shall be loaded into the container in the proper position, as indicated by the molded inner packing. 2.4.4 Packing shall be placed on top of the device and the lid shall be fastened using the bolt ring and nut and bolt. 2.4.5 After ensuring that all labels are present and legible, the device shall be loaded into the vehicle. 2.4.6 The device shall be secured to the vehicle by running a piece of chain through the handle and attaching it to an integral part of the vehicle and locking it with a pad lock.
2.5		<u>Handling Procedures -</u> Specific handling procedures are outlined in 2.1 (Operating Procedures) and 2.4 (Packaging, Loading and Unloading of Transport Containers) above.
3.0		<u>PROCUREMENT AND CONTROL OF DOCUMENTS</u>
3.1		Suppliers shall be required to submit appropriate verification that shipping containers were manufactured under control of and NRC-Approved Q/A program.
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3.2	Renewals of suppliers documents shall be obtained upon their expiration.	
3.3	Q/A documents shall only be issued to personnel involved in the company's Q/A program.	
3.4	It shall be the responsibility of the Radiation Safety Officer to ensure that the above items are adhered to.	
4.0	<u>IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS -</u>	
	All parts and components used to repair shipping containers shall be ordered from the manufacturer of the container. No part shall be used that has been changed or altered in any manner.	
5.0	<u>HANDLING, STORAGE AND SHIPPING</u>	
	All shipping containers, which contain radioactive materials, shall be kept in a locked storage container at all times when not being used. Keys to the locks on storage containers and shipping containers shall be controlled by the Radiation Safety Officer. The only individuals who will have keys issued are the ones who have had, as a minimum, training that is required for radiographers as outlined in the regulations.	
6.0	<u>CORRECTIVE ACTION</u>	
	The corrective action for items found to be in non-compliance are those outlined in 2.3 of this document. It shall be the responsibility of the Radiation Safety Officer to ensure that these corrective actions are taken for all items of non-compliance.	
7.0	<u>AUDITS</u>	
7.1	Quarterly audits of all shipping containers and their components shall be performed by the Radiation Safety Officer to ensure the containers are in compliance with the regulations. The checklist attached to the end of this document shall be followed.	
7.2	Annual audits of the Q/A program shall be performed by the Radiation Safety Director to determine the overall effectiveness and compliance with management policies and procedures. These audits may also include evaluations by outside consulting firms employed by the company.	
8.0	<u>Q/A RECORDS</u>	
8.1	Q/A records which shall be maintained shall include the following: records of quarterly audits and inspection of equipment, procurement documents, nonconformances,	
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personnel training and certification records, evidence of operational capability and verification of repair, replacement and maintenance.

- 8.2 Q/A records shall be maintained for a period of two (2) years from the date on the record, for inspection by the Nuclear Regulatory Commission.

ORGANIZATIONAL CHART
QA / QC PROGRAM



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INSPECTION FORM FOR SHIPPING CONTAINERS

Container #: _____

Item to be Checked	Satisfactory	Unsatisfactory	Action Taken
General Condition of Container	_____	_____	_____
Condition of Labels	_____	_____	_____
Condition of Locks	_____	_____	_____
Condition of Source Plugs and Dust Covers	_____	_____	_____
Condition of Handles	_____	_____	_____
Radiation Levels	_____	_____	_____

Date of Inspection: _____ By: _____

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QA PROGRAM FOR SHIPPING CONTAINERS

Q/A EXAMINATION

FOR

TRANSPORT CONTAINERS

NAME _____

SOCIAL SECURITY # _____

COMPANY _____

ADDRESS _____

DATE _____

The enclosed examination consists of 10 questions that are worth 10 points each; for a total of 100 points. A grade of 70% or better is required in order to pass.

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1. Explain the radiographer's duties in relation to the inspection of transport containers.
2. What items must be checked when inspecting transport containers under the Quality Assurance program for this company?
3. If a particular item was found to be in unsatisfactory condition during the inspection of transport containers, what must be done?
4. How frequently must the Radiation Safety Officer inspect transport containers.
5. How frequently must the radiographer inspect the transport containers?

6. What recourse does a radiographer have if he reports non-compliance of transport containers to the Radiation Safety Officer and no action is taken to correct the problems?
7. Who is authorized to use transport containers for this company?
8. Whose responsibility is it to see that maintenance and repairs to transport containers is performed?
9. How are transport containers to be secured on vehicles?
10. What job positions are involved in the Quality Assurance program for transport containers?