

January 29, 2002

Mike Tokar

Nuclear Regulatory Commission
Washington, D.C.
Fax: (301) 415-8555

Dear Mike,

It has been several years since we shipped PuBe sources and I am in need of your review and approval before we make another shipment.

This shipment, however, does not involve a return to Los Alamos. We would, however, like to adopt the procedures from the LANL Manual for this shipment.

This shipment involves the transfer of a two-curie PuBe source from Denison University in Granville, OH to Kenyon College in Gambier, OH. The D.O.E. has been informed and approved the transfer and documentation (741 form) will be generated. We have reviewed the Radioactive Materials License for Kenyon College to assure they can receive the source.

Bionomics, Inc. will be providing the following services for this project: Shipper of Record, providing the 6M container for the source transfer, generating manifest, marking, labeling, assuring package meets D.O.T. limits. In addition the package will be transported on our sister company's transport vehicle (TAG Transport).

Please review the attached submittal for adequacy in regards to 10 CFR Quality Assurance requirements. If adequate I will mail hard copy.

Please feel free to call should the Commission require additional information.

Sincerely,

Paul Nipper
Paul Nipper / QA Manager

(800) 578-6513

email pnipper-bionomics@home.com

10 CFR PART 71 QUALITY ASSURANCE PROGRAM
FOR SHIPMENT OF ²³⁹PLUTONIUM-BERYLLIUM NEUTRON SOURCE

Site Name and Address: Denison University
Olin Science Hall, Granville, OH 43023.

This Quality Assurance (QA) Program is limited to the shipment of (One) Two curie ²³⁹Plutonium source in Model DOT 6M packaging from Denison University by Bionomics, Inc. to Kenyon College. It is designed to meet the requirements of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material." The anticipated date of the shipment and the contents is provided below.

Estimated Shipment Date:
February 18, 2002

Number of DOT 6Ms: 1-(one)

²³⁹PU Source Information:

SERIAL # MRC-N-SS-W-PUBE-368 ELEMENT 27
ISOTOPE 29.04 CURIES 2.0

1. Organization (10 CFR 71.103)

The final responsibility for the QA program for 10 CFR Part 71 Subpart H Requirement resides with Bionomics, Inc.

The QA Program is implemented by John McCormick / V.P. Waste Management Bionomics, Inc.

The QA Manager is responsible for the overall administration of this QA program, including training of personnel and all quality-related activities regarding the shipment of ^{239}Pu Foils. These quality-related activities include, but are not limited to, inspection and identification of each DOT 6M prior to use by Bionomics, Inc., as well as proper handling, packaging, inspecting, testing, and recording each shipment.

2. Quality Assurance Program (10 CFR 71.105)

The management of Bionomics, Inc. establishes and implements this QA Program based on the LANL manual "Plutonium Beryllium ($^{239}\text{PuBe}$) Neutron Source Recovery Program", which is incorporated as part of this QA Program. Training on the LANL manual for all QA functions is required before any quality-related activities are performed. The QA Program will emphasize control of the characteristics of the transportation package, which are critical to safety.

3. Document Control (10 CFR 71.113)

All documents related to the shipment of the ^{239}Pu source will be controlled. The V.P. of Waste Management / Bionomics, Inc. shall assure that all QA functions are performed in accordance with the LANL manual and instructions.

4. Handling, Storage, and Shipping Control (10 CFR 71.127)

The procedures in the LANL manual for this transfer have been adopted and will be followed concerning the handling, storage, and shipping of transportation packages. Shipments will not be made unless tests, certifications, acceptances, and final inspections have been completed.

5. Inspection, Test, and Operating Status (10 CFR 71.129)

Inspection, test, and operating status of the transportation package for shipment of the ²³⁹Pu source will be documented. Transportation package status will be indicated by tag, label marking, or log entry. Nonconforming parts or transportation packages will be positively identified and segregated to avoid inadvertent use.

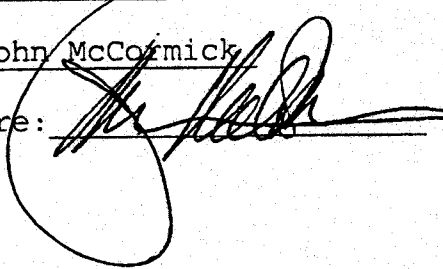
6. Quality Assurance Records (10 CFR 71.135)

Records of transportation package inspections and tests will be retained for three years beyond the date this QA Program ends. Records of the shipment will be retained for three years after each shipment occurs. The records will be identified and retrievable.

RESPONSIBLE OFFICIAL

Name: John McCormick

Title: V.P. Waste Management

Signature: 

Date: 1-29-02