

January 27, 2006

Mr. Jerry Wiza, President
Ram Services, Inc.
510 County Highway V
Two Rivers, WI 54241

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Wiza:

This is in response to your letter dated November 22, 2005, requesting our assistance in evaluation of your quality assurance program description submittal.

In connection with our review, we need the information identified in the enclosure to this letter. To assist us in scheduling staff review of your response, we request that you provide this information by 60 days of the date of this letter. If you are unable to provide a response by that date, our review may be delayed.

If you have any questions regarding this matter, I may be contacted at (301) 415-3567.

Sincerely,

/RA/

Robert J. Lewis, Chief
Transportation and Storage Safety
and Inspection Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No.: 71-0932

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DATE:	1/06/06		1/10/06		1/27/06	

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REQUEST FOR ADDITIONAL INFORMATION

The NRC review specifically identified the following areas where additional information is needed to continue the staff's review:

1. Under Section 1 of your submittal, identified as "Quality Assurance Organization," you indicate that it could be difficult or impossible to achieve some of the objectives of 10 CFR 71.103. You also identify that initially there would only be one person performing transportation activities under your quality assurance program. While 10 CFR Part 71 provides flexibility for varied organizational structures, the requirements under 71.103, "Quality Assurance Organization," paragraph (d), indicates that multiple persons would be implementing and managing the quality assurance functions. While one person could be authorized to perform any necessary functions, the organizational freedom, including sufficient independence from cost and schedule, will not exist in your organization unless other personnel (Ram Services employees or contractors) are employed and qualified to perform the required functions to assure the requirements of Part 71 have been met. Section 1 of your submittal must provide a description of how you satisfy the requirement for ensuring organizational freedom, including sufficient independence from cost and schedule prior to performing transportation activities under 10 CFR Part 71. Please provide the appropriate response.
2. Under Section 2.1.1.4, "Procurement Document Control (71-109)," though you indicate that Sections 2.2, 2.3, and 2.5 principally describe procurement document control, it is unclear as to which Ram Services document controls the procurement process, including procurement document quality. Please provide the appropriate response.
3. Under Section 2.1.1.10, "Internal Inspection (71.121)," hold points are defined in the Ram Services QA Manual procedures. Section 2.1.3 indicates that the preliminary inspection will be conducted in accordance with the Ram Services QA Manual and Section 2.1.5 indicates that the objectives of the completed package inspection are described in the QA Manual. From the reading of these sections of the Ram Services QA program description there appears to be inconsistencies in where the actual guidance may exist. Please clarify if the inspection guidance and any associated hold points are located in the QA Manual or in working level procedures/program implementation procedures.
4. Under Section 2.1.1.13, "Handling, Storage, and Shipping Control (71.127)," you do not describe any quality assurance procedures to provide guidance for the control of handling, storage, and shipping while the 20 WC packages are under Ram Services control. Please provide the appropriate response.
5. Under Section 2.1.1.15, "Nonconforming Material, Parts, or Components (71.131)," you did not address how nonconformances that occur while the 20WC packages are in Ram Services' possession will be addressed. Please provide the appropriate response.
6. Under Section 2.1.1.16, "Corrective Action (71.133)," you did not address the application of corrective actions for defective containers whose defect may have occurred while in Ram Services' possession. Please provide the appropriate response.

Enclosure

7. Under Sections 2.2, 2.3.3 and 2.5, it is unclear as to whether audits of suppliers will actually occur to support the President's certification of a supplier, vendor or partner. Please describe the application of the Ram Services QA Program to accomplish the audit process for procurement items and/or services.

8. Under Section 2.7, "Verification," your description indicates that all 20WC packagings (Both inner & outer containers) are constructed relatively simply. You also indicate that tests you have provided in your QA Manual should reliably detect potentially defective containers. Please describe the tests included in your manual and how they would be applied to the appropriate 20WC models.

9. Under Section 3, "Records," your QA program description fails to address some of the criteria detailed in 10 CFR 71.135, "Quality Assurance Records." Please provide an explanation why the criteria does not apply or describe how the criteria is included in your QA program requirements.

10. Under Section 3.1.1, "QA Policy," your QA program description indicates that there is a corporate QA policy. However, there is no indication of how this policy affects the handling of QA records. Please consider if a portion of this section is missing. If so, include it in your response to the items noted on this request for information.

11. Under Section 3.1.9, "Audits," your description indicates that audits may not occur. Please describe instances where audits may not be performed, why they would not be performed and how any associated activities affecting quality would otherwise be satisfactorily verified.

12. Under Section 4, "Audits," your first paragraph under this section reinforces our concern identified in the first item noted in the request for additional information. In addition, the last paragraph of this section reinforces our concern identified in the seventh item noted in this request. If you determine that the areas under Section 4 are different from those noted earlier than please describe how they are different and why the audits under Section 4 would not be performed and how any associated activities affecting quality would otherwise be satisfactorily verified.