

71-0865

iTi | **integrated Technologies, inc.**

316-1 Boston Post Road
Waterford, CT 06385

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September 16, 1996

Mr. John Jankovich
Section Chief
Mail Stop 0-6F18
United States Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Jankovich:

In accordance with 10 CFR 71 (c).(3), *integrated Technologies, inc.*, USNRC License No. 06-30317-01, requests to be registered as a user of the equipment listed below.

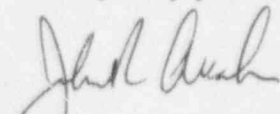
Manufacturer	Model Number	Package Identification Number	Certificate of Compliance Number
Amersham	660B Exposure Device	USA/9033/B(U)	9033
Amersham	650L Exposure Device	USA/9269/B(U)	9269
Amersham	680 Exposure Device	USA/9035/B(U)	9035
Amersham	771 Source Changer	USA/9107/B(U)	9107

Enclosed is our check for \$340.00 for this application. Also enclosed is a copy of our Quality Assurance Program (Appendix I to our Radiation Safety Procedures Manual).

If you have any questions, please contact Mr. David Orlosky, our Radiation Safety Officer, at (860)447-2474.

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PDR ADOCK 071*****
C PDR

Very truly yours,


John R. Allanach
Vice President

Rec'd w/ck # 1118
for \$340.00.

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ATTACHMENT I

Shipping Container Quality Assurance Requirements

1. SCOPE

The scope of this appendix is limited to fulfilling the requirements of 10 CFR 71 for shipping containers used by **ITi** to transport sealed radioactive sources. Design and fabrication of shipping containers is not covered by the requirements in this appendix.

2. ORGANIZATION

The Radiation Safety Officer is responsible for overall administration of these quality assurance requirements, training and certification, document control, and auditing. The senior Site Radiographers are responsible for handling, storing, shipping, inspection, test, operating status, and record keeping and are directly accountable to the Radiation Safety Officer on all radiation safety matters. Responsibilities are further defined in the Radiation Safety Procedures Manual, Section 3.

3. QUALITY ASSURANCE PROGRAM

This QA program, although limited in scope, is conducted in accordance with **ITi**'s normal quality assurance policies. For this program, this requires that all procedures necessary for the safe use and control of shipping containers be written and defined by the Radiation Safety Procedures Manual and that only properly trained, competent personnel shall conduct the defined operations, inspections, or tests. Also, the RSO shall assure that all shipping containers are designed and manufactured in accordance with 10 CFR 71 by certification from the manufacturer.

4. DOCUMENT CONTROL

All documents pertaining to the radiation safety program are controlled by the RSO and are included in the Radiation Safety Procedures Manual. This manual is distributed to all company employees involved in working with radioactive materials. Distribution of the manual and revisions are controlled in a positive manner.

5. HANDLING, STORAGE, AND SHIPPING

All operations involving the handling, storage, and shipping of packages for certain special form radioactive material will be done in accordance with our Radiation Safety Procedures Manual. No shipments will be made unless all test, certifications, acceptances, and final inspections have been completed.

6. INSPECTION, TEST, & OPERATING STATUS

The RSO shall assure radiography personnel conduct the following inspections and tests. Inspections and tests shall be documented on the Shipping Container QA Checklist, Figure 1.

6.1 The following inspections shall be conducted at receipt:

- 6.1.1 Survey
- 6.1.2 Visual inspection for correct marking and damage
- 6.1.3 Manufacturer's documentation

6.2 The following in-process inspections and tests shall be conducted as required:

- 6.2.1 Leak tests
- 6.2.2 Visual inspection and survey when damage is suspected
- 6.2.3 Daily, quarterly, and annual inspections and maintenance

6.3 The following final inspections shall be conducted immediately prior to shipping equipment off site:

- 6.3.1 Survey
- 6.3.2 Proper labeling
- 6.3.3 Proper preparation for shipping (bolts tightened, seals in place, source identification tag attached, etc.)
- 6.3.4 Shipping papers are complete and in order (shipper's certificate, bill of lading, etc.)

7. NONCONFORMANCES

ON discovery of a nonconforming condition, the container will immediately be surveyed. If the radiation level exceeds 200 mR/hr at the surface of 10 mR/hr at 1 meter, the restricted area shall be established and the RSO notified. He shall direct resolution of the nonconformance. Surveillance of the restricted area shall be maintained until the nonconformance is resolved. If the survey meets the above levels, the equipment shall be moved to a locked secure area. The RSO shall be notified of the nonconformance and he shall provide resolution.

8. QUALITY ASSURANCE RECORDS

All shipping container records will be maintained along with the other required radiation safety documents. All records are reviewed quarterly as part of the internal audit program.

9. AUDITS

Audit of the QA program will be conducted on an annual basis.

FIGURE 1
(Typical)

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SHIPPING CONTAINER QA CHECKLIST

1. RECEIPT INSPECTIONS	Sat.	Unsat.
a. Are radiation surveys conducted on receipt?	_____	_____
b. Are surveys conducted within allowable time limits?	_____	_____
c. Are visual inspections conducted on receipt?	_____	_____
d. Are current "Certificates of Conformance" on file?	_____	_____
e. Have received sources been leak tested within 6 months?	_____	_____
f. Were leak tests within allowable limits?	_____	_____
2. IN-PROCESS INSPECTION AND TESTS	Sat.	Unsat.
a. Are leak tests conducted within the last 6 months?	_____	_____
b. Are daily and quarterly maintenance inspections conducted?	_____	_____
c. Are inspections conducted when damage is suspected?	_____	_____
3. FINAL INSPECTIONS PRIOR TO SHIPMENT	Sat.	Unsat.
a. Are radiation surveys conducted?	_____	_____
b. Are surveys within allowable limits?	_____	_____
c. Are proper radioactive labels affixed?	_____	_____
d. Are shipments properly prepared (bolts tightened, seals in place, source ID tag attached, etc.)	_____	_____
e. Is the shipper's certificate properly prepared?	_____	_____
f. Are Bills of Lading properly prepared?	_____	_____
4. Are noticed of receipt received from the consignee?	_____	_____
<p>Auditor: _____ Date: _____</p> <p>Approval: _____ Date: _____</p> <p style="text-align: center;">Radiation Safety Officer</p>		