

PROGRESS SERVICES INC.

4170 Columbia Rd. Medina, Ohio 44256

71-0630

February 20, 1997

United State Nuclear Regulatory Commission
Mr. John Jankovich, Section Chief
Transportation and Storage Inspection Section
Spent Fuel Project Office, NMSS
Washington, DC 20555-0001

RE: Renewal of QA Program # 0630

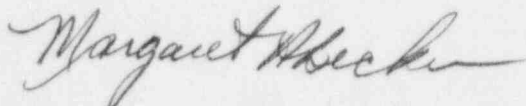
Dear Sir:

We herewith submit our request for renewal of our
QA Program which expires on April 30, 1997.

Enclosed is a copy of our current approved program,
which we submit in its entirety, unchanged.

Should further information of clarification be required,
we may be contacted at the above address and telephone
number.

Sincerely:



Margaret A. Becker
Progress Services Inc.

Enclosure

1102 1/1

270007

9702270226 970220
PDR ADOCK 07100630
C PDR

QUALITY ASSURANCE PROGRAM OUTLINE FOR TYPE B SHIPMENT
OF RADIOACTIVE MATERIAL

1.0 Organization

1.1 Progress Services Inc. is responsible for establishing and implementing a program for assuring that licensed radioactive material in its possession for the purpose of industrial radiography, is transported and or shipped in accordance with 10 CFR 71.24, 10 CFR 71.51 and DOT regulations, 49 CFR.

1.2 Authority and responsibility are as follows:

- A. Radiation Safety Officer/CEO - responsible for establishing the program and general administration of all aspects of the program.
- B. Assistant RSO/VP-Operations - assists with program administration and interfaces with Radiographers regarding proper procedures to be followed. Reports to the RSO.
- C. Radiographers - Responsible for proper handling, storage, inspection and surveying of sources and related equipment.
- D. Assistant Radiographers - no responsibility for shipping or transportation except for safe handling procedures.

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- 2.0 Quality Assurance Program
(Design and Fabrication are excluded)
- 2.1 The RSO shall oversee all aspects of the program to assure compliance with all procedures.
- 2.2 Radiographers and Assistants receive training and instruction, which includes transportation safety, as outlined in our in-house training program, which is NRC approved.
- 2.3 Manufacturers' certification for Type B containers shall be kept on file for each model in use.
- 3.0 Document Control
- 3.1 Instructions or recommendations from the manufacturer regarding shipping, inspection, handling etc. shall be held on file for reference.
- 3.2 The RSO shall be responsible for insuring that the above instructions are incorporated into the QA program.
- 4.0 Handling, Shipping, Transportation & Storage
- 4.1 Radiographic personnel shall receive instruction in and follow strictly, the approved Operating and Emergency Procedures, (OEP) regarding all aspects of handling, preparation for transport, and storage of radioactive material and related equipment.

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- 4.2 Radiographic personnel shall be responsible for accurate and complete filling out of forms and checklists relating to preparation for transport, including labeling and surveys of containers.
- 5.0 Inspections, Surveys and Maintenance Reports
- 5.1 Inspection, survey and maintenance documentation records shall be compiled and kept as specified in our NRC approved OEP.
- 6.0 Record Keeping
- 6.1 Complete, accurate documentation of the QA program shall be maintained on file.
- 6.2 Records include bills of lading, survey results, source use logs, manufacturers' certifications, and inspection and maintenance reports.
- 7.0 Audits
- 7.1 Audits of the entire radiation safety program, of which the QA program is a part, are conducted on a quarterly basis.
- 7.2 Audits are to be conducted by the RSO or Assistant RSO, and audit findings are documented and any action which is required to correct deficiencies will be carried out as soon as possible.

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Check List for Inspection & Maintenance of Gamma Equipment

All items listed below must be checked prior to use.

Any item or items found to be in unsatisfactory condition must be repaired before the equipment is returned to service.

Follow Procedure on the back of this sheet.

General exterior condition


Handle, legs, and identification labels

Source and drive cable tube and connections

Locking mechanism

Source connector

Crank and drive mechanism

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RADIATION SAFETY AND CONTROL

PRS 6

Exposure Device 660 _____ 680 _____

Radioactive Material Special Form NOS UN2974

Number of curies Co60 _____ Ir192 _____

Radioactive labels Yellow II _____ Yellow III _____

Transport index _____ (survey meter reading at 1 meter)

Type B Container

Location of use _____

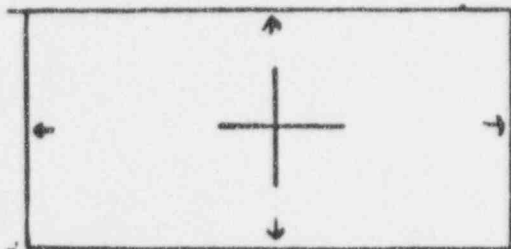
Date _____

Technician	Film Badge #	Dosimeter #	Read. Start	Read. Stop

Camera model _____ Serial # _____

Source material _____ Serial # _____

Survey meter model # _____ Serial # _____



Radiation Survey Results

Mr/hr. at camera _____ at one foot _____

Mr/hr. at outside of vehicle _____ at drivers seat _____

Mr/hr. at storage area _____

All company safety requirements were observed.

Signature of Radiographer

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RADIATION SAFETY AND CONTROL

Source Use Sheet

PRS 8

Gamma Equipment Inspection and Maintenance

Quarterly _____

Special _____

Make	Model	Serial #	Date	S	U
Equipment		Check for			
1. Exposure device		General operating condition			
2. Source identification		Tag and camera label attached			
3. Handle		Damage, securely attached			
4. Stand or wheels		Stability and damage			
5. Locking mechanism		Dirt, wear, ease of operation			
6. Leak test		Current leak test tag attached			
7. Drive cable and connections		Proper fit, wear or damage			
8. Drive cable tubes		Dirt build-up, damage or wear			
9. Control mechanism		General ease of operation			
10. Source guide tubes		Dirt build-up, wear or damage			
11. Source guide tube connections		Proper fit, wear and damage			
12. Source guide tube tips		Wear and damage			
<p>All unsatisfactory equipment is to be repaired before being returned to service.</p> <p>Comments: _____</p> <p style="text-align: right;">Inspected by _____</p>					

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PRS 7

5.0 Inspection and Maintenance of Equipment

5.1 Inspection Prior to Use

The radiographer shall use the following procedure before using any exposure device:

- a. Examine the equipment for each item listed on form PRS 6.
- b. Do not use any piece of equipment that is not in good working order, and notify the RSO of its condition.
- c. Acknowledge having performed this inspection by initialing form PRS 5, in the column marked "maintenance".

5.2 Quarterly Maintenance and Inspection

It is the responsibility of the RSO to inspect the equipment at intervals not to exceed three (3) months. He must:

- a. Examine the equipment for each item on form PRS 7.
- b. Perform, or have performed, any repairs which may be necessary on equipment. If the repair involves the exposure device itself, it should be sent to the manufacturer for service.
- c. Remove from service, any equipment on which maintenance or repairs cannot be performed.

5.3 Special Inspections and Maintenance

Equipment which has been subjected to a fall or any unusual stress, shall be inspected before it is returned to service. This inspection shall follow the same procedure as outlined in paragraph 5.2 of this section.

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SECTION II OPERATING AND EMERGENCY PROCEDURES

7.0 Source Changing

Progress Services personnel shall change only those sources listed with changers on the license. Others shall be changed by the supplier. Upon receipt of a source in a source changer, the source shall be transferred to an exposure device.

7.1 Source changing shall proceed as follows:

- a. Always use a calibrated, properly operating survey meter, keeping it close at hand at all times.
- b. Survey the shipping container upon receipt.
- c. Check all labels and tags on the source changer to assure that items are properly identified.
- d. With the exposure device locked, connect the drive cable to the pigtail.
- e. Connect the end of the guide tube to the empty changer port.
- f. Remove the safety plug from the exposure port, and connect the source guide tube. Keep the guide tube and control cables as straight as possible.

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SECTION II OPERATING AND EMERGENCY PROCEDURES

- g. Unlock the exposure device and crank the source into the empty side of the source changer. While doing this, watch your survey meter.
- h. Survey the exposure device, the guide tube and the changer, to be sure the source is in the changer port.
- i. Disconnect the source pigtail from the drive cable and disconnect the guide tube from the changer.
- j. Connect the drive cable to the new source and the guide tube to the changer.
- k. Retract the new source into the exposure device.
- l. Survey the exposure device as indicated in paragraph 3.5.1 of this section. Lock the device and replace the safety plug. Remove the key.
- m. Survey the shipping container, lock it and remove the key.
- n. Make sure all tags and labels are correct and properly in place.

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SECTION II OPERATING AND EMERGENCY PROCEDURES

6.0 Shipment of Sources

6.1 Radiographic sources may be shipped either in source changers or exposure devices. These containers shall have labels affixed to conform with the Department of Transportation Regulation, Title 49 of the Code of Federal Regulations. The following labels may be used to conform to these regulations:

A. "Radioactive White-I"

This label shall be used on packages having a dose rate of not more than 0.5 millirem per hour at any point on the external surface of the package. This label must be applied to two opposite sides of the package.

B. "Radioactive Yellow-II"

This label shall be used on packages having a dose rate of not more than 50 millirem per hour at any point on the external surface of the package and not more than 0.5 millirem per hour at one meter from the external surface of the package. The radiation level at three feet is known as the Transport Index, and is to be indicated on the shipping label. These labels are to be placed on two opposite sides of the package.

C. "Radioactive Yellow-III"

This label shall be used on all packages with radiation levels in excess of those specified for a "Radioactive Yellow-II" label. The Transport Index must be indicated on this label. Labels must appear on two opposite sides of the package.

6.2 Shipment of sealed sources back to the supplier for disposal may be accomplished in either a source changer or exposure device. When sources are shipped in this manner, the containers shall have proper labels affixed so as to conform to Department of Transportation Regulations. See 6.1, A through C above.

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SECTION I ORGANIZATION AND MANAGEMENT

- 6.3 "Empty" container labels may only be used on packages containing NO radioactive material, such as an empty source changer or exposure device. "Empty" labels must be applied to cover all old labels which have not been removed, destroyed, or obliterated on the package previously used for transportation of radioactive materials.

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SECTION I ORGANIZATION AND MANAGEMENT

3.2 Transportation of Exposure Devices

- 3.2.1 Transportation of exposure devices must conform to Department of Transportation Regulations, Title 49, in marking and radiation limits.
- 3.2.2 Secure the exposure device within the vehicle to prevent shifting or movement during transport.
- 3.2.3 Survey the vehicle to determine the radiation levels at the exterior surface of the vehicle and in the driver's compartment. The radiation intensity in these locations shall not exceed 2 mr per hour. If necessary, shielding shall be used to reduce the radiation intensity to this limit.
- 3.2.4 Acknowledge performance of this survey on form PRS 8.
- 3.2.5 Place signs reading "RADIOACTIVE" on the vehicle. One sign must appear on each side of the vehicle, 4 in all. These signs must be removed or covered in some manner when the vehicle is not being used to transport radioactive materials.

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