

POGUE INDUSTRIES INCORPORATED

5200 Manchester
St. Louis, Mo. 63110

Quality Assurance Program

for

Use, Maintenance and Repair of Shipping

Containers for Radioactive Material

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ORGANIZATION CHART

1.0 ORGANIZATION

The final responsibility for the Quality Assurance Program for Part 71 requirements rests with Pogue Industries Incorporated. Pogue Industries Incorporated includes:

Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the following organization:

- (a) The Radiation Safety Officer is responsible for overall administration of the Program, training and certification, documented control, and auditing.
- (b) Radiographers are responsible for handling, storing, inspection, test, operating status and record keeping.

2.0 QUALITY ASSURANCE PROGRAM

The management of PII establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagements in these functions, is required according to written procedures. QA Program revisions will be made according to written procedures with management approval. The QA Program will ensure that all defined QC procedures, engineering procedures, and specific provisions of the package design approval are satisfied. The QA Program will emphasize control of the characteristics of the package which are critical to safety.

The Radiation Safety Officer shall assure that all radioactive material shipping packages are designed and manufactured under a Quality Assurance Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after July 1, 1978. This requirement can be satisfied by receiving a certification to this effect from the manufacturer.

Written procedures and instructions for implementing the Quality Assurance Program are contained in the Radiation Safety Program.

3.0 DOCUMENT CONTROL

All document related to a specific shipping package will be controlled through the use of written procedures. All document changes will be performed according to written procedures approved by management.

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The radiation Safety office shall ensure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

4.0 HANDLING, STORAGE AND SHIPPING

Written safety procedures concerning the handling, storage and shipping of packages for certain special form radioactive material will be followed. Shipments will not be made unless all tests, certifications acceptances, and final inspections have been completed. Work instructions will be provided for handling, storage and shipping operations.

Radiography personnel shall perform the handling, storage and shipping operations.

5.0 INSPECTIONS, TEST AND OPERATING STATUS

Inspections, test and operating status of packages for certain special form radioactive material will be indicated by controlled by written procedures. Status will be indicated by tag, label, marking or log entry. Status of nonconforming parts or packages will be positively maintained by written procedures.

Radiography personnel shall perform the regulatory required inspections and tests in accordance with written procedures. The Radiation Safety Officer shall ensure that these functions are performed.

6.0 QUALITY ASSURANCE RECORDS

Records of package approvals (including references and drawings), inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written procedures will also be maintained.

These records will be maintained in accordance with written procedures. The records will be identifiable and retrievable. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

7.0 AUDITS

Audits for verification of compliance with the Quality Assurance Program will be conducted as described below:

- (a) Each completed "Radioactive Material Transfer Report" form (see Radiation Safety Program) will be reviewed by the

Radiation Safety Officer, or his designee, when it is received. This reveiwed will check for proper completion of all appropriate portions of the form.

- (b) At least once each year, each shipping container will be checked for damage, proper labeling, and identification.
- (c) Audits will be performed, at least once each year, on the activities conducted pursuant to PII Quality Assurance Program for Use, Maintenance and Repair of Shiping Containers for Radioactive Material. The audit will cover all nessary items and systems incorporated (eg. training records, document control, and personnel qualification) to assure compliance with this procedure and Title 10 CFR 71.51.

Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. Audit reports will be maintained as part of the Qaulity Assurance records. Personnel performing audits shall have no direct responsibility in the activity being audited.