

RETURN TO 396-SS PDR

✓ 71-9033  
9A-71-0560

**BMY**

November 22, 1985

Mr. Charles E. MacDonald, Chief  
Transportation Certification Branch  
Division of Fuel Cycle and Material Safety  
Office of Nuclear Material Safety and Safeguards  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. MacDonald:

In accordance with 10CFR 71.12(C).(3), BMY, A Division of Harsco Corporation has submitted license for NRC approval and requests to be registered as a user of Tech/Ops., Inc., Model 660 Package Identification Number USA/9033/B(U), under terms of Certificate of Compliance Number 9033 issued to Tech/Ops, Inc., Burlington, MA.

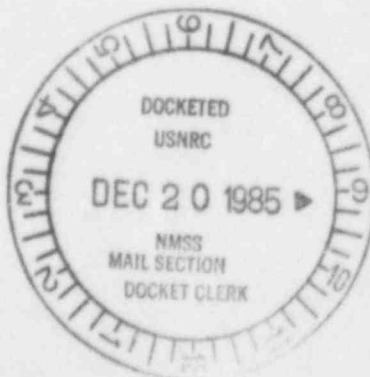
Very truly yours,

B M Y  
A Division of Harsco Corp.

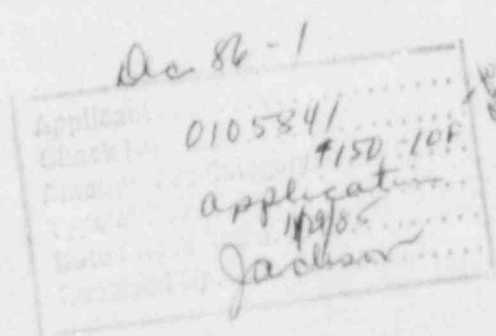
*Jerry M. Miller*

Jerry M. Miller  
Radiation Safety Officer

JM:dew



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U.S. NUC. COM.  
1000 PENTAGON  
WASHINGTON, D.C. 20540

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Application No.	0195841
Applicant's Name	BMJ
Date of Issue	1/19/85
Issued By	Jackson

## 10 CFR71 Q.A. PROGRAM

### For Industrial Radiography License

#### I. Organization

The final responsibility for the Quality Assurance Program for part 71 requirements rests with BMJ. Design and fabrication of radioactive material shipping packages should not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the following organization (attached).

The Radiation Safety Officer is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

#### II. Quality Assurance Program

The management of BMJ establishes and implements this quality assurance program. Training for all quality assurance functions, prior to engagement in these functions, is required according to written procedures. Quality assurance program will ensure that all defined quality assurance procedures, engineering procedures, and specific provisions of the package design approval are satisfied. The Quality Assurance 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 1 January 1979. This requirement can be satisfied by receiving a certification to this effect from the manufacturer.

#### III. Document Control

All documents 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.

The Radiation Safety Officer shall ensure that all quality assurance functions are conducted in accordance with the latest applicable changes to these documents.

#### IV. Handling, Storage, and Shipping

Written safety procedures concerning the handling, storage, and shipping of packages for certain specific forms of 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 critical handling, storage, and shipping operations.

#### V. Inspection, Test, and Operating Status

Inspection, test, and operating status of packages for certain special form radioactive material will be indicated and 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.

#### VI. 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.

#### VII. Audits

Established schedules of audits of the quality assurance program will be performed using written checklist. Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. The audits will be dependant on the safety significance of the activity being audited, but each activity will be audited at least once per year. Audit reports will be maintained as part of the quality assurance records. Members of the audit team shall have no responsibility in the activity being audited.

# ORGANIZATIONAL STRUCTURE



DOCKET NO. 71-9033, 71-0560

CONTROL NO. 26216

DATE OF DOC. 11/22/85

DATE RCVD. 11/27/85

FCUF ☐ PDR ☒

FCAF ☐ LPDR ☐

WM ☐ I&E REF. ☒

WMUR ☐ SAFEGUARDS ☐

FCTC ☒ OTHER ☐

DESCRIPTION:

requests to be  
registered as a  
user, enclosed  
is their Quality  
Assurance Program.  
12/20/85 INITIAL CEC