

71-0539

Arrow NDE Company, Inc.

• Nondestructive Examination •

11307 CORTEZ DRIVE

BROKEN ARROW, OKLAHOMA 74014

918/486-2880

June 25, 1997

Director,
Office of Nuclear Material Safety & Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Subject: Part 71 Quality Assurance Program approval.
Docket Number 71-0539

This letter, the attached copy of our Quality Assurance Program and six copies of each, are submitted for approval. The expiration date is June 30, 1997. I realize that a letter dated April 16, 1997 mentioned that I should forward the renewal request 30 days before the expiration date.

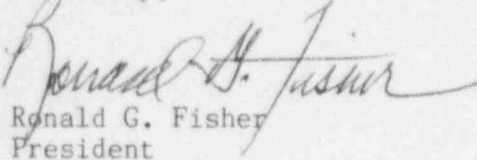
I am currently the only person active in this small company on a full time basis. The additional officers perform their responsibilities on a part time basis. I have had very little license related work and have had to take full time employment in addition to all my responsibilities with this company. I have been seriously considering closing this business, but have not yet made the final decision.

In addition, we are aware of the USNRC's final revisions to 10CFR Part 34, published in the Federal Register on May 28, 1997, and the related mail out notice to Part 34 Licensees. In this notice it states that the Part 34 licensees would not have to submit QA Programs for approval effective June 27, 1997, and expiration date would no longer be valid. So I was relieved that renewal was not necessary, nor would there be a related cost.

A QA Program audit, as described in "H.6." of our program has been triggered. I am concerned now that I may be misunderstanding the new revisions. I am forwarding the contents simply to assure that we are covered one way or another, even though our request may be late.

If there should any additional questions or needs in regard to the enclosed, they will receive as quick as possible attention on my part. Thank you for any considerations to this request and all of it's contents and statements.

Sincerely,


Ronald G. Fisher
President

NT02/1

cc: Mr. John P. Jankovich, Section Chief
Transportation and Storage inspection Section, Spent Fuel Project Office, NMSS

9707010288 970625
PDR ADOCK 07100539
C PDR



Arrow NDE Company, Inc.

• Nondestructive Examination •

11307 CORTEZ DRIVE

BROKEN ARROW, OKLAHOMA 74014

918/486-2880

ARROW NDE COMPANY, INC.- PART 71 QA Program

PART 71 QUALITY ASSURANCE PROGRAM

A. ORGANIZATION:

1. The final responsibility for the Quality Assurance Program (QA) rest with Arrow NDE Company, Inc.
2. Design, fabrication, and the associated tests, components' inspections and related package requirements, shall not be conducted under this QA Program, except as stated in this company's Operating, Emergency, Part 21, Procedures and/or this QA Program.
3. All package requirements of item 2, above, not conducted under our program, shall be conducted by manufacturer(s)/suppliere(s) listed on our license application, per their approved QA Program. This company's requirements can be satisfied by receiving a certification to this effect from the manufacturer(s)/supplier(s).
4. The Radiation Safety Officer is responsible for the overall administration of the program, training and certification, document control and implementing any corrective actions as a result of audit(s).
5. The radiographers are responsible for handling, storing, shipping, inspection, testing, operating status and record control as established in this company's Operating and Emergency Procedures and/or this QA Program.
6. Enclosed is the Organizational Structure of this company.

B. PURPOSE:

1. The QA Program will establish that through the use of procedures, certification(s), audits and records that are met and maintained.
2. Revisions, approved by management, will become future parts of this program. Revisions, and their need, will be based on experience in this program, periodic review, as revisions and guides to 10 CFR Part 71 become available or as required by the applicable regulatory agencies.

ARROW NDE COMPANY, INC.- PART 71 QA Program

C. QUALITY ASSURANCE PROGRAM:

1. The management of Arrow NDE Company, Inc. establishes and implements this Quality Assurance Program.
2. Training for all QA functions, prior to engagement in these functions, is required according to Operating, Emergency, Training and other related Procedures.
3. The QA Program will emphasize control of the characteristics of the package which are critical to safety.
4. The QA Program will emphasize control of the characteristics of the package which are critical to safety.
5. 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 and/or fabricated after July 1, 1978.
6. The QA Program will ensure that all defined QA procedures, engineering procedures, and specific provisions of the package design approval are satisfied. These requirements can be satisfied by receiving a certification to this effect from the manufacturer(s)/-supplier(s).

D. DOCUMENT CONTROL:

1. All documents related to a specific shipping package will be controlled through the use of written procedures.
2. All document changes will be performed according to written procedures approved by management.
3. The Radiation Safety Officer shall insure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

E. HANDLING, STORAGE AND SHIPPING:

1. The Operating and Emergency Procedures concerning the handling, storage and shipping of packages for certain special form of radioactive material will be followed.
2. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed.
3. Work instructions will be provided for handling, storage, transporting and shipping operations.
4. Radiography personnel shall perform the critical handling, storage, transporting, shipping, monitoring, periodic maintenances, leak test operations, and related visual examinations as outlined in this company's Operating and related Procedures.

ARROW NDE COMPANY, INC.- PART 71 QA Program

F. INSPECTION, TEST AND OPERATING STATUS:

1. Inspection, test and operating status of packages for certain special form radioactive material will be indicated and controlled by operating procedures.
2. Status will be indicated by tag, label, marking, and/or log entry.
3. Status of nonconforming parts or packages will be positively maintained by written procedures.
4. Radiography personnel shall perform the required inspections and tests in accordance with written procedures.
5. The Radiation Safety Officer shall ensure that these functions are performed.

G. QUALITY ASSURANCE RECORDS:

1. Records of inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained.
2. Descriptions of equipment and written procedures will also be maintained.
3. These records will be maintained in accordance with written procedures. The records will be identifiable and retrievable.
4. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

H. AUDITS:

1. Established schedules of audits of the Quality Assurance Program will be performed using written checklists.
2. Results of audits will be maintained and reported to the management.
3. Audit reports will be evaluated and deficient areas will be corrected.
4. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once a year.
5. Any item of noncompliance discovered by audit(s) or by other means, will trigger a progressive audit schedule of at least an interval or intervals of monthly, to weekly, to daily, as needed to assure that ARROW NDE COMPANY, INC. is in full compliance. Depending on the severity of the area of noncompliance or discrepancy, the progressive audit may bypass monthly and go to a weekly and/or daily audit(s).

(Revision 5/92)

ARROW NDE COMPANY, INC.- PART 71 QA Program

H. AUDITS (Continued):

6. Audit reports will have a place for recording the expiration dates of License(s), Certificates of Compliance, the Quality Assurance Program, etc. If an expiration date on documents is noted and it is one year or less away from date of audit, this will trigger the progressive audit schedule at least three (3) months prior to the document's expiration date. The progressive audit(s) will continue until ARROW NDE COMPANY, INC. has forwarded all required information.
(Revised 5/92)
7. Follow-up audits will be conducted within thirty (30) days from the expiration date of documents in item H.6. or after the final progressive audit in item H.5. or H.6. and will continue at thirty day intervals until all required renewals or corrective actions are evidenced by records, current documents, or regulatory agency's acknowledgement received and on file. Should additional information, revision or additional actions be necessary by this company, this finding will trigger the progressive audit schedule.
(Revised 5/92)
8. For use as a definition in this part only, thirty days would be any 25 to 35 consecutive days, and week would be any 5 to 9 consecutive days. The purpose of this is to keep from being in a technical violation from wording only in cases of holidays, illness, or other functions that might place the company or its personnel undue hardship(s) in respect other obligations or responsibilities.
(Revised 5/92)
9. The auditor(s) will have no responsibility in the activity they audit.
10. Audit reports will be maintained as part of the quality assurance records.

ARROW NDE COMPANY, INC.
ORGANIZATIONAL CHART

