

GAS RENTALS, INC./LOWELL GAS

Willie & Dutton Streets  
Lowell, MA. 01854

71-0214

December 12, 1978

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

(NPC PUBLIC DOCUMENT ROOM)

RE: By-product material license number 20-15003-01

Dear Director:

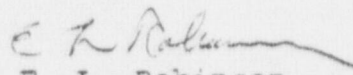
The enclosed discussion and procedures are submitted in accordance with the quality assurance requirements of 10 CFR Part 71, "Packaging of Radioactive Material for Transport and Transportation of Radioactive Material Under Certain Conditions."

The Q.A. Program described is to assure that all planned and systematic actions necessary to provide confidence in the safe use of gamma projectors purchased from Technical Operations, Inc., are taken. The organization, written procedures and inspection steps to be taken are described.

We hope that this submittal is adequate with respect to the requirements of 10 CFR 71.51 and our specific licensed activities.

Very truly yours,

GAS RENTALS, INC./LOWELL GAS

  
E. L. Robinson  
Vice President - Operations

ELR:mac

Attachment

CC: Members of Radiation Safety Committee

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QUALITY ASSURANCE PROGRAM

(For use of approved radiographic gamma projectors in  
accordance with requirements of 10 CFR Part 71.5.)

GAS RENTALS, INC./LOWELL GAS

## INTRODUCTION

The Quality Assurance program is designed to assure that all planned and systematic operations necessary to provide confidence in the safe use and satisfactory performance of the radiographic projectors are taken.

The Program describes the organization, written procedures and inspection steps to be taken in the use of approved devices under our license number 20-15003-01.

## DISCUSSION

The requirements of Appendix E of 10 CFR Part 71 which are mainly applicable to our field use of radiographic devices are: organization, purchase and control of licensed devices, inspection procedures, records and corrective action in terms of any discovered deficiencies.

It is also recognized that our approved operating and emergency procedures for licensed projectors is the primary assurance for safety of operation.

## PROCEDURES

Organization - Our organization is described in Section 6H of our license application. It consists of the licensee, radiation safety committee, radiation safety officer and radiographers.

With respect to our Q.A. Program, the RSO shall serve as the responsible individual who will insure that the Q.A. Program is developed, implemented and verified by periodic inspections.

The RSO shall have direct access to top management on all safety and Q.A. aspects of the licensee's radiographic operation.



The radiographer shall be responsible for carrying out the Q.A. procedures as described as well as maintenance of all records.

A member of management shall perform the periodic Q.A. Program audit.

Materials Possession - Prior to purchase and receipt of radiographic devices the radiographer shall require verification of a certificate of compliance from Technical Operations, Inc.

A check list shall be completed as follows:

Q.A. Check List

Certificate of Compliance and Quality Assurance	_____
Source data	_____
Size and weight	_____
Model number	_____
Leak Test Certificate	_____
Locking device and key	_____
Warning labels	_____
Control Cables	_____
Date _____ Radiographers	_____

Material Use - The radiographic projector(s) shall be used in accordance with Section 7 of our operating procedures, "Transportation and storage of the Radiographic Sources" and Section 8, "Reports, Records and Inspections."

As part of daily safety practices the check list shall be maintained whenever the projector is placed into use. The attached check list shall be considered a part of the material use quality assurance requirements.

## DAILY CHECK LIST (Prior to use of equipment)

I. DAILY CHECK LIST FOR 660 UNIT USEYES      NOA. Survey Meter

1. Survey meter(s) left on? \_\_\_\_\_
2. Visible damage to survey/monitoring equipment? \_\_\_\_\_
3. Battery condition good? \_\_\_\_\_
4. Supply of spare batteries? \_\_\_\_\_
5. Defective survey meter? \_\_\_\_\_
6. Comments: \_\_\_\_\_

B. Storage Container

1. Locked, properly labeled? \_\_\_\_\_
2. Physical damage to storage box or attachments to vehicle? \_\_\_\_\_
3. Unusual radiation levels? \_\_\_\_\_
4. Device secured properly? \_\_\_\_\_
5. Comments: \_\_\_\_\_

C. Control Unit (Not Connected)

1. Damaged or loose hardware? \_\_\_\_\_
2. Cable & Drive Mechanism working smoothly? \_\_\_\_\_
3. Odometer zeros properly? \_\_\_\_\_
4. Guide tubes damaged? \_\_\_\_\_
5. Comments: \_\_\_\_\_

D. Model 660 Projector

1. Visible damage to lock/selector mechanism? \_\_\_\_\_
2. Control & Guide tube connection points clean? \_\_\_\_\_
3. Guide tubes clean & undamaged? \_\_\_\_\_
4. Master tube available & snout intact? \_\_\_\_\_
5. Device properly labeled? \_\_\_\_\_
6. Locking mechanism operating? \_\_\_\_\_
7. External radiation levels normal? \_\_\_\_\_
8. Comments: \_\_\_\_\_

E. Personal

1. Pocket dosimeters and film badges available? \_\_\_\_\_
2. Mini radiation alarm working? \_\_\_\_\_
3. Copy of correction operating & emergency procedures (660 Projector)? \_\_\_\_\_
4. Other personnel properly equipped? \_\_\_\_\_
5. Comments: \_\_\_\_\_

Audits - Periodic inspections of our Quality Assurance Program shall be conducted by a member of the radiation safety committee other than the RSO.

This inspection audit shall be conducted at least once each year. Results and recommendations of such inspections shall be recorded and made available to the Radiation Safety Committee as well as NRC inspectors. Those activities found to be in violation of these Q.A. procedures shall be promptly corrected and reported to appropriate levels of management.

The following shall be checked during the Q.A. Audit:

Materials possession check list	_____
Materials Use daily log	_____
Last date of Q.A. Audit	_____
Periodic Management Equipment Inspection log	_____
Physical inspection of the licensed material and storage facility	_____
Records file	_____

Signature and date

Notifications - Any deficiencies in terms of Q.A. requirements of the licensed devices or associated Q.A. records shall be promptly brought to the attention of the supplier as well as the RSO. Notification of the NRC shall be made as appropriate by the RSO.

Training - The radiographer and RSO shall conduct a training session to review the Q.A. Program in order to verify full understanding of the requirements as described above.