



## Department of Energy

Washington, DC 20585

January 5, 2023

MEMORANDUM FOR CAROLINE POLANISH  
DIRECTOR  
MISSION INTEGRATION AND PROJECTS DIVISION  
OFFICE OF SCIENCE  
BROOKHAVEN SITE OFFICE

FROM: JULIA C. SHENK **JULIA SHENK** Digitally signed by JULIA SHENK  
Date: 2023.01.05 16:18:51 -05'00'  
HEADQUARTERS CERTIFYING OFFICIAL  
DIRECTOR  
OFFICE OF PACKAGING AND TRANSPORTATION

SUBJECT: Issuance of Quality Assurance Program Approval 0039

Attached is the Department of Energy (DOE) Quality Assurance Program (QAP) Approval, Approval Number 0039, Revision 0, for the Brookhaven National Laboratory (BNL) - Nonproliferation and National Security Department, in response to your request to Dr. James Shuler of my staff dated August 15, 2021, as supplemented November 28, 2022. This approval is based on independent review by the DOE Packaging Certification Program (PCP) of the BNL *Quality Assurance Plan for Use of Special Nuclear Materials/Special Form Sources in Operational and Performance Testing of Personal Radiation Detectors*, Revision 1, October 4, 2022 (approved November 28, 2022).

This DOE QAP Approval satisfies DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, and therefore complies with the provisions in 49 CFR 173.7(d) for DOE to maintain packaging standards equivalent to those specified in 10 CFR Part 71.

The expiration date of DOE Approval Number 0039, Revision 0, is January 31, 2028. If you wish to renew, revise, or terminate approval of QAP Approval 0039, please request this action in writing. Any revisions to the BNL *Quality Assurance Plan*, Revision 1, except for spelling corrections and non-substantive changes to punctuation or editorial items, shall be submitted and approved by DOE PCP prior to implementation of the proposed changes.

This approval memorandum also serves as a reminder that the Order requires that for offsite transportation each Departmental element that uses a Type B or fissile package certified by DOE must register with the DOE HCO prior to first use of the package. Refer to the following URL for registration instructions: <https://rampac.energy.gov/home/package-certificationinformation/guidance/doe-guidance>.

If you have any questions, please contact me or Dr. Shuler at (301) 903 5513.

Attachment:

cc: Cassie Asselta, BNL  
James Shuler, EM-4.24  
QA Docket 2021-003



U.S. Department of Energy  
**QUALITY ASSURANCE PROGRAM APPROVAL**  
 For Type B and Fissile Radioactive Material Packages

1. APPROVAL NUMBER <b>0039</b>
REVISION 0

Pursuant to DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, subparagraph 4.a.(3), *Quality Assurance (QA)* directs that each Departmental element that participates in the use, design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification of Type B or fissile materials packaging must have and maintain a quality assurance (QA) program in accordance with 10 CFR Part 71, Subpart H that is approved by the NRC or the DOE Certifying Official, prior to the performance of those operations. The Contractors Requirements Document in Attachment 1 of Paragraph 5.a. of the Order imposes the same requirement on DOE contractors. Based on the reliance on statements and representations heretofore made in Block 5 by the organization named in Block 2, the Quality Assurance Program Description identified in Block 5 is hereby approved. This approval is issued to satisfy the requirements of the Order, 49 CFR 173.7.(d), and 10 CFR 71.101. This approval is subject to all applicable rules, regulations, and orders of the U.S. Department of Energy now or hereafter in effect and to any conditions specified below.

2. ORGANIZATION NAME Brookhaven National Laboratory - Nonproliferation and National Security Department			3. EXPIRATION DATE January 31, 2028
STREET ADDRESS PO Box 5000			
CITY Upton	STATE NY	ZIP CODE 11973-5000	4. DOCKET NUMBER 2021-003

5. QUALITY ASSURANCE PROGRAM DESCRIPTION, REVISION, and DATE  
*Quality Assurance Plan for Use of Special Nuclear Materials/Special Form Sources in Operational and Performance Testing of Personal Radiation Detectors*, Revision 1, October 4, 2022 (approved November 28, 2022).

6. CONDITIONS

- Activities conducted regarding Type B and fissile material transportation packagings are to be executed under applicable criteria of 10 CFR Part 71 Subpart H. Authorized activities include: design, procurement, fabrication, assembly, testing, modification, maintenance, repair and use of transportation packagings.
- Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
  - Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
  - Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
  - Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
- Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.
- In addition to the requirements of Subparts G and H of 10 CFR 71, and except as specified in Section 5(d), "Conditions," of applicable Certificates of Compliance, each package must be designed, fabricated, acceptance tested, operated, and maintained in accordance with applicable Safety Analysis Report for Packaging requirements; specifically, Chapter 7, "Operating Procedures," Chapter 8, "Acceptance Tests and Maintenance Program," and Chapter 9, "Quality Assurance."

FOR THE U.S. DEPARTMENT OF ENERGY

SIGNATURE  <b>JULIA SHENK</b> Digitally signed by JULIA SHENK Date: 2023.01.05 16:13:43 -05'00'	DATE OF ISSUANCE  January 5, 2023
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Julia C. Shenk  
 DOE Headquarters Certifying Official  
 Director, Office of Packaging and Transportation