

USDA Radiation Safety Program Meeting
AMS, APHIS, ARS, FGIS, FS, FSIS, SCS
April 13, 1993

Actions Taken or Planned in Response to NRC Violations

A. Failure to inspect locations at required frequency.

(Miles City, MT; Plum Island, NY; West Lafayette, IN; Morriss, MN; Raleigh, NC; University Park, PA; Brookings, SD; Lubbock, TX; Kearneysville, WV; Columbia, MO; Wooster, OH; Fresno and Salinas, CA)

All locations have been inspected.

RSS is developing an inspection schedule which will assure compliance and identify resource requirements.

RSS will begin reporting progress to the USDA Radiological Safety Committee (RSC) in the near future.

B. Failure to perform leak tests of sealed sources.

(No locations were specifically named.)

Letters requiring leak tests were sent to users in March 1993.

RSS will identify all equipment overdue for leak testing in April 1993.

RSC Agency representatives will be notified of individuals who fail to respond; the RSC is responsible for final action against unresponsive users.

C. Failure to perform analysis of incinerator ash or maintain disposal records for incinerators used to dispose of radioactive waste.

(Athens, GA; Clay Center, NE; Fargo and Grand Forks, ND; Ames, IA; Plum Island, NY)

RSS did not receive or did not accurately file some reports from the locations identified.

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More rigorous analysis of ash is required for low-energy beta emitters such as hydrogen-3 and carbon-14 (liquid scintillation counting is not adequate); RSS will develop contract for ash analysis prior to FY-94.

RSS has assigned responsibility for tracking all incinerator reports to one individual who will resolve all reporting errors in April 1993.

D. Failure to secure radioactive material against unauthorized removal.

(Mississippi State, MS)

A gas chromatograph was stored in an unsecured hallway; the device was relocated and secured after the inspection.

RSS will send more specific information on security to users.

E. Unauthorized disposal of radioactive material.

(Albany, CA; University Park, PA; Ithaca, NY)

The incident in Albany was reported and corrective actions were implemented; the location was subsequently inspected by NRC - no violations were identified.

Transfer of waste from locations to Universities should immediately cease.

RSS will assist locations with waste disposal arrangements where the University will not continue to provide waste disposal services.

RSS will assist each location and University in obtaining authorization for transfer from NRC.

F.1. Failure to report laboratory surveys.

(No locations were specifically named.)

RSS is reviewing data to identify all laboratories for which surveys are required and will send letter requesting reports for first quarter of 1993 in April 1993.

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F.2., F.3. and G. Use of materials other than as prescribed by RSS.

(Pullman, WA; Fargo, ND; Ithaca, NY; Mississippi State, MS)

There are inconsistencies between RSS records and user inventories.

RSS will send inventories to users frequently so that user and RSS data can be reconciled.

If "old" sources are identified at a location they must be reported immediately to RSS so that they can be tracked and controlled.

RSS will broaden the "authorized use" condition on user approvals to remove unnecessary restrictions; RSS will review all approvals and reissue with consistent approved use conditions.

RSS will remind users that changes to approved experimental protocols must be reviewed and approved by RSS prior to performing work in the laboratory.

H. Failure to maintain shipping papers within drivers reach during transport of radioactive materials.

(University Park, PA)

RSS will send information out to all users with a more detailed explanation of this requirement.

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I. Failure to train ancillary staff.

(Berkeley, CA)

RSS will develop guidance for locations on the training requirements and require a positive response from each location that the training was attended as required for appropriate members of the ancillary staff.

J. Failure to post required documents.

(University Park, PA; Mississippi State, MS)

RSS will send guidance for posting required documents and require a positive response from each location that all documents have been posted.

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NRC Violations Identified at Forest Service Locations

* Berkeley, California

- Radiation safety training not provided to ancillary staff.
- Radioactive contamination surveys not recorded in proper units.
- USDA radioactive material approval form not available.

* Placerville, California

- NRC regulations not posted or available.
- USDA Radioactive material approval form not available.

* Hamden, Connecticut

- Not inspected by the USDA Radiological Safety Staff (RSS) within 5 years.

* Albany, California

- Unauthorized disposal of radioactive material - disposed of as normal trash.

* - Locations which were inspected by NRC.

NRC Violations Associated with Forest Service Activities

1. Failure to leak test sealed sources for radioactive contamination.

As of April 9, 1993, 26 responsible users did not respond to a March 11, 1993, request from RSS to submit a leak test sample.

2. Failure to submit quarterly laboratory radioactive contamination surveys.

As of April 4, 1993, 7 responsible users failed to submit a survey of their laboratories for the last quarter of 1992.

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**NRC Violations Identified at Animal and
Plant Health Inspection Service Locations**

* Plum Island, New York

- Not inspected by the USDA Radiological Safety Staff (RSS) within 3 years.
- Incinerator ash not properly analyzed for the presence of radioactive material.

Ames, Iowa

- Records of incineration of radioactive material not maintained by the RSS.

Otis Air Force Base, Massachusetts

- Not inspected by the RSS within 3 years.

* - Locations which were inspected by NRC.

**NRC Violations Associated with Animal and
Plant Health Inspection Service Activities**

1. Failure to leak test sealed sources for radioactive contamination.

As of April 9, 1993, 1 responsible user did not respond to a March 11, 1993, request from RSS to submit a leak test sample.

2. Failure to submit quarterly laboratory radioactive contamination surveys.

As of April 4, 1993, 1 responsible user failed to submit a survey of their laboratories for the last quarter of 1992.

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NRC Violations Identified at Soil Conservation Service Locations

* Tuscaloosa, Alabama

- Failure to post NRC regulations.

* - Locations inspected by the NRC.

NRC Violations Associated with Soil Conservation Service Activities

1. Failure to leak test sealed sources for radioactive contamination.

As of April 9, 1993, there were 26 responsible users who have not responded to a March 11, 1993, request from RSS to submit a leak test sample.

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Location Radiation Protection Officer (LRPO) Proposal

OBJECTIVE: Improve local control of radiation safety program by naming an individual as liaison between RSS, radioactive material users, and Location management.

Location - Identify individual at each location (RSS will provide selection criteria).

Location - Identify location management liaison.

RSS - Develop RSS location inspection report format (for use by line management and the location describing activities and identifying violations).

RSC/Agency - Develop procedures and mechanisms for resolving issues with LRPO and RSS.

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Location Radiation Protection Officer

Duties and Responsibilities

1. Maintain a current copy of the approval form for each responsible user.
2. Maintain monthly exposure records of all monitored personnel.
3. Notify RSS when a responsible user intends to discontinue use of radioactive materials and facilitate termination of the users approval (which may require providing storage for materials so that laboratory surveys may be performed and waste can be removed, and coordinating survey and decontamination of the user's laboratory).
4. Coordinate initial and annual refresher radiation safety training for all users and ancillary staff. The training shall cover generally applicable radiation safety practices and procedures and NRC regulations in 10 CFR Parts 19 and 20 and applicable license conditions.
5. Review notifications of responsible users who are late or overdue in reporting to RSS, serve as advisor to management on assuring timely response to overdue notices.
6. Coordinate radioactive waste disposal activities (incineration, drain disposal, decay-in-storage, off-site waste shipments) and submit reports to RSS.
7. Conduct an annual radiation safety audit of each responsible user (review accuracy and availability of required reports; assure materials are used only in approved areas by approved individuals; assure signs, labels, and documents are properly posted or available; assure radioactive materials are secured to prevent unauthorized removal).
8. Attend entrance and exit briefings with RSS health physicists and accompany RSS health physicists (or be generally available) during RSS inspections.
9. Attend entrance and exit interviews with NRC inspectors and accompany them during NRC inspections.

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Location Management Liaison

Duties and Responsibilities

1. Assure completion of and review annual LRPO audit of location users and location radiation safety program.
2. Resolve compliance issues raised by users, LRPO, and RSS.
3. Attend entrance and exit interviews with RSS health physicists.
4. Attend entrance and exit interviews with NRC inspectors.
5. Serve as liaison between location and line management for radiation safety matters.
6. Coordinate resources needed for location-wide radiation safety initiatives (training, etc.).