

NRC FORM 891M PART 1
 (11-2003)
 10 CFR 2.201

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Virginia Commonwealth University Office of Environmental Health & Safety Richmond, Virginia 23298 REPORT NUMBER(S) 2004-001	2. NRC/REGIONAL OFFICE REGION 1 US NUCLEAR REGULATORY COMMISSION 475 ALLENDALE ROAD KING OF PRUSSIA PA 19406-1415	
3. DOCKET NUMBER(S) 030-03297	4. LICENSE NUMBER(S) 45-00048-17	5. DATE(S) OF INSPECTION October 28-28, 2004

LICENSEE:
 The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

non-cited violation(s) were discussed involving the following requirement(s):

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

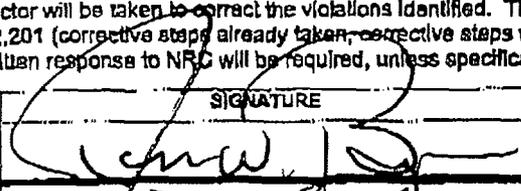
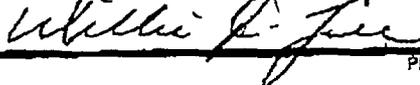
(Violations and Corrective Actions)

10 CFR 35.643(a)(1) requires spot-checks of high dose-rate remote afterloaders before each use on a given day. Checks include (1.) electrical interlocks at each remote afterloader room entrance, (2.) source exposure indicator lights on the remote afterloader unit, the control console and the facility, (3.) viewing and intercom systems in each remote afterloader facility, (4.) emergency response equipment, (5.) radiation monitors used to indicate source position, (6.) timer accuracy, (7.) clock (date and time) in the unit's computer, and (8.) decayed source activity in the unit's computer. In addition, 10 CFR 35.2643(a) requires a licensee to retain a record of each remote afterloader spot-check for 3 years.

Contrary to 10 CFR 35.2643(a), the licensee was not maintaining a record of spot-checks on electrical interlocks, viewing and intercom systems and emergency response equipment as required.

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE	Dean W. Broga, Ph.D. Medical Physicist		11/4/04
NRC INSPECTOR	Willie J. Lee		11/04/2004