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ENVIRONMENTAL HEALTH & SAFETY

Chemical • Radiological • Occupational • Biological

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January 27, 1992

John D. Kinneman, Chief  
Research Development &  
Decommissioning Section  
Division of Radiation Safety and Safeguards  
U.S. Nuclear Regulatory Commission, Region 1  
King of Prussia, PA 19406-1415

RE: Coyote Preditation Field Study

Dear Mr. Kinneman:

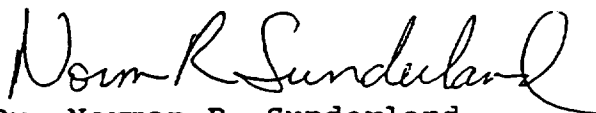
Utah State University, in good faith, did authorize under the auspices of its broad coverage license (No. UT0300159) and approve Dr. Frederick F. Knowlton's, Authorization (No. FFK 30100192) with reciprocity granted by the State of New Mexico, the right to use radioactive material in the above referenced "Coyote Preditation Field Study" during 1991.

It is the University's understanding that reciprocity was not and is not the proper regulatory manner to conduct interstate field studies. Nor is the burial of licensed material on federal property allowed without prior specific approval by the U.S. Nuclear Regulatory Commission (NRC). These apparent violations of the Code of Federal Regulations have been conveyed to Dr. Knowlton and to Utah State University's Radiation Safety Committee and Administration.

Please be assured that similar circumstances and/or apparent violations of NRC requirements by Utah State University will not occur. The Utah State University Radiation Safety Committee is responsible for granting such authorizations and as an informed body with the current regulatory position, will not authorize such projects without prior NRC approval.

Dr. Knowlton's authorization has not been renewed and all licensed material in his possession was transferred to the Radiation Safety Office for proper disposal.

Sincerely,

A handwritten signature in cursive script that reads "Norman R. Sunderland". The signature is written in dark ink and is positioned above the typed name.

Dr. Norman R. Sunderland  
Radiation Safety Officer  
Utah State University

cc: LeGrande Ellis, Chairman Radiation Safety Committee  
Bartell Jensen, Vice President for Research  
Fred Knowlton, Principal Investigator  
John T. Jensen, USDA, RSO  
Craig Jones, State of Utah