

THE STATE UNIVERSITY OF NEW JERSEY
RUTGERS

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Office of the Vice President
for Administration and Associate Treasurer
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December 21, 1993

Ms. Pamela J. Henderson
US Nuclear Regulatory Commission
Nuclear Material Safety Branch
Division of Radiation Safety and Safeguards
Region I
475 Allendale Road
King of Prussia PA 19406-1415

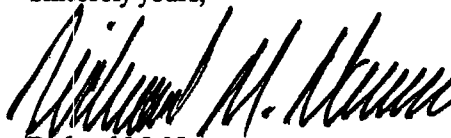
Dear Ms. Henderson:

Rutgers License No: 29-05218-28
Docket No: 030-00883
Control No: 118124

Attached is our response to your letter of November 29, 1993. Please be assured that Rutgers maintains a strong commitment to providing an effective and compliant Radiation Safety Program. REHS is a high-profile department with direct access to the highest administrative level of the University. The administration is kept well informed regarding REHS issues, and we are continually impressed with the high-quality service REHS provides to this large, complex research and teaching institution.

Please contact Mr. Michael C. Quinlan or Ms. Deborah Silva of Rutgers Environmental Health and Safety (REHS) Department at (908) 932-1550, if you have questions regarding the attached response.

Sincerely yours,



Richard M. Norman
Vice President for Administration and Associate Treasurer

Encs.

cc: T. Madey, Chair Radiation Safety Committee
M. Quinlan

MQ:lc GN/res

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RESPONSE TO NRC LETTER OF NOVEMBER 29, 1993

(1) TIME COMMITMENTS

There are no constraints on the amount of time the Director spends on any health or safety program. The Director is responsible for managing the Radiation Safety Program and his available staff in a manner that provides a service to the authorees responsible for the safe and compliant use of licensed material. The Director attends all Radiation Safety Committee meetings. As a practical matter, the amount of time spent on the Radiation Safety Program could range from 10-50% of a work week. Note that the Director of REHS has historically been the Radiation Safety Officer listed on all NRC and State licenses.

(2)(a.b.c.) EXPERIENCE OF M. QUINLAN

Mr. Quinlan has had the following practical experience with radioactive materials:

Aramco (1981-1984): Field surveys of sealed sources used in salt in crude monitors and level gauges in oil processing and refining operations. Also, surveys of X-Ray machines in medical clinics and dental offices to evaluate the potential for operator exposure.

Rutgers University (September 1989 - January 1992): As Associate Director of Operations, supervised field staff (Health/Safety Specialists) responsible for periodic audits of all laboratories using licensed materials. This included audits of the contamination surveys, annual wipe surveys, package contamination surveys and delivery. Also, supervised the field staff responsible for collecting, packaging, and disposing of all radioactive waste. Have assisted in these activities.

Directly responsible for implementing changes in the Rutgers Radiation Safety Program to comply with deficiencies cited in the NRC inspection of June, 1991.

The type and quantity of isotopes used were those licensed for use at Rutgers University and RWJMS.

As previously stated, Mr. Quinlan has had personal experience performing some of the tasks listed in (2) C. (Numbers 1-22) and, more importantly, has supervised individuals with experience in all of those tasks. Ms. Deborah Silva, the current University Health Physicist, has considerable experience in all aspects of radiation safety. Dr. Elan Gandsman and Mr. Jules Bodzas were experienced in all of these aspects; both reported directly to Mr. Quinlan.

Mr. Quinlan's practical experience at Rutgers has included the following:

- Evaluating the qualifications of authorized users and discussing their roles and responsibilities
- Conducting audits of laboratories
- Maintaining the personnel monitoring program
- Maintaining the contamination control program
- Developing the radiation safety program/manual
- Coordinating the inventory and accountability program
- Coordinating the radioactive waste disposal program.

During his tenure as Director of REHS (January 1992 to present), all of the other activities listed were performed by individuals reporting to Mr. Quinlan.

(3) ORGANIZATION CHART FOR REHS AND A LISTING OF THE INDIVIDUALS AND APPROPRIATE JOB TITLES.

Currently, REHS has twenty-one full-time employees with three vacancies. Two vacancies (Health/Safety Specialist and Secretary/Word Processor) will be filled on January 3, 1994. Another individual, Mr. Ira Schneider (currently Radiation Technician) will be promoted to a Health/Safety Specialist on January 3, 1994. The vacated Radiation Technician position will be filled as soon as a new employee can be recruited.

Three employees have full-time responsibility for radiation safety issues: the University Health Physicist (Ms. Deborah Silva), a Health/Safety Specialist assigned to UMDNJ (50%) and Rutgers (50%) (Mr. Ira Schneider), and the Radiation Technician.

Seventeen other employees (all except the Biosafety, Environmental Affairs, and Occupational Safety Officer positions) have part-time responsibility for and involvement in the Radiation Safety Program. This could range from 10-90% of an average work week.

Please note the following:

University Health Physicist -- Full-time responsibility for all aspects of the Radiation Safety Program. Liases with Health/Safety Specialists as needed on complex issues or concerns. Provides Radiation Safety Orientations. Interviews new authorees and inspects facilities to evaluate proposed uses. Spends 100% of time on radiation safety (50% UMDNJ and 50% Rutgers University).

Health/Safety Specialists (Technical Services) -- Have campus assignments for all aspects of occupational health and safety, including radiation safety. With few exceptions, they have BS or BA degrees in science or a related discipline. Experience ranges from two-to-thirty years.

Spend 30-50% of time on radiation safety activities at their campus assignments. Note that as of January 3, 1994, Mr. Ira Schneider will be dedicated Full-time (100%) to radiation safety for UMDNJ and Rutgers.

Health/Safety Specialists (Environmental Services) -- Responsible for the collection of all hazardous and radioactive waste. Collect radioactive waste from all laboratories at Rutgers and UMDNJ, transport the waste to the central facility (Gamma Greenhouse), package, label, and prepare drums for shipment. Maintain decay in storage and drain disposal programs. Responsible for contamination surveys at the waste facility. Report to the Manger of Environmental Services with responsibility for the radioactive waste program. Spend 10-90% of time on radiation safety issues.

Radiation Technician -- Implements and performs technician-level duties for the Iodination Survey Program, Isotope Receiving and Delivery Program, Authoree Inventory Management, Personnel Monitoring Program, Quality Assurance Program for Instrumentation, and assists in investigations, inspections, and laboratory surveys as required.

Co-op Students -- Undergraduates, typically in Environmental or Radiation Science, responsible for wipe tests of radioisotope packages, deliveries, assistance with recordkeeping, badge exchange, etc. (30 hours/week)

(4) **RADIATION SAFETY COMMITTEE OVERSIGHT**

Our reference to the interim period in our letter of May 25, 1993, referred to the period between the departure of Dr. Elan Gandsman and the hiring of a new University Health Physicist. Dr. Gandsman resigned from Rutgers University on June 7, 1993. (At the time of his departure, he served as both the University Health Physicist and Radiation Safety Officer.) Mr. Jules Bodzas was appointed as Radiation Safety Officer at that time. A new University Health Physicist, Ms. D. Silva, was hired and began work on August 12, 1993. Thus, the interim period was the time between June 7 and August 12, 1993. [See (4) above.]

Our reference to committing to several conditions during the interim period was based on a discussion between Mr. Thor Oberg of the Region 1 office and Dr. Gandsman. It was intended to satisfy concerns of the NRC until the arrival of the new Health Physicist.

(5) **QUALIFIED CONSULTANT**

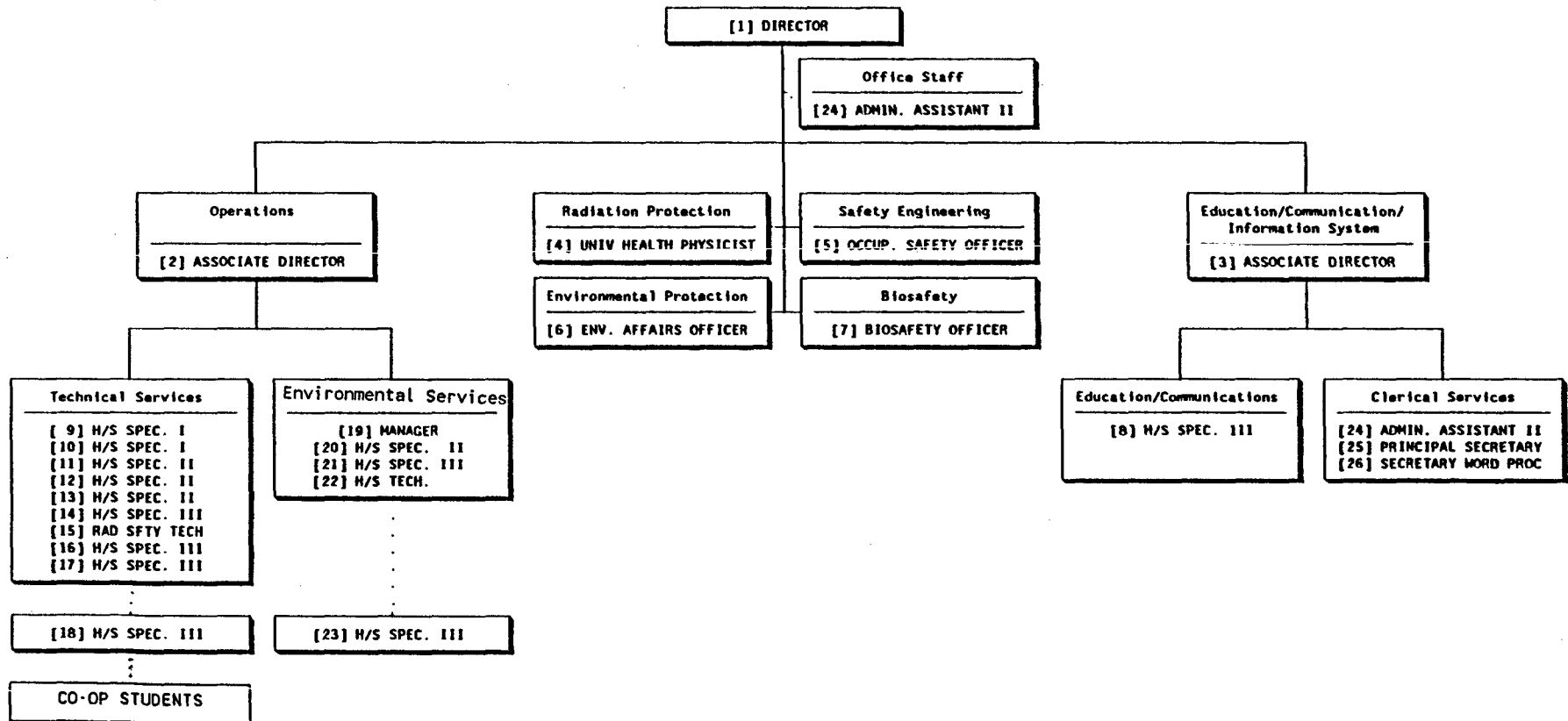
This condition, the hiring of a qualified consultant "for any situation requiring assistance" was again based on a discussion between Mr. Thor Oberg and Dr. Gandsman and also was a commitment for the interim period between June 7 and August 12, 1993.

(6) **METHOD FOR LISTING POSSESSION LIMITS**

Please use option (6)b., *i.e.* change condition 8 of the license to read: Not to exceed 5 Curies per radionuclide and 50 Curies total.

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RUTGERS ENVIRONMENTAL HEALTH & SAFETY
Organization Chart
November, 1993



REHS Staff

[01]	Michael Quinlan	Director
[02]	Sylvia Wittenberg	Associate Director, Operations
[03]	Sunil Desai	Associate Director, Educ/Commun/Info/System
[04]	Deborah Silva	University Health Physicist
[05]	<i>No funds</i>	University Occupational Safety Officer
[06]	Wendy Grossman	University Environmental Affairs Officer
[07]	Jeong Sook Yoo	University Biosafety Officer

Education/Communications

[08]	No funds	Health/Safety Specialist
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Technical Services

[09]	Ron Hartz	Health/Safety Specialist
[10]	Tom Block	Health/Safety Specialist
[11]	Thomas J. Trembley	Health/Safety Specialist
[12]	Rosemarie Kulp	Health/Safety Specialist
[13]	Mark McLane	Health/Safety Specialist
[14]	Ellen Vastola	Health/Safety Specialist
[15]	Ira w. Schneider	Radiation Safety Technician
[16]	Patrick McDermott	Health/Safety Specialist
[17]	Lori Kaufman	Health/Safety Specialist
[18]	<i>Vacant</i>	Health/Safety Specialist

Hazardous Waste

[19]	Martin Costello	Manager, Hazardous Waste
[20]	Susan Dickison	Health/Safety Specialist
[21]	Scott Sherman	Health/Safety Specialist
[22]	Stephen Etzold	Health/Safety Technician
[23]	<i>Vacant</i>	Health/Safety Specialist

Clerical Services

[24]	Lillian Comeau	Administrative Assistant
[25]	Patricia Buttcher	Principal Secretary
[26]	<i>vacant</i>	Secretary/Word Processing