



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 12, 2008

Docket No. 030-00964

License No. 37-02999-02

Jerry Berenson  
Chief Administrative Officer  
Bryn Mawr College  
101 North Merion Avenue  
Bryn Mawr, PA 19010

SUBJECT: INSPECTION 030-00964/2008-001, BRYN MAWR COLLEGE, BRYN MAWR,  
PENNSYLVANIA SITE AND NOTICE OF VIOLATION

Dear Mr. Berenson:

On January 30 and February 21, 2008, Lizette Roldán and Betsy Ullrich of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. Rick Croll, an inspector from the Pennsylvania Department of Environmental Protection (PADEP) accompanied the NRC inspectors. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. The findings of the inspection were discussed with you and Donald L. Abramowitz at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed that categorizes the violation by severity level. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

The violation described in the Notice of Violation enclosed with this letter was identified during a previous inspection of your licensed activities and documented in a Notice of Violation within an NRC Form 591X Part 1 dated May 29, 2003. From this inspection, it appears that your corrective actions were not effective since these items have recurred. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur.

Current NRC regulations are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications Page**. The current Enforcement Policy is included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **About NRC; Organization and Functions; Office of**

J. Berenson  
Bryn Mawr College

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**Enforcement; About Enforcement; then Enforcement Policy.** You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

Please contact Lizette Roldán at 610-337-5237 if you have any questions regarding this matter.

Sincerely,

***Original signed by James P. Dwyer***

James P. Dwyer, Chief  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

Enclosure:  
Notice of Violation

cc:  
Donald L. Abramowitz, RSO  
Commonwealth of Pennsylvania

J. Berenson  
Bryn Mawr College

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James P. Dwyer, Chief  
Commercial and R&D Branch  
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Enclosure:  
Notice of Violation

cc:  
Donald L. Abramowitz, RSO  
Commonwealth of Pennsylvania

Distribution:  
D. J. Holody, RI

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**SUNSI Review Complete: LRoldán**

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DATE	3/12/08		3/12/08		3/12/08		

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## NOTICE OF VIOLATION

Bryn Mawr College  
Bryn Mawr, PA

Docket No. 030-00964  
License No. 37-02999-02

During an NRC inspection conducted on January 30 and February 21, 2008, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 20.1101(c), requires, in part, that the licensee shall periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, as of February 21, 2008, the licensee did not review the radiation protection program content and implementation at least annually. Specifically, reviews were not performed for 2004, 2005, and 2006 nor was there documentation to support a radiation protection program review. This is a repeated violation.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Bryn Mawr College is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Notice of Violation  
Bryn Mawr College

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In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated This 12 day of March 2008