

800 W. Jefferson St.
Kirksville, MO 63501

Docket No. 030-12369
License No. 24-17210-01

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October 7, 2008

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

FOLLOW-UP TO REPLY REGARDING A NOTICE OF VIOLATION

In my response letter of September 5, 2008 to the referenced Notice of Violation, several corrective steps were proposed. Each of these steps had already been put into action by September 5, except for a planned training session to involve all active Authorized Users and Investigators at our site.

On September 18 and 19, 2008, I met with all active Authorized Users and Investigators and trained them in regard to the following topics, which were indicated in my Response to the Notice of Violation.

1. Ordering and Receiving Radioactive Materials

- The RSO must be notified in regard to each purchase of radioactive material.
- Authorized Users, Investigators or trained designees must pick-up shipments of radioactive material from the locked cabinet at the Receiving Dock within 3 business hours (of delivery).
- Personnel must wear protective gloves and use a survey meter (except for H-3 shipments) to monitor the package at the Receiving Dock.
- Each package must be surveyed externally and data must be entered into Form 2 (see below).

2. Receiving Radioactive Material at the Lab

- Within 3 business hours of transporting the package to the lab, packages must be opened and surveyed as directed by Form 2.
- Within 3 business days, the completed Form 2 (down through entry for wipe counts) must be sent to the RSO.

3. Securing and Supervision of Radioactive Stock Supplies

- Radioactive stock supplies must always be locked up or under the direct supervision of the Authorized User/Investigator or a designee trained in radiation safety and in safe usage of the material.

4. Incineration of Radioactive Materials

- Incinerations are allowed only for C-14 (combustible) and H-3 labeled materials. All incinerations must be approved in advance by the RSO. Maximum limits for incineration are as defined below.

Enclosed for you are 10 copies of the proposed corrective actions...

Very truly yours,
[Signature]

cc: TO RSO
cc: TO [unclear]
cc: TO [unclear]

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NMSS

Allowed Incinerator Emissions of Radionuclides

Radionuclides may be released into the air from KCOM at no more than the values for Allowed Incineration of Radioactive Materials Per Day (shown below). Data are derived from the Code of Federal Regulations 10, Part 20, Appendix B, Table 2 (Effluent Concentrations, Air), p336-385. Note: total aggregate quantities of radionuclides released per day may be no more than one daily limit, e.g., 1/2 daily limit of C-14 + 1/2 daily limit of H-3.

Nuclide	Allowed Effluent Concentrations in Air ($\mu\text{Ci/ml}$)	Allowed Incineration of Radioactive Materials Per Day (μCi)*
Carbon-14 (CO_2 upon incineration)	3.00E-07	3,900
Hydrogen-3	1.00E-07	1,300

*Calculations: Allowed Incineration of Radioactive Materials per Day (μCi) = NRC Allowed Effluent Concentrations in Air ($\mu\text{Ci/ml}$) x Flow rate ($2,550 \text{ ft}^3/\text{min}$) x Conversion Factor ($28,317 \text{ ml/ft}^3$) x Incineration Time (180 min/day)

Example for C-14:

$$(3.00\text{E-}07 \mu\text{Ci/ml}) \times (2,550 \text{ ft}^3/\text{min}) \times (28,317 \text{ ml/ft}^3) \times (180 \text{ min/day}) = 3,900 \mu\text{Ci/day}$$

Values can be averaged over the number of days in a given week that incineration is performed at the effluent flow rate cited above. Thus, if two incinerations are performed in one week, the allowed values for incineration cited above may be doubled.

Please let me know if you have any questions.



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PERTINENT INFORMATION:

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