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UNITED STATES GOVERNMENT

Memorandum

TO : E. R. Price, Assistant Director
Division of Licensing and Regulation, HQ

DATE: JAN 24 1964

FROM : R. S. Cleveland, Radiation Specialist (Review)
Region I, Division of Compliance

SUBJECT: TRANSMITTAL OF LICENSE COMPLIANCE INSPECTION REPORT -
10 CFR 30

CC:I:EE

Transmitted herewith is a license inspection report involving noncompliance:

DEPARTMENT OF THE NAVY
U. S. Naval Hospital
Radioisotope Laboratory
St. Albans 25, New York

License No. 31-76-6



The items of noncompliance were discussed at a conference on December 24, 1963 with Captain Walter F. Hansen, USN, Chief of Radiology and Acting Base Commander in the absence of Captain J. Yown USN, Base Commandant. Hansen indicated his willingness to comply with the regulations and to take appropriate corrective action.

It was pointed out to Hansen that failure to maintain records of sewerage disposals and failure to perform tests for leakage at intervals not to exceed six months were recurrent deficiencies which had been noted at our inspection of License No. 31-76-4 on 9/14/59. Hansen and Pischnotte, the RSO, who also attended the conference, both stated they never saw the results of the previous inspection or the letters from DL&R dated 12/30/59 listing the items of noncompliance and the licensee's corrective action in the letter of 1/8/60. Hansen stated that this is partly due to the fact that supervisory control suffers from transfer of personnel without arrival of replacements for considerable time. He stated he would search for all the correspondence and stated prompt corrective action would be taken.

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The items of noncompliance listed for failure to make an adequate evaluation of a spill of Sr-90-Y-90 and of the concentrations of Sr-90-Y-90 and I-131 disposed to the sanitary sewerage system were also discussed. It was pointed out to Hansen that, although the Sr-90-Y-90 spill occurred approximately two years ago, the floor drain through which floor washings are disposed still shows signs of removable beta contamination and it was evident that a large quantity of Sr-90-Y-90 had been disposed of without any record or evaluation of concentration.

Hansen stated they will no longer use the present hold-up tank. He stated that all operations will cease until the laboratory is thoroughly decontaminated with all washings collected and contaminated items disposed of by burial or transfer. He stated a new hold-up tank would be installed and that a full evaluation of concentrations and activity involved would be made of the hold-up tank's contents before release to the sanitary sewerage system.

Management control of the radioisotope program was also discussed with Hansen. The inspector pointed out that there appeared to be a breakdown in management control when they are not informed of spills of radioactive material, where decontamination efforts are made by subordinates without management knowledge and where it appears for periods of time there is no management control due to transfer of naval personnel. It was also pointed out that a subordinate assumed the duties of RSO without any supervision from the actual RSO. Hansen stated he would institute strict control and it was evident to him that there was a breakdown in management of the radioisotope program.

The licensee's administrative instructions were also reviewed with Hansen. It was pointed out that on page 4 of the instructions emergency dose of 10R and 25R are permitted. It was pointed out that these radiation doses exceed the limits

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as expressed in 10 CFR 20.101(b). Item V on page 4 of the instructions refers to general surface contamination as being maintained below tolerance levels in 10 CFR 20. It was pointed out that 10 CFR 20 does not list specific limits of surface contamination. It is recommended that these procedures be further considered by L&R as to whether or not they should still be approved and required to be followed by License Condition 43.

It is felt that the licensee's method of evaluating personnel film badges is very inappropriate and subject to gross errors. Since the density on a developed film is affected by the strength of developer, temperature of developer, time in developer, and character of specific emulsion used in a given batch of film, it is most difficult to validly evaluate a given film without comparing it with other films of the same emulsion batch which have been given known exposures and developed under the same conditions (preferably along side) the film being analyzed. It is felt that this matter raises a question as to whether the licensee's film badges can be considered as "appropriate personnel monitoring equipment" meeting the requirement of 10 CFR 20.202 and that this may need to be discussed by L&R with the licensee.

It is believed that the items of noncompliance do not currently involve a substantial hazard. However, a reinspection will be scheduled to be performed in about six months.

Form AEC-592 was not issued to the licensee because two of the items of noncompliance noted during this inspection were deficiencies which remained uncorrected after the last inspection and because of the other control deficiencies discussed above.

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40* License No. 31-76-7 was also inspected at the same time. Form AEC-591 was issued to the licensee involving one item of noncompliance, a record keeping deficiency.

Enclosure:
1 cy of Rpt.

cc: CO:HQ
w/orig. of Rpt.