



DEPARTMENT OF HEALTH & HUMAN SERVICES

FOOD AND DRUG ADMINISTRATION
Jefferson Laboratories
National Center for Toxicological Research
Regulatory Compliance & Risk Management

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Jason VonEhr, Health Physicist
Region IV – Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Re: May 31, 2017 inspection of Jefferson Laboratories

Dear Mr. VonEhr,

Thank you for taking the time to thoroughly inspect our facility on May 31, 2017 and for recognizing our Broad Scope License was missing Condition 23 which allows our RSC the flexibility to approve certain types of changes without prior NRC approval.

Per our telephone conversation on June 5, 2017 you informed me that we are being cited for a level 4 violation since the survey meters were past due for calibration (not calibrated within the one-year time frame as indicated in our Radiation Program document, which serves as a supplement to our NRC License). This oversight will be immediately corrected by shipping several survey meters to Ludlum for calibration. In order to have at least one survey meter on hand while our meters are out for calibration, we have secured the use of a survey meter that is current in its calibration. In addition, the majority of the survey meters currently in inventory will be labeled "Not in Service" and we will determine the best possible means for disposal.

We also request to change the frequency of calibrations from annually to every 24 months, unless we have reason to believe the survey meter should be calibrated prior to 24 months. In any instance in which a survey meter does not appear to be working correctly, it will be removed from service and sent to Ludlum for calibration. Our justification for requesting the change in the frequency of calibration is that there is no longer the need for large, concentrated amounts of radioactivity. We have also documented that our radioisotope use has decreased and our users are not likely to exceed the annual dose limit established by NRC. The purpose of the survey meter becomes more of a necessity to document the presence or absence of radioactivity rather than to measure the dose an employee is exposed, since in instances where an approved user is actively working with radioactive materials, we require the employee to wear a TLD badge and/or ring.

I hope this adequately addresses all concerns you have about survey meter calibration. If I have missed anything or if more clarification is needed, please feel free to contact me via email or phone.

Best Regards,

A handwritten signature in black ink that reads "Kim Daniel".

Kimberly D. Daniel, RSO