

Appendix A

NOTICE OF VIOLATION

Kirksville College of  
Osteopathic Medicine

License No. 24-17210-01

As a result of the inspection conducted on March 3-4, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition 14 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated May 24, 1977; and letters dated February 12, 1977, June 21, 1978, and August 13, 1979.

The license application dated May 24, 1977, and the letter dated February 12, 1977, states each laboratory will perform and record the results of monthly area monitoring and wipe tests of floors and working surfaces.

Contrary to these requirements, it was learned through statements of licensee representatives and a review of records that monthly area wipe tests were not always performed between June 10, 1980, and February 26, 1981. Records of the results of wipe tests were not kept on six occasions between March 1980 and November 1980.

This is a Severity Level V violation (Supplement VII).

2. License Condition 14 requires that licensed material be possessed and used in accordance with statements, representations, and procedures contained in application dated May 24, 1977; and letters dated February 12, 1977, June 21, 1978, and August 13, 1979.

The license application dated May 24, 1977, requires annual or post service calibration of survey meters.

Contrary to this requirement, it was learned through statements of licensee representatives and a review of records that the survey meters were not calibrated annually. Specifically, the Technical Associates GM survey meter Model PUG 1, Serial 12632 was last calibrated on September 29, 1979. The Technical Associates GM survey meter PUG 1, Serial 12631 was last calibrated on July 21, 1979.

This is a Severity Level V violation (Supplement VII).

3. License Condition 15 requires that the gaseous effluent from incineration does not exceed the limits specified for air in Appendix B, Table II, 10 CFR 20.

10 CFR 20, Appendix B, Table II, requires that the limits for the incineration of tritium may not exceed  $2.0 \times 10^{-7}$  microcuries per milliliter per day.

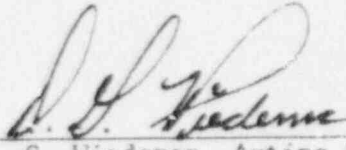
Contrary to this requirement, it was learned through statements of licensee representatives and a review of records, that a bag containing tritium contaminated rats, vials, waste paper and rat bedding was incinerated which resulted in a gaseous effluent in excess of  $2.0 \times 10^{-7}$  microcuries per milliliter per day. Specifically, on December 26, 1980, the tritium gaseous effluent was  $2.32 \times 10^{-7}$  microcuries per milliliter.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within twenty-five days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated

3/20/81

  
D. G. Wiedeman, Acting Chief  
Materials Radiation Protection  
Section 1