



UTAH STATE UNIVERSITY

UMC 45, LOGAN, UTAH 84322
Phone (801) 750-2892

UNIVERSITY SAFETY OFFICE

Chemical
Radiological
Occupational

November 24, 1980

Glen D. Brown, Chief
Fuel Facility and Material Safety Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Dr. Brown:

Regarding items of noncompliance pertaining to Byproducts Materials License No. 43-02935-10, the following actions have been taken:

- (1) The 60-cobalt and 137-cesium sources in question have been secured by lock and access can only be gained by me and one other officer of the University. This condition will remain until a valid license covering these materials has been granted.
- (2) Non-compliance in this instance apparently resulted from errors involved during personnel changes. Future communication problems of this type will be avoided by assembling all licenses and license related materials in a single file which will be maintained in a permanent Radiation Safety Office. This, in fact, has now been done and any future personnel changes will not affect this record keeping system.
- (3) A new license application covering these materials has been submitted to the License Management Branch (see copy of cover letter attached) for consideration.
- (4) Full compliance with NRC regulations will be achieved when Licensing Officials provide a new specific license for the sealed sources, recommend that the materials be included in our Broad License Renewal Application, or stipulate other dispositions for these materials.

Regarding items of noncompliance pertaining to Byproduct Materials License No. 43-12087-04, the following actions have been taken:

- (1) The three sealed sources that were not tested for leakage and/or contamination for periods longer than six months were immediately secured and leak tests were performed -- these results were negative.
- (2) To avoid similar occurrences of these problems, many sealed sources have been rescheduled for testing on dates that will be less likely to conflict with field use occasions. Further, more conscientious review of the files will be performed by radiation safety personnel to identify pending leak test dates. This will provide earlier notices to soil probe users so that timely

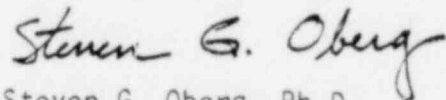
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tests can be performed without fear of delinquency. All record keeping within the Safety Office will soon be computerized. The computer will likely be programmed to notify the Safety Officer of pending and completed sealed source leak tests.

(3) Full compliance has effectively been achieved by the procedures indicated above. Confirmation of compliance will be noted in practice.

If these responses are deemed insufficient by your office, please notify me. I will be glad to consider any actions you might suggest to further improve USU's Radiation Safety Program. Thank you for your assistance.

Sincerely,



Steven G. Oberg, Ph.D.
USU Radiation Safety Officer

Enclosures: (1)

cc: Chief, License Management Branch
Bartell C. Jensen, Research Vice President
Thomas M. Farley, Chairman, Radiation Safety Committee