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July 9, 1980

James G. Keppler
Director
Region III
U.S. Nuclear Regulatory
Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Dr. Keppler:

We have received your letter of June 24, 1980 which was in reply of our June 6, 1980 letter. Perhaps, as a way of brief explanation, we should say that in our previous (June 6) letter, we tried to concentrate on the specific items of non-compliance, which were listed in your May 21, 1980 letter. We will provide the additional requested information in this letter. An outline of our administrative control procedures follows.

Administrative Authority

Decisions regarding administrative and licensing procedures are made by the Radioisotope Safety Committee (RISC) which currently has a membership of five faculty members (one each from Engineering, Chemistry, Physics, Biology and the School of Dentistry), as well as two ex-officio members, the Radiation Safety Officer and the Director of Research Support.

Licensing of Individual Users

Individuals who wish to use byproduct material in their research must submit a request to the Radioisotope Safety Committee (RISC). The request consists of a completed AEC-313 form and any other information which may aid the committee in its evaluation of the request. The request is circulated to all members of the committee and each member is asked to approve or disapprove it. If any member needs more information or wishes to place restrictions on the license, he states so on the comments sheet. If serious disagreements exist, the request is discussed at the next meeting of the committee, at which a vote is taken to approve or deny the request. The applicant is then given an explanation of the action taken and is given another opportunity to apply.

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Record Keeping

In addition to the records required to be kept by individual users, a complete set of records on each individual user is maintained at the Office of Research Support (ORS). Each user's file includes a copy of his/her application, with a blueprint or diagram of the laboratories where byproduct material is used or stored, a complete record of purchases and possessions, a record of disposals, records of all bioassay and film badge monitoring results, records of surveys and wipe tests conducted in the individual's laboratory and all other pertinent information and records on the individual performance. These records are maintained by the Director of the Office of Research Support with the aid of an administrative assistant. All members of the RISC have access to these records and may inspect them at any time. In addition, the Radiation Safety Officer (RSO) has a list of all approved users, their locations and a copy of the blueprints or diagrams which detail the locations of use and storage of byproducts. The ORS also maintains a copy of all correspondence regarding our license, minutes of the meetings of the RISC, the institutional license, and the Title 10 of CFR along with the supplemental materials which have been issued by the NRC.

Purchases.

All requisitions for the purchase of byproduct materials must be processed through the ORS. In addition to the regular university requisition form, the request must include a permit and registration form (Appendix A). This form must bear the approval and signature of a member of the RISC. This is required since it is a procedure contained in our license application. This procedure was written into the application since at the time we thought that the purchase records will be kept by the RISC. It is now superfluous and we may amend the license in the future in such a way as to eliminate this step. The additional steps insure adequate control and record keeping. When the request reaches the ORS, it is checked for the following. First, the requisitioner must be an approved user. Secondly, the isotope must be one for which the individual was approved when his/her application was processed. Thirdly, the amount requested should not exceed the individual's approved possession limits, when it is added to the amounts already on-hand. If any questions arise which are of a technical nature, the ORS will contact the requisitioner as well as a member of the RISC. Following this processing by the ORS, the requisition along with the permit and registration form is sent to the Purchasing Department. This department is responsible for the preparation of the official university purchase order (PO). The only individual authorized to process requisitions for byproduct material is Mr. Dennis Streich, who is one of the purchasing agents. He has been provided with a list of byproduct materials, including chemical symbols and a list of vendors from which such materials may be purchased. Should someone attempt to purchase byproduct material without going through the ORS, Purchasing would provide another

control point. No purchases can be made without a university PO number, which can be assigned only by Mr. Streich. He has also sent instructions to all vendors asking them not to accept telephone orders from anyone, except him or the chairman of the RISC. The latter will make such calls only if Mr. Streich is not available within a reasonable time. A copy of the PO is sent, along with the permit and registration form to the central receiving point (stockroom of the Biology Department). When the package arrives, it is placed in a secure area (marked as a radiation area) by the stockroom clerk. He will ask the delivery person to remain until the package is inspected by a qualified person. We have five such individuals listed for the stockroom clerk. All five are faculty in the Department of Biology and one of them should be available at all times. When the package has been found in satisfactory condition, the delivery person is allowed to leave. Should there be leakage and a chance for contamination, the delivery person is so informed and asked to stay. The RSO will be immediately informed.

The requisitioner is then informed of the arrival of the package by the stockroom clerk and will pick up the package either in person or through an authorized representative. Packages will not be sent through campus mail. The requisitioner or his/her representative will sign the permit and registration form, which is then sent to the ORS, where the purchase is entered on the possession form of the requisitioner.

Disposal

When an individual user disposes of byproduct material, he/she transfers the isotope to a designated waste storage area and enters the amount in a logbook located in the storage area. At the same time, the individual sends a note to the ORS, informing this office of the disposal. This amount is then removed from the individual's total possession.

Transfer of radioactive waste is made periodically to Atomic Disposal, Midotlan, Illinois. When such transfers are made, the total amount of each isotope transferred is removed from the total university possession.

Film Badges

Results from all developed film badges are sent to ORS, where they will be stored for future reference. Copies are sent to the individual users. These records will be inspected on a quarterly basis by the RISC.

Bioassay Results

All bioassay results are sent to the ORS and are inspected on a quarterly basis.

Survey and Wipe Test Results

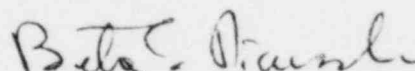
These results are reported to the ORS at the required intervals and are inspected by the RISC on a quarterly basis. If the required results are missing, the individual user will be sent a letter of warning. If this does not produce the required information, the RISC will take appropriate action.

Meetings of the RISC


The committee will meet at least once per quarter, although it has been more frequent in the past two months. A previously established agenda is followed, although new business can always be added. Items of an emergency nature are always handled first. Minutes of the meetings are kept by the administrative assistant to the Director of the ORS. A copy of the minutes is circulated to all members of the RISC for approval.

We trust that the above information will fill the gaps in our last letter. Should you need any other information, please let us know. We will do our best to provide it.

Sincerely yours,



Bela E. Piacsek, Ph.D.
Co-Chairman, Radioisotope
Safety Committee



Lynn E. Miner, Ph.D.
Director, Office of
Research Support

BEP:bjd

Enclosure

Appendix A

MARQUETTE UNIVERSITY PERMIT AND REGISTRATION

FOR PURCHASE OF BYPRODUCT MATERIAL

REQUISITION:

Name:

Department:

Date:

University Requisition No.:

Vendor:

Isotope:

Amount:

Chemical Form:

Phone

Office:

Home:

APPROVAL OF RADIOISOTOPE SAFETY COMMITTEE:

Name of Committee Member:

Signature:

Date:

ORS REGISTRATION:

Recorded by (Please initial):

Date:

PURCHASING:

Processed by (Please initial):

Date:

University P.O. No.:

CENTRAL RECEIVING:

Received from (shipper):

Date:

Received by (Please initial):

Inspected by (Please initial):

TRANSFER TO USER:

Picked up by:

Name (print):

Signature:

Date:

COMMENTS AND NOTES: