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UNIVERSITY OF MINNESOTA
TWIN CITIES

Department of Environmental Health and Safety
Boynton Health Service, Room W-140
410 Church Street S.E.
Minneapolis, Minnesota 55455
(612) 626-6002

July 26, 1989

22-00218-29

D.J. Sreniawski, Chief
Nuclear Materials Safety Sec.
Region III
U.S. Nuclear Regulatory Com.
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Sreniawski:

As requested by the Office of the President of the University of Minnesota, I am submitting this response to your June 30, 1989 letter concerning the June 5-8, 1989 safety inspecti[illegible] The following corrective actions have been taken by the University Radiation Protection Progra[illegible] University Division of Nuclear Medicine with respect to the two violations noted in your r[illegible]ket NO. 030-2194).

1.) The first violation noted concerned the failure of the Division of Nucle[illegible]ne to perform a contamination smear survey of use areas following the preparation and admi[illegible]n of two radiopharmaceutical doses on Saturday, May 29, 1989. As I discussed with you in our telephone conversation on July 19, 1989, to avoid this violation in the future, we will institute the revised 10CFR Part 35 regulation (section 35.70) to replace the current requirement under license Condition 23. Under this new regulation the Division of Nuclear Medicine will perform a daily radiation survey of all areas where radiopharmaceuticals are prepared or administered. This daily survey will be performed on each day that radiopharmaceuticals are prepared and/or administered, and the survey will be conducted using a portable radiation survey instrument (calibrated GM survey instrument). The results of these daily surveys will be recorded and the person performing the survey will initial the record. In addition, the Radiation Protection Program will perform a weekly contamination smear survey and portable radiation instrument survey of all radioisotope use and storage areas. The adoption of these new survey regulations has already been requested as part of our license renewal application for NRC License No. 22-00218-29 (letters dated May 27, 1988 and September 21, 1988).

2.) The second violation cited concerned the disposal of radioactive waste in a non-approved container within one of the patient imaging rooms (Room 2-448). A survey of a waste basket on June 6, 1989 revealed the presence of a gauze wipe which was contaminated with radioactive material. The waste basket was removed from the room and placed in a radioactive materials storage room for decay storage. To correct this violation, the Division of Nuclear Medicine has instructed all of their staff concerning the requirement that all wastes resulting from the patient injection procedures (syringe, gauze wipes, gloves) must be disposed in the labeled radioactive waste containers in the room and/or in the hot laboratory. In addition, the daily radiation survey by Nuclear Medicine personnel will include a sur[illegible]ey of all waste baskets and syringe needle receptacles in the patient imaging rooms. This survey [illegible] performed at the end of the normal work day prior

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to any of the waste baskets being emptied. If any contaminated items are detected in these waste containers, they will be removed by Nuclear Medicine personnel and placed in a radioactive materials storage areas for decay to background level (as measured with a calibrated GM survey instrument).

If you have any questions concerning the corrective actions listed or if you require additional information, please call me.

Sincerely,

Jerome W. Staiger

Jerome W. Staiger
Radiation Protection Officer

JS/dr
cc: Dr. Nils Hasselmo, President, University of Minnesota
Dr. Robert Boudreau, Director, Division of Nuclear Medicine
Dr. Donald Vesley, Director, Department of Environmental Health and Safety
Jim Tennison, Chief Nuclear Medicine Technologist