

University of Cincinnati
Medical Center



Office of Administrative Services

Health Professions Building
Eden and Bethesda Avenues
Cincinnati, Ohio 45267-0553

October 30, 1989

U.S. Nuclear Regulatory Commission
Attention: Mr. A. Bert Davis
Regional Administrator (FAX 312-790-5665)
799 Roosevelt Road, Building No. 4
Glen Ellyn, IL 60137

References: 1) NRC License No. 34-06903-05; Docket No. 030-02764
2) Confirmatory Action Letter (CAL-RIII-89-019), Dated 8/30/89

Subject: Response Required by Referenced Confirmatory Action Letter

Gentlemen:

This refers to the above-referenced CAL and the responses required by Item 4, which states:

Continue laboratory surveys/audits, prioritizing high volume and suspected problem laboratories. All survey audits will be completed and the results and planned corrective actions submitted to the Commission (Region III) by October 30, 1989.

The initial audit period began on August 21, 1989, and was completed on October 13, 1989. The scope of the audits/surveys (which involved the inspection of 677 radioactive material use labs under the University of Cincinnati Broad Scope License) included reviews of individual laboratory survey records posting/labeling, inventory records, disposal records; observations of practices and procedures; and both radiation level and removable contamination (smear) surveys.

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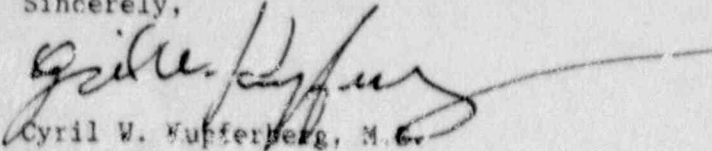
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Approximately 80% of the 677 labs audited/surveyed demonstrated some violation(s) of NRC and/or UC rules and regulations. The majority of violations were related to the failure to perform/document lab surveys and inventories (26% and 23%, respectively). The specific violations, the number of labs found within each violation category and the percent of labs per violation are tabled on the attached LABORATORY AUDIT/SURVEY SUMMARY. During the period October 16-26, 1989, all labs exhibiting contamination levels above UC allowable limits were revisited and found to have successfully decontaminated or shielded (for fixed contamination) the affected areas. In addition, a number of labs in each of the other violation categories were revisited and found to be in compliance with applicable rules and regulations.

Corrective actions taken/planned included providing necessary postings/labels, adding laboratories to our rosters of labs to be routinely audited by this office, re-training of all radiation workers (which included a review of the identified violations and specific corrective action(s) to be taken on the part of the authorized users) and revisits of labs to verify that corrective action had indeed been taken.

A more detailed response (including other areas addressed in the CAL) will be provided during our planned meeting at the NRC Region III offices on Wednesday, November 1, 1989. If you should have questions/concerns regarding the above (prior to the NRC/UC meeting), do not hesitate to contact this office.

Sincerely,



Cyril W. Kupperberg, M.D.
Associate Senior Vice President
for the Medical Center, and
Associate Dean for the College of Medicine
Management and Finance

Enclosure

cc: Donald C. Harrison, M.D. (with enclosure)
Jerome F. Wiot, M.D. (with enclosure)
Howard R. Elson, Ph.D.
Francisco Trejo (NES)
Robert Burgin (NES)

((FAXED 10/30/89))

NES

**UNIVERSITY OF CINCINNATI
NES AUDIT/SURVEY FINDINGS SUMMARY**

Initial Audit/Survey Period: August 21 - October 13, 1989

Followup Audit/Survey Period: October 16-26, 1989

<u>Violation</u>	<u>Number of Rooms</u>	<u>% of Rooms per Violation</u>
Survey/Records	176	26%
Postings/Labels	64	9%
Unauthorized Users *	25	4%
Unauthorized Rooms	50	7%
Contamination Above Limits	46	7%
Inventories/Records	160	23%
Waste Disposal Records	6	1%
Eating/Drinking/ Smoking	13	2%
NO VIOLATIONS	120	21%

* The violation related to "Unauthorized Users" refers to individuals working in the absence of an authorized user.

TOTAL ROOMS IN VIOLATION: 540

PERCENT OF TOTAL ROOMS IN VIOLATION: 79%

TOTAL ROOMS AVAILABLE: 677

All contaminated labs were revisited and found to have been decontaminated (or shielded in the case of fixed contamination) to acceptable levels. In addition, approximately 90 other labs previously demonstrating violations during the initial audit period were revisited and were found to be in compliance with applicable NRC and/or UC rules and regulations.

For NES:

Robert E. Burgin
Robert E. Burgin
Sr. Licensing Consultant