

NOV 8 1990

License Nos. 35-03176-01
35-03176-04MD
35-03176-05
Docket Nos. 30-02885/90-01
30-12750/90-01
30-15184/90-01

The University of Oklahoma
Health Sciences Center
ATTN: Clayton Rich, M.D.
Provost and Vice President
for Health Sciences
P.O. Box 26901
Oklahoma City, Oklahoma 73190

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office on July 30 through August 3, 1990, of the activities authorized by NRC Byproduct Material License Nos. 35-03176-01, 35-03176-04MD, and 35-03176-05. The findings of the inspection were discussed with the radiation safety officer (RSO) and administrative, research, and pharmacy staff members at the conclusion of the inspection. The enclosed NRC Inspection Reports 30-02885/90-01, 30-12750/90-01, and 30-15184/90-01 document the inspection.

The inspection was an examination of the activities conducted under each license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the inspector.

During this inspection, certain of your activities were found not to be conducted in full compliance with NRC requirements for License Nos. 35-03176-01 and 35-03176-04MD. Consequently, you are required to respond to this matter in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notices of Violation enclosed with this letter. In preparing your response, please refer to the instructions provided in the Notices. No violations or deviations were identified in regard to License No. 35-03176-05.

RIV:NMSIS *JK*
LLKasner:ym
11/2/90

C:NMSIS *etc*
CLCain
11/5/90

D:DRSS
ABB *Rich*
11/8/90

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35-03176-01 PNU

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Additionally, the inspection revealed that certain other of your activities were in violation of NRC requirements for License Nos. 35-03176-01 and 35-03176-04MD. However, in accordance with Sections V.A and V.G.1 of the NRC's Enforcement Policy (10 CFR Part 2, Appendix C), no citation is being issued for these violations. These violations are identified in the enclosed inspection reports.

The inspector also reviewed the actions you had taken with respect to the 11 violations observed during our previous inspections of the nuclear pharmacy program (NRC License No. 35-03176-04MD) on March 8 and May 3, 1989. She verified that the corrective actions had been implemented for each of the violations as described in your correspondence dated June 23 and September 21, 1989, and observed that these actions had remained effective in preventing recurrence of the specific violations during this inspection period.

The inspector observed that the radiation safety programs had been the subject of closer review by both management and the RSO, and that management controls had improved during this period. However, as noted in the enclosed inspection reports, due to the similarity and overlap of some program activities, particularly those involving the nuclear pharmacy and certain research projects, we believe management controls implemented for both the broad and pharmacy licenses worthy of continued review.

Specifically, we note that more stringent controls are required for those activities involving the nuclear pharmacy's preparation and transfer of radiopharmaceuticals under the UOHSC broad license to ensure that they do not become the subject of distribution under the nuclear pharmacy license. Additionally, we are concerned that program audits are not of sufficient detail to identify fundamental safety issues as well as the persistent lack of aggressive and timely resolution of issues which are identified as a result of program audits. These problems are evidenced in our inspection findings regarding failures to evaluate charcoal filters placed in fume hood exhaust systems for saturation; improper evaluation of surveys; and most notably, the failure to aggressively investigate extremity exposures for pharmacy personnel.

The findings of this inspection evidence a need for continued development regarding the detail of internal program audits, thereby enhancing this aspect of the program and improving your ability to identify safety issues and violations of license conditions or NRC requirements. The inspection also identified a need to establish a systematic review of problems or violations which are identified during routine program audits to ensure that they are promptly corrected. The nature of these issues are similar, in part, to those discussed during the June 26, 1989, Enforcement Conference conducted in regard to violations identified during our previous inspection of the UOHSC nuclear pharmacy. Consequently, NRC is requesting to conduct a management conference to discuss the specific actions planned or taken to improve the effectiveness of program management and internal review by the RSO and RSC. You will be contacted at a future date to schedule the conference. We are requesting that the conference be conducted at the UOHSC in order to facilitate the participation of a greater number of individuals responsible for program management.

The University of Oklahoma

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In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,
Original Signed By:
A. B. BEACH

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

Enclosures:

1. Appendix A - Notice of Violation
30-12750/90-01
2. Appendix B - Notice of Violation
30-02885/90-01
3. Appendix C - NRC Inspection Report
30-12750/90-01
4. Appendix D - NRC Inspection Report
30-02885/90-01
5. Appendix E - NRC Inspection Report
30-15184/90-01

cc:
Oklahoma Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (4503)
*WLFisher
*CLCain
*LLKasner
*NMSIS
*MIS System
*RIV Files (2)
*RSTS Operator
*REHall, URFO

*W/766