



ROCKFORD SCHOOL OF MEDICINE

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Rockford, Illinois 61101
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August 25, 1982

D. G. Wiedeman, Chief
Materials Radiation Protection
Section 1
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Wiedeman:

Re: license No. 12-18786-01

In response to the Notice of Violation which lists three items of noncompliance which were found on the July 21, 1982 inspection of our facility, each item is listed and followed by an explanation of corrective action to be taken and estimated time of compliance.

Item 1. In violation of license application dated July 31, 1979, we have not calibrated our survey meters on a quarterly basis but rather on an annual basis.

Course of action: We will calibrate the G-M survey meter quarterly, effective immediately, but will request amendment of our license to indicate that henceforth such calibrations be done on an annual basis. If the amendment is approved, we will calibrate the meter annually.

Item 2. In violation of referenced letter dated October 17, 1979, we visually inspect incoming packages but do not monitor exposure rate with a survey meter as required.

Course of action: Incoming packages will be monitored as required, effective immediately, but amendment of our radiation safety manual will be requested to delete this requirement based on NRC Part 20.205 which does not require meter survey of incoming packages at our level of isotope usage.

Item 3. In violation of referenced letter dated October 17, 1979, item number 7, we have not done daily or weekly surveys and have missed five monthly surveys in 1981.

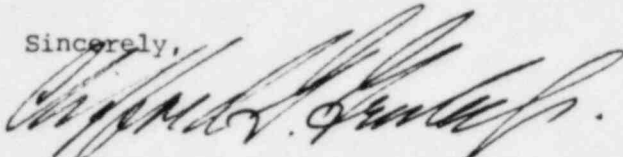
Course of action: Daily surveys will be performed with a G-M survey meter and weekly and monthly wipe tests will be performed as indicated, effective immediately. Monthly surveys for 1982 have been in compliance. Amendment of the radiation safety manual will be requested to modify the requirement for daily and weekly surveys of preparation and storage areas.

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Our request for license amendment (see attached) will be submitted before September 1, 1982. Until notification of amendment approval is received, the requirements of the radiation safety manual as approved by NRC will be honored.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clifford G. Grulee, Jr.", written in dark ink.

Clifford G. Grulee, Jr., M.D.
Dean
Rockford School of Medicine

AMENDMENTS

Amendment #1

We request the possession limit for tritium to be changed from 30 millicuries to 60 millicuries.

Amendment #2

We request that our application, dated July 31, 1979, item 11 (Method, Frequency, and Standards Used in Calibrating Instruments Listed Above) be amended to require annual calibration of our survey meter (instead of quarterly).

AMENDMENTS TO SAFETY MANUAL

Amendment #1

We request that page 11 of the Safety Manual, item (1), be amended to read:

- (1) During normal working hours, carriers must be instructed to deliver radioactive packages directly to the main office of the Department of Biomedical Sciences. If packages contain isotopes above levels of activity cited in NRC Part 20.205, packages must be monitored within three hours by the ICO.

Amendment #2

We request that page 12 of the Safety Manual, item 2), be amended to read:

- 2) Isotope Control Officer Responsibility:

If packages contain isotope activity above levels cited in NRC regulations, Part 20.205, then the following procedure for package inspection will apply:

- (1) Measure exposure rate at 1 meter from package surface and record. If more than 10 mR/hr., stop procedure and notify Radiation Safety Officer.
- (2) Measure surface exposure rate and record. If more than 200 mR/hr., stop procedure and notify Radiation Safety Officer.
- (3) Open the outer package (following manufacturer's directions, if supplied) and remove packing slip. Open inner package to verify contents (compare requisition, packing slip, and label on bottle), and check integrity of final source container (inspecting for breakage of seals or vials, loss of liquid, discoloration of packaging material). Check also that shipment does not exceed possession limits.

- (4) Monitor the packing material and packages for contamination before discarding.
 - a. If contaminated, treat as radioactive waste.
 - b. If not contaminated, obliterate radiation labels before discarding in regular trash.
- (5) Complete the Radioactive Shipment Inspection Report Form and maintain a file of these forms.

Amendment #3

We request that page 14 of the Safety Manual, item 2), number (1) be amended to read:

- 2) Isotope Control Officer Responsibility:
 - (1) A control log will be maintained by the isotope control officer for each type of radionuclide licensed by NRC. A sample format of the log is given on page 15.

Amendment #4

We request that page 14 of the Safety Manual, item 1) number (2) be amended to read:

- (2) The Radiation Safety Committee shall also designate an alternate Isotope Control Officer (AICO), who will be responsible for the duties of the ICO when the latter is not present or available.

The designated Isotope Control Officer is David Turriff, Ph.D.

The designated Alternate Isotope Officer is Fu-Li Yu, Ph.D.

Amendment #5

We request that page 24 of the Safety Manual, item 3. be amended to read:

3. If a spill is suspected, monitor hands and clothing for contamination before leaving the area.

Amendment #6

We request that page 24 of the Safety Manual, item 4. be deleted.

Amendment #7

We request that page 24 of the Safety Manual, item 6. be amended to read:

6. If iodine-125 or iodine-131 use exceeds 100 microcuries per month, wear film badge while in areas where radioactive materials are used or stored. These devices should be worn at chest or waist level.

Amendment #8

We request that page 24 of the Safety Manual, item 9, be amended to read:

9. Survey preparation area and use areas for contamination as specified on page 25 unless a spill is suspected. In cases of suspected spill, survey immediately and decontaminate immediately if necessary.

Amendment #9

We request that page 25 of the Safety Manual, item 1), number (1) be amended to read:

- (1) All preparation and animal injection areas will be surveyed daily with a low-range thin-window G-M survey meter and decontaminated if necessary (except for tritium and Carbon-14).

Amendment #10

We request that page 25 of the Safety Manual, item 1), number (2) be amended to read:

- (2) Laboratory areas where only small quantities of radioactive material are used (less than 100 microcuries of tritium or carbon 14 per day or less than 100 microcuries per month for other isotopes) will be surveyed monthly.

Amendment #11

We request that page 26 of the Safety Manual, item 2), number (1) be amended to read:

- (1) The radioisotope storage room and waste storage room will be surveyed weekly, following the procedures outlined above. A general survey log will be maintained recording results of survey and any decontamination that was necessary.

Amendment #12

We request that page 33 of the Safety Manual, number (5) be amended to read:

- (5) If the average thyroid burden of an exposed worker is less than 0.04 millicuries of Iodine-125, less than 0.12 millicuries of Iodine-131, or less than the corresponding proportionate amount of a mixture of these isotopes, no further tests shall be taken.