

APPENDIX A

NOTICE OF VIOLATION

Whitehead Institute for Biomedical Research  
Cambridge, Massachusetts 02142

Docket Nos. 030-20745  
030-20746  
License Nos. 20-20706-02  
20-20706-01

As a result of the inspection conducted on August 27 and 28, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

A. Condition 2C of License No. 20-20706-02 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated June 24, 1989, and the attached Required Procedures for Radiation Protection.

1. Item III (L)(1) of the Required Procedures for Radiation Protection requires that there be no smoking, eating, storage of food, or use of cosmetics in any area where unsealed and sources of radioactive materials are being used, handled, transferred or stored.

Contrary to the above, on August 27 and 28, 1990, inspectors observed evidence of eating and drinking in areas where unsealed radioactive materials are used. Furthermore, inspectors observed one radiation worker actually eating in an area restricted for radioactive material use.

This is a Severity Level IV violation. (Supplement VI)

2. Item 10.5 of your license application states, in part, that persons working with volatile forms of radioiodine are subjected to thyroid monitoring and that the frequency of monitoring be in accordance with the criteria established in Regulatory Guide 8.20.

Contrary to the above, as of August 28, 1990, two radiation workers had not received thyroid monitoring after performing work with volatile radioiodine, at the frequency required in Regulatory Guide 8.20.

This is a Severity Level IV violation. (Supplement IV)

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3. Item III (L)(6) of the Required Procedures for Radiation Protection requires that when hand or clothing contamination is probable, protective gloves and lab coats be worn during operations involving the handling of radioactive materials.

Contrary to the above, on August 27 and 28, 1990, numerous radiation workers were observed not wearing protective lab coats while performing work in restricted areas.

This is a Severity Level V violation. (Supplement VI)

4. Item II D.(10)(a) of the Required Procedures for Radiation Protection states that each project supervisor possessing or using radioactive material or radiation sources is responsible for establishing daily laboratory 'close-down' procedures adequate to ensure that at the end of the work day, survey meter measurements have established that external radiation and contamination levels are within permissible levels.

Contrary to the above, as of August 28, 1990, a review of available records indicated that survey meter measurements were not performed at the end of each work day when radioactive materials were utilized.

This is a Severity Level V violation. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, The Whitehead Institute for Biomedical Research is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.