



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

**NR 18 0001**

Docket: 030-01176  
License: 49-09955-10

University of Wyoming  
ATTN: Daniel Baccarri  
Vice President, Finance  
P.O. Box 3413  
Laramie, Wyoming 82071

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-01176/94-01

Thank you for your letter of April 7, 1994, in response to our letter and Notice of Violation dated March 14, 1994. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

*Charles L. Cain*

Charles L. Cain, Chief  
Nuclear Materials Inspection Branch

cc:  
Wyoming Radiation Control Program Director

210001

9404220007 940418  
PDR ADOCK 03001176  
C PDR

*JEET*

bcc w/copy of licensee letter:

DMB - Original (IE-07)

LJCallan

SJCollins

RAScarano, DRSS/RIV

MMessier, OC/LFDCB (4503)

WLFisher

CLCain

RABrown

NMIB

MIS System

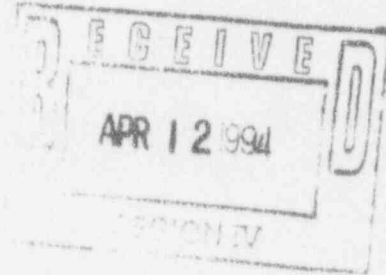
RIV Files (2)

RIV:NMIB	C:NMIB			
RABrown	CLCain			
04/15/94	04/15/94			

bcc w/copy of licensee letter:  
DMB - Original (IE-07)  
LJCallan  
SJCcollins  
RAScarano, DRSS/RIV  
MMessier, OC/LFDCB (4503)  
WLFisher  
CLCain  
RABrown  
NMIB  
MIS System  
RIV Files (2)

RIV:NMIB	C:NMIB			
RABrown	CLCain			
04/15/94	04/15/94			

April 7, 1994



Docket: 030-01176  
License: 49-09955-10

ATTN: Document Control Desk  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Reply to a Notice of Violation

This letter is in response to the NRC INSPECTION REPORT 030-01176/94-01 (NOTICE OF VIOLATION) dated March 14, 1994 and signed by Samuel J. Collins, Director, Division of Radiation Safety and Safeguards. The report was a result of the routine, unannounced inspection on the University of Wyoming (byproduct materials license 49-09955-10) conducted by Mr. Robert A. Brown on February 10-11, 1994. The University of Wyoming does not contest the violations as listed in the appendix to the above mentioned report. In compliance with the conditions of the notice of violation, the University of Wyoming (UW) submits the following statements of explanation:

(1) The reason for the violation

The written calibration procedures at UW were included as part of a letter to the NRC dated 10/20/83 and incorporated into UW's byproduct materials license 6/12/85. At that time a 1.2 Ci Cs-137 beam calibrator was secured for this purpose. As stated in section 3.2 (Instrument Calibration Facilities) of the April 7, 1993 letter mentioned above, the location for instrument calibration was room 108 of the Agriculture A building on campus, but it was to be moved to the Regulated Materials Management Center (RMMC) upon the building's completion. Although the old calibration facility in Agriculture-A was twice the length of the work room in the RMMC, the gamma backscatter, inadequate lighting and other factors in room 108 made it less desirable as a calibration facility. Due to delays in construction and in stabilizing the emergency detection and suppression systems at the RMMC, the move of operations to that building was detained. Because the work room in the RMMC is half the length of the room previously used, another X10 attenuator for the calibrator was ordered to reduce the calibration beam to the lower exposures required. At the same time, a replacement fuse

94-0768

~~9404100259~~

housing and light bulbs for the calibrator safety system were ordered.

After a review in August, 1993 of the calibration needs at UW, the process was begun to secure funding and purchase additional (beta-emitting) sources and equipment in hopes they could be ordered and received by the next time calibrations were due. The calibration sources and equipment have been ordered but, as of the date of this letter, not all have been received. Although the April 7, 1993 letter mentioned above states that "portable radiation survey instruments are calibrated by the RSO or assistant at least every six months" (which has been the practice), both the ANSI N323-1978 and Appendix B to NRC Regulatory Guide 10.8 specify that an annual calibration period is sufficient. Rather than proceed with calibrations in December, 1993 as they had been conducted in the past, it was thought better to wait until the new facility and equipment could be used in order to make the calibrations safer and more effective. It was not anticipated that the delay would be as long as it was.

(2) The corrective steps and the results achieved

The hand-held radiation survey instruments were successfully calibrated on April 1, 1994 by the Radiation Safety Officer and staff, according to the procedures outlined in the 10/20/83 letter to the NRC. The calibrations were performed in the RMMC work room, using the newly acquired X10 attenuator.

(3) The corrective steps that will be taken to avoid further violations

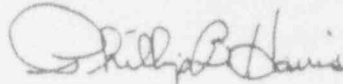
The written procedures for survey instrument calibration are being improved to better meet the high standards expected of NRC licensees. These changes in the program will be sent to the NRC Region IV Nuclear Materials Licensing Section for review. These procedures will specify the required frequency of the calibrations, and Radiation Safety personnel will be instructed to adhere to the prescribed schedule. Unless any amendments to the current materials license are requested by the licensee and accepted by the NRC, the frequency of calibrations will remain "at least every six months."

(4) The date when full compliance will be achieved

Hand-held survey instrument calibrations were conducted on April 1, 1994 as specified by UW's license. From this point on, the University of Wyoming will remain in compliance with its license provisions by adhering to the six-month schedule for calibrations unless a change in that schedule is requested by the licensee, approved by the NRC and included in the university's materials license.

Should there be any questions regarding the above statement, please direct them to Radiation Safety Officer, Jim Herrold at (307) 766-3277.

Sincerely,



Phillip B. Harris, Associate Vice  
President, Administration and Finance

cc: Regional Administrator, NRC Region IV