

NOTICE OF VIOLATION

University of Hawaii
Office of the President
Bachman Hall 202
Honolulu, Hawaii 96822

Docket No. 030-07517
License No. 53-00017-23

During an NRC inspection conducted on November 28 and 29, 1990 certain violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

- A. 10 CFR 20.201(b) requires each licensee make such surveys as may be necessary to comply with the requirements in Part 20 and which are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to the above requirement, at the time of the inspection, radiological evaluations of the estimated exposure doses received by badged personnel had not been made for 48 film badges lost or missing since January, 1990.

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

- B. 10 CFR 19.12 requires, in part, that all individuals working in a restricted area be instructed in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to the above requirement, at the time of the inspection, the licensee's training program did not include approximately 50 housekeeping/maintenance staff who enter restricted areas.

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

- C. License Condition 21, states, in part, that except as specifically provided otherwise in the license, the licensee shall conduct its program in accordance with the statements, representations and procedures contained in the application dated May 31, 1989.

1. Part IV A. of the Radiation Safety Office operating procedures attached to the application states that portable survey meters are calibrated every six months.

Contrary to the above requirement, at the time of the inspection, the following instruments being used in the laboratories were past due for calibration as follows:

<u>Instrument</u>	<u>Serial No.</u>	<u>Calibration Date</u>	<u>Calibration Date</u>
Technical Associates DR5-3	0688	Jan. 5, 1990	Aug. 15, 1990
Eberline E-520	4962	Jan. 25, 1990	Aug. 10, 1990
Eberline E-520	1366	Jan. 25, 1990	Aug. 8, 1990

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

2. Part I.A.3 of the Radiation Safety Manual attached to the application states, in part, that authorizations are renewed on a biennial basis (not to exceed 730 days). Renewals will be approved by the Committee.

Contrary to the above requirement, only about 30% of the authorization renewal applications had been received by the Radiation Safety Office for review and processing on the due date of November 28, 1990 which was 730 days since prior approval. None of the renewal applications had been approved by the Committee. This is a repeat violation.

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

4. Part II.D of the Radiation Safety Manual attached to the application states, in part, that lab coats shall be worn when handling open containers of radioisotopes.

Contrary to the above requirement, at the time of the inspection, lab coats were not being worn when working with open containers of radioisotopes.

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

Pursuant to the provisions of 10 CFR 2.201, University of Hawaii, Honolulu, is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert J. Pate

Dated at Walnut Creek, California
this 17th day of January 1991