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ROBERT S. KRUTSICK
Interim President and Chief Executive Officer

October 24, 1990

CONFIDENTIAL

Docket No. 030-12779

License No. 37-17452-01

United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pa 19406

Gentlemen:

Subject: Reply to a Notice of Violation.

This letter is in response to your notice of violation based upon Inspection No. 030-12779/89-001 performed on September 13, 1989 by NRC staff. The response is provided according to the alpha-numeric order presented in the citation.

In general, to avoid future violations of NRC regulations and to ensure cooperation and compliance by research investigators with our Radiation Safety Program, we have (1) increased attention to timely and centralized recordkeeping, as a necessary part of good oversight, and (2) increased communication with research investigators, both in writing and through visits to their laboratories. In this regard, visits were made to our licensed laboratories in March and August of 1990, at which time the NRC regulations and our radiation safety program were reviewed with all laboratory staff.

A. In addition to the increased communication with researchers already working in our licensed laboratories, it is now standard practice that our personnel office contacts the RSO whenever there is a new hire in a licensed laboratory. The RSO provides a radiation safety course, a copy of the Science Center's Radiation Management Program, and then tests the new employee's comprehension.

B. 1. As of January 1, 1990, it has been our policy that the RSO is notified of the intended purchase of all radiolabelled materials prior to ordering. The RSO checks the order against present inventories and issues approval (or disapproval) and at the same time enters the intended purchase into the inventory.

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2. Radiolabelled material is received at the laboratory of the RSO who logs it in and does a wipe test of the outer packaging. It is then distributed to the user laboratory. The users are then required to wipe at each level as they unpack, and to submit a copy of the results to the RSO.
 3. All of our survey meters are being sent, one at a time, for calibration. We expect that all of the meters will have been calibrated by December 1, 1990. It should be noted here that these survey meters are not used as instruments for routine safety monitoring but rather are used as semi-quantitative monitors for the presence of label in our biological experiments involving P-32. For routine laboratory safety monitoring, we use wipe tests of the working areas, which are read on calibrated liquid scintillation counters.
 4. Inventories of all isotopes are now maintained by the RSO and updated monthly and at the time of ordering (as described in B1). Previously, each laboratory maintained its own inventories and notified the RSO of usage. To improve oversight, the RSO has taken over the inventory process. The present system prevents inadvertent coverage in inventory owing to various laboratories acting independently.
 5. (a) The Radiation Safety Office maintains records of audits and surveys done by the RSO.
(b) Previously, we had requested that all records of laboratory monitoring be maintained in each laboratory. To improve oversight, the RSO now collects and maintains copies of the records in a central file. The records are handed in to him at the end of each month by each laboratory unit. Full compliance has been in effect since January 1, 1990.
- C. All personnel have been informed that they must notify the RSO whenever a transfer of radioactive materials is to be made from the University City Science Center to any other institution. The RSO will, at the time of such shipment, remove the materials from inventory and notify the RSO at the receiving institution of the


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shipment. As yet, we have had no instance of this since the last event cited.

The Radiation Safety Officer, the individual who provides administrative support to the RSO, and the Director of Research Development comprise a Radiation Safety Committee which meets monthly, usually during the first week of the month. At that time, the Radiation Safety Officer reports on the activities of the previous month and verifies the compliance of the laboratories with respect to performing and submitting copies of their wipe tests. Committee meetings also provide an opportunity to discuss and decide on additional actions, such as scheduling visits to the laboratories. Minutes are prepared promptly for each meeting and a copy is submitted to the Interim President.

We hope that this response provides the NRC with adequate information. We believe we are in compliance in all respects but calibration of our survey meters, which will be completed by December 1, 1990.

Sincerely yours,



Robert S. Krutsick

cc: Dr. Robert Alper