



University of Hawaii at Manoa

Environmental Health and Safety Office
2525 Maile Way, Bldg. 2
Honolulu, Hawaii 96822
Telephone (808) 948-8680

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REGION V

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April 19, 1990

License No. 53-00017-23

United States Nuclear Regulatory Commission
Regional Administrator
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Dear Gentlemen:

This is in response to the Notice of Violation dated February 21, 1990 for University of Hawaii, License Number 53-00017-23. The Radiation Safety Committee recognizes your concern over the repetitive nature of the three minor violations. The Committee will have a member accompany the Radiation Safety Officer on audits of all Principal Investigators and will emphasize the Committee's concern for all violations identified by the NRC during the audit. Changes involving supplementation of audit activities will be reviewed for implementation by the Radiation Safety Committee.

A. SECURITY

The Radiation Safety Committee (RSC) and the Radiation Safety Office (RSO) have considered security of radioactive materials of primary concern, especially since the April 1986 inspection. Numerous notices have been sent to Principal Investigators emphasizing the seriousness of the proper security of materials. The RSC did list, in a memorandum to all Principal Investigators, the use of a lockbox as a proper means of securing radioactive materials. It was our understanding at the time, based on the previous inspection and discussions with the inspector, that this would be adequate. We believe we have made substantial improvements in the area of security since the 1986 inspection.

All Principal Investigators have been notified of the violation, during recent audits, and have assured the RSC that they will effect laboratory policies to insure that materials will be locked or attended in secured unremovable containers.

Compliance will be achieved by July 1, 1990.

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B.1. CONTAMINATION

Currently our Radiation Safety Manual requires decontamination of work surfaces found to have removable contamination greater than 500 dpm/100cm². This limit will be amended to 5000 dpm/100cm² in line with the acceptable surface contamination limits published by the NRC. In addition facilities (e.g. sinks, hoods, waste boxes) used for storage or disposal will be allowed to have removable contamination above 5000 dpm/cm². The RSC will continue to strongly urge all Principal Investigators to monitor for contamination following any radioisotope procedure.

Compliance will be achieved immediately.

B.2. UNAUTHORIZED USER

Principal Investigators are required to have all radiation workers approved by the RSC. This will be reemphasized in a letter from the RSC to all Principal Investigators. Audit procedures will be expanded to assure that all workers have been approved.

Compliance will be achieved by July 1, 1990.

B.3. MONTHLY SURVEYS

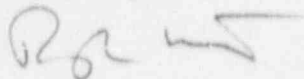
As stated in response to the violation cited in March of 1988, prior to the 1986 inspection, performance of laboratory surveys had been left to the discretion of the Principal Investigator as appropriate to the amount, type, and frequency of isotope use. After 1986, Principal Investigators were notified that monthly surveys were required. Several notices have been sent to Principal Investigators and audits have been used to check for the performance of monthly surveys. Since then, we have had a substantial increase in the number of surveys performed by the Principal Investigators.

It is our understanding that the license renewed October 24, 1989 was renewed based entirely on the information provided in the application. Monthly surveys are technically no longer required of the Principal Investigator under the license renewal of October 24, 1989. However audits will continue to be used to check for the performance of adequate laboratory surveys and semi-annual inventories will ask investigators to provide evidence of the surveys.

In response to your concern for improvement in the University management control system the following procedures will be implemented.

1. The audit procedure will be amended immediately to identify all deficiencies, even when corrected at the time of the audit. The RSC will review all audit procedures for effectiveness and make any necessary additions to avoid future repetitive violations.
2. The biennial renewal of the licenses for each Principal Investigator is November 1990. All items from NRC inspections will be reviewed with the investigator before the renewal of the license. The RSC will review all biennial renewals.
3. The RSC and the RSO will actively investigate the hiring of an additional radiation safety technician to aid in performing more frequent and in depth field surveys.

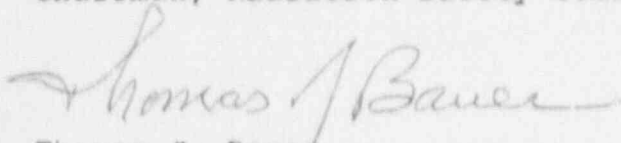
Sincerely,



Ralph Horii
Vice-President for Finance & Operations



Gregory Patterson
Chairman, Radiation Safety Committee



Thomas J. Bauer
Radiation Safety Officer

cc: President Simone