



University City Science Center

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ROBERT S. KRUTSICK
Interim President and Chief Executive Officer

January 10, 1991

Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

RE: DOCKET NO. 030-12779/EA NO. 90-187

Dear Mr. Martin:

This acknowledges receipt of your letter dated December 13, 1990 with the notification that the NRC will not take any enforcement action against the University City Science Center in this case. We have already taken action to instruct supervisors and other managers and employees involved in licensing activities that they are not to be discouraged from communicating safety concerns to the NRC. A copy of our communication to managers, supervisors, and employees is attached.

Thank you.

Sincerely yours,

Robert S. Krutsick

RSK/sg

Enclosure

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REG1 LIC30
37-17452-01 PDR

Key members of the Radiation Safety Committee can be reached at the following numbers:

Dr. Robert Alper Radiation Safety Officer	215-387-2255, ext. 331
Dr. Susan Smith Director, Research Development	215-387-2255, ext. 211
Bernadine Hawes Administrative Official	215-387-2255, ext. 228

2.2 Category of Users of Radioisotopes

Under the terms of the Science Center's license issued by the NRC, radioactive materials may only be used by or under the direct supervision of individuals designated as Authorized Users.

- o Authorized users are members of the research staff who have received clearance from the NRC and the Radiation Safety Officer to use specific radioactive materials. They are responsible for supervising other lab users.

Supervised users are technicians and other support staff who have received clearance from the Radiation Safety Officer and an NRC approved Authorized User (supervisor) to use radioactive materials.

Each Authorized User is designated as a liaison between the Radiation Safety Officer and his/her research lab. This liaison is the primary focal point for communications between the Office of Radiation Safety and all personnel using radioactive materials.

* 2.3. Employee Rights and Responsibilities

Each Science Center employee has the right to directly contact the NRC with any safety concerns or if he/she believes that violations of NRC rules or of the terms of the license have occurred. You may call the nearest NRC Regional Office collect at (215) 337-5000.

Each employee has the responsibility to report any known or suspected violation of NRC regulations or Science Center radiation safety policies to his/her immediate Supervisor and the Radiation Safety Officer. Employees are encouraged to alert both individuals. The Radiation Safety Officer will promptly investigate any such concerns and take appropriate action, as well as consult with Science Center management as appropriate.

*Excerpt from UCSC's Radiation Management Program

EMPLOYEE RESPONSIBILITIES AND RIGHTS

You have the responsibility to:

- report all violations you observe to your supervisor and the Radiation Safety Officer

You have the right to:

- * ■ directly contact the NRC without being disciplined, discriminated against, or dismissed,
- request an inspection
- speak to an NRC Inspector



NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION (PART 20) NOTICES, INSTRUCTIONS AND REPORTS TO WORKERS INSPECTIONS (PART 19), EMPLOYEE PROTECTION

WHAT IS THE NUCLEAR REGULATORY COMMISSION?

The Nuclear Regulatory Commission is an independent Federal regulatory agency responsible for licensing and inspecting nuclear power plants and other commercial users of radioactive materials.

WHAT DOES THE NRC DO?

The NRC's primary responsibility is to ensure that workers and the public are protected from unnecessary or excessive exposure to radiation and that nuclear facilities including power plants are constructed to high safety standards and operated in a safe manner. The NRC does this by establishing requirements in Title 10 of the Code of Federal Regulations (10 CFR) and in licenses issued to nuclear users.

WHAT RESPONSIBILITY DOES MY EMPLOYER HAVE?

Any company that conducts activities licensed by the NRC must comply with the NRC's requirements. If a company violates NRC requirements, it can be fined or have its license modified, suspended or revoked.

Your employer must tell you which NRC radiation requirements apply to your work and must post NRC Notices of Violation involving radiological working conditions.

WHAT IS MY RESPONSIBILITY?

For your own protection and the protection of your co-workers, you should know how NRC requirements refer to your work and should alert them if you observe violations of the requirements. You should report them.

HOW DO I REPORT VIOLATIONS?

If you believe that violations of NRC rules or of the terms of the license have occurred, you should report them immediately to your supervisor. If you believe that alternative corrective action is not being taken, you may report this to an NRC inspector at the nearest NRC Regional Office.

WHAT IF I WORK IN A RADIATION AREA?

If you work with radioactive materials or in a radiation controlled area, the amount of radiation exposure that you may legally receive is limited by NRC Regulations. The limits on your exposure are contained in Sections 20.103, 20.103 and 20.104 of Title 10 of the Code of Federal Regulations (10 CFR) 201. While these limits are the maximum allowable limits, your employer should also keep your radiation exposure as far below these limits as is "reasonably achievable."

MAY I GET A RECORD OF MY RADIATION EXPOSURE?

Yes. Your employer is required to tell you, in writing, if you receive any radiation exposure above the limits set in the NRC regulations on your employer's license. In addition, if your employer's radiation work may result from your employer's review of your annual radiation exposure in terms of your total exposure in a year, you may also.

ARE VIOLATIONS OF NRC REGULATIONS IDENTIFIED?

NRC inspectors regularly inspect facilities to assure compliance with NRC requirements. In addition, your employer and his co-workers conduct their own inspections to assure compliance. All violations are reported by Federal law enforcement with whom may result in criminal prosecution for a Federal offense.

MAY I TALK WITH AN NRC INSPECTOR?

Yes. Your employer may not prevent you from talking with an NRC inspector and you may talk privately with an inspector and request that your identity remain confidential.

MAY I REQUEST AN INSPECTION?

If you believe that your employer has not corrected violations involving radiological

WHAT FORMS OF DISCRIMINATION ARE PROHIBITED?

No employer may fire you or discriminate against you with respect to job benefits or working conditions because you help the NRC.

HOW AM I PROTECTED FROM DISCRIMINATION?

If you believe that you have been discriminated against for helping safety concerns to the NRC, you may file a complaint with the U.S. Department of Labor. Your complaint must describe the facts or circumstances and must be filed within 30 days of the occurrence.

Send complaints to:

Office of the Administrator
Wage and Hour Division
Employment Standards Administration
U.S. Department of Labor
Room 53502
200 Constitution Avenue, NW
Washington, D.C. 20210

or any local office of the Department of Labor, Wage and Hour Division. Check your telephone directory under U.S. Government listings.

WHAT CAN THE LABOR DEPARTMENT DO?

The Department of Labor will notify the employer who it may order you to file your complaint. It may also file a complaint with and will investigate the case.

WHAT WILL THE NRC DO?

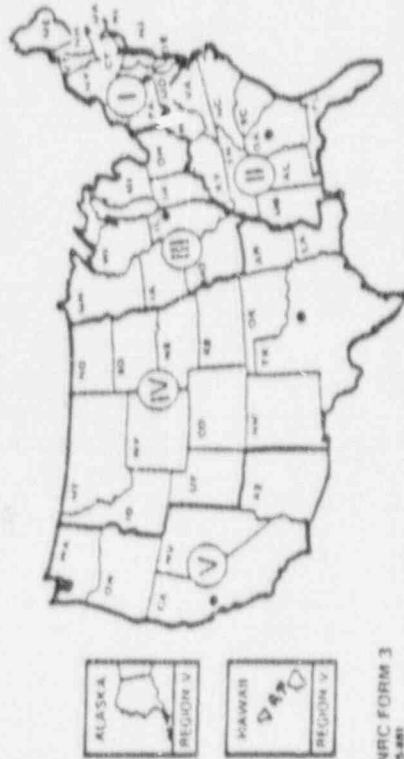
The NRC may advise the Department of Labor in its investigation. NRC may conduct its own investigation where necessary to determine whether unfair discrimination has occurred. The NRC may also file a complaint with the U.S. Department of Labor. The NRC may issue a Notice of Violation to your employer, impose a fine or suspend, modify or revoke your employer's NRC license.

UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONAL OFFICE LOCATIONS

A representative of the Nuclear Regulatory Commission can be contacted at the following addresses and telephone numbers. The Regional Office will accept collect telephone calls from employees who wish to register complaints or concerns about radiological working conditions or other matters regarding compliance with Commission rules and regulations.

Regional Offices

REGION	ADDRESS	TELEPHONE
I	U.S. Nuclear Regulatory Commission Region I 415 Alameda Road King of Prussia, Pa. 19386	215 237 5000
II	U.S. Nuclear Regulatory Commission Region II 401 Massachusetts Ave. Aurora, GA 30203	404 311 4503
III	U.S. Nuclear Regulatory Commission Region III 700 Massachusetts Road Oak Ridge, TN 37837	312 790 5500
IV	U.S. Nuclear Regulatory Commission Region IV 801 River Plaza Drive, Suite 1000 Nashville, TN 37211	615 860 8100
V	U.S. Nuclear Regulatory Commission Region V 1500 Nevada Lane, Suite 210 Beverly Creek, CA 94708	415 943 2700



THE FOLLOWING ARE AVAILABLE FOR INSPECTION AT THE RADIATION SAFETY OFFICE AT 3624 MARKET STREET BY CONTACTING MRS. BERNADINE HAWES OR DR. SUSAN SMITH: 1) Science Center's NRC License 2) Science Center's Radiation Management Program 3) NRC regulations governing radiation standards and employee rights, and 4) Results of inspections and surveys by the Science Center and the NRC and the Science Center's response to these.