



CLARK UNIVERSITY

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Department of Biology

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Mr. Mohamed M. Shanbaky, Chief
Division of Radiation Safety
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

May 25, 1994

Reply to notice of violation

Dear Sir:

In response to the findings of non-compliance with NRC regulations in our research program as listed in Docket No. 030-08144 for Licence No. 20-02245-04 we wish to implement corrective action as follows.

A1. Non wipe testing of packages of purchased radioisotopes.

We have correctly implemented the wipe testing of the surfaces of packages of radioisotopes received in Room N303 of the Chemistry Dept. This wipe testing procedure has been implemented effective immediately for all future shipments of purchased material.

2. Lack of calibration of survey meters.

Effective immediately, survey instruments that were not calibrated within the past year have been recalibrated by Radiation Safety and Controls Corp. of New Hampshire and will be in use in appropriate labs that employ radioisotopic materials for student training and research.

3. Storage of waste for decay in excess of defined maximums.

An examination of the bags of waste stored for decay on-site, revealed that material in bags in one drum and one external bag (5 gallon) contained waste that had long exceeded the 10 half life decay period. These waste items belonged to a previous faculty member (recently deceased) who had put them in storage. We surveyed the bags and found them to contain no detectable levels of radioactivity (^{32}P and ^{35}S) so they were disposed of in regular trash.

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4. Non surveillance of radioactive waste storage-bag integrity.

The quarterly survey of radioactive waste package integrity that is stored in plastic bags in steel drums has been immediately implemented and the labelling of the drums with the appropriate labels for contents, dates and integrity has been established.

5. Multiplicity of film badge providers.

The change of film badge providers from the current services has been changed to a single supplier (ICN Dosimetry of California) for all radioactive lab workers effective June 1st 1994.

B. Irregular surveys of physical inventory of sealed sources.

The physical inventory of all sealed sources in the Physics dept. has been conducted and updated to the present time. This will be continued every 6 months as specified in condition 16 of the licence.

C. Insufficient "Caution" labelling of radioactive waste containers.

The clear labelling of all drums containing radioactive materials either in storage for decay or in temporary use in laboratories will be implemented immediately so that information regarding the contents can be clearly assessed by workers in the vicinity in order to minimize exposures.

Sincerely,



John J. Brink, RSO
Clark University
Worcester, MA 01610

cc: Alan Jones, Dean of the Graduate School
Prof. D. Thurlow, Chemistry Dept.
Prof. S. L. Blatt, Physics dept.
USNRC, Washington DC