UNIVERSITY OF DELAWARE

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OFFICE OF PERSONNEL & EMPLOYEE RELATIONS SAFETY & RADIATION SAFETY 4:7 ACADEMY STREET PHONE: 302-738-8475

August 25, 1982

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Thomas T. Martin, Director Division of Engineering & Technical Programs U. S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, Pennsylvania 19406

License Nos.07-01579-06 07-01579-19 Docket Nos. 30-06892 30-10925

Subject: Inspection No. 82-02

Dear Mr. Martin:

This refers to the actions taken by the University of Delaware to correct violations listed in the Notice of Violation dated August 18, 1982 as a result of the inspection conducted on July 13, 1982.

A. Surveys of effluent volumes for ventilation systems used in conjunction with iodination procedures have been conducted. The data has been used to demonstrate compliance to 10CFR20.106 with regard to the release of iodine-125 to unrestricted areas. Iodinations at the University of Delaware are conducted in closed systems. The estimated release of iodine-125 has been set at 1% of the amount purchased. For the purpose of these calculations, concentrations have been averaged over a period of one year (7/1/81 - 6/30/82) in accordance with 10CFR20.106(a). The attached table demonstrates iodine-125 levels in unrestricte. areas are not likely to exceed the MPC specified in Appendix B, Table II of 10CFR20, 8E-11uCi/ml (air).

Similar measurements and calculations will be conducted whenever a new location for iodinations is established or whenever there is any other reason to suspect an increase in the amount of iodine-125 released.

In addition, the University of Delaware will periodically monitor effluent air discharges during iodinations when the highest concentrations of iodine-125 are likely to occur. Monitoring results will be forwarded to the USNRC, if requested. We believe this action has achieved full compliance with regulation.

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B. On August 12, 1982 the Division of Fuel Cycle and Material Safety issued amendment number 11 to license number 07-01579-06. Amendment number 11 removed the requirement that the cobalt-60 irradiator room be equipped with continuously operating radiation monitors with audible and visible alarms as previously stated in item 15.D of the application dated February 3, 1981. We believe this action has achieved full compliance with regulation. In addition, the audible portion of the cobalt-60 irradiator room radiation monitor was repaired and back in service by 1630 hours, July 13, 1982 (the date of the inspection). A copy of the amendment request and amendment 11 are attached.

Please contact me if additional information is required. Your consideration will be appreciated.

Sincerely,

UNIVERSITY OF DELAWARE

Stuart W. Kline

Stuart W. Kline Associate Director of Safety Radiation Safety Officer

for

C. Harold Brown, Vice President Personnel and Employee Relations

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Attachments

cc: L. Leon Campbell, Provost University of Delaware

> John T. Brook, Director Public Safety University of Delaware

State of Delaware

ESTIMATES OF IODINE-125 RELEASED TO UNRESTRICTED AREAS

Building	Effluent Volume Per Year	I-125 Purchased For Iodination 7/1/81-6/30/82	Estimated Release 7/1/81-6/30/82
Worrilow	2.95E13 ml	1.70E4uCi	1.70E2uCi
Brown	2.32E14 ml	1.80E4uCi	1.80E2uCi
McKinly	2.23E15 ml	5.00E4uCi	5.00E2uCi

Estimated Average I-125 Concentration in Effluent 7/1/81 - 6/30/82	Estimated % MPC Released 7/1/81 - 6/30/82
5.76E-12uCi/m1	7.20%
7.76E-13uCi/ml	0.97%
2.24E-13uCi/m1	0.28%