

September 27, 1982

Mr. S.L. Lasuk
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Lasuk:

I am responding to your questions concerning the second violation at the Bob Hipple Laboratory. The violation discovered August 18-19, 1982, involved a Mr. O'Connell who was using Fe⁵⁹ without committee approval. You asked two questions, transmitted by phone to Dr. Austin, Consultant Radiation Safety Officer.

- 1) If an individual is working with isotopes in an Authorized User's Laboratory, but the individual is not designated as an individual user, what is his category and how does the committee verify his training.
- 2) Does the Radiation Safety Committee consider Mr. O'Connell's training at Monsanto's Mound Facility to be adequate for the work he has been doing.
- 1) The committee recognizes only 3 categories of users: Authorized user, individual user, and student user. The first two are well defined in our proposal. The third has never been so defined. I will do so here. This information will also be added to our manual. A student user is one who is using radiation-producing devices or radioactive materials in a laboratory, for course credit. There are several sub-categories:
 - a) graduate student users: they must acquire individual user status to proceed with their research.

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- b) undergraduate student users: a protocol must be submitted by the authorized user. The authorized user is responsible for the student training necessary for use. All use must be under the direct personal supervision of the authorized user.
 - i) if the user is in a didactic course where the same manipulations will be performed by each student or student group and the same procedures may be used in several school academic quarters or years, the names of the students do not have to be submitted with the protocol.
 - ii) if the use is in a research setting, the protocol must name the student user.

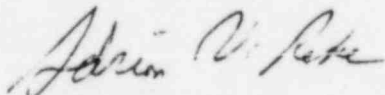
As for Mr. O'Connell, he was not a student according to Wright State definition so he should have obtained an individual user approval prior to use (volunteer or employee, it makes no difference to us).

At the time of use he was not registered for a course credit and had not matriculated in the University, although he is now enrolled in the Medical School here.

- 2) We were not asked to determine if the Mound's course was sufficient for O'Connell's training before his use. In retrospect it would appear that the course is designed for orientating technicians doing proscribed routine user work and is not designed for research type of activity where the user has latitude in user use. Thus we do not think the training was adequate for Mr. O'Connell type of activities. It may be adequate in other types of limited activities but these must be reviewed case by case.

In summary, it would appear that the Bob Hipple Laboratory is in violation of our rules again and we have asked Dr. Murphy to attend our next meeting to discuss the situation.

Sincerely,



Adrian V. Rake, Ph.D.
Chairman
University Radiation Safety Committee

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