BOSTON BIOMEDICAL RESEARCH INSTITUTE

RADIATION SAFETY OFFICER HARTMUT WOHLRAB, Ph.D.

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June 9, 1994

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

Ref:

Reply to a Notice of Violation

Routine Inspection No. 030-01971/94-001

License No.20-13748-01

Docket No. 030-01971

Gentlemen:

The Radiation Safety Officer of the Boston Biomedical Research Institute (Dr. Hartmut Wohlrab) met on Wednesday, June 1, 1994, with Mr. Robert Johnson, Associate Radiation Protection Officer (responsible for Licensing and Training) of Harvard University Environmental Health and Safety, to initiate an independent comprehensive audit of our radiation safety program. The Boston Biomedical Research Institute recordkeeping forms are being modified to facilitate recordkeeping while retaining compliance with requirements by the U.S. Nuclear Regulatory Commission License. These forms are also being modified to permit the recording of surveys taken before waste generated by decay in storage is disposed of.

The Boston Biomedical Research Institute Radiation Safety Officer will take two courses conducted by Mr. Robert Johnson: 1. "Fundamentals of Radiation Safety," - four-hour lecture followed by a quiz (June 23 and 28, 1994); and 2. "Advanced Investigator Training" (four-hour lecture and a two-hour quiz, scheduled during first half of July, 1994). This second course is designed for Investigators and Radiation Safety Officers, and has been approved by the U.S. Nuclear Regulatory Commission for

Radiation Safety Officer training at other institutions.

An instructional meeting was held on June 9 with Boston Biomedical Research Institute radioisotope users to emphasize the license requirements for recordkeeping. Within 60 days, laboratories will be inspected (audited) at an accelerated pace to confirm compliance with recordkeeping requirements, and those laboratories that show noncompliance will be reaudited within 30 days. Mr. Johnson requires about three weeks to update our radiation safety manual and the recordkeeping forms. The modifications have then to be approved by our Radiation Safety Officer and a special meeting of the Radioisotope Committee. Time restraints make it extremely difficult to complete these processes within the six weeks allowed.

Full compliance can be achieved by September 1, 1994, and we request that you approve an

extension of time allowed for compliance to that date.

Sincerely yours,

Hartmut Wohlrab, Ph.D.,RSO

John Gergely, Ph.D., M.D.

Director.

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