

JUN - 7 1994

Docket No. 9999-0001

California License No. 1777-70

J. L. Shepherd & Associates
ATTN: J. L. Shepherd
1010 Arroyo Avenue
San Fernando, California 91340

Dear Mr. Shepherd:

SUBJECT: SPECIAL INSPECTION NO. 9999-0001/94-007

On May 10 and 11, 1994, John R. McGrath and Steve Shaffer of this office conducted a special safety inspection at LaSalle University of activities authorized under an NRC general license. The inspection was limited to the removal of a Isomedix Gammator irradiator from LaSalle University. The findings of the inspection were discussed with Dan Peabody of your staff at the conclusion of the inspection.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. Specifically, you did not follow provisions of your Radiological Safety Control Manual as they relate to the frequency of instrument calibration and dosimetry exchange. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

Please use the enclosed self-addressed green envelope when you submit your copy to the Regional Administrator, Region I. This will assist us in the timely processing of your response. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room. The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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Your cooperation with us is appreciated.

Sincerely,

**Original Signed By:
Walter J. Pasciak**

Walter J. Pasciak, Chief
Industrial Applications Section
Division of Radiation Safety
and Safeguards

Enclosure:

Appendix A, Notice of Violation

cc:

Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
State of California

bcc:

Region I Docket Room (w/concurrences)
D. J. Holody, RI
RI Reciprocity File

DRSS:RI
Shaffer/cmm

EWB
6/6/94

DRSS:RI
McGrath

SM
6/6/94

DRSS:RI
Pasciak

WJ
6/6/94

APPENDIX A

NOTICE OF VIOLATION

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During an NRC inspection conducted on May 10 and 11, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Condition 13 (ii) states, "Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in this license in accordance with statements, representations, and procedures contained in the documents listed below." Subpart (a) includes J. L. Shepherd and Associates Radiological Safety Control Manual dated October 24, 1988. Section VIII of that manual commits to calibrating primary portable instruments on a quarterly basis.
 Contrary to the above on May 10, 1994, the licensee's technician, used an Eberline E-520, for performing surveys demonstrating compliance with Department of Transportation requirements for transporting radioactive material, which had not been calibrated since December 10, 1993.
 This is a Severity Level IV violation (Supplement IV).

- B. Condition 13 (ii) states, "Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in this license in accordance with statements, representations, and procedures contained in the documents listed below." Subpart (a) includes J. L. Shepherd and Associates Radiological Safety Control Manual dated October 24, 1988. Section VI, subpart 2 of that manual states, "Film badges for personnel working on loaded units, per Section XIV.2, will be changed on a monthly basis."
 Contrary to the above as of May 10, 1994, the licensee's technician was wearing a Thermoluminescent Dosimeter (TLD) for measurement of personnel exposure to radiation which had not been exchanged since November 1, 1993.
 This is a Severity Level IV violation (Supplement IV).

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