



University of Hawai'i at Mānoa

Environmental Health and Safety Office
2040 East-West Road • Honolulu, Hawai'i 96822
Telephone: (808) 956-8660 • Facsimile: (808) 956-3205

June 17, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Docket No. 030-07517
License No. 53-0017-23

RE: Reply to a Notice of Violation

Dear Sir:

This letter is in response to the Notice of Violation that the University of Hawaii received on May 25, 1994.

- A. The Radiation Safety Office is now performing weekly radiation and contamination surveys for the Radiation Waste Storage room at the Environmental Protection Facility and at the Cancer Research Center of Hawaii. No removable contamination was found. The deteriorated boxes have since been surveyed with no removable contamination found and properly disposed. Compliance has been met.
- B. The basement room at the Cancer Research Center of Hawaii and the Radiation Storage Room at the Environmental Protection Facility were both posted with "Caution, Radiation Area" signs later that day on April 21, 1994, after it was determined that they were radiation areas. Compliance has been met with the posting of the signs and surveys performed.
- C. The personnel working in the two labs that were cited have been instructed in proper surveying techniques. A "read and sign" form will be distributed among all radiation workers to inform them of all 10 CFR Part 20 changes. Compliance will be met by the end of July 1994.

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- D.
1. The Radiation Safety Office (RSO) has made a new form which acts as our shipping papers for all waste boxes (see attached). This form has all the information required in 49 CFR 172.203 (d). The appropriate labels with transport indices are affixed as needed prior to shipping.
 2. The new RSO form also has our emergency response telephone number as prescribed in 49 CFR 172.201 (d) and Subpart G of 49 CFR Part 172.
 3. All packages requiring labeling , with exceptions not applicable, are labeled prior to shipping, with two labels on opposite sides. The labels have the contents, activity, and transport index on the blank spaces of the label.
 4. All off-campus labs are now performing contamination surveys with the results written on our new form. RSO will perform radiation surveys on each box to determine whether it is a Radioactive White - I or Yellow-II or -III and fill in that portion of our new form as specified in 49 CFR 173.475, 49 CFR 173.441 and 49 CFR 173.443. If required, the proper shipping labels will be affixed on those boxes. Most of waste falls into the limited quantity category and will label those boxes as such and indicate that on our shipping paper form. Compliance has been met with the use of this form.
 5. We will attend hazmat training classes when they become available in either July (see attached flyer). Compliance will be met after attending the Hazmat training class.

If you require additional information or have any questions, please call me at (808) 956-8591 or FAX (808) 956-3205.

Sincerely,



Irene Sakimoto
Radiation Safety Officer

cc: Regional Administrator, Region IV
Director, WCFO

Enclosure: shipping paper form
Hazmat training class flyer

RADIOACTIVE MATERIAL N.O.S. UN _____

Emergency Phone Number: 956-8591

PHYSICAL FORM: _____ SOLID or _____ LIQUID (SELECT ONLY ONE)

BOX	ISOTOPE	ACTIVITY (mCi)	CHEMICAL FORM	SWIPE SURVEY (300cm ²)	RSO USE ONLY. RAD. SURVEY	RSO USE ONLY. LABEL CATEGORY
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

CONTAMINATION SURVEY INSTRUMENT: _____
MODEL NUMBER SERIAL NUMBER

SURVEY PERFORMED BY: _____
SIGNATURE DATE

RSO USE ONLY

RADIATION SURVEY INSTRUMENT: _____
MODEL SERIAL

SURVEY PERFORMED BY: _____
SIGNATURE DATE

RECEIVED BY: _____
SIGNATURE DATE

Department of Transportation (DOT) Hazardous Materials Transportation Act

JUNE 7
JULY 7
AUGUST 3

7:30 a.m. - 4:00 p.m.

This course is designed to help employers meet the regulatory requirements of the Department of Transportation's regulations under the Hazardous Materials Transportation Act (HMTA), HM-181 and HM-126F. Course materials include course manual, handouts, and materials for activities. A Certification of Completion is provided upon completion of the course.

COURSE OUTLINE:

General Awareness & Familiarization

- EPA & DOT Regulatory Review
- Timetable for Implementation of HM-181
- References

Function Specific Training

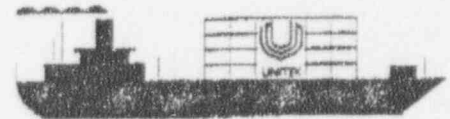
- DOT's Hazardous Materials Table
- Shipping Papers & Manifests
- Marking & Labeling
- Placards
- Performance Oriented Packaging

Safety: Methods & Procedures

- Industrial Hygiene & Engineering

Controls

- Understanding Chemical Hazards
- Educating the Worker



WHO SHOULD ATTEND?

HazMat Employees, hazardous waste employees, transportation employees, supervisors, managers, drivers, safety or compliance officers.

COST: \$195.00 (discount offered for groups.)

HOW TO REGISTER: Call 836-0555 or Mail/Fax Registration Form.



UNITEK ENVIRONMENTAL CONSULTANTS, INC.

Courses are held at our training facility located at 930 Mapunapuna Street.