

AUG 03 1994

License No. 37-04594-011
Docket No. 030-15139
CAL No. 1-94-11

Drexel University
ATTN: Richard Breslin, Ph.D.
President
32nd and Chestnut Streets
Philadelphia, Pennsylvania 19104

Dear Dr. Breslin:

SUBJECT: CONFIRMATORY ACTION LETTER 1-94-11

This letter documents the commitments made during an inspection of your NRC licensed activities on July 20, 27, and August 1, 1994, between Dr. Eli Fromm, Vice Provost for Research and Graduate Studies, and Dr. Jack Kay, Drexel University's Radiation Safety Officer and Mary Cahill of this office. This letter also documents the commitments made during a telephone conversation on August 2, 1994 between Mr. Bert Landau and Dr. Jack Kay of your staff and Dr. Mohamed Shanbaky of this office.

During the inspection, the inspector noted that your current radioactive material inventory system for sealed and unsealed radioactive material in use and in storage does not provide assurance that all radioactive material on Drexel University's campus is adequately accounted for, characterized and stored. In particular, the inspector observed in Building No. 50 that sealed and unsealed radioactive materials were stored without labels identifying the contents. The inspector also noted that Building No. 50 was not equipped with fire protection and suppression systems to minimize the likelihood and extent of a fire.

The NRC has concerns regarding the lack of an adequate radioactive materials inventory system for your entire campus and the inadequate fire protection evident at Building No. 50 where licensed material is stored. Dr. Shanbaky discussed these concerns with Drs. Fromm and Kay on August 1, 1994. It is of significant concern to the NRC that the Radiation Safety Officer and Radiation Safety Committee were not aware of the types and amounts of radioactive material on campus nor were they aware of the poor material conditions at Building No. 50. During the inspection, Drs. Fromm and Kay became cognizant of the potential safety and regulatory concerns associated with the inadequate radioactive material inventory system and further, the inadequate fire protection and poor material conditions associated with Building No. 50.

180055

OFFICIAL RECORD COPY - S:\PENDING\DREXEL.CAL - 08/03/94

9408160259 940803
PDR ADOCK 03015139
C PDR

1E107
1/0

Pursuant to a telephone conversation between Mr. Bert Landau, Senior Vice President for Administration and Finance, and Dr. Jack Kay, Radiation Safety Officer of Drexel University and Dr. Mohamed Shanbaky of this office on August 2, 1994, it is our understanding that:

1. All radioactive materials in Building No. 50 will be placed in appropriate containers and moved to an appropriate radioactive waste/material interim storage facility with appropriate fire protection and alarm systems. This will be completed by August 18, 1994.
2. The interim radioactive waste/material storage facility will be clearly posted with the Radioactive Material sign, type of material stored, and telephone numbers and individuals' names including the Radiation Safety Officer that are required to be contacted in case of emergency. This will be completed by August 18, 1994.
3. You will immediately initiate a radioactive materials inventory of all sealed and unsealed radioactive material on Drexel University's campus, including radioactive materials discovered during the inspection at Building No. 50. Upon locating any radioactive material that is not in use, it will be immediately stored at the interim storage facility. The inventory will identify the radionuclide, activity, and location of each radioactive material in Drexel University's possession. This inventory will be completed by October 30, 1994.
4. Monthly surveillance of the interim radioactive waste/material storage facility will be conducted by appropriately trained staff. This surveillance will include a radiation survey of the interim radioactive material/waste storage facility for removable contamination and radiation levels, verification of radioactive material package/source integrity and identification of evidence of package or source leakage. These surveys will include the documentation of monthly radiation dose rate measurement and contamination (wipe tests) surveys. Documentation of monthly surveillance requirements will be maintained by the Radiation Safety Office. The monthly surveillance will begin immediately.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to:

1. Notify me immediately if your understanding differs from those set forth above.
2. Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change.

3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.


Issuance of this Confirmatory Action Letter does not preclude issuance of an Order formalizing the above commitments or requiring other actions on the part of the licensee. Nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The response directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub.L. 96-511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

Original Signed By
Susan Frant Shankman

 Charles W. Hehl, Director
Division of Radiation Safety
and Safeguards

cc:

Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
Eli Fromm, Ph.D., Vice Provost for Research and Graduate Studies
Jack Kay, Ph.D., Radiation Safety Officer
Bert Landau, Senior Vice President for Administration and Finance

bcc:

Region I Docket Room (w/concurrences)

H. Thompson, DEDS

J. Lieberman, OE

C. Paperiello, NMSS

J. Glenn, NMSS

S. Lewis, OGC

T. Martin, RI

W. Kane, RI

C. Hehl, RI

S. Shankman, RI

R. Bellamy, RI

M. Shanbaky, RI

D. Holody, RI

K. Smith, RI

D. Chawaga, RI

M. Cahill, RI

for
DRSS:RI
Cahill/cmm

8/3/94

md
EO:RI
Holody

8/3/94

for
DRSS:RI
Shanbaky

8/3/94

RC:RI
Smith *Strong
E. milled
com.*

8/ /94

nm
DRSS:RI
Bellamy

8/3/94

DRA:RI
Kane *ja*

8/3/94

for
DRSS:RI
Hehl

8/3/94