



September 21, 1992

Francis M. Costello, Chief
Industrial Applications Section
Division of Radiation Safety and Safeguards
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Reference: License Number 20-20592-01
Docket Number 030-19953

Dear Mr. Costello:

This correspondence is in reference to Routine Inspection No. 030-19953/92-001 conducted by Dr. Keith Brown. As a consequence of this inspection, a Notice of Violation was issued for one discrepancy and two additional items were noted in the accompanying letter.

Notice of Violation:

Item VII of a letter dated September 28, 1990 requires, in part, "that areas in which isotope usage at any given time is greater than 200 microcuries be surveyed for dose rate and removable contamination at weekly intervals". Contrary to the above, the Molecular Biology area, an area in which isotope usage was greater than 200 microcuries at a given time, was not surveyed between April 27, 1992 and May 22, 1992, and between May 22, 1992 and June 30, 1992, periods greater than one week.

Response:

The survey records of the Molecular Biology Laboratory were reviewed and discussions were conducted with personnel in that Department. To avoid a repetition of these discrepancies, three (3) individuals within the laboratory have been trained to perform the survey procedures. In addition, a review of these records for compliance has been initiated on a monthly basis. This review will be documented coincident with the monthly facility-wide survey. Similar procedures have been extended to the Bioassay laboratory which must also be surveyed weekly. Compliance with these procedures will be achieved as of the date of this response.

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Other Noted Irregularities:

1.) On August 7, 1991, this facility exceeded its licensed level of Sulphur-35 due to an unanticipated shipment.

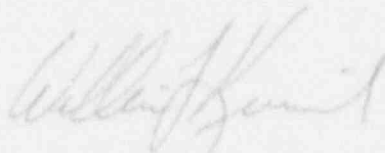
Response: This item is being addressed at two levels. In the near term, a database is currently being established in Quattro to track inventory levels of individual isotopes by computer. The amount of each isotope entering and leaving the facility will be entered. The program will also be designed to calculate and subtract radioactive decay of inhouse materials as well as to facilitate the constant monitoring of amounts on an ongoing basis. This system is expected to be in place by October 1, 1992.

In the long term, an amendment to our license is being prepared to be in compliance once denial of access to the existing low level disposal sites has been implemented. This amendment will include higher possession limits to allow storage-for-decay and storage-for-future-disposal. More stringent monitoring of in-house levels will be an integral part of this plan.

2.) It was also pointed out by Dr. Brown that our quantitative assessment of thyroid burdens was not strictly correct as we did not calibrate our monitoring instrumentation using a thyroid phantom.

Response: A calibrated survey meter with a Sodium Iodine crystal has been recalibrated for thyroid counting using a thyroid phantom consisting of a plexiglas block approximately 3 inches thick. The reduction in signal afforded by this system will be used to increase the levels of radioactivity detectable at the surface of the neck.

Sincerely yours,



William F. Kusmik, PhD
Radiation Safety Officer