

APPENDIX A

NOTICE OF VIOLATION

Yale University
New Haven, Connecticut 06520

Docket No. 030-00582
License No. 06-00183-03

As a result of the inspection conducted on July 30 to August 1, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1990), the following violations were identified:

- A. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Condition 21 of License No. 06-00183-03 requires that licensed material be used in accordance with the statements, representations and procedures contained in a letter dated March 23, 1988.

Item 4 in this letter requires that NRC Regulatory Guide 8.23 be used as contamination guide. The applicable level for contamination in a restricted area for rubidium-86 is 2,200 disintegrations per minute per hundred square centimeters (dpm per 100 cm²).

Contrary to the above, on June 18, 1990, surveys were performed which were inadequate to evaluate the extent of the radiation hazards present, resulting in contamination of and a 15 rem radiation dose to a laboratory worker's hand and the loss of use of several rooms during decontamination. Laboratory workers using rubidium-86 decontaminated areas only if radiation levels exceeded 1 milliroentgen per hour when measured with the laboratory GM survey meter, a value in excess of 2,200 dpm per 100 cm².

This is a Severity Level IV violation. (Supplement VI)

- B. Condition 21 of License No. 06-00183-03 requires that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in an application dated August 10, 1987 and letters dated December 21, 1987 and March 23, 1988.

Item 10 of the application dated August 10, 1987 requires that an audible alarm sound and a flashing red light be visible when the 7 curie cesium-137 source is raised in the calibration/irradiator facility.

Contrary to the above, on August 1, 1990, neither the audible alarm nor the visible alarm functioned when the source was raised to the exposed position.

This is a Severity Level IV violation. (Supplement VI)

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Pursuant to the provisions of 10 CFR 2.201, Yale University is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including:

- (1) the corrective steps which have been taken and the results achieved;
- (2) corrective steps which will be taken to avoid further violations; and
- (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.