

DEC 31 1987

Docket No. 030-01179

University of Alaska  
310 Signers Hall  
Fairbanks, Alaska 99701

Attention: Dr. Luis Proenza  
Vice Chancellor for Research

Gentlemen:

Thank you for your letter of November 30, 1987, in response to our Notice of Violation dated October 27, 1987, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Original signed by

R. D. Thomas  
James L. Montgomery, Chief  
Nuclear Materials Safety and  
Safeguards Branch

bcc w/copy of letter dated 12/7/87:  
State of Alaska  
docket file copy  
LFMB  
M. Smith  
B. Faulkenberry  
J. Martin

50-02430-07

REGION *V380*  
DSKJv/dot *RThomas*  
12/31/87 *12/31/87* *JMontgomery*  
*12/31/87*

REQUEST COPY ]	REQUEST COPY ]	REQUEST COPY ]
YES / <u>NO</u> ]	YES / <u>NO</u> ]	YES / <u>NO</u> ]

SEND TO PDR ]
<u>YES</u> / NO ]

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NRC  
REGION V

UNIVERSITY OF ALASKA - FAIRBANKS  
Fairbanks, Alaska 99775

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November 30, 1987

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

Gentlemen:

I am writing in response to your report on the NRC inspection of activities conducted by Mr. David D. Skov on August 11-12, 1987, and authorized by NRC License No. 50-02430-07.

I am enclosing a report from Dr. Dan Holleman, Radiation Safety Officer, addressing each of the violations cited in your report and informing you of the corrective actions taken to eliminate any inadequacies that may have existed, and to ensure compliance with NRC regulations and license conditions.

Please do not hesitate to contact me at (907) 474-7314 should you require any further clarification in this matter, or if I can be of any further assistance.

Sincerely,

Luis M. Proenza  
Vice Chancellor for Research and  
Dean of the Graduate School  
306 Signers' Hall - UAF  
Fairbanks, Alaska 99775-1720

LMP/dpg

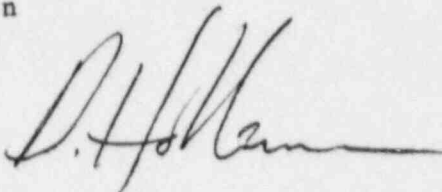
cc: Region V  
Walnut Creek, CA

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DATE: Nov. 25, 1987

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

FROM: D. Holleman, RSO, NRC 50-02430-07



SUBJECT: Reply to a Notice of Violation

The purpose of this memorandum is to comply with the regulation that requires a written statement following an issuance of a 'Notice of Violation' by NRC. This 'Notice of Violation' was issued to the University of Alaska (NRC 50-02430-07) by correspondence dated Oct. 27, 1987 signed by James L. Montgomery, Chief, Nuclear Materials Safety and Safeguards Branch, Region V, NRC.

The letter accompanying the 'Notice of Violation' expressed a concern related to the radiation safety program and its ineffectiveness in preventing violations. The University Radiation Safety Committee (RSC) discussed this concern and agrees with the NRC inspection team that a stronger safety program is essential. A more effective safety program means more frequent internal inspections of the University's authorized users and more informational/training sessions for all radioisotope users. The RSC has instituted or is in the process of instituting several measures to strengthen the radiation safety program. The committee recognizes the necessity of a more active involvement in the safety program by the University Administration. To promote a more active involvement by the administration, the RSC has designated that the committee representative from the Office of the Vice Chancellor serve as the chairperson of the committee. Direct fiscal support for the radiation safety program is essential if internal inspection/informational/training efforts are to succeed therefore the committee has prepared a proposed budget and will submit the budget to the University Administration.

The person that ultimately determines compliance with the provisions of the license is the actual users of radioactive materials. To address this concern the RSC has directed the RSO to hold an informational/training/inspection session with each authorized user to assure that the safety provisions of the license are understood and compliance is being met. Special efforts will be made to assure that posting and records are complete and in proper order, and available for inspection at all times.

The specific violations as enumerated in the NRC letter of Oct. 27, 1987 are discussed below. As requested a statement is

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made concerning each violation and includes (1) reason for the violation, (2) corrective steps and results achieved, (3) corrective steps to avoid further violations and (4) the time when full compliance will be achieved.

**Violation A** - licensed material in an unrestricted area.

(1) The building had been recently altered to allow handicapped persons to more easily access the building. In accomplishing this building alteration, a corridor that was previously restricted became unrestricted. The areas in question are two incubator rooms which are accessible from the corridor.

(2) Locks have been placed on the two incubator rooms which restricts access to these sites where radioactive materials are used.

(3) Physical plant personnel have been alerted as to the problems that can occur when access is altered in areas where radioactive materials are used or stored.

(4) Full compliance has been achieved.

**Violation B** - quantity of radioactive material in the inventory exceeds the possession limit.

(1) In the license application (letter dated May 1, 1985 - page 23) the University's nickel-63 EC detectors were listed individually and add up to a total of 82 millicuries. However when the total was entered on page 2 of the same letter, a typing error was made and 72 millicuries was inadvertently entered.

(2) An amendment to the license requesting a higher possession limit of nickel-63 is being drafted and will correct the ambiguity.

(3) Not applicable.

(4) The amendment request will be submitted within 30 days.

**Violation C 1** - food/drink in an area where radioactive materials were being used.

(1) Misunderstanding by the authorized user concerning the proximity of a coffee pot and the use of radioactive materials.

(2) The coffee pot has been removed from the room and all personnel working in the laboratory have been instructed as to

the importance of physically separating all food/drink from areas where radioactive materials are used or stored.

(3) Education of personnel involved.

(4) Full compliance has been achieved.

**Violation C 2** - failure calibrate a survey meter.

(1) The WRC was not required to have a survey meter for radioactive material use as approved by the RSC therefore no instrument calibration was required.

(2) The RSC has considered the concern of the NRC inspector and will require that a calibrated survey meter be available to the WRC.

(3) The authorized user has been advised of the additional requirement and has been instructed as to how he can meet the requirement.

(4) Full compliance has been achieved.

**Violation C 3** - failure to provide adequate training for a supervised user.

(1) The person in question was working under the direct supervision of an authorized user. The authorized user was available at all times if any assistance was needed. However in the questioning of the user it was apparent that she did not understand all the requirements under the license. The reason was inadequate training and not the absence of training.

(2) Since the inspection both the authorized user and the RSO have conducted informational/training sessions with the supervised user.

(3) An increased frequency of training sessions in the future will prevent such occurrences.

(4) Full compliance has been achieved.

**Violation C 4** - failure to conduct radiation surveys and/or failure to keep adequate records of such surveys.

(1) Misunderstanding by the authorized user as to the

frequency of surveys as required by the license and the need and importance of survey records.

(2) The authorized user has been informed concerning the frequency and records related to surveys. He has been provided, as will all other authorized users, with written material which reviews the requirements of the license including survey requirements.

(3) Surveys as well as other requirements of the license will be discussed in detail with all authorized users by the RSO.

(4) Several of these sessions have already taken place and will continue. All authorized users will be reviewed within a few weeks.

**Violation C 5** - failure to make proper records of radiations surveys.

This violation involves the same laboratory and the same authorized user as the previous violation - see Violation C 4

**Violation C 6** - failure to properly label a radioactive waste container with the radiation symbol and the words 'Radioactive Waste'.

(1) Carelessness on the part of the supervised user.

This is the same laboratory and supervised user as discussed previously - see Violation C 3.

**Violation D** - using a sign with the words 'Caution Radiation Area' instead of a sign with the words 'Caution Radioactive Materials'.

(1) Misunderstanding of the regulations by the RSO. The building was marked with an all-weather sign with the radiation symbol and the words "Caution Radiation Area" as well as a document listing persons to be contacted in case of emergencies.

(2) A sign with the radiation symbol and the words 'Caution Radioactive Materials' has been posted on the building.

(3) Education of RSO.



(4) Full compliance has been achieved.

**Violation E** - NRC-3 form not posted in the O'Neill Building.

(1) The only radioactive material in Room 325 of O'Neill Bldg. is the EC detector containing a tritium foil. The room was recently altered and the instrument as well as most of the other equipment in the room was rearranged. The NRC-3 form was inadvertently taken down and was not re-posted following the alteration.

(2) A new NRC-3 form has been posted and compliance has been achieved.

(3) The user of the instrument has been instructed as to the importance of the proper posting for the room and for the instrument.

(4) Full compliance has been achieved.

**Violation F** - transporting radioactive materials from the main campus to the LARS without meeting DOT regulations.

(1) Misunderstanding by the RSO concerning DOT regulations and how they apply to the transfer of radioactive materials from one site to another when both sites are part of the University campus.

(2) DOT regulations have been reviewed with the authorized user involved in the transfers. A shipping form (shipping papers) has been drawn-up which requests the information required by DOT for the transfer of radioactive materials on public highways.

(3) Dot regulations will be reviewed with all authorized users who transport radioactive materials from their site of receipt via public means.

(4) Full compliance has been achieved.