

03 OCT 1988

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Enforcement Conference Report No. 030-00582/88-002

Docket No. 030-00582

License No. 06-00183-03 Priority II Category F1A Program Code 01100

Licensee: Yale University
260 Whitney Avenue
New Haven, Connecticut 06520

Enforcement Conference At: Region I, King of Prussia, Pennsylvania

Enforcement Conference Conducted: June 21, 1988

Prepared by:

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9/8/88
date

Approved by:

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9/26/88
date

Summary: The findings documented in Inspection Report No. 030-00582/88-001 were discussed. The licensee described corrective actions taken and planned. The NRC's enforcement options and policy were reviewed.

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DETAILS

1. Persons Attending

Yale University

Edward A. Adelberg, Deputy Provost
George R. Holeman, Radiation Safety Officer

Nuclear Regulatory Commission

James M. Allan, Deputy Regional Administrator
Glen L. Sjoblom, Acting Director, Division of Radiation Safety
and Safeguards
John D. Kinneman, Chief, Nuclear Materials Safety Section B
Jay M. Gutierrez, Regional Attorney
Daniel J. Holody, Enforcement Officer
Laurence F. Friedman, Senior Health Physicist

2. Conference Summary

- a. J. Allan, explained that the focus of the Conference would be the two instances of loss of licensed material which occurred in May 1988, and the licensee's procedures for ensuring the security of licensed material.
- b. L. Friedman, described the three violations which had been identified during the June 1-2, 1988, inspection, and a similar event which took place in December 1985. Dr. Friedman described the licensee's actions after the 1985 event, and indicated how the actions had failed to prevent a recurrence of the loss of licensed material.
- c. G. Sjoblom, explained that, in the view of the NRC, Yale University has a broad-scope license, and the Radiation Safety Committee has, as one of its roles, that of a regulator. He further indicated that the losses of control of licensed material might be an indication of weaknesses in the program.
- d. G. Holeman, described the licensee's corrective actions. He stated that the custodian involved in the waste-disposal incident claimed he had not seen the markings on the box from which he had removed the liner, and indicated this statement was difficult to understand since the worker had never before made this mistake and had been dealing with this and other, identical boxes for two years. The worker was retrained immediately, and all custodial workers were given additional training. A memorandum was sent by the head of custodial services to all Principal Investigators instructing them on the proper use of waste containers. The employee responsible for the incident was given a written reprimand. Additional action will be considered by the Radiation Safety Committee at the June 28, 1988, meeting.

With regard to the event where material recently delivered to a laboratory was discarded, licensee representatives agreed that the licensee's corrective action following the similar incident in December 1985 had been inadequate since they had suggested, but not required, actions by all Investigators. For the current event, the Principal Investigator will appear before the Radiation Safety Committee and explain his corrective actions and his staff will be retrained. A memorandum will be sent to all Principal Investigators, forwarding a model procedure for the receipt and custody of licensed material. Each Principal Investigator will be required to develop procedures for his own laboratory which provide for strict control of incoming shipments. The Principal Investigators will be required to meet with their staffs to explain the procedures, and forward a list of attendees to the Radiation Safety Committee, along with the procedures, for approval.

The Radiation Safety Committee will study the entire flow of licensed material throughout the University. Mr. Holeman stated that he has already done a preliminary study of one building in preparation for presenting a plan for the study to the June 28 Radiation Safety Committee meeting. He has also reviewed the flow of paper into and out of the Radiation Safety Office. The preliminary audit revealed several areas in need of improvement that were corrected immediately, and also showed several areas that had been previously detected and corrected by the existing audit functions.

Mr. Holeman stated that he prepares a semiannual report to the Radiation Safety Committee, which summarizes external and internal radiation doses to employees, any incidents which occurred, and the results of any special surveys done.

- e. D. Holody, reviewed the NRC's enforcement options.