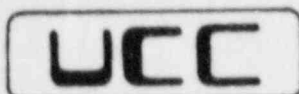


UNIVERSIDAD CENTRAL DEL CARIBE



ESCUELA DE MEDICINA

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January 21, 1988

William E. Cline, Chief
Nuclear Material Safety and Safeguards Branch
Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission Region II
101 Marietta Street, N.W.
Atlanta, Georgia 30323

Re: NRC Inspection Report
No. 52-23059-01/87-01

Dear Mr. Cline:

I am extremely sorry about our belated reply to your letter of December 2, 1987, received at our office on December 14, 1987, and pertaining to the inspection conducted by M. P. Elliott on November 17, 1987. I was away from my office, and, as you probably know, there is an unnecessarily long Christmas Recess in Puerto Rico which extends until the day after Epiphany.

Enclosed please find an explanatory response to the different violations noted in the inspection report. I certainly hope these meet with your approval.

Cordially yours,

UNIVERSIDAD CENTRAL DEL CARIBE

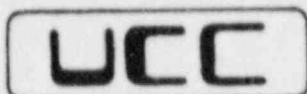
Radi A. Marcial-Rojas, M.D., J.D.
President/Dean

Enclosure

pc: Dr. Shukri El-Khatib, Radiation Safety Officer, UCC

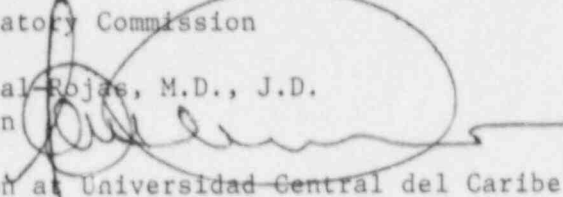
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52-23059-01 PDR

UNIVERSIDAD CENTRAL DEL CARIBE



ESCUELA DE MEDICINA

TO: Nuclear Regulatory Commission

FROM: Raúl A. Marcial Rojas, M.D., J.D.
President/Dean 

SUBJECT: NRC Inspection at Universidad Central del Caribe
No. 52-23059-01/87-01.

An inspection of activities conducted under our license with respect to radiation safety and compliance with NRC regulations was conducted by Mr. M. P. Elliott on November 17, 1987. The findings were discussed with our Radiation Safety Officer, Dr. Shukri M. El-Khatib. We acknowledge that the inspection conducted was an impartial and fair procedure.

This represents our official reply to the violations reported and the corrective steps therefore.

A. "The licensee did not conduct Radiation Safety Committee meetings during the first and third quarters of 1987."

The violation is admitted. The basic problem is that our institution at present is in the process of consolidating all facilities at the Bayamón Campus where a new academic health center is evolving. The fact that members of said Radiation Safety Committee attend two different campuses 35 miles away from each other did not help us comply with said regulation.

The President of the University communicated with the members of the Committee urging of them to attend the quarterly meetings. At the same time the schedule for the meetings will be arranged for alternate site meetings so that members will have greater opportunities to attend. The problem will be completely solved when all physical facilities will be consolidated in the University Hospital Campus at Bayamón. We expect this will be the case in more or less the next 18-20 months. Meanwhile, we will urge all members to comply with the obligations in this endeavor.

B. "The licensee did not maintain records showing results of surveys conducted upon receipt of packages containing radioactive materials."

The records of receipt of shipped radioactive materials were kept, though not in a form with detailed information. This violation has been fully corrected as a new detailed form was already designed and is under utilization (Appendix 1).

C. "At the time of inspection, the licensee had not posted the documents or the notice of where the documents might be examined."

The Radiation Safety Officer distributed the documents to the users of IOCFR; however, he did not conduct adequate follow-up as to whether the documents were posted or not. This violation has been completely corrected as the Radiation Safety Officer is personally posting NOTICE TO EMPLOYEES in those areas where radioactive materials are used, along with a note specifically indicating that the license and all other documents related to those radioactive materials are in file and available for inspection as his office.

The President/Dean of Universidad Central del Caribe hereby reassures that said violations are not to be repeated and that the adequate administrative measures have been taken to guarantee the continuous compliance with all the regulations of the Nuclear Regulatory Commission.

pc: Shukri M. El-Khatib, Ph.D.
Radiation Safety Officer, UCC

UNIVERSIDAD CENTRAL DEL CARIBE - SCHOOL OF MEDICINE

RADIOACTIVE SHIPMENT RECEIPT REPORT-FORM 02

1. Shipment # _____ Survey Date _____ Time _____
Surveyor _____
2. CONDITION OF PACKAGE:
_____ O.K. _____ Punctured _____ Status _____ Wet _____
_____ Crushed _____ Other _____
3. RADIATION UNITS OF LABEL: _____ Units(mR/hr)
4. MEASURED RADIATION LEVELS:
a. Package surface _____ mR/hr
b. 3 feet or 1 meter from surface _____ mR/hr
5. DO PACKING SLIP AND VIAL CONTENTS AGREE?
a. Radionuclide _____ yes _____ no. difference _____
b. Amount _____ yes _____ no. difference _____
c. Chem Form _____ yes _____ no. difference _____
6. WIPE RESULTS FROM:
a. Outer _____ CPM= _____ DPM
eff= ()
b. Final source container _____ CPM= _____ DPM
eff=()
7. SURVEY RESULTS OF PACKING MATERIAL AND CARTONS _____ mR/hr,CPM
8. DISPOSITION OF PACKAGE AFTER INSPECTION _____
9. IF NRC/CARRIER NOTIFICATION REQUIRED, GIVE TIME, DATE,AND PERSONS NOTIFIED.

Signature_____
Date