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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL RISK MANAGEMENT RESEARCH LABORATORY
SUBSURFACE PROTECTION AND REMEDIATION DIVISION
P.O. BOX 1198 • ADA, OK 74820

Charnes

Transfer

August 14, 1996

Director of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF
RESEARCH AND DEVELOPMENT

RE: Report of Device Transfer as Found in 10 CFR 31.5(c)(8)

Dear Sir:

This letter is intended to provide an explanation of our failure to comply with U.S. Nuclear Regulatory Commission (NRC) regulations as found in 10 CFR 31.5(c)(8) which require the submission of a report to the NRC concerning the transfer of licensed materials. The following four items are a complete inventory of the materials involved in the incident during which these requirements were violated.

- 1) Gas Chromatographic Electron Capture Detector, serial #A989
- 2) Gas Chromatographic Electron Capture Detector, serial #60
- 3) Gas Chromatographic Electron Capture Detector, serial #141
- 4) Gas Chromatographic Electron Capture Detector, serial # "UNK" *

* No serial number printed on detector

Each of the four items originally contained 8 mCi of Nickel-63 and, no longer functional due to breakage, were shipped from our laboratory on March 5, 1996 to:

Varian Chromatography Systems
2700 Mitchell Drive
Walnut Creek, California 94598
510-939-2400 ATTN: Larry Steinwandt

Due to the retirement of the previous Radiation Safety Officer (RSO), responsibilities for radiation safety procedures have been shared by a newly designated RSO and other Laboratory health and safety personnel. While administrative tasks have remained the concern of the new RSO, laboratory surveys and routine functions involving radioisotopes have been delegated to health and safety personnel. Unfortunately, both the RSO and the personnel in the health and safety office have been assigned a broad range of research and operational duties. Demands arising from these multi-disciplinary duties have not allowed personnel sufficient time to carefully delineate all procedures and requirements contained in the NRC regulations pertaining to our radiation safety program.

Several steps have been initiated in response to concerns expressed by Laboratory personnel and our failure to act in

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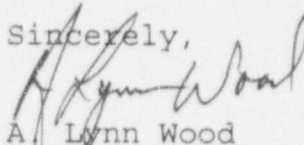
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accordance with the above referenced NRC regulations. First, the Laboratory has hired additional personnel to perform some of the duties associated with the operation of our radiation safety program. Second, the Laboratory's Safety, Health and Environmental Manager is investigating the acquisition of formal RSO training provided by external sources. Finally, the RSO, safety and health personnel, and new staff are reviewing the existing radiation safety program in an effort to improve operations and communications between all employees.

In accordance with the reporting requirements found in 10 CFR 31.5(c)(8) I submit this letter as the required report for the transfer (disposal) of the items listed above, if that is satisfactory with your office. I am also enclosing copies of the Certificate of Disposition of Materials that we received from Varian upon their receipt of our licensed materials. I hope this will satisfy the NRC requirements.

Sincerely,



A. Lynn Wood
Radiation Safety Officer
405-436-8552

Enclosures

cc: Stephen R. Schmelling, Director of Research
Garmon B. Smith, Safety, Health & Environmental Manager