

Princeton University

Office of Occupational Health & Safety

James Forrestal Campus  
Princeton, New Jersey 08544  
609-452-5294

September 19, 1986

Nuclear Regulatory Commission, Region I  
Nuclear Material Section B  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Jack Davis

Re: License No. 29-05185-25  
Docket No. 030-12287  
Control No. 105678

Dear Sir or Madam:

This letter requests amendment of Princeton University's Irradiator License No. 29-05185-25; specifically we request deletion of the phrase "and in the physical presence of the authorized user" first imposed by the Commission in amendment No. 10 (license condition No. 11), signed by Mr. Jack Davis on July 2, 1986.

Under Princeton University's existing radioactive materials authorization procedure (see Radiation Safety Guide Section 5) only persons of senior rank, such as laboratory directors and/or faculty, are authorized (licensed) by the Radiation Safety Committee to use and possess radioactive materials of the magnitude contained in the two irradiators. Both of the individuals so-authorized are members of the faculty with substantial teaching and other academic responsibilities; thus, they cannot be in the irradiator laboratory facilities at all times. For these reasons the restrictions added to the license in amendment No. 10 place an unreasonable burden on the operation of the laboratories and are essentially unworkable in an academic environment. Similarly, a procedure whereby the Radiation Safety Committee would individually authorize all irradiator operators including post-doctoral research staff, technical staff and graduate students would result in an unreasonable and, we believe, unnecessary administrative burden on the Committee and would dilute the responsibility of the authorized user for the continued safe operation of these devices.

At the same time we understand the Commission's concerns and intentions in this matter and agree that only responsible, trained persons should be authorized to operate or supervise the operation of the irradiators. To ensure continued safe operation and to resolve this dilemma we propose the following procedure as a substitute for your requirement that the devices be operated only in the "physical presence of the authorized user."

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24 SEP 1986

"OFFICIAL RECORD COPY"

Date	10/10/86
Log	Det. 7 I
By	A. Kemler
Date Completed	10/15/86

Letter: NRC, Region I

Re: License No. 29-05185-25

September 19, 1986

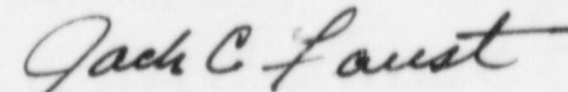
Page 2

1. We will continue the established procedure where one senior individual is designated as the authorized (licensed) user by the University Radiation Safety Committee. Inherent in this procedure is the understanding that this individual is responsible for all aspects of safe operation and use of the irradiator.
2. The authorized user will designate persons whom he or she believes to have the personal and technical qualifications to become irradiator operators.
3. These persons will attend a three hour training course presented by the Health Physics staff which deals with radiation safety and the safety features and the operation of the irradiator. Following the Health Physics training the designees will receive specific training, presented by the authorized user, or in the future experienced irradiator operators, relating to the use and operation of the irradiator, including hands-on training. An outline of the proposed Health Physics training course for irradiator operators is attached as Appendix A.
4. Following completion of the training, the authorized user will inform the Health Physics Office in writing of the names of those individuals who have been approved as an "irradiator operator." The Office of Occupational Health and Safety will inform the Radiation Safety Committee of these appointments.
5. Only persons formally identified in writing as an "irradiator operator" will be permitted to operate or supervise the operation of the devices.

We trust this proposal will satisfy the Commission's concerns regarding the safe operation of the irradiators at Princeton University. It eliminates the recently added requirement which is now interfering with the operation of the one existing irradiator facility which has been operated safely for almost 10 years. With respect to the new irradiator authorized in amendment No. 10, we do not now expect delivery of this unit until sometime in November.

Please give this request your prompt and favorable consideration. If we can be of any assistance or provide additional information, please do not hesitate to contact Mr. Robert R. Milwicz, the Senior Health Physicist, or the author. Thank you for your cooperation and interest.

Very truly yours,



Jack C. Faust  
Director

JCF:lt

cc: Radiation Safety Committee

Prof. R. M. May

L. A. Pyle, Jr., M.D.

file 9.16

Attachment as per text

RADIATION PROTECTION TRAINING  
FOR IRRADIATOR USERS

TABLE OF CONTENTS

PART I. THEORY AND DISCUSSION

I. RADIATION QUANTITIES IN UNITS

- A. CURIE - BECQUEREL - ACTIVITY
- B. SPECIFIC ACTIVITY
- C. ROENTGEN - EXPOSURE
- D. RAD - ABSORBED DOSE
- E. REM - DOSE EQUIVALENT
- F. QUALITY FACTOR

II. CHARACTERISTICS OF CESIUM-137

- A. RADIATIONS EMITTED
  - 1. DECAY SCHEME
  - 2. BETA PARTICLES
  - 3. GAMMA RAYS

III. MATHEMATICS

- A. RADIOACTIVE DECAY
- B. HALF-LIFE
- C. INVERSE SQUARE LAW CALCULATIONS
- D. DOSE RATE CALCULATIONS
- E. TIME FOR LETHAL DOSE NEAR LARGE SOURCE
- F. SHIELDING CALCULATIONS
- G. CPM - DPM - ACTIVITY

IV. INTERACTION OF RADIATION WITH MATTER

- A. GAMMA RAYS
  - 1. PHOTOELECTRIC EFFECT
  - 2. COMPTON SCATTERING
  - 3. PAIR PRODUCTION
- B. BETA PARTICLES
  - 1. COLLISIONAL LOSSES
  - 2. BREMSSTRAHLUNG

V. RADIATION SHIELDING

- A. HALF VALUE LAYERS
- B. TENTH VALUE LAYERS
- C. RELATIVE EFFECTIVENESS OF DIFFERENT MATERIALS
- D. DENSITY THICKNESS
- E. TIME
- F. DISTANCE



- VI. NONOCCUPATIONAL SOURCES OF RADIATION
  - A. NATURAL BACKGROUND RADIATION
  - B. MANMADE SOURCES
- VII. OCCUPATIONAL RADIATION EXPOSURE
  - A. MAXIMUM PERMISSIBLE DOSE FOR RADIATION WORKERS
  - B. POPULATION DOSE
- VIII. BIOLOGICAL EFFECTS OF RADIATION
  - A. SOMATIC
    - 1. PROMPT
    - 2. DELAYED
  - B. GENETIC
  - C. TERATOGENIC
- IX. RISK FROM RADIATION EXPOSURE
- X. ALARA - PHILOSOPHY
- XI. APPLICABLE NRC AND UNIVERSITY REGULATIONS
  - A. TITLE 10, CHAPTER 1, CFR PART 19
  - B. TITLE 10, CHAPTER 1, CFR PART 20
  - C. IRRADIATOR LICENSE CONDITIONS
  - D. UNIVERSITY RADIATION SAFETY GUIDE
  - E. NRC FORM - 3
  - F. OHS EMERGENCY FORMS 12 AND 31.
- XII. RADIATION MEASUREMENTS
  - A. TYPES OF MEASURING DEVICES
    - 1. IONIZATION CHAMBER
    - 2. GEIGER COUNTER
    - 3. SCINTILLATION DETECTOR
    - 4. FILM BADGE
    - 5. TLD
  - B. OPERATION OF INSTRUMENTS
    - 1. TURN ON AND CHECK OUT PROCEDURE
    - 2. DETECTABLE LIMITS
    - 3. RESPONSE TIME
    - 4. DETECTION RANGE
    - 5. SATURATION
  - C. CALIBRATION OF INSTRUMENTS
- XIII. SURVEY AND AREA MONITORING TECHNIQUES
  - 1. LEAK TESTS
  - 2. INSTRUMENT SURVEYS
  - 3. AREA MONITORS
  - 4. MONITOR BADGES

XIV. PERSONAL MONITORING EQUIPMENT

- A. PLACEMENT ON PERSONNEL
- B. EXCHANGE FREQUENCY
- C. DOSIMETRY REPORTS

XV. IRRADIATOR DESIGN

XVI. IRRADIATION SAFETY SYSTEM

- A. SAFETY INTERLOCKS
- B. OPERATION OF SAFETY INTERLOCKS
- C. SHIELDING
- D. CONTINUOUS MONITORING

XVII. EMERGENCY PROCEDURES

- A. SUSPECTED OVEREXPOSURES
- B. FAILURE OF SOURCE TO RETURN TO SAFE POSITION
- C. DAMAGED SOURCE
- D. FIRE
- E. SUSPECTED CONTAMINATION
- F. HIGH OR UNUSUAL RADIATION LEVEL

XVIII. ADMINISTRATIVE CONTROLS

- A. RECORDKEEPING
  - 1. INVENTORY REPORT
  - 2. RADIATION SURVEY REPORTS
  - 3. IRRADIATOR USE LOG
- B. CONTROLLING ACCESS TO IRRADIATOR
- C. WARNING SIGNS

XIX. REASONS FOR CONTACTING HEALTH PHYSICIST OR SUPERVISOR

- A. FOR PERSONAL EXPOSURE INFORMATION
- B. IF PROBLEMS ARE SUSPECTED
- C. IF THERE ARE QUESTIONS ON RADIATION SAFETY
- D. IF THERE ARE SUSPECTED PROBLEMS WITH THE IRRADIATOR
- E. FOR REGULATIONS, LICENSE, AMENDMENTS, INSPECTION REPORTS.
- F. IF PREGNANT

XX. DISCUSSION - QUESTIONS AND ANSWERS

PART II. PRACTICAL

- I. FAMILIARIZATION WITH IRRADIATOR
- II. WARNING SIGNS
- III. SAFETY DEVICES
- IV. SURVEY TECHNIQUES
- V. IRRADIATOR OPERATION

BETWEEN: William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

John E. Glenn, Chief  
Nuclear Materials Section B  
Division of Engineering and  
Technical Programs

030-12287

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12/86

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee: Princeton University

Application Dated: 9-19-86

Control No.: 106222

License No.: 29-05185-25

2. FEE ATTACHED

Amount: 0

Check No.: 0

3. COMMENTS

Signed SLJ

Date 10-6-86

**FEE EXEMPT**

B. LICENSE FEE MANAGEMENT BRANCH

1. Fee Category and Amount: EXSE 170.11(4)

2. Correct Fee Paid. Application may be processed for:

Amendment                     

Renewal                     

License                     

Signed Sandra Kimberley

Date 10/15/86