

APPENDIX A
NOTICE OF VIOLATION

Yale University
New Haven, Connecticut 06520

Docket No. 030-00582
License No. 06-00183-03

As a result of the inspection conducted on July 15-17, 1987, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 71.5(a) requires that no licensee deliver any licensed material to a carrier for transport without complying with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170-189.

1. 49 CFR 172.403 requires that each package of radioactive material, unless excepted from labeling by 173.391 or 173.392, be labeled, as appropriate, with a RADIOACTIVE WHITE-I, a RADIOACTIVE YELLOW II, or a RADIOACTIVE YELLOW-III label.

Contrary to the above, on January 20, 1987, a licensee package transported to Hanford, Washington, was not appropriately labeled with a RADIOACTIVE YELLOW-II label, but was inappropriately labeled with a RADIOACTIVE WHITE-I label. Specifically, the maximum surface radiation level was 2.2 millirem per hour.

2. 49 CFR 173.421 requires that the radiation level, at any point on the surface of a package that is transported as a limited quantity of radioactive material, does not exceed 0.5 millirem per hour.

Contrary to the above, on July 17, 1987, the radiation level, on the surface of a package transported as a limited quantity of radioactive material, exceeded 0.5 millirem per hour. Specifically, the maximum dose rate on the package was measured as 1.0 millirem per hour.

These are Severity Level IV violations. (Supplement V)

- B. 10 CFR 20.311(b) requires that each shipment of radioactive waste to a licensed land disposal facility must be accompanied by a shipment manifest that indicates as completely as practicable the radionuclide identity and quantity.

Contrary to the above, on January 20, 1987, the manifest that accompanied a shipment of radioactive waste to Hanford, Washington did not indicate that 0.7 millicuries of sodium-22 was contained in one of the packages.

This is a Severity Level IV violation. (Supplement IV)

C. Condition 21 of License No. 06-00183-03 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in the application dated May 15, 1979, including a manual of Radiation Safety Procedures dated July, 1977.

1. Item 5 on page 5 of the manual of Radiation Safety Procedures prohibits eating, drinking or smoking in areas where radioactive materials are present.

Contrary to the above, on July 15 and 16, 1987, laboratory personnel consumed beverages and food in areas where radioactive materials were present.

2. Item 4b on page 5 of the manual of Radiation Safety Procedures requires that each individual who has contact with radioactive materials wear gloves.

Contrary to the above, on June 3, 1987, an individual handling Rb-86 was not wearing gloves and contaminated her hands

These are Severity Level IV violations. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Yale University is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including; (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.