

From: Lars Q. English
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April 4, 2006

To:
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Reply to a Notice of Violation

The following is a response to the violations found during inspection 03000994/2006001 in the notice dated March 16, 2006.

A. Physical inventory every 6 months

Reasons for the violation:

The College had incorrectly assumed that we had obtained the appropriate permission from the NRC to conduct yearly inventories. In the context of our radiation program, yearly inventories seemed more reasonable, considering that radioactive sources stored in Tome Scientific Hall are used only once a year as part of an academic course.

Corrective Steps:

Since the last inventory was conducted on January 16, 2006, we will conduct the next inventory on or before July 16, 2006 and every six (6) months thereafter or as otherwise required by the regulations. The record of inventory will contain the date the inventory is conducted, and a list of radionuclides, quantities, manufacturer's name and model numbers. This list will also be stored electronically as a spreadsheet.

B.1. Instrument Calibration Source not Traceable to NIST

Reason for violation:

We believed that we had correctly linked the activity of the HEG-137 cesium source to that of a weaker traceable cesium source (traceable to the U.K. Atomic Energy Authority). Thus, we considered the calibration source (HEG-137) to be a traceable source itself.

Corrective Steps:

We will stop calibrating our survey instruments in house and send them out to the accredited vendor as soon as possible and annually thereafter. This change will make traceability a moot issue. The vendor that has been selected by the College is JRT Calibration Inc, however, the College reserves the right to upgrade its survey instruments and to change providers of calibration services to other authorized providers.

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B.2. Calibration of Survey Instrument

Reason for Violation:

The Eberline E120 instrument was reading dose rates at times exceeding calculated/expected values by more than 15 percent. This discrepancy was not immediately corrected, as the instrument is used for our qualitative surveys only. For these purposes a slightly elevated sensitivity did not seem alarming or even undesirable.

Corrective Action:

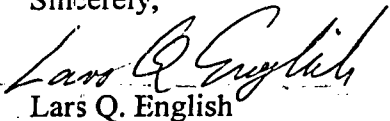
The Eberline E120 instrument is now calibrated correctly. The undersigned used the College's traceable Cs-source to calibrate that instrument on March 8, 2006. We will send out all survey meters in Tome, Althouse, and Dana Halls for calibration once a year to the authorized vendor listed above. Given the date of the last calibration, we will send the survey meters to be recalibrated on or before November 9, 2006.

Request for a Future Change to our License Requirements

Lastly, Dickinson College hereby requests that the required interval of 6 month for physical inventories and instrument calibrations be extended to one year. Yearly inventories, as already mentioned, are more consistent with our radiation program. Specifically, the licensed sealed sources stored in Tome Hall are only used once a year as part of an academic course (Radiation and Medical Physics). It would make sense if the regular inventory cycle were synchronized with the actual use. For the same reason, the College would also ask for permission to do the lab survey in Room 215 of Tome Scientific Hall on a yearly basis.

We look forward to your response to our request.

Sincerely,



Lars Q. English
Assistant Professor / RSO
Dickinson College