

Warren, Geoffrey

From: Richard, Mack L <mrichar@iu.edu>
Sent: Friday, January 17, 2014 4:11 PM
To: Warren, Geoffrey
Cc: Swank, Eric David; Payne, R. Mark; Mays, Trenton L; Kleyn, Tim David; Hadden, Matthew Alan; Mason, Jeffrey S.
Subject: Follow-Up to Security in Radionuclide Research Labs
Importance: High

Dear Geoff:

As a follow-up to this morning's exit meeting and the issues surrounding security of radioactive material in the specific research laboratories you visited during the inspection, we have taken the following steps:

1. The major portion of the I-125 (primarily stock vials) which was located in the laboratory under that specific Radionuclide Use Permit has been transferred by my staff to an authorized radionuclide use laboratory under our (Radiation Safety's) control. This radioactive material will remain under the control of the Radiation Safety Office until a long-term solution has been attained.
2. When our staff member picked up the radioactive material, personnel were present in the laboratory and as such, the material was secure. However, I have had a direct conversation with the Permit Holder and in addition to the aforementioned step, he has instructed his laboratory personnel that their laboratories are to be locked when they are not occupied. This step has been taken to assure even small quantities of radioactive material (e.g. radioactive waste) are properly secured.
3. I attempted to talk with the Permit Holders responsible for the laboratories that contained the lower quantities of radioactive material (primarily S-35); however, neither was immediately available by telephone. I personally visited those laboratories to assure that the radioactive materials there were properly secured as well. When I did so, there were no individuals present in those laboratories, and they were locked.
4. We will be issuing non-compliance notices to the respective Permit Holders of these research areas and requiring a written response. This entire matter and any additional information related to same will be reviewed at the next Radionuclide Radiation Safety Committee (RRSC) meeting.

It should be noted that these steps should be considered preliminary actions to assure that we are in immediate compliance with NRC regulations. Longer term actions will be explored to assure continued compliance in these areas and the remainder of areas on campus. The aforementioned actions and any additional actions deemed necessary will be included in our response to the upcoming notice of violation. Should you have any questions, please do not hesitate to contact me.

Regards,
Mack R.

Mack L. Richard, MS, CHP
Director of Health Physics – IU Office of Research Administration

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Warren, Geoffrey

From: Richard, Mack L <mrichar@iu.edu>
Sent: Friday, January 24, 2014 10:28 AM
To: Warren, Geoffrey
Cc: Swank, Eric David; Mays, Trenton L; Mason, Jeffrey S.; Hadden, Matthew Alan; Kleyn, Tim David
Subject: Follow-Up Action on Security Issues
Importance: High

Dear Mr. Warren:

As a follow up to last week's inspection and our conversation yesterday morning, I wanted to bring you up to date on additional actions we have taken to address the security issues raised during your inspection. We have taken a tiered approach with an emphasis on immediately addressing research laboratories that currently have greater than 1,000 times the 10 CFR 20, Appendix C quantities. A review of the radionuclide inventories of all research labs indicates that the only research laboratory that had in excess of 1,000 times the Appendix C quantities was the one that you identified during the inspection. The actions outlined in my email to you on Friday (January 17, 2014) of last week were implemented to assure that those identified problems no longer exist.

In addition, we are contacting the Permit Holders of research laboratories containing less than 1,000 times, but greater than 100 times Appendix C quantities to again emphasize the importance of securing their radioactive material. We are requiring those Permit Holders to provide a response, indicating their method of securing their radioactive material. Those responses will be evaluated by the Radiation Safety Staff and any inadequate responses will be followed by a security audit. Finally, Permit Holders who currently possess less than 100 times the Appendix C quantities will be reminded in writing of their responsibility to secure their radioactive material from unauthorized removal. Compliance with those requirements will be evaluated during routine audits by the Radiation Safety Staff. These are steps that are being implemented in addition to our previous actions.

Should you have any additional questions, please don't hesitate to contact me.

Regards,
Mack R.

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