



# UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES

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11 December 2019

U.S. Nuclear Regulatory Commission, Region 1  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

Subject: Reply to a Notice of Violation; EA-19-120 Dated 20 November 2019

1. This letter is in response to a Severity Level IV Violation, received by our command 4 Dec 2019, identified by Nuclear Regulatory Commission (NRC) Region 1 during an inspection conducted on October 17, 2019 regarding NRC license 19-08330-02 docket 030-04545 and NRC license 19-08330-03 docket 020-06931.

a) Reason for the violation: During the period of June 20, 2019 and July 26, 2019, the individual specified in Condition 12 of both licenses cited above did not fulfill the duties and responsibilities of the Radiation Safety Officer (RSO). The RSO left employment on June 20, 2019, and an amendment was not received by the NRC until July 26, 2019. There was no NRC awareness of the pending change to the license and the individual who performed the duties in the interim did not fully meet the qualification requirements for the Broad Scope License 19-08330-02.

b) Corrective steps that have been taken and results achieved: AFRRI licensee has agreed that the new RSO undergo a mentorship program for a period of one year with another broad scope RSO in the Washington DC Metro Area. The amendment has been approved by the NRC with a license condition that the RSO mentorship program is completed fully.

c) Corrective steps that will be taken to avoid further violations: AFRRI leadership will ensure that NRC has awareness of any pending license actions before changes are made to the license structure. To ensure proper procedures are followed in the future, AFRRI leadership has received annual Radiation Principle Investigator (RAD PI) refresher training which includes NRC licenses management and lessons learned, and this will be continued annually.

d) Date when full compliance will be achieved: The RAD PI refresher training was conducted 10 December 2019. As of the date of this letter, all compliance objectives have been achieved.

2. The AFRRI point of contact for this correspondence is LT Jeffrey A. Divis, RSO, at (301)-295-1285, email jeffrey.divis@usuhs.edu.

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