

Appendix

NOTICE OF VIOLATION

University of Health Sciences
The Chicago Medical School

License No. 12-02193-03

As a result of the inspection conducted on June 18, 1985, and in accordance with the General Policy and Procedure for NRC Enforcement Action, (10 CFR Part 2, Appendix C), the following violations were identified:

1. License Condition No. 8(J) limits the amount of sulfur-35 that you may possess at any one time to a total of 50 millicuries.

Contrary to this requirement, you routinely possessed quantities of sulfur-35, including that as waste and/or in use or storage, in excess of your possession limit. Specifically, 130 millicuries of sulfur-35 was received by your institution from January 15 through February 1985 and 135 millicuries was received in March 1985.

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

2. License Condition No. 18, amendment No. 37 (dated March 2, 1984) and amendment No. 34 (dated January 31, 1979) require that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced applications and letters.
 - a. The letter dated December 21, 1978, initially referenced in amendment No. 34, states that representatives of the Radiation Safety Committee will meet at a publicized meeting with personnel of the building to review general radiation safety procedures.
 - b. The application dated July 6, 1983, initially referenced in amendment No. 37, states in item 15 that a radiation safety course comparable to that given by Dr. Levan in 1983, will be given each year.

Contrary to these requirements, as of the day of the inspection, a meeting with building personnel was not held in at least the last two years and a radiation safety course was not given since Dr. Levan's in 1983.

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

3. License Condition Nos. 18 and 19 require that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced applications and letters.

The referenced letter dated October 31, 1978 states in item 11(c) that the Radiation Safety Committee meets twice a year formally and at need, informally to approve various applications and to discuss problems or questions.

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Contrary to this requirement, your Radiation Safety Committee has not met at least twice a year. Specifically, the committee met only once in 1984.

This is a Severity Level V violation (Supplement VI).

4. License Condition Nos. 18 and 19 require that licensed material be possessed and used in accordance with the statements, representations, and procedures contained in certain referenced applications and letters.

The referenced letter dated October 31, 1978 states in item 8 and its' enclosure entitled "Survey Procedures," that all elution, preparation and injection areas will be surveyed daily and all other laboratories using greater than 100 microcuries will be surveyed weekly. A permanent record will be kept of all survey results, including negative results.

Contrary to the above, area survey requirements have not been met. Specifically, most laboratories using greater than 100 microcuries, other than your "hot laboratory," perform monthly rather than weekly surveys. Also, records of survey results are not routinely maintained for daily surveys performed in your "hot laboratory."

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

This is a repeat item of noncompliance.

With respect to item 3, the inspection showed that action had been taken to correct the identified item of noncompliance and to prevent recurrence. Consequently, no reply to this item of noncompliance is required and we have no further questions regarding this matter. With respect to items 1, 2, and 4, pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

7/8/85
Dated

Robert C. Burgin
for D. G. Wiedeman, Chief
Nuclear Materials Safety
Section 1