



Office of Environmental
Health and Safety

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October 4, 1996

A. Bill Beach
Regional Administrator
US Nuclear Regulatory Commission, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

SUBJECT: UPDATE OF CORRECTIVE ACTIONS

RE: Confirmatory Action Letter (August 22, 1996)
Docket Numbers: 030-02640 and 030-31605
NRC Licenses 34-00293-02 and 34-00293-14

Dear Mr. Beach:

This letter is to update corrective actions that have been taken by The Ohio State University in response to the Confirmatory Action Letter dated August 22, 1996.

1. Standard Operating Procedure was developed and implemented by September 30, 1996 for conducting physical inventories of sealed sources including those in storage, and RSO notification in the event of a missing source.
2. Standard Operating Procedure was developed and implemented by September 30, 1996 for notification of the RSO in the event of a leaking source.
3. A campus wide inventory of sealed sources was completed by September 1, 1996.
4. The waste at the Corrosive Storage Bunker and the Bulk Chemical Warehouse has been characterized by Auxier and Associates. The waste will be packaged and disposed by December 1996 pending waste broker access to Barnwell, South Carolina burial site.
5. The University Radiation Safety Committee developed and accepted a laboratory security and enforcement policy. This policy will be implemented on October 30, 1996 by the Radiation Safety Section.

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6. The October 1996 Radiation Safety Newsletter will address the following issues:

Security of Radioactive Materials

Use of Protective Equipment

Radioactive Waste Issues (Solubility, Biological Dispersible and Survey of Waste Receptacles)

Contamination Surveys (Floor)

Minimum Training Requirements for Approved Supervisors (40 Hours)

Following URSC Approved Procedures

7. The Radiation Safety Section completed an evaluation of sewer water solubility from January 1994 to September 1996. The following not readily soluble radionuclides and activities were disposed into the sewer:

^3H 1215.75 uCi; 0.20% of all ^3H hot sink disposals

^{14}C 350.731 uCi; 0.87% of all ^{14}C hot sink disposals

^{125}I 498.6687 uCi; 0.68% of all ^{125}I hot sink disposals

8. Radiation surveys of normal trash receptacles is a part of the lab audit program. The emphasis of proper disposal of radioactive waste has been included in the Radiation Safety Short Course and Approved Supervisor Conferences.

9. An outside firm will provide Department of Transportation training to the Radiation Safety Section staff and other pertinent University personnel.

10. The staff of the Nuclear Reactor Laboratory performed gamma spectrometry analysis of a water sample collected near the bottom of the pool irradiator. There was no difference from the sample taken from the bottom or top of the pool.

11. The University will notify the NRC Region III Materials Licensing Branch prior to introducing reactor fuel or other potential contaminants into the irradiator pool to determine the need for a license amendment.

12. The Radiation Safety Section has implemented the use of a secondary container for transporting radioactive material packages, and the release of these packages to radiation workers effective August 30, 1996.

13. The University Radiation Safety Committee implemented a 40 hour minimum/training requirement for Authorized Users effective July 1996

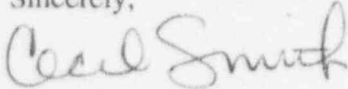
14. The Radiation safety Section has informed research laboratory staff of the need to include floors and other potential contaminated surfaces as a part of the routine radiation survey program. This information was and will be disseminated through lab audits, Radiation Safety Short Course, and the October 1996 Radiation Safety Newsletter.

15. The status of the previously identified missing sealed sources will be addressed in a separate letter from the University.

If you have any questions concerning these matters please call us at (614) 292-1284.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Cecil R. Smith". The signature is written in dark ink and is positioned above the printed name.

Cecil R. Smith, DPH
Assistant Vice President
Environmental Health and Safety

cc Wayne Slawinski, Senior Inspector, Region III
Robert E. Peterson, Jr., University Radiation Safety Officer
RS Files