

JAN 28 1997

Roy W. Pickens, Ph.D.
Acting Director
NIDA, Addiction Research Center
Department of Health & Human Services
4940 Eastern Avenue
Baltimore, MD 21224

SUBJECT: INSPECTION NO. 030-31714/96-001


Dear Dr. Pickens:

This letter refers to the letter dated January 15, 1997, from your Radiation Safety Officer, in response to our letter dated December 16, 1996.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

ORIGINAL SIGNED BY: 

John D. Kinneman, Chief
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

Docket No. 030-31714
License No. 19-09760-02

cc:

Capt. Peter A. Doob, USPHS, Radiation Safety Officer
State of Maryland

9702050081 970128
PDR ADOCK 03031714
C PDR

RETURN ORIGINAL TO
REGION I

OFFICIAL RECORD COPY

1E:07

Roy W. Pickens, Ph.D.
NIDA, Addiction Research Center

-2-

Distribution:

PUBLIC

Nuclear Safety Information Center (NSIC)

Region I Docket Room (w/concurrences)

DOCUMENT NAME: R:\WPS\MLDL\03031714.961

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	<input checked="" type="checkbox"/> N	DNMS/RI	<input checked="" type="checkbox"/> N			
NAME	SLodhi		JH...erman				
DATE	01/21/97		01/23/97		01/ /97		01/ /97

OFFICIAL RECORD COPY



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
National Institute on Drug Abuse
Intramural Research Program
P.O. Box 5180
Baltimore, Maryland 21224

January 15, 1997

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

re: Docket No. 030-31714

Gentlemen:

This is the reply of the National Institute on Drug Abuse (NIDA) to deficiencies described in your Notice of Violation dated 12-16-96, re License No. 19-09760-02.

RESPONSES TO VIOLATIONS

VIOLATION A. Calibrations of three survey instruments for photon-emitters not current

The Commission noted, in the course of its December 2-3, 1996, inspection, 3 survey instruments not calibrated within the previous 6 months, and indicated that a similar problem was identified on the previous inspection. NIDA responds:

1. All out-of-calibration survey instruments have been brought into current calibration.
2. NIDA's radiation safety records system, including those associated with meter calibrations, had been identified in 1995 for upgrading, in order to streamline radiation safety operations and increase the efficiency of radiation safety officer oversight functions. With a suitable recordkeeping system in place, the Radiation Safety Officer would have been alerted to the meter calibration lapses.

In October 1996 NIDA acquired a proprietary radiation safety database. Survey instrument calibration data had not yet been entered at the time of the subject inspection. When database installation is completed, a monthly report will be generated and reviewed by the Radiation Safety Officer detailing all near-future and any newly-outstanding license requirements, including

RETURN ORIGINAL TO
REGION I

JAN 16 1997

9701160205 ypp

survey instrument calibration status.

3. All NIDA radiation users are instructed, during initial radiation safety training and during annual refresher radiation safety training, to perform an operational survey instrument check each time the unit is used, utilizing the attached check sources. Although calibration was not current on the instruments at issue, all units subject of this violation were fully operational at the time of inspection. Smears required for quantification of removable contamination demonstrate independently that contamination limits were not violated as a result of these survey instruments being overdue for recalibration.
4. NIDA has found the recalibration of survey instruments in very small groups, e.g., 1 or 2, to be inefficient, but unavoidable, when the number of loaner units available is small. It is presently enlarging its set of loaner instruments to enable removal for calibration of approximately 5 survey units at a time.
5. NIDA is considering requesting NRC permission to recalibrate all survey instruments during two semiannual intervals of one month each. For example, if June and December were selected, no instrument would be deemed overdue for calibration until after June 30 or December 30. By concentrating meter recalibrations into two annual campaign periods, this approach would further increase the efficiency and reliability of its calibration program. Under this arrangement, the recalibration interval (*i*) would be $5 < i < 7$ months.
6. NIDA is in the process of training an additional technician to provide relief support to NIDA Safety Unit staff, such as the radiation safety technician, during peak periods. Several such peak periods occurred during 1996, due substantially to an enhancement of NIDA's waste minimization program.

VIOLATION B. Radiation Safety Technician not instructed in the applicable provisions of the regulations and conditions of the license re receiving and opening packages.

The Commission noted, in the course of its December 2-3, 1996, inspection, that nonexempt packages were being received without required external contamination and radiation level checks. NIDA responds:

1. NIDA's radiation safety technician is a well-trained individual with more than 10 year's experience with radioactive materials programs. He was aware of the applicable provisions of the regulations and conditions of the license regarding the receiving and opening of packages, and acted within the spirit if not the letter of these.
2. NIDA's written package inspection procedures require that external contamination and radiation level checks be performed for nonexempt packages prior to opening. NIDA's radiation safety technician, however, was opening all packages and checking for source container leakage first, then checking packaging if leakage was detected. Notwithstanding the departure from pertinent regulations and license conditions, NIDA believes that its technician's package opening practices fully protected shippers, handlers, and staff against any leaking source containers in the packages it received.
3. To remedy its package inspection deficiency:
 - a. NIDA has thoroughly reviewed its receiving procedures for radioactive materials, and has not found any departures other than the subject external checks on qualifying packages.
 - b. NIDA has created a printed label for attachment to receiving documents that will be used to document that external checks have been performed on all nonexempt shipments.
 3. NIDA has created a wall poster for placement in the radioactive materials receiving area reminding the radiation safety technician of the criteria for

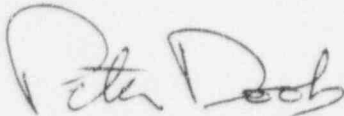
U.S. Nuclear Regulatory Commission
15 January 1997
page 4 of 4

nonexempt shipments and associated external check requirements.

ASSURANCE OF ADEQUACY OF REMEDIES

To ensure that the above remedies are adequate, NIDA's Radiation Safety Officer will periodically report to Senior NIDA Management on the success of efforts to remedy both violations noted above.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Peter Doob". The signature is fluid and cursive, with the first name "Peter" and last name "Doob" clearly distinguishable.

Capt. Peter A. Doob, USPHS
Radiation Safety Officer, NIDA

cc: Regional Administrator
US Nuclear Regulatory Commission
Region 1
475 Allendale Rd.
King of Prussia, PA 19406-1415