

# TRINITY COLLEGE

WASHINGTON

February 6, 1997

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

## REPLY TO NOTICE OF VIOLATION

On December 12, 1996, Richard Gibson, Jr., conducted safety inspection Number 030-00644/96001 at Trinity College, 125 Michigan Avenue, N.E., Washington, D.C. 20017

As a result of this inspection, Trinity College was cited for two violations, which are identified and addressed below:

A. "10 CFR 30.36(d)(4), effective August 15, 1994, requires that when no principal activities, as defined in 10 CFR 30.4, have been conducted under the license for a period of 24 months, the licensee provide notification of that fact to the NRC in writing within 60 days of the completion of the 24 month period and begin decommissioning its site for unrestricted use."

Trinity College was not in compliance with this regulation because we were unaware of this requirement, an issue which is addressed in the second violation. The sources which we are licensed to possess are used for instructional purposes. Due to fluctuations in enrollment, curricular changes, and personnel turnover, the courses which utilize these materials have not been offered within the last 24 months. Radioactive sources will be used in a new course "Data Acquisition and Analysis," offered in fall 1997, as well as "Nuclear Physics," scheduled for spring 1998. We are currently aware of our responsibility to notify the NRC in the event that no principal activities have been conducted for 24 months. The course rotation which we are implementing will ensure that licensed materials will be used within a two-year cycle.

B. "Condition 12. of License No. 08-06506-01 requires Nivard Scheel, Ph.D., to be the Radiation Safety Officer for the license."

In May 1994, our Radiation Safety Officer Dr. Nivard Scheel retired and left Trinity College. Of the remaining individuals authorized to use and supervise licensed material, only Sandra Oyewole is currently on the faculty. In August 1994, however, she accepted a two-year position at the National Science Foundation. As a result of these personnel changes, no individual who would have been aware of the new regulation were actively employed at Trinity College. The lack of a radiation safety officer meant that mailings from the NRC were directed to different offices, with no single individual being responsible for compliance.

RETURN ORIGINAL TO  
REGION I

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OFFICE OF THE PRESIDENT

Letter to the U.S. Nuclear Regulatory Commission  
February 6, 1997

Under separate cover, we are requesting an amendment to our license designating Hollis Williams, Ph.D., as our Radiation Safety Officer. At the same time, we will delete personnel no longer on the staff of Trinity College, and add the following personnel: Brunella Bowditch, Ph.D.; Laura Eisen, Ph.D., and Mary Kirchhoff, Ph.D. We will work with the Radiation Safety Officer at Catholic University, Mr. Donald Luster, to ensure adequate training for all designated personnel. Full compliance will be achieved when the Nuclear Regulatory Commission approves the amendment to our license.

We hope this response adequately addresses the violations which were noted during the inspection.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia McGuire", written in dark ink.

Patricia McGuire  
President

cc: Regional Administrator, Region I