

Nuclear Reactor Laboratory
Engineering Building (20)
P. O. Box 210020
Tucson, Arizona 85721-0020



John G. Williams, Director
e-mail: jgw@bigdog.engr.arizona.edu
voice (520) 621-9729
FAX (520) 621-8096

November 27, 1996

10CFR19.13(b)

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk MS P1-37
Washington, DC 20555

RE: Required Report, License No. R-52; Docket No. 50-113

DESCRIPTION OF THE OCCURRENCE

An apparent violation of 10 CFR, Part 19, has come to my attention.

§19.13, para (b) reads:

"Each licensee shall advise each worker annually of the worker's dose as shown in records maintained by the licensee pursuant to the provisions of §20.2106 of 10 CFR part 20."

So far as I am aware, such reports were not issued to Nuclear Reactor Laboratory (NRL) radiation workers. This regulation was published in the Federal Register: 58FR 67657, on 12/22/93, with effective date 1/1/94. That means that we were in violation for the calendar year dose reports for 1994 and 1995.

The omission did not cause any risk to the health and safety of the public, or to employees.

CAUSE OF THE OCCURRENCE

Records, as required by 10CFR20, were kept by the University of Arizona Radiation Control Office (RCO) for workers with the potential to be occupationally exposed to ionizing radiation. After the calendar years, 1994 and 1995, timely required reports prepared by the RCO were made to the USNRC by the Director of the Nuclear Reactor Laboratory, using NRC Form 5 (1994) and Arizona Radiation Regulatory Agency Form Z (1995). The latter form is the agreement state equivalent of Form 5. Forty-five (45) forms

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were submitted for 1994, and twenty-six (26) were submitted for 1995. For 1994, the reports of nine workers showed shallow dose equivalents to an extremity ranging from 0.030 rem to 0.140 rem. All other doses recorded were nil. For 1995, the reports of seven workers showed shallow dose equivalent to an extremity ranging from 0.020 rem to 0.050 rem; the reports of two workers showed shallow dose equivalents to the whole body of 0.010 rem and 0.020 rem, respectively; the report of one worker showed deep dose equivalent to the whole body and to the lens of the eye of 0.010 rem. All other doses recorded were nil.

The Director of the Nuclear Reactor Laboratory overlooked the Part 19 requirement for reports to be sent to individual workers. This was discovered October 30, 1996, during a requalification training review.

The Director of the Radiation Control Office was made aware of the omission and stated that during ARRA's last inspection of the University's broad licenses, a broad range of dosimetry issues were discussed. Vendor-related problems had made it difficult to provide accurate written statements to all individuals. However, the requirement to notify the NRC that reports had not been provided to individual workers occupationally exposed at the Nuclear Reactor Laboratory was overlooked.

CORRECTIVE ACTION

For the 45 Nuclear Reactor Laboratory workers monitored during 1994 and the 26 NRL workers monitored during 1995, reports of their individual exposure data have been prepared and mailed, to their latest known addresses.

The University Radiation Control Office has made commitments to mail future annual reports to individual workers in a timely manner.

The Director of the Nuclear Reactor Laboratory will also ensure that in future this is done before the due date (April 30) for submission of the annual personnel exposure report to the USNRC for the Nuclear Reactor Laboratory.

Facility technical specifications, section 6.7 c, requires a written report within 30 days to the US NRC Document Control Desk, with a copy to Region IV, of:

4. Any observed inadequacy in the implementation of administrative or procedural controls.

This report is made in accordance with that requirement.

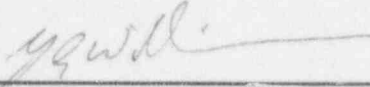
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SUMMARY AND CONCLUSIONS

As a result of remedial and corrective actions a recurrence of a similar error is unlikely.

REPORT PREPARED AND SUBMITTED BY:



John G. Williams, Director
Nuclear Reactor Laboratory

11/27/96

Date

cc: Dr. Charles Sondhaus
Director, Radiation Control Office
University of Arizona,

Dr. Michael Cusanovich
Vice-President for Research
University of Arizona,

Dr. Charles Geoffrion, Associate Vice-President
Director of Research Communication and Research Integrity Office
University of Arizona.

Dr. Philip Secker, Chairman
Nuclear Reactor Committee
University of Arizona.

Region IV USNRC
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064