

APPENDIX A

NOTICE OF VIOLATION

University of Connecticut
Health Center
Farmington, Connecticut

Docket No. 030-01295
License No. 06-13022-02

As a result of the inspection conducted on November 21, 1985 and November 23, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207(b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 20 CFR 20.3(a)(17), an unrestricted area is any area access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, on November 21, 1985 millicurie quantities of iodine-125 was stored in an unlocked freezer in the third floor hall of the research wing, which is an unrestricted area, and was neither under instant surveillance nor immediate control.

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

- B. Condition 28 of License No. 06-13022-02 requires that licensed material be possessed and used in accordance with statements, representations and procedures contained in an application dated July 25, 1983, including ALARA program and attachments.

1. Item No. 10 of this application requires that dose calibrators be calibrated in accordance with procedures contained in Appendix D, Section 2, of NUREG-0338, Revision 1.

Contrary to the above, as of November 21, 1985, the required daily constancy tests on your dose calibrator were not adequately performed. Specifically, the activity measurement of the cobalt-57 standard was not compared at the time of measurement to the expected value to ensure a variance of less than $\pm 5\%$.

2. Item No. 15 of this application requires that the University of Connecticut Health Center research activities follow procedures listed in the institution's Radiation Safety Manual.

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- a. Subitem III., Use of Radionuclides, E.3. "Bioassays", part b. require all personnel who use one or more millicuries of iodine-125 for protein labeling to be monitored for thyroid uptake within seven days of the procedure.

Contrary to the above, during the interval of time from January 1, 1985 to November 21, 1985 one individual who performed protein labeling with millicurie quantities of iodine-125 on five separate occasions failed to be monitored for thyroid uptake.

- b. Subitem V., Radiation Protection Procedures, K., "Radiation Protection Procedures for the Individual User", part 6., prohibits eating or drinking in a laboratory approved for the use of radioactive materials.

Contrary to the above, on November 21, 1985 in room L-3042, a laboratory approved for the use of radioactive materials and where radioactive material was being used, a research employee was found eating a sandwich. In this same room an empty coffee cup was found on a laboratory bench where radioactive materials were used.

These are Severity Level IV violations. (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, University of Connecticut Health Center is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.