

MAR 27 1986

Docket Nos. 030-02939  
070-00123  
030-07056

License Nos. 37-00118-07  
SNM-114  
37-00118-11

University of Pennsylvania  
ATTN: Neil J. Hamburg  
Office of the General Counsel  
110 College Hall CO  
Philadelphia, Pennsylvania 19104

Gentlemen:

Subject: Inspection No. 030-02939/85-01, 030-00123/85-01 and 030-07056/85-01

This refers to your letter dated March 3, 1986, in response to our letter dated December 20, 1985.

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.

In your discussion of actions taken or planned to improve the effectiveness of your phosphorus-32 safety and dosimetry program, additional information is found to be need. Your proposal for monitoring individuals handling millicurie quantities of phosphorus-32 could effectively result in the cessation of personnel monitoring for all phosphorus-32 users, regardless of quantity handled. The hazards associated with handling beta emitters of this energy should dictate a conservative approach in routine personnel monitoring and handling procedures. Please revise your personnel monitoring program to reflect this consideration by providing for, as a minimum, the mandatory use of finger dosimeters when handling more than one millicurie of phosphorous-32.

In your response, you also indicate that the university's survey team observes the handling of newer and larger quantity uses of phosphorus-32 and provide on-the-spot instruction of appropriate safety procedures to these users. Please specify the quantity of phosphorus-32 that you consider to be a "larger quantity" and for which you will provide radiation safety monitoring and/or observation. Furthermore, please develop and submit the special safety instructions that you will provide to all users of phosphorus-32 and include your criteria for performing bioassays.

Please submit to this office within thirty (30) days of receipt of this letter a written statement containing the requested information.

In accordance with 10 CFR 2.790(a), a copy of this letter will be placed in the NRC Public Document Room.

8604040414 860327  
REG1 LIC30  
37-00118-07 PDR

OFFICIAL RECORD COPY

RL U OF PA - 0001.0.0  
03/20/86

11  
1E07

University of Pennsylvania

2

MAR 27 1986

Your cooperation with us is appreciated.

Sincerely,

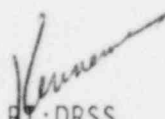
John D. Kinneman, Chief  
Nuclear Materials Safety Section A  
Division of Radiation Safety  
and Safeguards

cc:  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
Commonwealth of Pennsylvania

University of Pennsylvania  
ATTN: John W. Thomas  
Radiation Safety Officer  
Radiation Safety Office  
14th Floor-Blockley Hall/S1  
418 Service Drive  
Philadelphia, Pennsylvania 19104

bcc:  
Region I Docket Room (w/concurrences)

RI:DRSS  
Piccone/mm  
*J.M.P.*  
3/21/86

  
RI:DRSS  
Kinneman

3/21/86

OFFICIAL RECORD COPY

RL U OF PA - 0002.0.0  
03/20/86