



IN REPLY REFER TO

United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Office of Program Support
Western Region Service Center
345 Middlefield Road, Mail Stop 211
Menlo Park, California 94025-3591

JUL - 2 1997

Mr. Ross A. Scarano, Director
Division of Nuclear Materials Safety
Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Dear Mr. Scarano:

Enclosed is a copy of the response to a Notice of Violation (Docket Number 030-13620) for the U.S. Geological Survey (License Number 04-06674-01), located at 345 Middlefield Road, Menlo Park, California 94025. The response was submitted to me by the Chairman of the U.S. Geological Survey Western Region Safety Committee. I reviewed the response and found it responsive to the issues of concern. It is being forwarded to the U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, Washington, D.C. 20555.

Sincerely,


George F. Hargrove, Jr.

Management Officer, Western Region

Enclosures (4)

cc: NRC Document Control Desk
NRC Walnut Creek Field Office
USGS Bureau Safety Manager
USGS Chairman W.R. Radiation Safety Committee

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John Duff

From: John Duff [jhduff]
Sent: Tuesday, April 29, 1997 11:56 AM
To: Bob Fleck (E-mail); Brian Cole (E-mail); Chris Fuller (E-mail); Homa Lee (E-mail); Jim Kuwabara (E-mail); Joe Wooden (E-mail); John Nimmo (E-mail); John Duff (E-mail); Ron Oremland (E-mail); Sam Luoma (E-mail)
Cc: Don Wadsworth (E-mail); Larry Miller (E-mail); Byeong Lee (E-mail); Frank Ribeiro (E-mail); Don Wadsworth (E-mail)
Subject: NRC Inspection: Storage and Control of Licensed Material

On April 22nd and 23rd, Kent Prendergast and Frank Wenslauski with the U.S. Nuclear Regulatory Commission performed a routine inspection of our laboratories and an audit of our committee records. During their inspection, they noted that licensed material was not secure in one of our designated laboratories. The purpose of this memo is to emphasize the importance of security and control of licensed material. Security of licensed material is a crucial aspect of our safety program and all Permit Holders must comply with NRC Regulations. The following regulations are quoted from 10 CFR, Part 20, 1801 & 1802: The licensee shall secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas. The licensee shall control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage. Please be sure that all licensed material is secure and that laboratory doors are locked when appropriate. Please contact me or Don Wadsworth at any time if you have questions regarding this issue. Thank you. John

Enclosure A.1

**Review of the WRRSP (Western Region Radiation Safety Program),
April 30, 1997.**

Attendance at the review included members of the Western Region Radiation Safety Committee (WRRSC), (John Duff, Chris Fuller, Larry Miller, Homa Lee, Beyong Lee), a representative of management (Frank Ribeiro), and the Radiation Safety Consultant (Don Wadsworth). The following summation was written by John Duff and reviewed by the meeting attendees.

Radiation Safety Manual. The Radiation Safety Manual (RSM) needs to be updated. Several discrepancies were noted during the NRC inspection. John Duff will make changes to the manual and forward a copy of the changes to committee members for review. The updated manual will be submitted to the NRC for approval in October, 1997. Specific changes need to be made on the following sections: Radiation Safety Committee Membership; Procurement of Radioactive Materials; Dosimetry; Radiation surveys; Storage of Licensed Materials; and Transportation of Radioactive Materials. An Annual Review of the Radiation Safety Program will be added under Functions and Responsibilities of the RSC, Section 4.5. The RSM should reflect new forms that will be part of the new tracking software program.

Administrative Procedures and Committee Membership. The WRRSC reports to the Director's Representative of the Geological Survey, Western Region, and has the responsibility of supervising the health and safety of all operations involving the usage of ionizing radiation produced by radioactive licensed materials. The Committee is

Enclosure B.1

comprised of at least five users of licensed materials and a representative of management as designated by the Director's Representative. The management representative shall be exempt from specific technical qualifications required for the users, the representative of management shall not serve as chairperson or secretary, and the representative of management shall not have a vote technical issues discussed by the Committee. Frank Ribeiro has been designated as the Director's Representative, which will be confirmed in a memo to George Hargrove, Director's Representative, Western Region. The Committee will rewrite the RSM to reflect the specific role of the Director's Representative.

Radiation Safety Consultant. During the review, the Committee noted that the consultant can more closely oversee WRRSC programs. The following recommendations were made to the consultant. Perform an annual review of NRC regulation changes to insure our RSM remains in compliance with NRC regulations. Participate in an Annual Review of the WRRSP in March, and following the review and the semi-annual audits in December, attend a meeting with the chairperson, secretary and directors representative to discuss the Radiation Safety Policy and Program. In addition, the consultant agreed to modify audit forms if appropriate to meet all RSP needs, including NESHAPS, the Annual Review of the WRRSP, and Radiation surveys and records in the Seavan (Rad Waste Holding Facility).

The Seavan, Licensed Material Storage Area. Several safety-related issues were reviewed with regard to the Seavan. First, a copy of the survey records and current

inventory needs to be stored in the Seavan. Don Wadsworth did this. Second, a fire suppressant system needs to be installed in the Seavan. New procedures have been adopted for storage of licensed material by Principal Users and are reflected in memos from the Chairperson to Principal Users. With the help of Don Wadsworth, the Committee is petitioning the NRC to amend our license to hold radioactive isotopes with half-lives less than 120 days for decay.

Use Permits and applications. Our RSM states that radiation survey procedures shall be stated in the Permits. Currently, radiation survey procedures for individual permit holders are addressed in the ALARA and in the RSM but not in the Permits. The committee will update everybody's Permit to reflect the radiation survey procedures. The committee noted that it is important to have every Permit Holder submit a complete application package by Nov 1st every year. The package must include a current inventory with the application.

Inventory and procedures related to Receival, Transfer and Disposal of Licensed Materials. The committee found that most procedures in place are working well. It is imperative that Principal Users and Users follow established guidelines for ordering and receiving isotopes. The Committee recently sent memos to PU's refreshing their memories about ordering policies. Licensed materials should be sent to the warehouse (1020 O'Brien Drive) and not to the mailroom. The RSM needs to be updated to reflect this. Transfers and disposals continue to be handled by the Radiation Safety Consultant.

Radiation Surveys. See Use Permit Applications above in conjunction with this review. The committee reviewed its policy on radiation surveys. Currently, survey frequency is discussed in ALARA statements and in the RSM. The RSM (November 17, 1993) states that the frequency of surveys shall be stated in the appropriate permit and shall be made at least monthly. The revised RSM (August 8, 1995) states that the frequency of surveys shall be stated in the appropriate permit and shall be made at least monthly *unless no use has occurred*. The Committee found that the frequency of survey was not stated specifically in the permits and will add the statement to them as it is worded in the RSM. Permit holders may choose to have a more comprehensive survey plan outlined in their ALARA.

Radioisotope Use Logs. The Committee has recommended that Principal Users maintain a use log for each isotope so that the current disposition of the licensed materials in the laboratory is known. Currently, the RSM calls for Principal Users only to maintain an annual physical inventory. This change will be reflected in the revised RSM and with a memo to Principal Users.

Transportation. Users who transport licensed material must now have formal training on DOT regulations pertaining to the licensed material. This new requirement is being added to the RSM. One permit actively transports licensed materials. The Permit Holder has received formal training and is in compliance with regulations for shipping their licensed material only.

Dosimetry. The Committee needs to update the manual to reflect current dosimetry procedures. The RSM calls for all licensed material handlers to receive dosimetry. However, all handlers have the option of declining dosimetry if they believe they do not reasonably expect to receive a radiation dose exceeding 1/10 of the dosage specified in Part II, A, 2.1 of the RSM. The Committee believes that we can switch from monthly dosimetry to quarterly dosimetry and is reviewing this issue as well as requesting comments from Principal Users.

Training. The Committee believes that training requirements are adequate and has in place a formal program where licensed material handlers can receive 4 hours of training every year, and an arrangement where personnel can accrue training hours through a number of avenues outlined in the RSM. All training must be documented with a memo to the Secretary descriptive of the training accrued.

Responsibility of Users. The WRRSC recognizes three categories of users and a fourth category comprised of non-users who work in laboratories where isotopes are used or stored. Three categories of personnel who work with licensed materials include the Principal User, Users and Handlers. Users share many of the responsibilities that Principal Users are charged with, and therefore the Committee believes that Users should be aware of record keeping responsibilities and procedures as well as the location of records and permits. In addition, many users work more closely with handlers than do Principal Users. Therefore, the Committee plans to include Users in communications to Principal Users of WRRSC business when appropriate.

Site License. The Committee will consider changing our License with the NRC from a Broadscope License to a Specific R&D License. No action will occur until details of the Specific License are received by the Committee.

John Duff

From: John Duff [jhduff@usgs.gov]
Sent: Tuesday, June 17, 1997 11:47 AM
To: Bob Fleck (E-mail); Brian Cole (E-mail); Chris Fuller (E-mail); Jim Kuwabara (E-mail); Joe Wooden (E-mail); Ron Oremland (E-mail); Sam Luoma (E-mail); John Duff (E-mail)
Cc: Byeong Lee (E-mail); Chuck Culbertson (E-mail); Don Wadsworth (E-mail); Doug Kent (E-mail); Jody Edmunds (E-mail); Larry Miller (E-mail); Marvin Lanphere (E-mail); Matthias Kohler (E-mail)
Subject: Monthly Surveys

I am preparing the final response to our Notice of Violation from the routine NRC inspection. The USGS Radiation Safety Manual, revised on November 17, 1993, specifies that users of licensed materials will perform routine surveys, including area monitoring and wipe tests, at least monthly. During the inspection, the NRC found that contrary to the above, surveys were not performed in one laboratory. Some of you may have a revised Radiation Safety Manual dated August 8, 1995. In there it states that routine surveys shall be made at least monthly *unless no use has occurred*. Unfortunately, this revision of the Manual was not forwarded to the NRC, and therefore we are bound by the 1993 Manual. Therefore, until a revised Manual is accepted by the NRC, all Permit Holders must perform monthly surveys in areas where licensed materials are used. I plan to submit a Manual revision at the end of my field season, in October. Thanks for your attention to this matter. John

Enclosure C.1.

Western Region Radiation Safety Committee

U.S. Geological Survey
345 Middlefield Road, Mail Stop 439
Menlo Park, CA 94025-3591
Ph: (415) 329-4319
Fax: (415) 329-4463
Email: jhduff@usgs.gov

To: George Hargrove, Director's Representative, Western Region
From: John Duff, Chairperson, WRRSC
CC: Secretary, WRRSC
Don Wadsworth, New World Technology
Frank Ribeiro
Date: May 22, 1997
Re: Radiation Safety Committee Membership

Radiation Safety Committee Membership

Dear George,

This memo will confirm the role of the Director's Representative on the Western Region Radiation Safety Committee (WRRSC). The WRRSC reports to the Director's Representative of the Geological Survey, Western Region, and has the responsibility of supervising the health and safety of all operations involving the usage of ionizing radiation produced by radioactive licensed materials. The Committee is comprised of at least five users of licensed materials and a representative of management as designated by the Director's Representative. The management representative shall be exempt from specific technical qualifications required for the users of licensed materials on the Committee. The management representative shall not serve as chairperson or secretary. The management representative shall not have a vote on radiological issues. In our last WRRSC Meeting, Frank Ribeiro reported that he would serve as the representative of management. We look forward to Frank's participation. We have worked very well with Frank in the past, particularly in areas that overlap with laboratory safety and management policy. Please contact me if I can be of further assistance. I plan to set up a meeting with you, Frank, and Don Wadsworth, our Radiation Safety Consultant, when we receive our recent NRC Inspection Report.

Enclosure C.2.