



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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TDD Relay Service: 1-800-833-6388

December 8, 2016

David M. Anderson, D.V.M.  
Executive Director, Health Sciences Administration  
University of Washington  
Environmental Health & Safety, Box 356355  
Seattle, Washington 98195-4400

License Number: **WN-C001-1**

Dear Dr. Anderson,

This letter constitutes a notice of correction (pursuant to RCW 43.05.100 and the Regulatory Reform Act of 1995) and refers to the inspection conducted November 29 thru December 1st, 2016, of activities authorized by your Washington State Radioactive Materials License Number WN-C001-1.

Over all the UW has an excellent, engaged staff who have made many program improvements during the two years since the previous inspection. This inspection revealed the following item of noncompliance with the requirements of the license and the Washington State Rules and Regulations for Radiation Protection. For your information, each item of noncompliance is categorized according to severity; as a violation, an infraction, or a deficiency. Generally, violations are those items which have a high probability of causing an overexposure to personnel, infractions are those items which could cause an excessive exposure in certain circumstances, and deficiencies are those items of noncompliance which have a minor safety significance or minor environmental impact.

**NOTICE OF CORRECTION**

1. **Radioactive Materials License condition 22:** States "The licensee must maintain a documented running inventory of all unsealed radioactive materials received, possessed, used, transferred, and disposed of under the license."

Contrary to the above, when the radiation safety department sends out queries every six months regarding inventory of radioactive material to the various primary investigators (PI's), only around 50-60% are returned to radiation safety. PI's not verifying their inventories leads to uncertainty of the whereabouts of the unsealed radioactive material.

This lack of response from the PI's to Radiation Safety is categorized in these instances as an **INFRACTION**.

The minimum required corrective action is:

1. There needs to be some sort of enforcement protocols in place if the PI's do not return the inventory verification forms.
2. Explanation of how a better response rate regarding inventory tracking will be achieved.

## 2. **Recommendation Only**

### 1. Broad Scope License Authority

As a broad scope license the University Radiation Safety Program is both a service provider for the UW and a regulatory agency. Washington Department of Health defers their authority to the broad scope licensee to authorize the use of radioactive materials within their facilities and by their staff in accordance with the Rules and Regulations of Radiation Protection and oversight by Washington Department of Health. To receive and maintain a broad scope license, management must be whole heartedly in support of the Radiation Safety Program as it is a critical to the University's medical diagnostic, therapeutic services as well as many of their research programs. Due to the high profile of this university-wide program, it is customary for regulators to close out with upper level management for the out-going debrief.

We very much appreciated the attendance of several Radiation Safety Committee members who are integral to maintaining such an extensive program.

It is strongly recommended that more members of executive management attend the inspection close out meetings so that we can confirm management is actively engaged in radiation safety at the University of Washington.

2. It was noticed that at the Harborview facility the nuclear medicine techs did not source check the survey meter for their daily survey meter QA checks, and only did a battery check. (Note: UWMC nuclear medicine techs did both checks)

It is recommended that when doing a survey meter check the user do a source check as well as a battery check to ensure that the meter is working properly. This also considered to be a good health physics practice.

3. The Cyclotron is increasing its production of Actinium, and may or may not lead to additional release of radionuclides into the air.

It is recommended that a continuous radiation air monitor be used in the production facility as a best practice and to show any actual quantifiable releases. If there is no release, the data would a basis for discontinuing monitoring.

4. The NRC Part 37 requirements call for annual (or according to manufacturer) maintenance and testing of the security systems for Category 1 and 2 sources. These systems had not been checked yet when the inspectors came for the inspection. This was identified during a self-audit by Radiation Safety staff.

This is a reminder and recommendation to make sure testing is done annually.

Please respond in writing within 30 days of receipt of this letter, describing the actions, or planned actions that will bring your activities into full compliance and that will avoid further noncompliance. If you believe you cannot achieve compliance within this time period, you may request an extension for good cause.

A request for extension should be sent within 14 days of this letter and must identify the item of noncompliance, the reason compliance cannot be achieved, and the expected date of full compliance.

Please send your response (or request for extension) to:

Tristan Hay PhD  
Radioactive Materials Section  
DOH - Office Radiation Protection  
P.O. Box 47827  
Olympia, Washington 98504-7827  
(Telephone: 360-236-3257)

For technical assistance in determining how to achieve or maintain compliance with our rules, you may contact me at the address or phone number given above. For additional technical assistance, we maintain a list of "Technical Assistance Providers" as required RCW 43.05.020. This list is available by calling our admin at (360) 236-3220.

In accordance with WAC 246-222-020, this formal notice of noncompliance must be posted within two working days after receipt. It must remain posted until corrective actions are completed or for a minimum of five working days if corrective actions are completed sooner. The posting is to be in a sufficient number of conspicuous places such that people working under this license may observe it.

It was a pleasure to work with the Radiation Safety staff at the University of Washington, and it is obvious that they are dedicated radiation protections professionals.

Sincerely,

A handwritten signature in black ink, appearing to read "Tristan Hay", with a long horizontal stroke above it.

Tristan Hay PhD  
Radioactive Materials Section

cc:

Craig Lawrence, Radioactive Materials Manager WDOH  
Anine Grumbles, Laboratory program manager WDOH  
Robert Ennes, Director, Finance and Administration  
Jude Van Buren, Director, Environmental Health and Safety  
Kalpana Kanal, Ph.D. Radiation Safety Committee Chair  
Philip G. Campbell, CHP, Radiation Safety Officer