

June 14, 1986

Mr. Robert Healy
City Manager
Cambridge City Hall
Cambridge, MA 02139

Dear Mr. Healy:

You may have read recently that the federal Nuclear Regulatory Commission (NRC) has proposed to fine Harvard University \$2500, the agency's minimum penalty, for alleged deficiencies in the management of the University's Radiation Safety Program.

Because some newspaper reports were incomplete or inaccurate concerning the specific violations of NRC requirements cited by the agency, I am writing to you so that you can be fully informed about the matter as it affects the City of Cambridge.

At the outset, I want to assure you that the incidents cited by the NRC concerned an extremely low level of radioactive material. None of the incidents involved a level of radioactivity higher than that typically found in high-altitude jet aircraft or even in some pottery-type tableware. (And, the type of radiation in these examples is high-energy radiation while that used in biological experiments has a much lower energy level). At no time was anyone at Harvard or elsewhere at risk.

I also want to assure you that all of the administrative deficiencies noted by the NRC have already been corrected or are in the process of being corrected by the University. We are currently recruiting two senior health physicists, one of whom will be responsible for supervising the entire waste disposal program. Harvard's Radiation Safety Committee has tightened its regulations and has transmitted these rule changes to investigators authorized to use radio-nucleides.

We consider it a privilege to be able to use radio-isotopes in our medical and other biological research, and we take our responsibility for managing that research very seriously. We have always prided ourselves on the technical excellence of our program. This is the first time in 25 years of the Radiation Safety Program that the University has received any penalty for alleged violations of agency requirements.

The incidents cited in Cambridge by the NRC and the corrective action the University has taken included the following:

1. Description of Incident:

Laboratories using radioactive materials were found to be unlocked and not occupied. This situation occurred when

maintenance personnel unlocked the laboratories in the morning before the arrival of technical and professional personnel.

Corrective Action Taken

All investigators have been notified that only an authorized professional will be permitted to unlock a laboratory and that a qualified person will be in the laboratory at all times when the laboratory is open.

2. Description of Incident:

Small amounts of radioactive-contaminated material such as wiping tissues, plastic pipette tips and paper towels were placed into the regular trash instead of into the proper disposal containers.

Corrective Action Taken

Regular trash will be monitored. If violations are found, the University Radiation Safety Committee will consider it a serious violation which will lead to the immediate suspension of the investigator's license until proper assurance is given that the situation has been corrected. In all instances, when investigators seek to have their licenses reinstated, they will be required to be accompanied by the senior dean of their respective faculties when they appear before the Committee.

3. Description of Incident:

Low-level radioactive materials were transported to 46 Oxford St., Cambridge in plastic bags and unsecured barrels. This is in violation of the University's standing operating procedures and the regulations of the NRC and Department of Transportation (DOT).

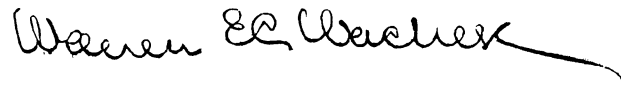
Corrective Action Taken

Technicians-drivers have been cautioned that any future violations of these regulations will significantly affect the evaluation of their performance and repeated violations will lead to immediate severance.

I hope that any questions you may have had concerning Harvard's management of its Radiation Safety Program have been answered. If you have any further concerns, however, I would be happy to discuss them with you. I can be reached at (617)495-2010.

With best wishes,

Sincerely,

A handwritten signature in cursive script that reads "Warren E. Wacker". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Warren Wacker, M.D.
Director
Harvard University
Health Services

1. S-4/4
Comm. from Warren Wacker, M.D., Director,
Harvard University Health Services Re: Nuclear
Regulatory Commission's fine of \$2,500. to
Harvard University for alleged deficiencies in
the management of the University's Radiation
Safety Program.

In City Council,

June 16, 1986