SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED
West Virginia University
WWU Health Sciences Center South
64 Medical Center Drive
Morgantown, WV 26506

2. NRC/REGIONAL OFFICE
Region 1
2100 Renaissance Blvd
Suite 100
King of Prussia, PA 19406-2713

REPORT NUMBER(s) 2021001

3. DOCKET NUMBER(s)
030-38182

4. LICENSE NUMBER(S)
47-23035-03

5. DATE(S) OF INSPECTION
03/02/2021 - 07/21/2021

LICENSEE:
The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

☐ 1. Based on the inspection findings, no violations were identified.

☐ 2. Previous violation(s) closed.

☐ 3. The violations(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

☐ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

License Condition 19 of License Number 47-23035-03 requires, in part, that the licensee shall conduct its program in accordance with statements, representations, and procedures contained in the letter dated June 15, 2020 (ADAMS Accession Number: MLC20175A680). Item 3 of the letter dated June 15, 2020, states, in part, that the license will utilize stack monitor setpoints of 0 pCi/ml for the "Low" setpoint, 1000 pCi/ml for the "Alert" setpoint, 5000 pCi/ml for the "Alarm" setpoint, and 10000 pCi/ml for the "Danger" setpoint.

Contrary to the above, for an undetermined period of time between June 20, 2021 and March 2, 2021, the licensee did not conduct its program in accordance with the procedures contained in the letter dated June 15, 2020. Specifically, the licensee failed to utilize stack monitor setpoints of 0 pCi/ml for the "Low" setpoint, 1000 pCi/ml for the "Alert" setpoint, 5000 pCi/ml for the "Alarm" setpoint, and 10000 pCi/ml for the "Danger" setpoint. Specifically, the cyclotron's stack monitor setpoints were set to 99999999 pCi/ml.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.3).

On March 3, 2021 the licensee implemented a corrective action which included adjusting the stack monitor setpoints to the values documented in their procedures: 0 pCi/ml for the "Low" setpoint, 1000 pCi/ml for the "Alert" setpoint, 5000 pCi/ml for the "Alarm" setpoint, and 10000 pCi/ml for the "Danger" setpoint. The licensee has also password protected the alarm setpoints so that only authorized individuals can adjust the setpoints and the licensee added an item to their quarterly audit to verify that the alarm set points are at the values documented in their procedure.

Statement of Corrective Actions
I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

<table>
<thead>
<tr>
<th>TITLE</th>
<th>PRINTED NAME</th>
<th>SIGNATURE</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>LICENSEE'S REPRESENTATIVE</td>
<td>Nasser Razmianfar</td>
<td>[Signature]</td>
<td>7/21/2021</td>
</tr>
<tr>
<td>NRC INSPECTOR</td>
<td>Randolph Ragland</td>
<td>[Signature]</td>
<td></td>
</tr>
<tr>
<td>BRANCH CHIEF</td>
<td>Christopher Cahill</td>
<td>[Signature]</td>
<td></td>
</tr>
</tbody>
</table>

NRC FORM 591M PART 1 (07/2012)