

Office Memorandum • UNITED STATES GOVERNMENT

TO : N. H. Woodruff, Assistant Manager for
Operations

DATE: October 11, 1955

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FROM : Paul C. Aebersold, Director,
Isotopes Division

SUBJECT: COORDINATION OF AND RESPONSIBILITY FOR ISOTOPES PROGRAM

SYMBOL: OI:GLH

Activities and interests of the Isotopes Division are relatively broad including licensing of byproduct material users, visitation of licensees and applicants for licenses, technical information and training functions, participation in production scheduling and pricing of byproduct and other isotopic materials. The majority of these activities are concerned directly or indirectly with licensing.

It appears appropriate at this time to clarify the organizational and functional status of the Isotopes Division in relation to the Office of Oak Ridge Operations, Divisions of Civilian Application, Research, Biology and Medicine, and Inspection. This is particularly true in view of the content of the latest draft of Volume 7000 of the AEC Manual, Part 7500, "Isotopes and Irradiation Services." Section 021 of 7501-02, however, is so broad and generalized that confusion as to responsibility may result.

We believe that it is desirable to coordinate activities of the Isotopes Division through one central office insofar as feasible. Inasmuch as our primary functions are concerned with licensing, it appears that the Division of Civilian Application is the logical office through which the isotopes program could be most effectively coordinated. The following recommendations are proposed for your review and consideration. We do not believe that they involve substantive conflict with the current draft of the aforementioned chapter in the AEC Manual.

Licensing Procedures and Policies

In accordance with AEC regulations and policies the Isotopes Division would issue, amend, modify, suspend, or revoke all byproduct material licenses for domestic use or export except those which may be combined with licenses for production or utilization facilities. The Isotopes Division would develop byproduct material regulations, distribution policies and procedures, and appropriate licensing and related forms with approval of the Division of Civilian Application. Any application for a license requiring approval at a Washington level would be forwarded by the Isotopes Division to the Division of Civilian Application.

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 COLLECTION *Paul Aebersold Papers*
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Field Visitation

Field visitation by personnel of the Isotopes Division would be coordinated with the Division of Civilian Application, insofar as such activities pertain to the licensing function. Within broad guide lines, concurred in by the Division of Civilian Application, the Isotopes Division would determine and schedule such visits as are deemed necessary to review facilities and procedures prior to issuance of licenses.

It is to be noted that issuance of a license ordinarily is not delayed until a visit can be made; the primary purpose of a visit is to discuss and review radiological safety matters. Informational aspects of the visit include isotope availability, procedures and regulations. A "formal inspection for compliance" can easily be integrated into such a visit. Within broad guide lines adopted by Division of Civilian Application, concurred in by the Division of Inspection, or upon direct request of the Director, Division of Inspection, the Isotopes Division would make such visits to licensees to determine that radiological safety standards and other AEC regulations, and license conditions are being complied with and that byproduct materials are being used in a safe manner. The Isotopes Division would issue such recommendations or administrative orders as necessary to correct unsatisfactory radiological safety conditions.

Minor infractions of AEC licensing or safety regulations by byproduct material users would be handled by the Isotopes Division, but non-compliance problems, or apparently willful violations, would be referred directly to the Inspection Division for formal investigation or other action.

Byproduct Material Regulations

Questions from users or prospective users regarding byproduct material regulations would be referred to the Isotopes Division. The Isotopes Division would explain the intent and meaning of AEC byproduct material regulations, issue waivers and exemptions from such regulations, and impose such additional limitations, not included in the general regulations, as are necessary to maintain radiation safety. Amendments to byproduct material regulations would be prepared by the Isotopes Division and forwarded directly to the Division of Civilian Application for issuance, publication, or other action.

Production and Distribution of Isotopic Materials

Production of byproduct material, other radioisotopes, and stable isotopes and budgeting therefor would be coordinated by the Division

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of Research, through the appropriate Operations Office and other interested Divisions. Routine or minor adjustments in production scheduling at ORNL would be handled directly by Oak Ridge Operations.

The Division of Civilian Application, with concurrence of the Division of Research, would establish policies regarding distribution of by-product materials and determine what materials would be included in the distribution program. Similar arrangements would be carried out in connection with stable isotopes and other isotopic materials.

Pricing

In the interest of maintaining a uniform pricing policy the Division of Civilian Application would receive pricing proposals and would coordinate the pricing of AEC-produced byproduct material with the concurrence of the Controller. Instructions to operating contractors would be issued by the appropriate operations office.

Activities of Technical Developments Branch

Since isotopes are used for a wide variety of purposes in industry, agriculture, medicine, and research there is no single division interested in all of the technical information and training functions of the Technical Developments Branch. We recommend that these activities be coordinated through the Division of Civilian Application.

The Technical Developments Branch also performs the services outlined in the attached summary of functions. The majority of these activities can best be performed directly by the Isotopes Division.

It is to be noted that the majority of these duties such as the preparation of special safety reports, compilation of statistical data, etc., are necessary for purely internal AEC purposes. By a slight increase in effort it is possible to make these reports and data available to isotope users, information which usually is not available from other sources.

If the above suggestions meet with your approval we shall appreciate your obtaining concurrence of interested divisions.


Paul C. Aebersold

Enclosure:

Activities of Technical Developments Branch

cc: Division of Organization & Personnel

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