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WILLIAM J. LILLYMAN

US Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington DC 20555

May 26th 2000

Gentlemen:

Reply to Notices of Violation

Reference VIO 50-326/2000-01-01 and VIO 50-326/2000-01-02

We are pleased to respond as follows:

- 1) "Contrary to the above (Tech. Spec 6.2.f) the committee (Reactor Operations Committee) did not meet between September 1st 1998 and October 19th 1999.

Reactor Operations Committee meetings will now be scheduled on a regular May and November cycle each year. Secretarial and other staff (see below) will assist in scheduling and paperwork for these meetings. Dr Miller's secretary has calendared reminders one month before these dates to set up and schedule the meetings. She will also assist directly in preparing minutes and other documentation needed.

- 2) "Contrary to the above (Tech. Spec 3.6), the reactor was operated on at least four occasions when the emergency shutdown system had not been verified operable within the preceding 30 days.

The language of Technical Specification 3.6 reads, in part:

" The reactor shall not be operated unless the facility and building ventilation system is in operation and the emergency shutdown system has been verified to be operable within the preceding 30 days. An exception may be made for periods of time not to exceed two days to permit repairs to the system. During such periods"

At the present time, the ventilation system verification checks and the measurements of flow rates in all exhaust systems are combined in monthly surveillance. Since this requirement calls only for verification of operability and emergency shutdown, and not measurement of actual ventilation rates, it is proposed that the verification of operability be done as part of the routine daily start-up checks prior to reactor start-up. This will be done by simulating a high level radiation sensor alarm and observing that the regular ventilation system shuts down and that "switch-over" takes place from the regular to the emergency ventilation system. The ventilation flow rates under normal and emergency conditions will then be measured on a quarterly basis.

This will assure that "the reactor will not be operated" since unsatisfactory performance on a start-up item is always taken to preclude reactor operation.

This change will be implemented as of June 1st 2000.

In addition, the facility will undertake the permanent installation of a flow indication device in the emergency exhaust flow that will provide indication that the small ventilation form the room that is permitted under emergency conditions has commenced operation. (flow will change direction from negative to positive in this vent).

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This change is expected to be implemented within 120 days.

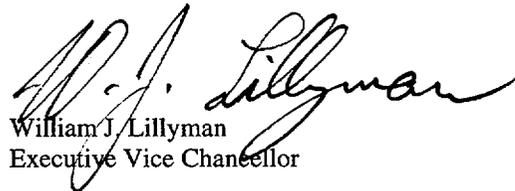
In your cover letter, you requested that "technical staffing support should be considered in your evaluations of the violations and other inspection items.

Staffing issues in relation to surveillance are accordingly addressed as follows:

- 1) A replacement part-time employee (Dan Trinh) has been appointed starting May 15th. He is being trained by EH&S and the existing employee (Eugene Kwak) who will leave as of June 30th 2000. Dan is a first year chemistry major student who shows good promise of rapidly learning the tasks, and should be with us for several years. The importance of meeting all requirements ON TIME will be emphasized during training. Full initial training is expected to be completed by July 30th 2000.
- 2) The Physical Sciences Safety Officer, Rama Singh, is being assigned a percentage of his time to direct supervision and checking of routine radiation safety and other regulatory activities at the reactor. He is experienced in general and chemical safety and is undergoing training in special aspects of radiation safety relevant to the reactor. The School of Physical Sciences has agreed to provide Mr Singh with additional part-time assistance to compensate for the time he will be at the reactor. Full implementation of this assignment is expected within 90 days.
- 3) The Radiation Safety division of the EH&S Office at UCI has prepared new checklists for use by their personnel during quarterly inspections of the Reactor Facility. This will assist them further to bring incomplete surveillance items to the attention of the Reactor Supervisor for correction ASAP. This checklist is based on the complete list of surveillance and maintenance required at the UCI Reactor Facility, including Tech. Spec. related items. This list has already been implemented and follow-ups are being done.

We believe that these steps will be effective in correcting the deficiencies noted and that continued operation of the facility in complete safety for the public will be assured.

Sincerely,



William J. Lillyman
Executive Vice Chancellor

cc: Stephen Holmes, Off ice of Nuclear Reactor Regulation,
Non-Power reactors Branch
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