



General Electric Company
Vallecitos Nuclear Center
6705 Vallecitos Road, Sunol, CA 94586

November 10, 2000

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Reply to Notice of Violation

References: 1) License R-33, Docket 50-73
2) Invoice No. RS0003-01
3) NRC Inspection Report No. 50-73/2000-201; July 17, 2000.

Gentlemen:

On October 25, 2000, an invoice was received from the U.S. Nuclear Regulatory Commission (NRC) for the June 26-29, 2000 inspection of the Nuclear Test Reactor (NTR) located at Vallecitos Nuclear Center (VNC). According to on-site files, the inspection report had not been received.

On October 27, 2000, Marvin Mendonca of the NRC was contacted to inquire about the status of the inspection report. Mr. Mendonca located a copy of the report, which was dated July 17, 2000, and discovered that the cover letter contained the former address of VNC. (The address of VNC was changed from a post office box to the facility street address more than a year ago. In a letter dated January 13, 1999, General Electric notified the NRC of this change.) If the report was placed in the mail on July 17, 2000, the U.S. Postal Service did not forward the report to the new address because the service is no longer provided. Mr. Mendonca then sent an electronic copy of the report via e-mail. As a corrective measure, Mr. Mendonca also said that he notified the inspector of the correct address of VNC. It should be noted that this letter was prepared during the 30-day period after the receipt of the report sent via e-mail.

During the referenced routine inspection conducted by an inspector from Region II, one violation of NRC requirements was identified. The following discussion provides GE's written statement or explanation of the violation.

1. TS 6.3 requires that the licensee have procedures for various activities including radiation protection.

IE01

Reason for Violation:

In 1999, an individual who was regularly assigned to work in the NTR received only three bioassays (whole body counts), and not four as required by procedure.

A. Response to Violation

1. Three separate methods were in place at VNC for ensuring that required whole body counts are performed. However, all three methods failed because of personnel error and miscommunication, which resulted in missing the fourth whole body count for the subject individual. A contributing factor to the error was that a computer software program used to schedule whole body counts was changed due to Y2K concerns.

B. Corrective Steps Taken

1. The "Compliance Calendar" is a company-wide on-line tool utilized by Environmental, Health, and Safety (EHS) personnel to schedule tasks and regulatory compliance events. It is available through a password-protected intranet website and is a proven, reliable system for maintaining compliance assurance.

On October 27, 2000, the required whole body counts for all personnel working at the NTR were entered as tasks into the Calendar. With this in place, the individual, the NTR Facility Manager, and the site Dosimetrist are automatically notified when a whole body count is due and are continually notified until the date it was conducted is entered into the Calendar.

2. The NTR Facility Manager now receives a copy of the whole body count trace from each of his employees and verifies on a check sheet to ensure that required whole body counts are performed.

C. Corrective Steps to be Taken

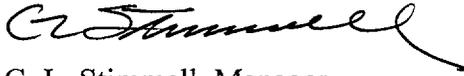
1. None.

D. Full Compliance Achievement Date

1. The Compliance Calendar was updated on October 27, 2000. Thus, full compliance was achieved on this date.

If you have any questions, please contact Chris Hamilton, Senior Licensing Engineer, at 925-862-4455.

Thank you,



G. L. Stimmell, Manager
Vallecitos and Morris Operations

Cc: Craig Bassett, Senior Non-Power Reactor Inspector
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