



UNIVERSITY OF VIRGINIA
NUCLEAR REACTOR FACILITY

U.S. MAIL ADDRESS
P.O. Box 400322
Charlottesville, VA
22904-4322

STREET ADDRESS
675 Old Reservoir Road
Charlottesville, VA 22903
Telephone: 804-982-5440
Fax: 804-982-5473

REPLY TO NOTICE OF VIOLATION

February 23, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington D.C.
20555-0001

SUBJECT: Reply to NRC Inspection Report No. 50-62/2001-201 and Notice of Violation, with reference to the University of Virginia Reactor, Docket No. 50-62, License R-66.

Gentlemen:

Please find in attachment our reply to an NRC Notice of Violation stated in NRC Inspection Report No. 50-62/2001-201 of January 25, 2001. Should there be a need for follow-up information, I can be contacted at (804) 982-5440.

Sincerely,

Robert U. Mulder, Director
University of Virginia Nuclear Reactor Facility

City/County of Albemarle
Commonwealth of Virginia

I hereby certify that the attached document is a true and exact copy of a letter, presented before
(type of document)

me this 23rd day of Feb., 19 2001.
by Robert Mulder
(name of person seeking acknowledgement)

Victorie L. Thomas
Notary Public

My Commission Expires 2/28 10 2002

Enclosures: Reply to NRC Notice of Violation

Cc: Mr. Craig Bassett, Inspector, U.S. Nuclear Regulatory Commission, Region II,
61 Forsyth St. S.W., Suite 23T85, Atlanta, Ga. 30303

Mr. Alexander Adams, Project Manager, U.S. Nuclear Regulatory Commission,
Mail Stop 012-D3, Washington D.C., 20555-0001

IEO1

REPLY TO NOTICE OF VIOLATION

As referenced in NRC Inspection Report No. 50-62/2001-201 of January 25, 2001, we agree that the following cited violation happened as described:

“During the year 2000, no checks of [emergency] facilities, supplies, instrumentation and equipment were completed as required. The most recent checks were done on January 8, 2001, and the previous checks had been completed on September 29, 1999.”

Section 8.6 of the Emergency Plan requires emergency equipment and supplies to be inventoried every six months. The Emergency Plan Surveillance procedure requires: 1) an annual check of the auxiliary lighting in the Front Office, 2) a semi-annual inspection of the windsock to check its condition and movement, 3) a quarterly check of the eyewash and shower to verify that they are functional and a check of the fire extinguishers, and 4) a quarterly check of various items located in the emergency lockers in the facility. The Emergency Plan and Implementing Procedures are required by UVAR Technical Specifications (UVAR TS).

1) Reason for the Violation

The UVAR is in a defuelled and permanently shutdown condition. The Reactor Staff is now comprised of a Reactor Supervisor, a Reactor Health Physicist, a Reactor Secretary and a Reactor Director. The Reactor Supervisor is responsible for performing the reactor license-related surveillances. The Reactor Director is responsible for assuring that the surveillances are performed.

Due to past NRC-approved changes to UVAR TS accommodating the present shut-down status of the facility, a majority of the reactor-related surveillances have been eliminated. However, surveillances required by the Emergency Plan still need to be performed. While the Reactor Supervisor had a sheet in his office listing all the surveillances still required by the reactor license, due to oversight he forgot to complete them. Because the reactor is no longer in service, his level of concern with performing the missed checks was reduced, unfortunately. In his mind the equipment and supplies were available if needed, because he knew that the few remaining individuals on staff would have had no reason to use or disturb the emergency equipment. Also, since these surveillances had not been listed on a surveillance schedule board, the Reactor Director was not aware that they had not been completed.

Reactor staffing level was not a contributing element to this violation, for it would have taken the Supervisor little more than an hour to complete the checks and the supporting paperwork.

2) Corrective Steps Taken and Results Achieved

All facility documents have been reviewed to assure that all surveillances still required are properly listed on a schedule list. In this listing, reference now is made to the document originally specifying the requirement. The surveillance items have now also been listed on a surveillance schedule board, with an indication of due and performance dates. The Reactor Director and the Reactor Health Physicist will periodically monitor this schedule board and check that surveillances are being performed on the required schedule. To date, required surveillances have been completed and documented, and will continue be performed in the future as per the required schedule.

3) Corrective Steps Taken to Avoid Further Violations

Additionally, the University of Virginia Radiation Safety Committee will be notified semi-annually by memorandum from the Reactor Director regarding the status of the completion of surveillance items.

4) Date When Full Compliance Will Be Achieved

The University of Virginia Reactor Facility is presently in full compliance with its license and federal regulations.