



Office of the Executive Vice Chancellor

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June 8, 2001

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

**RE: NRC Inspection Report No. 50-326/2001-201 and Notice of Violation**

We are pleased to acknowledge receipt of the report, dated May 8, 2001 on the recent, generally positive inspection of our reactor facility. In response to the referenced Notice of Violation, we reply as follows:

“As identified by the inspector during this inspection, Section 4.4 Pool Water Level Channel of the UCI Technical Specifications states that: ‘The pool water level measuring channel shall be verified to be operable at intervals not to exceed two months.’ Contrary to the above (Tech. Spec 4.4) from October 9, 2000 to January 11, 2001, (a period exceeding two months) the pool water level measuring channel was not verified to be operable.”

The pool water measuring channel is a float switch designed to indicate a significant problem with the pool water level as back-up to a number of other ways that pool water level drop would be monitored (daily operator observations, 24/7 radiation monitoring alarms over the pool, etc.). A large rapid pool water loss incident is much more likely to occur at an above ground pool reactor and such measuring channels are probably common on all reactors as a result. While we are aware of slow leak situations at other facilities, we have never heard of any large, rapid loss at a below ground tank pool reactor such as the UCI TRIGA. Thus, we believe this issue to be of extremely low safety significance, and the need for the inclusion of the channel to be of marginal benefit at this facility.

The monitoring of this channel has proceeded without previous incident for the 30-year lifetime of the facility. The lapse occurred as a result of a successive failure to implement monthly surveillance checks during the mentioned period. Since January 11<sup>th</sup>, the operation has been verified each month (February 1, March 6 and 27, and May 3) so we are currently in full compliance.

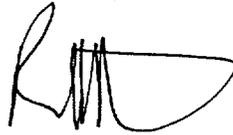
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Notwithstanding, we intend immediately to implement the following procedures to insure continued compliance:

1. The Reactor Supervisor will carry out monthly checks of the monthly surveillance lists and perform any necessary corrections. His reviews will be verified by the quarterly external audits, and any issues brought immediately to his attention.
2. The verification of pool water level channel operation will be added to those surveillances reviewed by the quarterly external review process. This list will be carefully reviewed to ensure that all significant (Tech Spec related) items are covered.

These procedures will be implemented by June 30, 2001. We believe they will be effective in assuring consistent future compliance.

Sincerely,



Ronald J. Stern, Dean  
School of Physical Sciences



Michael R. Gottfredson  
Executive Vice Chancellor

c: Stephen Holmes, Office of Nuclear Reactor Regulation,  
Non-Power Reactors Branch  
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