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To: U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D.C. 20555

From: John G. Williams, Director
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RE: Required report, transmitted within 30 days; Facility License, Docket 50-113

Technical Specifications for Facility License R-52, the University of Arizona Research Reactor (UARR), requires in section 6.7 c.4 a written report to the Commission of "Any observed inadequacies in the implementation of administrative or procedural controls." This report fulfills that requirement in the case of a deficiency discovered on May 20, 2002, in implementation of the University of Arizona Operator Re-qualification Program as required in 10 CFR 55.

Description of the Occurrence

1. It was discovered during review of past re-qualification program files that for the re-qualification period from January 1, 2000 to December 31, 2001, one Senior Reactor Operator (SRO) and one Reactor Operator (RO) were not administered a biennial written examination within the 30 month compliance period. This is stated in paragraph 1.5 of the UARR Re-Qualification Program. In accordance with UARR Technical Specification Section 1.0 Definitions (page 4) under Time Intervals, a. Biennially – a two year interval (not to exceed 30 months) was violated.

The SRO was last given the exam on November 5, 1999 and was out of compliance as of May 5, 2002. The operator's certification to operate the reactor was withdrawn until completion of the biennial exam.

The RO was given the exam on November 18, 1999 for the previous re-qual period and was out of compliance as of May 18, 2002. The operator's certification to operate the reactor was withdrawn until he completed the biennial written exam with a passing grade on May 23, 2002.

In each instance no one operated under the capacity of their license outside of the compliance period. The SRO last operated on March 5, 2002 and the RO on April 25, 2002.

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2. During the same review it was also discovered that two SROs and one RO had not completed a review of the Administrative, Operating and Emergency Procedures within the two year re-qualification period from January 1, 2000 to December 31, 2001. This is stated in paragraph 4.1 of the UARR Re-Qualification Program.

The first SRO last reviewed the procedures November 5, 1999 and was out of compliance as of January 1, 2002. The operator's certification to operate the reactor was withdrawn until he completes the review of procedures.

The second SRO last reviewed the procedures on November 11, 1999 and was out of compliance as of January 1, 2002. The operator's certification to operate the reactor was withdrawn until he completed the procedure reviews on May 22, 2002.

The RO last reviewed the procedures on November 9, 1999 and was out of compliance as of January 1, 2002. The operator's certification to operate the reactor was withdrawn until he completed the procedure reviews on May 23, 2002.

In each instance the SROs and RO operated under the capacity of their license outside of the compliance period. The first SRO last operated on March 5, 2002, the second last operated on April 25, 2002 and the RO on April 25, 2002.

Cause of the Occurrence

In each instance the failure to comply with the UARR Re-qualification Program was due to an oversight on the part of the Reactor Supervisor. This oversight could have been prevented had the Reactor Supervisor reviewed the Operator Re-qualification Program more frequently and more in depth.

The biennial audit of the re-qualification program, by the Reactor Committee, was scheduled to be completed in April 2002. The actual due date is not until October 2002. The timing of this audit could have been scheduled, by the Reactor Supervisor, such that this discrepancy would have been discovered prior to any violation.

Possible Consequences

The UARR Operator Re-qualification Program is intended to ensure a high overall level of knowledge and operating proficiency for each operator at the UARR. The SROs and RO, affected by this occurrence, have completed all other UARR Re-qualification Program requirements including 10 lectures with quizzes, two in depth annual operating examinations and maintained operating proficiency by actively performing licensed functions for a minimum of four hours per calendar quarter. The above mentioned lectures and quizzes include Normal Operating and Emergency Procedures as topics presented. Documentation of separate self-study review of the procedures, however, was not completed within the two year term of the program as has been done in the past. By being out of compliance, for a short period of time, with the biennial written examination requirement and procedure reviews, the RO's and SROs' level of knowledge did not sufficiently deteriorate to potentially cause any safety concerns. This is evident from the high passing grades achieved by the RO (98%) on the biennial exam and by their(the SROs' and RO's) past performance on quizzes and annual operating exams. The staff at the UARR is aware of the potential for unsafe operating conditions if the level of knowledge and operating proficiency is not maintained at a high standard.

Remedial Actions

This instance of failing to comply with the UARR Operator Re-qualification Program was reported to the Nuclear Reactor Laboratory Director by the Reactor Supervisor on May 20, 2002. The Reactor Committee has been informed and the Reactor Supervisor will place it on the agenda to be discussed at the next Reactor Committee meeting in September 2002. During this discussion the Reactor Supervisor will recommend that the audit that follows the current biennial audit be done in December 2003 so that any issues may be addressed prior to the end of the re-qualification period.

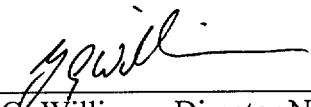
The Reactor Supervisor has thoroughly reviewed the re-qualification program and will present an extra re-qualification lecture on this topic.

The Reactor Supervisor has reviewed all maintenance and periodic reports for the past year and those that are due in the next six months to ensure that all UARR programs, reports and maintenance are in compliance.

The Reactor Supervisor will also implement a periodic review of all UARR programs to ensure familiarity with the content and requirements of these programs.

Please note that there is one SRO that has not completed the required items to reinstate his certification to operate the reactor. He is currently travelling and will be briefed by the Reactor Supervisor on the situation and will complete the required biennial exam and procedure reviews upon his return.

I believe that these actions will prevent a recurrence of a similar oversight of the requirements of any UARR program.



John G. Williams, Director Nuclear Reactor Laboratory