

March 13, 2003

Mr. Peter Henry  
Acting Medical Center Director  
Department of Veterans Affairs  
Nebraska/Western Iowa Health Care System  
4101 Woolworth Avenue  
Omaha, NE 68105

SUBJECT: NRC INSPECTION REPORT NO. 50-131/2002-201

Dear Mr. Henry:

This letter refers to the inspection conducted on June 19-24, 2002, at the Veterans Administration Medical Center TRIGA Reactor Facility. The inspection included a review of activities authorized for your facility. The enclosed report presents the results of that inspection.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of activities in progress. Based on the results of this inspection, no safety concern or noncompliance with Nuclear Regulatory Commission (NRC) requirements were identified. No response to this letter is required.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at (the Public Electronic Reading Room) <http://www.nrc.gov/NRC/ADAMS/index.html>.

Should you have any questions concerning this inspection, please contact Stephen W. Holmes at 301-415-8583.

Sincerely,

*/RA/*

Patrick M. Madden, Section Chief  
Research and Test Reactors Section  
Operating Reactor Improvements Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket No. 50-131

License No. R-57

Enclosure: NRC Inspection Report No. 50-131/2002-201

cc w/enclosure: See next page



Veterans Administration  
Medical Center

Docket No. 50-131

cc:

Mayor  
City of Omaha  
Omaha, NE 68102

Julia Schmitt, Program Manager  
Department of Health and Human Services  
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M. Brenda Hebert (12C1)  
Department of Veterans Affairs  
810 Vermont Avenue, N.W.  
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Test, Research, and Training  
Reactor Newsletter  
University of Florida  
202 Nuclear Sciences Center  
Gainesville, FL 32611

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U. S. NUCLEAR REGULATORY COMMISSION

Docket No: 50-131

License No: R-57

Report No: 50-131/2002-201

Licensee: Omaha Department of Veterans Affairs

Facility: A. J. Blotcky Reactor Facility

Location: Omaha, Nebraska

Dates: June 19-24, 2002

Inspector: Stephen W. Holmes

Approved by: Patrick M. Madden, Section Chief  
Research and Test Reactors Section  
Operating Reactor Improvements Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

## EXECUTIVE SUMMARY

The Omaha Veterans Administration Medical Center reactor is a 20-kilowatt TRIGA Mark I open pool type used primarily for medical research. By letter dated December 6, 2001, the OVAMC notified the NRC of their decision to permanently shut down and decommission the reactor. The United States Geological Survey agreed to accept the transfer of the reactor fuel to its one megawatt TRIGA reactor facility in Denver, Colorado.

The NRC notified the Omaha Veterans Administration Medical Center by letter dated June 13, 2002, that the fuel shall be shipped as if it met the definition of spent nuclear fuel found in 10 CFR 73.37(a). Accordingly, this material was transported in accordance with the requirements of 10 CFR 73.37 and 73.21 and advance notification was made to the NRC in accordance with 10 CFR 73.72. The Omaha Veterans Administration Medical Center also complied with NRC Security Advisory SA-01-02, dated December 13, 2001, on the shipment of irradiated reactor fuel.

The Omaha Veterans Administration Medical Center contracted with NAC International to remove and transport the fuel using their USA 9225/B(U) F-85 Model No. NAC-LWT package (a fuel shipping cask). They also hired GTS Duratec to provide radiological safety services during the fuel shipment. Two NRC licensed Senior Reactor Operators from the USGS reactor and a number of radiological safety personnel from the University of Nebraska Medical Center provided assistance during shipping operations. They did so under direction of the Omaha Veterans Administration Medical Center Reactor Supervisor, an NRC Licensed Senior Reactor Operator, and the GTS Duratec Project Manager as authorized by Technical Specification (TS) Sections 6.1 and 6.2(4) and facility radiological safety procedures.

The fuel was removed from the pool, moved through the hospital, transferred to the NAC-LWT cask, packaged, marked, placarded, and shipped successfully in accordance with federal, state, and licensee requirements.

### Organization

- The organizational structure and functions met the requirements specified in Technical Specification Section 6. Management control and oversight of contract and support staffs during fuel shipping was acceptable.

### Review, Audit, and Design Change Functions

- The Reactor Safeguards Committee acceptably performed their review and oversight functions as required by Technical Specification Section 6.5.

### Radiation Protection

- Radiation protection activities satisfied NRC and licensee requirements and were appropriate for the fuel shipment being performed.

### Procedures and Procedural Compliance

- Facility procedures and document reviews satisfied Technical Specification Section 6.6 requirements.



Fuel Handling and Movement

- Fuel handling and movement was acceptable.

Security

- The NRC-approved security program was acceptably implemented.

Transportation

The Omaha Veterans Administration Medical Center TRIGA fuel shipment met 10 CFR Parts 71 and 73, applicable portions of 49 CFR, NRC Security Advisory SA-01-02, dated December 13, 2001, and licensee shipping requirements. No violations or noncompliances of NRC or DOT regulations were noted.

## REPORT DETAILS

### **Summary of Plant Status**

The Omaha Veterans Administration Medical Center reactor is a 20-kilowatt TRIGA Mark I open pool type used primarily for medical research. It had ceased operation and in the near future will be undergoing decommissioning. During the inspection all fuel was removed from the pool, packaged, and shipped to the United States Geological Survey reactor in Denver, Colorado.

#### **1. Organization and Reporting**

##### **a. Inspection Scope (Inspection Procedure [IP] 69001)**

To verify that staffing specified in Technical Specifications (TS) Section 6.0 Administrative Controls was being met, the inspector reviewed:

- organization and staffing for the OVAMC Reactor Facility
- administrative controls and management responsibilities specified in TS Section 6.0
- reactor console logs and maintenance logs for 2001 through the present
- NRC Report No. 50-131/2001-201, dated December 5, 2001
- Reactor Safeguards Committee (RSC) meeting minutes from October 2000 through the present
- OVAMC Reactor Facility Annual Report for January 1 - December 31, 2001

##### **b. Observations and Findings**

The licensee's current operational organization structure and assignment of responsibilities were consistent with that specified in TS Section 6.2. Through discussions with licensee representatives, the inspector determined that no functional changes had occurred in the organization since the last NRC inspection in August of 2001 (NRC Report No. 50-131/2001-201, dated December 5, 2001).

A review of the reactor operations and maintenance logs showed that no reactor power operations had been performed since the OVAMC notified the NRC of their decision, by letter dated December 6, 2001, to permanently shut down and decommission the reactor.

The Reactor Supervisor (RS) remained the only licensed reactor operator at the facility. During the last inspection an Inspector Follow-up Item 50-131/2001-201-01 was opened concerning upper management attention to providing for adequate reactor operations staff. Based on the licensee's decision to cease operations and the transfer of its fuel to another licensee, this item is closed.

During fuel movement and shipping operations, the inspector observed that contract and support staffs were under the direct control of the RS or Reactor Director. Management staff ensured they complied with facility procedures, TS requirements, and NRC regulations when performing fuel movements, radiological safety functions, and shipping operations.



c. Conclusions

The organizational structure and functions met the requirements specified in TS Section 6. Management control and oversight of contract and support staffs during fuel shipping was acceptable.

**2. Review Functions**

a. Inspection Scope (IP 69001)

To verify that the licensee had established and conducted reviews and audits as required in TS Section 6.4 and to determine whether modifications to the facility, if any, were consistent with 10 CFR 50.59, the inspector reviewed:

- RSC meeting minutes from October 2000 through the present
- selected RSC meetings held during the inspection
- 14652-P-01 Veteran's Administration TRIGA Shipment Loading Package June 19, 2002
- SOP-101 NAC-LWT TRIGA Fuel basket Loading Procedure Rev 1, June 19, 2002

b. Observations and Findings

The inspector reviewed minutes of the RSC meetings since the last inspection. The minutes showed that the committee and its subcommittee met at the frequency required by TS Section 6.5.1 and that a quorum was present at each meeting. The topics considered during the meetings were appropriate and as stipulated in TS Sections 6.5.1, 6.5.2, and 6.5.3.

During the inspection the committee met at least daily to review fuel movement, shipping, and radiological safety activities.

The committee had reviewed and approved the fuel shipping plan and all OVAMC, NAC and GTS Duratec procedures used during fuel shipping. During the inspection the committee also reviewed and approved modifications made to the shield support table and changes to the TRIGA Fuel Basket Loading Procedure.

The inspector's review of these activities and observations of committee meetings during the inspection confirmed they were fulfilling their independent review and oversight duties as required by TS Section 6.5.

c. Conclusions

The RSC acceptably performed their review and oversight functions required by TS Section 6.5.

### 3. Radiation Protection

#### a. Scope (IP 69001)

The inspector reviewed selected aspects of:

- radiological signs and posting
- radiation area and contamination surveys and monitoring
- OVAMC Radiation Protection Plan, dated August 23, 2001
- maintenance and calibration of radiation monitoring equipment
- REDS-OPS-201 Performance of Surveys, Rev 5, June 18, 2002
- REDS-OPS-206 Personnel Survey and Decontamination, Rev 2, June 18, 2002
- REDS-OPS-207 Access Control Program, Rev 5, June 18, 2002
- REDS-INST 219 Operation of the Eberline PCM-1B Personnel Contamination Monitor, June 18, 2002
- REDS-OPS-303 Posting of Radiologically Controlled Areas, Rev 5, June 18, 2002

#### b. Observations and Findings

OVAMC hired GTS Durtec to provide the health physics control and oversight during removal and packaging of the fuel. Assistance was provided by a number of radiological safety personnel from the University of Nebraska Medical Center (UNMC), who worked under the direction of the GTS Durtec Project Manager (PM).

Access to the reactor room was controlled by radiological safety staff. Personnel were issued self reading dosimeters and/or tld badges, as appropriate, during fuel transfer operations and before entering the reactor controlled area. Additionally, all persons were monitored for contamination using an Eberline PCM-1B Personnel Contamination Monitor before leaving the controlled area. No personnel contamination was detected. Self reading dosimeter results showed that no doses greater than 20 millirem were received. Subsequent badge results reported by the licensee indicated that the highest dose received by personnel during the fuel shipment was four millirem. Personnel exposures were well below 10 CFR Part 20 regulatory limits.

Continuous surveys were performed during fuel movement and shipping operations. Contamination and radiation area surveys were done for personnel work environments, the shield and cask, and loading dock and fuel transfer areas. Contamination levels and radiation levels encountered were well below 10 CFR Part 20 regulatory limits.

Caution signs, postings, and warnings were in compliance with 10 CFR 20, Subpart J and appropriate for the shipping activities. The inspector observed personnel performing fuel movement activities and verified that they complied with the indicated access precautions and postings.

#### c. Conclusions

Radiation protection activities satisfied NRC and licensee requirements and were appropriate for the fuel shipment being performed.

#### 4. Procedures and Procedural Compliance

##### a. Inspection Scope (IP 69001)

To determine whether facility procedures met the requirements outlined in TS Section 6.7 and were appropriate for use during the current fuel shipment, the inspector reviewed:

- administrative records
- RSC meeting minutes from October 2000 through the present
- selected RSC meetings held during the inspection
- procedural reviews and updates documented in the RSC meeting minutes
- 315-P-03 NAC-LWT Annual Maintenance Procedure
- 14652-P-01 Veteran's Administration TRIGA Shipment Loading Package, June 19, 2002
- SOP-101 NAC-LWT TRIGA Fuel basket Loading Procedure, Rev 1, June 19, 2002
- SOP-110 Veteran's Administration TRIGA Shipment Loading Procedure, June 19, 2002
- REDS-OPS-208 Radiation/Hazardous Work Permits 4, June 18, 2002
- other selected procedures

##### b. Observations and Findings

For the shipping of the reactor fuel, the OVAMC temporally incorporated selected NAC and GTS Duratec procedures into their reactor program. They pertained to the use of the NAC shipping cask and its auxiliary systems or to radiological safety and control for fuel shipment activities provided by GTS Duratec. All such procedures were reviewed and approved by the RSC as required.

The inspector confirmed that written procedures were available for those tasks and items required by TS Section 6.7 pertaining to fuel movement, radiation protection, and transportation activities. Temporary changes to the procedures that did not change the original intent or involve a safety question were made with the approval of the RS as outlined in TS Section 6.7. Other changes made to the procedures were approved by the RSC as required.

The inspector observed licensee, contractor, and support personnels' use of procedures during the inspection. All observed operations were performed using approved procedures. All changes required to procedures during the fuel shipment were approved by the RS or RSC, as noted above, prior to their use. Adherence to the procedures was observed and acceptable.

##### c. Conclusions

Facility procedures and document reviews satisfied TS Section 6.6 requirements.

## 5. Fuel Handling and Movement

### a. Inspection Scope (IP 69001)

To verify adherence to fuel handling, movement, and regulatory requirements, the inspector reviewed:

- TS Sections 5.5, 6.2(4), and 6.7(3)
- 14652-P-01 Veteran's Administration TRIGA Shipment Loading Package, June 19, 2002
- SOP-101 NAC-LWT TRIGA Fuel basket Loading Procedure, Rev 1, June 19, 2002
- SOP-6 Fuel Loading, Unloading, Storage and Inspection, August 27, 2001 (reapproved)
- SOP-110 Veteran's Administration TRIGA Shipment Loading Procedure, June 19, 2002
- applicable logs and records
- observed fuel movement/loading operations

### b. Observations and Findings

Since the OVMAC reactor has only one licensed reactor operator on staff, two NRC licensed SROs from the USGS reactor performed fuel loading operations under the direction of the OVMAC Reactor Supervisor (an SRO) as authorized by TS Section 6.7(3). The USGS is also a TRIGA Mark I design utilizing the same type and configured fuel elements and fuel handling tools as the OVMAC reactor. The inspector observed the operators performing fuel handling and movement activities and verified they were done in a safe and deliberate manner. No safety concerns were noted.

The reactor's placement in the basement of a functioning hospital caused some unique challenges for movement of the irradiated fuel.

A concern during fuel movement through the hospital was the need for minimal impact on hospital operations. Management addressed this concern by scheduling fuel transfers through the hospital basement floor for evening and weekend hours and by staging and loading the shipping cask in the dock area parking lot. The parking lot was isolated from general access by its design. It was bounded by the hospital loading docks on two sides, and bermed earth walls on the others, with the entrance controlled by a police vehicle and officer. Observations by the inspector and feedback from the hospital staff confirmed that no disruption to hospital operations occurred.

Another concern was the lack of overhead space in the reactor room for use of the standard shielded intermediary transfer cask. The lack of overhead space for the transfer cask was overcome by the design of NAC's transport system itself. The intermediary transfer cask's inner shield was used when removing the fuel from the pool and transporting it to the loading dock. Here the fuel was transferred to the intermediary cask and then to the transport container itself.

When using the inner shield to transfer fuel, a stand must be used to support it in the reactor pool during actual fuel loading. Such a table was designed and built using drawings of the reactor pool and core. Upon putting it into the pool it was discovered that the pool floor was neither totally flat nor round, nor were the pool sides exactly vertical as indicated in the design drawings. These conditions and angled supports for the reactor core base, not shown on the design drawings, prevented the installation of the support stand as built.

In order to fit, the stand had to be modified by removing part of its support base and two of its five legs. The committee required NAC to do an evaluation of the modified stand's ability to support the shield's weight and its resistance to tipping over during fuel loading. The committee evaluated NAC's findings that the stand would perform as designed and subsequently approved the modifications to the stand and changes to the loading procedures.

Dry runs were done before each portion of the fuel transfers. Licensee, NAC, GTS Duratec, UNMC, and USGS personnel practiced until they were comfortable with their performance before continuing with the actual operation. Fuel removal from the pool was uneventful.

Later in the transfer process the transfer latching unit, used to transfer the fuel from the inner shield to the intermediary transfer cask, malfunctioned. It would not work while the shield and cask were in the fully coupled and shielded position. However, when partially connected and not fully shielded, it functioned as required. The committee reviewed the PM and NAC's evaluation that, based on radiation readings taken in this configuration, there would be no appreciable increase in dose to personnel or possibility of an accident when performed in this manner. The committee subsequently approved the needed changes to the fuel transfer procedures.

c. Conclusions

Fuel handling and movement was acceptable.

**6. Security**

a. Scope (IP 81421)

The inspector reviewed selected aspects of:

- security badging procedures
- posting of officers during fuel movement
- Physical Protection Plan, dated June 26, 1998
- physical security barriers

b. Observations and Findings

Since the incidents of September 11, 2001, security officers had been posted in the reactor control room 24 hours a day. This continued during the shipping of the fuel.

Additionally, a chain-link fence with locking gate had been installed at the entrance to the facility, increasing security and positive access control.

During the fuel shipping operations from June 19 through 24, 2002 special photo identification badges were issued to all participants. These badges "self expired" with a positive visual indication 24 hours after activation. Therefore, all personnel had to report in person to the Chief of Police each day to receive a new badge. Persons not properly badged were denied access to the area. Use of these "self expiring" badges provide additional positive personnel control during shipping activities and is noteworthy.

During fuel movement through the hospital, police officers were positioned along the basement hallways. The officers were stationed at intersections, stairwells, elevator openings and the loading dock, within visual and audible range of each other. This allowed positive access control to the transport route during multiple fuel movements from the reactor to the loading dock. The performance of the hospital police department and individual officers, providing security for the fuel transfer was notable.

c. Conclusions

The NRC-approved security program was acceptably implemented. Security operations during the fuel shipment were notable.

**7. Transportation**

a. Inspection Scope (IP 86740)

The inspector reviewed the following to verify compliance with 10 CFR Parts 71 and 73, applicable portions of 49 CFR, NRC Security Advisory SA-01-02, dated December 13, 2001, and licensee shipping requirements:

- OVAMC TRIGA Fuel shipment documentation
- USA 9225/B(U) F-85 Model No. NAC-LWT Package Certificate of Compliance (COC) dated September 17, 2001
- 315-P-03 NAC-LWT Annual Maintenance Procedure
- 14652-P-01 Veteran's Administration TRIGA Shipment Loading Package, June 19, 2002
- USGS Registered User Request for the NAC-LWT Cask, dated June 11, 2002
- OVAMC Registered User Request for the NAC-LWT Cask, dated June 21, 2002

b. Observations and Findings

The inspector reviewed the shipping package paperwork, the NAC-LWT cask maintenance and inspection records, the NRC package COC, and cask user requests. The inspector observed package preparation and pre-inspection, fuel loading, package configuration, radiation and contamination surveys, marking and placarding, and post packaging inspection.

The COC for the cask was current and both the USGS and OVAMC had requested and been approved, as required by 10 CFR 71.12, to be registered users of the NAC-LWT cask.

The inspector verified that the required annual maintenance, to include gasket replacement, had been done as required. Package pre-inspections, basket fuel loading, package configuration, and final inspections were performed as outlined in the COC and as required by Department of Transportation (DOT) and NRC regulations. Radiation and contamination surveys were also done as required.

The package was shipped as exclusive-use. The inspector verified that the package and vehicle radiation and contamination levels were within 49 CFR 173.441 and 443 limits for exclusive-use. Required shipping paperwork was prepared accurately and included all required information including the shipper's certification. The package, the closed shipping container (COC Section 5.c(16)), and the vehicle were marked and placarded as required by the COC, 10 CFR 49 Part 172 and Subpart E.

Notifications to the NRC, route planning, and safeguards actions met the December 13, 2001, Security Advisory, 10 CFR 73.72, and other applicable regulatory requirements. Advance notification to the States was made as required by 10 CFR 71.97.

The inspector observed the Nebraska State Patrol Carrier Enforcement Division's officer's inspection of the shipment. No violations or noncompliances with DOT or NRC requirements were found. Three minor vehicle mechanical defects were identified by the officer and corrected by the carrier before release of the shipment.

c. Conclusions

The OVAMC TRIGA fuel shipment met 10 CFR Parts 71 and 73, applicable portions of 49 CFR, NRC Security Advisory SA-01-02, dated December 13, 2001, and licensee shipping requirements. No violations or noncompliances of NRC or DOT regulations were noted.

**8. Exit Meeting Summary**

The inspection scope and results were summarized on June 24, 2002, with licensee representatives. The inspector discussed the findings for each area reviewed. The licensee acknowledged the findings and did not identify as proprietary any of the material provided to or reviewed by the inspector during the inspection.

**PARTIAL LIST OF PERSONS CONTACTED**

Licensee

|                |   |
|----------------|---|
| M. Christensen | Radiation Safety Officer (contractor)   |
| J. Claassen    | Reactor Supervisor  |
| J. Garrett     | Chief of Police   |
| L. Klassen, MD | Reactor Director  |
| G. Nugent      | Chief Executive Officer, Department of Veterans Affairs<br>Nebraska/Western Iowa Health Care System |

Other Personnel

|             |  |
|-------------|--|
| R. Boyd     | NAC International Project Manager  |
| P. Helfer   | USGS SRO   |
| P. Jones    | GTS Duratec Project Manager  |
| R. Perryman | USGS SRO   |
| B. Wagner   | Nebraska State Patrol Carrier Enforcement Division Hazardous<br>Materials Specialist |

**INSPECTION PROCEDURE USED**

|          |                             |
|----------|-----------------------------|
| IP 69001 | Class II Non-Power Reactors |
| IP 86740 | Transportation              |
| IP 81421 | Security                    |

**ITEMS OPENED, CLOSED, AND DISCUSSED**

Opened

None

Closed

|                    |     |  |
|--------------------|-----|--|
| 50-131/2001-201-01 | IFI | Fill vacant reactor operator position. |
|--------------------|-----|--|

Discussed

None

## **LIST OF ACRONYMS USED**

|       |   |
|-------|---|
| ADAMS | Agencywide Documents Access and Management System |
| CFR   | Code of Federal Regulations                       |
| COC   | Certificate of Compliance                         |
| DOT   | Department of Transportation                      |
| IFI   | Inspector Follow-up Item                          |
| IP    | Inspection Procedure                              |
| NAC   | NAC International                                 |
| NRC   | Nuclear Regulatory Commission                     |
| OVAMC | Omaha Veterans Administration Medical Center      |
| PARS  | Publicly Available Records                        |
| PM    | GTS Duratec Project Manager                       |
| RS    | Reactor Supervisor                                |
| RSC   | Reactor Safeguards Committee                      |
| SRO   | Senior Reactor Operator                           |
| TS    | Technical Specifications                          |
| UNMC  | University of Nebraska Medical Center             |
| USGS  | United States Geological Survey                   |