



Nuclear Facilities  
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April 24, 2006

Attn: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

**14-Day Report  
Potential Tech Spec Violation --  
Operation Outside Allowed Interval  
for Operability Tests of Certain  
Limiting Safety System Settings**

University of Florida Training Reactor  
Facility License R-56, Docket No. 50-83

Pursuant to the reporting requirements of Paragraphs 6.6.2 (3) (b) and (g) of the UFTR Technical Specifications, a description of what is considered to be a potential violation of the technical specifications was reported by telephone and fax on April 11, 2006 per telephone conversation with NRC Project Manager Marvin Mendonca on April 11. The required one-day letter dated April 11, 2006 was sent by regular mail on April 11, 2006. This letter constitutes the required 14-day written report including occurrence scenario, NRC notification, evaluation of consequences, corrective action and current status. The potentially promptly reportable occurrence involved the operation of the reactor outside the allowed interval as specified in UFTR Tech Spec Table 3.2 (Safety System Operability Tests) for those scram functions with a quarterly test performance frequency.

Scenario

On April 10, 2006, during an informal check of the surveillance status board to plan the week's activity, it was discovered that the quarterly check of scram functions (Q-1 Surveillance) had been tracked as due on March 16, 2006 with the allowed interval extending to April 16, 2006. In actuality, the proper due date was determined to be March 1, 2006 with the allowed interval extending to April 1, 2006.

Immediate action consisted of not allowing operation of the reactor until the quarterly scram checks (Q-1 Surveillance) could be performed. In the meantime, the event was evaluated and the RSRS Executive Committee convened to review the occurrence. The Executive Committee met and reviewed the potential violation of Tech Specs on April 11, 2006, and noted that it was an oversight that had been discovered on April 10, 2006. The Committee recommended that it be reported as a potential Tech Spec violation and suggested that ways to prevent recurrence should be considered. The Committee also indicated that the delayed Q-1 Surveillance must be completed successfully prior to running the reactor as required by Tech Specs. Subsequently, the NRC notification was made and the Q-1 Surveillance was completed successfully late on April 11 to allow return to normal operations since that date. All trips were checked on this date including those in Table 3.1 that are required on a daily frequency. All were successful.

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### NRC Notification

NRC Project Manager Marvin Mendonca was informed of the potential violation in a telephone call on April 11, 2006 and briefed on the occurrence where the quarterly check of the scram functions (Q-1 Surveillance) had not been performed within the allowed interval. Project Manager Mendonca then informed the UFTR Project Manager Alexander Adams of the occurrence by email since he had not been available for the telephone call. Mr. Mendonca was also informed that the reactor would remain in administrative shutdown until successful completion of the Q-1 Surveillance.

The occurrence of reactor operations outside the allowed interval for the Q-1 Surveillance and the initial communication with NRC were then summarized in a one-day report faxed on April 11 and mailed on April 11, 2006 (see Attachment I).

### Evaluation/Corrective Action

Based upon the reactor control and safety systems measuring channels delineated in Section 3.2.3 of the UFTR Tech Specs and the specification for reactor safety system trips in Table 3.1, it is concluded that UFTR operation from April 1 through April 7, 2006 without completion of the quarterly scram tests specified in Table 3.1 is a potentially reportable occurrence per UFTR Tech Specs Section 6.6.2 delineating requirements for special reports (Paragraphs (3) (b) and (3) (g)). The applicable section of the Tech Specs requiring certain LSSS's to be tested on a quarterly basis is Section 3.2.3 (Reactor Control and Safety Systems: Measuring Channels) in Table 3.1.

It should be emphasized that these trip tests conducted as the Q-1 Surveillance are only about half of the trips tested per Table 3.1 and that all were tested successfully on April 11, 2006 with no problems. As an aside, the high voltage trip on Safety Channel 1 was checked and verified operable as a result of a spurious trip on April 5, 2006.

Tech Specs Paragraph 6.6.2 (3) (b) requires a prompt report for "operation in violation of limiting conditions for operation established in the Technical Specifications unless prompt remedial action is taken." Tech Specs Paragraph 6.6.2 (3) (g) requires such a report for a violation of the Technical Specifications. Since the reactor was operated between April 1 and April 10 (approximately 3.5 hours of operation) with the Q-1 Surveillance not performed, this violation extends over that period and is considered promptly reportable.

Currently, surveillances that are due for completion each month are informally delineated separately from the status board in the control room so their completion can be planned effectively. As corrective action to prevent recurrence of events where the allowed performance interval for a surveillance is exceeded, this list will continue to be delineated separately but will be checked by a second staff member to preclude the incorrect transcription that led to this potential violation.

### Current Status/Consequences

As noted, several members of the Reactor Safety Review Subcommittee (RSRS) were informed of this event and the Executive Committee met to evaluate it on April 11, 2006. There was no operation until after the surveillance was successfully completed on April 11, 2006. No problems were noted during the performance of all tests noted in Table 3.1 nor has there been any problem since that time. This potential violation for reactor operation outside the allowed interval for operability tests of certain limiting safety system settings will be further reviewed with the RSRS at its next regular meeting in late May 2006. The subcommittee essentially agreed with actions taken and with the initial staff evaluation that the occurrence did represent a

potential violation of the UFTR Technical Specifications and should be treated as reportable. Reactor Management and the Reactor Safety Review Subcommittee also agree there has been no significant compromise to reactor safety in the occurrence and no impact on the health and safety of staff or the public so this occurrence is now considered closed.

If further information is needed, please advise.

Sincerely,



William G. Vernetson  
Director of Nuclear Facilities

WGV/dms  
Attachment

cc: A. Adams, NRC Project Manager  
C. Bassett, NRC Inspector  
Reactor Safety Review Subcommittee

Sworn and subscribed this 24 day of April 2006.

  
Notary Public

**Terri L. Sparks**  
Commission # DD346498  
Expires August 12, 2008  
Bonded Troy Fair - Insurance, Inc. 800-363-7819



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As per my telephone conversation on April 11, 2006 with NRC Project Manager Marvin Mendonca concerning UFTR operation outside the allowed quarterly interval for the operability tests of certain Limiting Safety System Settings (LSSS's), we have concluded that this operation with the LSSS's not checked for operability within the requisite quarterly interval as specified in Tech Spec Table 3.2 is a potentially promptly reportable occurrence per UFTR Technical Specifications Section 6.6.2 delineating requirements for special reports. The applicable section of the Tech Specs is Table 3.2 in Section 3.2.2 which lists the LSSS's required to be tested for operability on a quarterly basis.

Sincerely,

William G. Vernetson  
Director of Nuclear Facilities

WGV/dms

cc: A. Adams, NRC Project Manager  
C. Bassett, NRC Inspector  
Reactor Safety Review Subcommittee

Sworn and subscribed this 11<sup>th</sup> day of April 2006.

Notary Public



**Terri L. Sparks**  
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