

April 14, 2010

Dr. Ali Haghghat  
Director of University of Florida Training Reactor  
Nuclear and Radiological Engineering Department  
P. O. Box 11830  
University of Florida  
Gainesville, FL 32611

SUBJECT: UNIVERSITY OF FLORIDA - NRC INSPECTION REPORT NO.  
50-083/2010-201

Dear Dr. Haghghat:

The U.S. Nuclear Regulatory Commission (NRC) conducted an inspection on March 22-25, 2010, at your University of Florida Test Reactor Facility (Inspection Report No. 50-083/2010-201). 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 enclosed 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, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington DC 20555-0001.

In accordance with Title 10 of the *Code of Federal Regulations* Part 2.390 "Public inspections, exemptions, and requests for withholding" 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 (Agencywide Document Access and Management System (ADAMS)). ADAMS is accessible from the NRC Web site at (the Public Electronic Reading Room) <http://www.nrc.gov/reading-rm/adams.html>.

Should you have any questions concerning this inspection, please contact Jack Donohue at 301-452-1950 or electronic mail at [Jack.Donohue@nrc.gov](mailto:Jack.Donohue@nrc.gov).

Sincerely,

/RA/

Johnny H. Eads, Jr., Chief  
Research and Test Reactors Oversight Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Docket No. 50-083  
License No. R-56

Enclosure: NRC Inspection Report No. 50-083/2010-201  
cc: w/encl: See next page

University of Florida

Docket No. 50-083

Administrator  
Department of Environmental Regulation  
Power Plant of Siting Section  
State of Florida  
2600 Blair Stone Road  
Tallahassee, FL 32301

State Planning and Development  
Clearinghouse  
Office of Planning and Budgeting  
Executive Office of the Governor  
The Capitol Building  
Tallahassee, FL 32301

William Passetti, Chief  
Bureau of Radiation Control  
Department of Health  
4052 Bald Cypress Way  
Tallahassee, FL 32399-1741

Test, Research and Training  
Reactor Newsletter  
Director of Nuclear Facilities  
University of Florida  
202 Nuclear Science Building  
Gainesville, FL 32611-8300

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cc: w/encl: See next page

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U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION

Docket No: 50-083

Report No: 50-083/2010-201

Licensee: University of Florida

Facility: University of Florida Training Reactor

Location: University of Florida  
Gainesville, FL

Dates: March 22- 25, 2010

Inspector: Jack Donohue

Approved by: Johnny H. Eads, Jr. Chief  
Research and Test Reactors Oversight Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

## EXECUTIVE SUMMARY

University of Florida  
University of Florida Training Reactor  
Inspection Report No.: 50-083/2010-201

The primary focus of this routine, announced inspection was the onsite review of selected aspects of the University of Florida's (the licensee's) Class II research reactor safety program including: organizational structure and staffing, radiation protection, effluent and environmental monitoring, and transportation of radioactive materials since the last U. S. Nuclear Regulatory Commission (NRC) inspection of these areas. The licensee's programs were acceptably directed toward the protection of public health and safety, and in compliance with NRC requirements.

### Organizational Structure and Staffing

- The organizational structure was consistent with the requirements outlined in the Technical Specifications. Staffing at the facility was at the minimum level required in Technical Specifications Section 6.2.3.

### Radiation Protection Program

- Surveys were being completed and documented acceptably to permit evaluation of the radiation hazards present.
- Postings met the regulatory requirements specified in Title 10 of the *Code of Federal Regulations* Parts 19 and 20.
- Appropriate dosimeters were being worn by staff members as required and doses were well within the NRC's regulatory limits.
- Radiation monitoring equipment was being maintained and calibrated as required.
- The Radiation Protection Program being implemented by the licensee satisfied regulatory requirements.

### Effluent and Environmental Monitoring

- Effluent monitoring satisfied procedural and regulatory requirements and releases were within the specified regulatory and Technical Specification limits.

### Transportation of Radioactive Materials

- Transfer of radioactive material from the University of Florida Training Reactor to the State of Florida (Agreement State) License was completed and documented in accordance with licensee procedural requirements.

## REPORT DETAILS

### Summary of Plant Status

The University of Florida (the licensee, UF) one hundred kilowatt modified Argonaut-UTR research and test reactor (RTR) continued to be non-operational due to defueling and piping repair following leak identification.

#### 1. **Organizational Structure and Staffing**

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

The inspector reviewed selected aspects of the following regarding the licensee's organization and staffing to ensure that the requirements of Sections 6.2.1 - 6.2.4 of the facility Technical Specifications (TS), Amendment No. 26, dated September 1, 2006, were being met:

- Current staff qualifications
- Management responsibilities as outlined in the TS
- Organizational structure for the University of Florida Training Reactor (UFTR)
- Selected portions of the operations log for the past year through the present
- The University of Florida Annual Report for the period from September 1, 2008 – August 31, 2009
- The University of Florida Annual Report for the period from September 1, 2007 – August 31, 2008

##### b. Observations and Findings

The organizational structure had not functionally changed since the last routine inspection (refer to NRC Inspection Report 50-083/2009-201). The operations staff was comprised of two Senior Reactor Operators (SROs). One of the SROs was the Reactor Manager and the other was a person who works full-time at the facility. There were also several other part-time employees (student technicians) who were available to support reactor operations. It was noted however that the Reactor Manager was recently appointed but due to the reduction of an RO and an SRO the reactor staff is at the minimum.

TS Section 6.2.4 specified that UFTR personnel were required to meet the training and qualification criteria contained in the ANSI/ANS (American National Standards Institute/ American Nuclear Society) Standard 15.4-1988, "Standards for Selection and Training of Personnel for Research Reactors." The inspector verified that the education, training, and experience of the operations staff met ANSI/ANS 15.4-1988 requirements.

c. Conclusions

The facility organizational structure and functions were consistent with TS Section 6.2.

**2. Radiation Protection Program**

a. Inspection Scope (IP 69001)

The inspector reviewed the following to verify compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Parts 19 and 20 and TS Sections 3.4.1 and 4.2.4:

- UFTR facility dosimetry records for 2009 and to date in 2010
- University of Florida "Radiation Control Guide," last revised December 1999
- Radiation and contamination survey records for 2008 through the date of the inspection
- University of Florida "Radiation Safety Short Course Study Guide," last issued August 1999
- Calibration and periodic check records for selected radiation monitoring instruments documented on the applicable forms for 2008 and 2009 and to date in 2010
- "Radiation Worker Instructions – Training Manual," University of Florida Training Reactor Facilities, Nuclear and Radiological Engineering Department, last issued February 2006
- ALARA Policy as outlined the "University of Florida Training Reactor Facility As Low As Reasonably Achievable (ALARA) Program," Rev. 1, dated August 2002
- UFTR SOP-D.1, "UFTR Radiation Protection and Control," Rev. 5, dated December 1993 and the latest TCN dated October 2001
- UFTR SOP-D.2, "Radiation Work Permit," Rev. 11, dated October 2003
- UFTR SOP-D.3, "Primary Equipment Pit Entry," Rev. 4, dated October 2001
- UFTR SOP-D.1, Appendix I, Table 1, "Quarterly Exposure Limits for the UFTR Facility," Rev. 5, dated December 1993 and the latest TCN dated April 1994
- UFTR Form SOP-D.1A, "UFTR Radiation Weekly Survey," Rev. 5, dated December 1993
- UFTR Form SOP-D.1B, "UFTR Swipe Survey Results," Rev. 5, dated December 1993
- UFTR Form SOP-D.2A, "Radiation Work Permit, University of Florida Training Reactor," Rev. 11, dated October 2003
- UFTR Quarterly #2 (Q-2 Surveillance), "Calibration Check of Area and Stack Radiation Monitors," Rev. 3, dated February 2003 and the latest TCN dated September 2005 (controlled by UFTR SOP-0.5)

- UFTR Quarterly #4 (Q-4 Surveillance), "Unrestricted Area Indoor/Outdoor Radiation Survey," Rev. 3, dated February 2003 (controlled by UFTR SOP-0.5)
- UFTR Quarterly #5 (Q-5 Surveillance), "Restricted Area Radiation Survey," Rev. 3, dated February 2003 and the latest TCN dated October 2003 (controlled by UFTR SOP-0.5)
- UFTR Quarterly #9 (Q-9 Surveillance), "Quarterly Calibration of Air Particulate Detector," Rev. 3, dated February 2003 (controlled by UFTR SOP-0.5)

The inspector also toured the facility and observed the various radiological signs and other postings as well.

b. Observations and Findings

(1) Surveys

The inspector reviewed weekly radiation and contamination surveys conducted by reactor staff personnel. These were surveys of facility controlled areas including the Radiochemistry Laboratory (Lab) and classroom, the Neutron Activation Analysis (NAA) Lab, the Control Room, and the Reactor Cell from 2009 through the date of the inspection. The inspector also reviewed quarterly general area radiation surveys of restricted and unrestricted areas completed by the licensee. The results were documented on the appropriate forms and were evaluated and reviewed as required. No readings or results were noted that exceeded set action levels and the licensee indicated that corrective action would be taken if results were detected that were above these levels.

(2) Postings and Notices

The inspector reviewed the postings at the entrances to various controlled areas including the Control Room, the Reactor Cell, and the Radiochemistry Lab in the UFTR facility. The postings were acceptable and indicated the radiation and contamination hazards present. Other postings also showed the industrial hygiene hazards present in the areas. The facility radioactive material storage areas were noted to be properly posted. No unmarked radioactive material was detected in the facility. Copies of notices to workers were posted in various locations throughout the facility, including on a bulletin board in the Control Room. The inspector noted that the copies of NRC Form-3, "Notice to Employees," posted at the facility, as required by 10 CFR Section 19.11, were the current version.



(3) Dosimetry

The licensee provided reactor staff personnel with dosimetry from a National Voluntary Laboratory Accreditation Program-accredited vendor (Landauer). Pocket Ion Chambers (PICs) were routinely given to visitors for use during tours of the facility. Through direct observation, the inspector determined that dosimetry was acceptably used by facility personnel and visitors as well.

The inspector noted that the licensee used Optically Stimulated Luminescent (OSL) dosimeters for staff whole body monitoring of beta and gamma radiation exposure with an additional component to measure fast/thermal neutron radiation. The licensee used thermoluminescent dosimeter (TLD) finger rings for extremity monitoring as needed. These were periodically sent to the vendor for processing.

An examination of the OSL dosimeter and TLD results for the past two years showed that the highest occupational doses, as well as doses to the public, were within 10 CFR Part 20 limitations. The records showed that the highest annual whole body exposure received by a single individual for 2009 was 1415 millirem (mr) deep dose equivalent (DDE). That individual also received an extremity exposure of 1696 mr and a shallow dose equivalent (SDE) of 1428 mr for that year. For 2010 to date, the highest routine annual whole body exposure received by a single individual was 643 mr DDE, 1220 mr extremity exposure, and 785 mr SDE. These doses were well within limits specified in 10 CFR Part 20. The majority of exposure has been due to the defueling and rebuilding of reactor piping and components which is near completion.

The inspector also reviewed the dose records for those individuals who had been involved in defueling the reactor following the reactor coolant leak identification and repair. Because that work involved disassembly and inspection of the irradiated primary piping and components, more dose had been accumulated by the workers than during a typical year. Three staff members had completed the majority of the work. Although the reactor piping and components (graphite) were reassembled the individual receiving the highest accumulated whole body dose through the end of January had received 643 mr DDE. This is approximately 50% of the dose received for the same period in the previous year. Although the majority of the reactor assembly is complete, the licensee was informed that the NRC was concerned about that amount of dose accumulation and challenged them to do more to maintain their doses ALARA.

(4) Radiation Monitoring Equipment

The calibration records of selected portable survey meters, friskers, fixed radiation detectors, and air monitoring instruments in use at the facility were reviewed. The records showed that the portable instrument

calibrations were completed by UF campus EH&S Division personnel and fixed radiation detectors and air monitors were typically calibrated by reactor staff personnel. The calibrations were tracked and controlled using a Microsoft Access database. The inspector confirmed that the frequencies of the calibrations completed quarterly or semiannually, satisfied the requirements established in the TS Section 4.2.4 and 10 CFR Section 20.1501(b). All instruments checked by the inspector had a current calibration sticker attached.

- (5) Licensee Reported TS Violation concerning the Quarterly Surveillance (Q-2) Calibration Check of Area and Stack Radiation Monitors were not completed within four months period per TS 4.2.4 (1) states "The area radiation monitor channel, the stack monitor, and the air particulate monitor shall be verified to be operable before each reactor startup, as required by the daily checkout. Calibration of radiation monitoring channels shall be performed quarterly at interval not to exceed 4 months". The previous check was completed on October 6, 2009, which required the next check to be performed no later than February 6, 2010. The Reactor Manager noticed the discrepancy on March 8, 2010 and completed the surveillance on March 22, 2010. The inspector was informed and verified that the corrective action included a posted updated surveillance tracker that would be utilized by reactor personnel.

The licensee was informed that this non-repetitive, licensee identified and corrected violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A.8 of the NRC Enforcement Policy (NCV 50-083/2010-201-01).

- (6) Radiation Protection Program

The licensee's Radiation Protection Program was established through the UF "Radiation Control Guide", last revised December 1999, and the UFTR SOPs. The program required that all personnel, who had unescorted access to radiation areas or to work with radioactive material, receive training in radiation protection, policies, procedures, requirements, and facilities. The inspector verified that the program was being reviewed annually as required.

The ALARA Policy was outlined and established in the UF "Program for Maintaining Occupational Radiation Exposure for Non-Medical Licensed Activities at the University of Florida, As Low As Reasonably Achievable (ALARA)," dated January 18, 2005, in Section 7 of the TS, and in the "University of Florida Training Reactor Facility As Low As Reasonably Achievable (ALARA) Program," Rev. 1, dated August 2002. The ALARA Policy provided guidance for keeping doses as low as reasonably achievable and was consistent with the guidance in 10 CFR Part 20.

(7) Radiation Work Permit Program

The inspector reviewed the Radiation Work Permits (RWPs) that had been written as stipulated in UFTR SOP-D.2 and used during 2008 and 2009 and to date in 2010. It was noted that the controls specified in the RWPs were acceptable and applicable for the type of work being done. The RWPs had been initiated, reviewed, and approved as required. Following completion of the work covered by the various RWPs, they had been terminated as required.

(8) Facility Tours

The inspector toured the Control Room, Reactor Cell, and other selected support laboratories and offices. Control of radioactive material and control of access to radiation and high radiation areas were acceptable. As noted earlier, the postings and signs for these areas were appropriate.

c. Conclusions

The inspector determined that the Radiation Protection Program being implemented by the licensee satisfied regulatory and TS requirements because: 1) surveys were being completed and documented acceptably; 2) postings met regulatory requirements; 3) personnel dosimetry was being worn as required and doses were within the NRC's regulatory limits; 4) radiation monitoring equipment was being maintained and calibrated as required; and, 5) the radiation protection training program was acceptable.

**3. Effluent and Environmental Monitoring**

a. Inspection Scope (IP 69001)

The inspector reviewed the following to verify compliance with the requirements of 10 CFR Part 20 and TS Sections 3.4.2 - 3.4.6 and 4.2.4:

- Results of the analyses of air samples taken from the Reactor Room and the stack
- Data concerning environmental releases and effluent monitoring contained in the licensee's "Monthly Utilization and General Activities Reports" for 2006 and 2007
- UFTR SOP-D.1, "UFTR Radiation Protection and Control," Rev. 5, dated December 1993 and the latest TCN dated October 2001
- UFTR SOP-D.7, "Circulation, Sampling, Analysis, and Discharge of Holdup Tank Wastewater," Rev. 1, dated April 2002 and the latest TCN dated November 2005
- UFTR Form SOP-D.1C, "Portable Air Sample Activity and LLD Calculation," Rev. 5, dated December 1993

- UFTR Form SOP-D.1D, "Liquid Sample Activity and LLD Calculation," Rev. 5, dated December 1993
- UFTR Form SOP-D.7A, "Liquid Sample Activity and LLD Calculation," Rev. 1, dated April 2002
- UFTR Form SOP-D.7B, "UFTR Waste Water Holdup Tank Release Authorization," Rev. 1, dated April 2002
- UFTR Form SOP-E.6B, "Argon-41 Stack Effluent Concentration," Rev. 2, dated October 2003
- UFTR Quarterly #2 (Q-2 Surveillance), "Calibration Check of Area and Stack Radiation Monitors," Rev. 3, dated February 2003 and the latest TCN dated September 2005 (controlled by UFTR SOP-0.5)
- UFTR Quarterly #4 (Q-4 Surveillance), "Unrestricted Area Indoor/Outdoor Radiation Survey," Rev. 3, dated February 2003 (controlled by UFTR SOP-0.5)
- UFTR Semiannual #4 (S-4 Surveillance), "Measurement of Argon-41 Stack Concentrations," controlled by UFTR SOP-E.6, "Argon-41 Concentration Measurement," Rev. 2, dated October 2003 and the latest TCN dated October 2005

b. Observation and Findings

The inspector reviewed the records documenting liquid and airborne releases to the environment for the past two years. The inspector determined that gaseous releases continued to be calculated as required by procedure and were adequately documented. The releases were determined to be within the annual dose constraints of 10 CFR 20.1101 (d), 10 CFR Part 20 Appendix B concentrations, and TS limits. This was documented in the licensee's "Monthly Utilization and General Activities Reports" issued for information and review by the RSRs. COMPLY code calculations conducted by the UF EH&S Division for the UFTR indicated an effective dose equivalent to the public of 0.3 mrem for 2009. As the result of observation of the facility by the inspector, no new potential release paths were found.

Liquid releases were approved by the Facility Director or Reactor Supervisor and the Radiation Control Officer after analyses indicated that the releases met regulatory requirements for discharge into the sanitary sewer. It was noted that there were no releases in 2008, 2009 and 2010 to date.

The inspector also reviewed the cumulative environmental monitoring OSL dosimeter results for 2008, 2009 and the first quarter of 2010. The effective dose equivalent to the public was well within the regulatory limits. In addition, the inspector reviewed the calibration records of the area and stack monitoring systems. These systems had been calibrated quarterly as required by TS Section 4.2.4.

c. Conclusions

Effluent monitoring satisfied procedural and regulatory requirements and releases were within the specified regulatory and TS limits.

**4. Transportation**

a. Inspection Scope (IP 86740)

The inspector reviewed the following to verify compliance with TS Section 3.4.6 and procedural requirements for transferring licensed material:

- Records of radioactive material transfers from the reactor license to the State of Florida materials license for 2004 and to date documented on various forms
- UFTR SOP-D.4, "Removing Irradiated Samples from UFTR Experimental Ports," Rev. 7, dated October 2001
- UFTR SOP-D.5, "UFTR Reactor Waste Transfer," Rev. 2, dated June 2002
- UFTR SOP-D.6, "Control of UFTR Radioactive Material Transfers," Rev. 1, dated April 2000 and the latest TCN dated October 2003
- UFTR Form SOP-D.4A, "Record of Sample Irradiation and Disposition," Rev. 7, dated October 2001
- UFTR Form SOP-D.5A, "Radioactive Reactor Waste Transfer Checklist," Rev. 2, dated June 2002
- UFTR Form SOP-D.5B, "Radioactive Reactor Waste Container Inventory," Rev. 2, dated June 2002
- UFTR Form SOP-D.5C, "Swipe Samples Analysis Report," Rev. 2, dated June 2002
- UFTR Form SOP-D.5D, "Radioactive Waste Container Radiation Survey," Rev. 2, dated June 2002
- UFTR Form SOP-D.6A, "University of Florida Training Reactor/University of Florida Radioactive Material Transfer Record," Rev. 1, dated April 2000
- UFTR Form SOP-D.6B, "University of Florida/University of Florida Training Reactor Radioactive Material Transfer Record," Rev. 1, dated April 2000
- UFTR Form SOP-D.6C, "University of Florida Training Reactor/University of Florida Activated Foil Transfer Record," Rev. 1, dated April 2000
- UFTR Form SOP-D.6D, "University of Florida Training Reactor/University of Florida Neutron Radiography Film Cassette Transfer Record," Rev. 1, dated April 2000
- UFTR Form SOP-D.6E, "University of Florida Training Reactor/University of Florida Rabbit System Sample Package Transfer Record," Rev. 1, dated April 2000

b. Observations and Findings

Through records review and discussions with licensee personnel, the inspector determined that the licensee had transferred radioactive material and solid waste produced by reactor operations to the university's "State of Florida Radioactive Materials License" (Agreement State License), License No. 356-1, expiration date March 31, 2011, for possession, shipment, or disposal. All transfers were recorded on the appropriate and applicable forms and transfer documentation was kept on file as required.

c. Conclusions

Transfer of radioactive material from the UFTR to the State of Florida (Agreement State) License was completed and documented in accordance with facility procedural requirements.

**5. Exit Meeting Summary**

The inspector reviewed the inspection results with members of licensee management at the conclusion of the inspection on March 25, 2010. The licensee acknowledged the findings presented 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 Personnel

M. Berglund	Senior Reactor Operator
B. Shea	Reactor Manager
A. Haghghat	Director of University of Florida Training Reactor

### Other Personnel

D. Hintenlang	Chair, Reactor Safety Review Subcommittee
D. Munroe	University of Florida Radiation Control Officer

## **INSPECTION PROCEDURE (IP) USED**

IP 69001	Class II Research and Test Reactors
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## **ITEMS OPENED, CLOSED, AND DISCUSSED**

### Open

50-083/2010-201-01	NCV	Quarterly Surveillance (Q-2) Calibration Check of Area and Stack Monitors not completed within Four Month Period Per TS 4.2.4(1)
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### Closed

50-083/2010-201-01	NCV	Quarterly Surveillance (Q-2) Calibration Check of Area and Stack Monitors not completed within Four Month Period Per TS 4.2.4(1)
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## **LIST OF ACRONYMS USED**

ADAMS	NRC's Agencywide Documents Access and Management System
ANSI	American National Standards Institute
CFR	Code of Federal Regulations
IP	Inspection Procedure
NAA	neutron activation analysis
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
Rev.	Revision/Revised
RSRS	Reactor Safety Review Subcommittee
RTR	Research and Test Reactor
SOP	Standard Operating Procedure
SRO	Senior Reactor Operator
TCN	Temporary Change Notice
TS	Technical Specifications
UF	University of Florida
UFTR	University of Florida Training Reactor
VIO	Violation