

August 14, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Docket No. 50-083

Subject: Reply to Notice of Violation (Ref. ML15194A260)

During a planned inspection activity on 15-17 June 2015, Nuclear Regulatory Commission (NRC) inspectors identified a violation of UFTR Emergency Plan requirements. This written response is submitted to describe the reasons for the violation and the steps being taken to correct this condition.

Description of Violation

The NOTICE OF VIOLATION states the following:

Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(q)(2) requires the licensee "follow and maintain the effectiveness of an emergency plan." The licensee's Emergency Plan (E-Plan) requires emergency response agencies and Gainesville Fire and Rescue (fire) department orientation and facility familiarization tour on a biennial basis. The E-Plan also requires that any deficiencies in the E-Plan that could potentially impact reactor safety or the health and safety of the public be immediately reported to the University Radiation Control Committee (RCC) and the Dean of the College of Engineering.

Contrary to the above, the fire department and emergency medical services (EMS, ambulance) under the Alachua County Emergency Management have not participated in activities to meet this requirement and this deficiency has not been reported to the RCC or the Dean.

Apparent Causes

UFTR staff failed to recognize and implement this Emergency Plan requirement.

1. Because of the volume of requirements that must be tracked, UFTR staff rely on the list of required activities (surveillances) documented in procedure SOP-0.5, Quality Assurance Program, and the related surveillance tracking spreadsheet, to ensure all required surveillance activities are completed in a timely manner. This particular Emergency Plan requirement had never been formalized in procedure SOP-0.5 or the surveillance tracking spreadsheet.
2. The page of the Emergency Plan containing this requirement was last revised in February 2007 by the long-time Facility Director approximately 20 months prior to his retirement. Due to personnel turnover and a high number of significant licensing activities that occurred during roughly that same timeframe, it's reasonable to assume that institutional memory of this requirement was lost as a result.

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Completed Corrective Actions

1. UFTR staff received face-to-face notification of the apparent violation immediately following discovery.
2. Initial notification of the apparent violation was immediately made to the Associate Dean of Research & Facilities, as well as to select members of the University Radiation Control Committee and Reactor Safety Review Subcommittee.
3. A follow-up written report describing the apparent violation, its causes, and the corrective actions needed to prevent recurrence was submitted to the Dean of the College of Engineering, University Radiation Control Committee, Associate Dean of Research & Facilities, Reactor Safety Review Subcommittee, and the NRC Inspector.
4. New Surveillance A-7 was created, and the surveillance spreadsheet updated, to track the required orientations and tours.
5. The Q-3 drill surveillance sheet was enhanced to include quarterly verification that new A-7 surveillance is current and to remind staff of the need to schedule the required orientations and tours well in advance of their due dates.
6. The Emergency Plan section of the Annual QA Audit Checklist was enhanced to include verification of the new A-7 surveillance.
7. The Emergency Plan has been reviewed to verify all other requirements / commitments are being appropriately implemented and tracked.
8. Details of this violation have been incorporated into the Emergency Plan training requalification lecture materials and UFTR staff have been trained on this event.
9. The feasibility of incorporating a UFTR facility orientation session for emergency response agency heads into the campus wide annual disaster exercise agenda was investigated and tabled for the time being. There was insufficient time available to intervene in the campus wide annual disaster exercise agenda which was held on July 30, 2015.

Remaining Corrective Actions

1. Perform the required orientation training / facility tour.
Due date: Tentative 30 October 2015 (due date may be extended dependent on attendee availability)

Please let us know if you need further information.

This submittal has been reviewed and approved by UFTR management and by the Reactor Safety Review Subcommittee.

Sincerely,



Brian Shea
Reactor Manager

cc: Dean, College of Engineering
Chair, University Radiation Control Committee
NRC Inspector