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TAC 16-005

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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555-001

**Subject:** GEH VNC Written Follow-Up Report – NTR Operator License Expiration

**References:** 1) NRC License R-33, Docket 50-73  
2) GEH Event Report 51789, 3/14/16  
3) Vallecitos Nuclear Center (VNC) Technical Specifications for the R-33 Nuclear Test Reactor (NTR), 5/15/07

Dear Sir or Madam:

In accordance with NTR Technical Specification 6.6.2(a)(2) Special Reports, GE-Hitachi Nuclear Energy Americas, LLC (GEH) hereby submits a written follow-up report for Event Notification 51789 that was provided to NRC on March 14, 2016 (Reference 2). As discussed in the initial event report, GEH reported a discovery that the licenses of two active operators at the NTR facility were unintentionally allowed to lapse.

Additional information is provided as follows:

**Event Details and Safety Significance**

At approximately 0800 on March 10, 2016 the VNC NTR Operations Manager was informed by a senior reactor operator (SRO) that his six year license for the facility had expired on January 6, 2016. It was subsequently determined that a second reactor operator six year license also expired on January 6, 2016. Both operators performed licensed activities and manipulated controls during routine reactor operations between January 7 and March 10, 2016 with expired NRC operator licenses. Both operators had multiple prior years of NTR facility operating experience.

On March 10, 2016 there were discussions about NRC reporting; however, during the period when operators had expired licenses, the reactor was operated normally, there were no unusual occurrences and at no time did the expired licenses cause the existence or development of an unsafe condition with regard to reactor operations.

The discovery was reported to NRC on March 14, 2016 as a deviation from NTR technical specification 6.1.3.1 Staffing, where minimum staffing levels for reactor operations is specified.

A review of the activities for these two operators during the period between January 6 and March 10, 2016 revealed the following:

For Operator #1; Senior Reactor Operator License Number SOP-70609; Docket Number 55-70481

- On twelve (12) occasions, this operator conducted the Daily Surveillance Checks, Startup Report and Shutdown Report, and manipulated the reactor controls during Startup, Steady State Operations and Shutdown. On all of these occasions, a second SRO with an active and current license was at the facility.
- On one (1) occasion, this operator provided watch station relief at the control panel. On this occasion, a second SRO with an active and current license was at the facility.
- On thirteen (13) occasions, this operator approved experiments, eight (8) of which were Neutron Radiography experiments and five (5) of which were sample irradiations.
- No other licensed activities were conducted by this operator during this period.
- This operator has been restricted from licensed activities since March 10 when the condition was discovered.

For Operator #2; Reactor Operator License Number OP-70693; Docket Number 55-70998

- On seven (7) occasions, this Reactor Operator conducted the Daily Surveillance Checks, Startup Report and Shutdown Report, and manipulated the reactor controls during Startup, Steady State Operations and Shutdown. On all of these occasions, an SRO with an active and current license was at the facility.
- On one (1) occasion, this operator provided watch station relief at the control panel. On this occasion, an SRO with an active and current license was at the facility.
- No other licensed activities were conducted by this operator during this period.
- This operator has been restricted from licensed activities since March 10 when the condition was discovered.

A currently qualified SRO was working and directly involved with operations activities at the facility in all of the 21 instances where these two operated the reactor with an expired license as assigned reactor operator or in relief.

### **Immediate Corrective Actions Taken**

- 1) As an immediate corrective and containment action, both operators were removed from performing any licensed activities at the Nuclear Test Reactor. Memos have been inserted into the operations files for these operators that detail the extent of these activity restrictions and what needs to happen before the activities can be resumed.
- 2) A currently qualified SRO reviewed and verified the accuracy of the thirteen (13) occasions where Operator #1 acted as SRO approver for experiments.
- 3) Regarding effect and extent, other periodic operator requirements such as required physicals were checked and found to be on schedule for proper completion.

- 4) Condition Report # 18665 was initiated in the GEH Corrective Action Program to track the investigation findings, causes, and corrective and preventive actions.

### **Probable Cause of Event**

A preliminary investigation determined that the current administrative controls used to report and notify management of upcoming license expirations were inadequate. A more formal root cause investigation is underway.

### **Short Term Corrective Actions**

- 1) Subsequent interviews with both operators determined there were no changes to their physical, medical or general health condition that may have caused operational errors that endanger public health and safety.

Complete: March 23, 2016

- 2) It was also determined that both operators are progressing satisfactorily to complete their requalification requirements, including passing of an annual operating test.

Scheduled complete: April 1, 2016

### **Longer Term Corrective Actions**

- 1) Revise the current administrative controls used to track and notify NTR Operations Management of reactor operator license expiration dates.

Scheduled completion: May 13, 2016

If you have any questions regarding this matter, please contact me at (925) 918-6018.

Sincerely,



Tom Caine, Manager  
Vallecitos Nuclear Center

Enclosures: None

Commitments: As shown above

cc: NRC Region IV Administrator  
D. Hardesty, NRC NRR/DPR