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U.S. Nuclear Regulatory Commission
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Special Report – Event Notification #53321
Operating License R-87, Docket 50-182
Technical Specification 6.7.b.1.c.vi

This special report details a Technical Specification oversight which occurred at the PUR-1 reactor facility. Technical Specification 4.6 calls for a fuel inspection annually with no interval to exceed 15 months. The prior fuel inspection was completed on August 1, 2016 which then had an extended deadline for renewal no later than October 31, 2017. Unfortunately, this surveillance was not performed in that time frame, an oversight which was discovered upon compiling the Annual Report for the 2017 operating year. At no time during the period of noncompliance was the reactor in operational status and the primary coolant was monitored within specification for any contamination which would indicate loss of fuel integrity.

The Technical Specification compliance fault raises the concern for a reportable occurrence due to “an observed inadequacy in the implementation of administrative or procedural controls such that the inadequacy causes or could have caused the existence or development of an unsafe condition with regard to reactor operations.” However, the reactor was under a standing order to not operate following the suspension of several other surveillances as approved by the Committee On Reactor Operations. Additionally, the failure to inspect plates could not have *caused* the existence or development of an unsafe condition.

The PUR-1 facility is currently in a stand-by mode due to an upgrade in the Instrumentation and Control system. Reduced activities due to the stand-by mode form the root cause of the oversight which would have been recognized if the facility was in active operations. Therefore, the corrective action must be such that it does not rely on operations alone to trigger a check of this specification.

Several corrective actions are underway to rectify the administrative procedures to prevent this from recurring. The changes are twofold. Primarily, a scheduling display will be prominently displayed in the reactor bay which clearly indicates the deadline for each upcoming Technical Specification required surveillance. To promote facility staff actively checking these upcoming requirements, regular logbook entries (among the first actions each week) wherein the operator will make note of which surveillances are nearing the end of their allowed intervals. This entry, in conjunction with more diverse and prominent notifications of upcoming deadlines will rectify oversight issues. As the facility returns to fully operational status, these additions will be re-evaluated to determine their continued relevancy or need for improvement.

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Finally, a comprehensive Quality Assurance Plan is under development which will be reviewed and approved by the CORO. An ongoing facility effort is underway to further utilize the Quality Assurance plan guidance developed by the ANS/ANSI standard in all aspects of facility operation as it will be vital to the operation of the upcoming digital instrumentation and controls. This Quality Assurance plan will be submitted at a later date following the CORO and other stakeholder's review.

Please notify the PUR-1 Facility Director Robert Bean by email or telephone should you need any further information.

Sincerely,

/SA

Clive Townsend
PUR-1 Reactor Supervisor

