

APPENDIX A

NOTICE OF VIOLATION

Virginia Polytechnic Institute and
State University

License No. R-62

Based on the NRC inspection January 30 through February 2, 1979, certain of your activities were apparently not conducted in full compliance with NRC requirements as indicated below.

- A. As required by 10 CFR 50.54(i-1), the licensee shall have in effect his NRC-approved operator re-qualification plan. The licensee's approved re-qualification plan requires that emergency procedures will be reviewed every three months at required meetings. In addition, the plan states that a list of qualified reactor operators and senior reactor operators will be maintained at the reactor console. Finally, the plan requires licensed personnel to enter in the console log the hours spent operating the reactor.

Contrary to the above, for a period of April through June of 1978, no record could be found documenting the required meetings. Additionally, a documentation form for operator emergency procedure review for 1978 contained no entry for four licensed personnel in various quarterly periods of 1978. Contrary to the above requirements, no list of qualified licensed operating personnel was maintained at the console. Finally, no clearly identifiable log entry of reactor operating times was maintained.

This is a deficiency. A previous item in the area of reactor operator re-qualification was identified in our letter dated December 21, 1977.

- B. As required by Technical Specifications for the Virginia Polytechnic Institute and State University Reactor, Section 8.3 and associated subsections state in part, "The Radiation Safety Committee shall review and approve written procedures for: Testing and calibration of reactor operating instrumentation and controls, control rod drives, and area radiation monitors.... Preventive or corrective maintenance operations which could have an affect on the safety of the reactor". Section 11.2 of the same requires, "routine maintenance on all control and process system components shall be performed in accordance with written schedules and written procedures".

Contrary to the above, two written procedures requiring component maintenance to be performed on the dump valve and the Westronic recorder at specified intervals, were found not being accomplished at the required frequency. Upgrade of the equipment relaxed the maintenance requirements of the components; however, the licensee failed to make the

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necessary changes to the scope and content of the procedures. Three evolutions (reactor heat balance, rod speed checks, and the rod cocking portion of rod drop time determinations) were also discovered being performed by the licensee without written approved procedures.

Also contrary to the above requirements, the licensee failed to implement certain procedures [Procedures IV.21 (Argon 41), V.21 (Reentering the Building After an Evacuation Alarm) and III.2 (Fuel Transfer)] after approval by the Radiation Safety Committee. These example procedures were found which had been approved by the Radiation Safety Committee but current copies were not available for use.

This is an infraction.

- C. As required by Table 1 of the University's Technical Specifications, the annunciation alarm for the fission product monitor, utilized to monitor radiation levels of the primary coolant before it returns to the dump tank, is to be set at a value ten times its normal background reading.

Contrary to the above, the setpoint was discovered set on January 30, 1979 at a value greater than ten times normal during normal operation of the reactor.

This is an infraction.

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