



EXECUTIVE VICE CHANCELLOR
IRVINE, CALIFORNIA 92717

July 24th, 1980

U. S. Nuclear Regulatory Commission
Region V
Reactor Operations and Nuclear Support Branch
1990 N. California Blvd.
Suite 202, Walnut Creek Plaza
Walnut Creek, California 94596

Ref: Docket 50-326
License No: R-116
Inspection 80-01

Undated Notice of Violation

Gentlemen:

We are in receipt of a Notice of Violation attached to a letter dated July 3rd, 1980, received by this University on July 11th, 1980. This Notice was generated as a result of inspection made May 19-21, 1980.

We make the following response in accord with 10CFR 2.201.:

Item A. "... the Reactor Operations Committee had not met from April 24, 1979 to November 7th, 1979...." in violation of Tech. Spec. 6.2.f.

As noted in the minutes for the meeting of November 7th, the discrepancy had been noted by the Committee.

(1) Corrective steps: The Committee established a regular schedule for meetings for the 1980 calendar year and also agreed to meet even if the Reactor Supervisor were recalcitrant at calling a meeting or was absent.

(2) To avoid further violation, the meeting schedule will be closely monitored and a schedule will be established well in advance, each year.

(3) Compliance is considered achieved. Meetings were held on January 8th, April 8th, and June 10th, 1980 in full compliance.

Item B. "...quarterly reviews of operations and operational records had not been conducted between July 5th, 1978 and January 7th, 1980".

As noted at the November 7th, 1979 meeting, cited above, this discrepancy had been noted by the Committee.

(1) Compliance steps:

(a) The Committee has established a regular schedule of member rotation for review of facility operations.

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- (b) At a regular meeting of the Committee on June 10th, 1980, the Committee voted unanimously to amend section 3.4 of the Standard Operating Procedures for the UCI facility relating to this matter as follows:

Modify one sentence as follows (words deleted are indicated)

"The Committee will review reactor operations ~~at least quarterly~~ to assure that the facility is operated in a manner consistent with public safety and within the terms of the facility license."

Add one sentence to read:

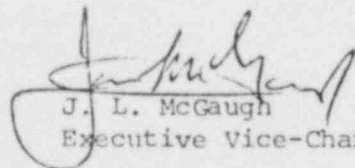
"The Committee shall meet at least quarterly."

- (2) No further action is planned, as these actions are expected to preclude further violations.
- (3) Compliance is considered to be achieved. Reviews were conducted by Committee members as follows: 1/7/80, 2/11/80, 3/17/80, 6/3/80, 6/10/80.

The above items were classified as Infractions. We question that the items represent any "substantial potential for causing, contributing to or aggravating an incident" or that there was any threat to the health, safety or interest of the public or the common defense or security other than "remote". We would argue that items of this nature, would more properly constitute Deficiencies according to Commission guidelines of December 31, 1974.

We will be pleased to supply any additional information the Commission may require.

Sincerely,


J. L. McGaugh
Executive Vice-Chancellor

JM/km

cc: F. S. Rowland, Reactor Administrator
G. E. Miller, Reactor Supervisor
ROC Committee members