

APPENDIX A

NOTICE OF VIOLATION

Rensselaer Polytechnic Institute

Docket No. 50225

As a result of the inspection conducted on January 22-23, 1981 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification 6.6.2, Non-Routine Reports, states, in part: "a. Reportable Operational Occurrence Reports - Notification shall be made within 24 hours by telephone and telegraph to the Director of the appropriate Regional Office ... in the event of a reportable occurrence as defined in Section 1.0."

Technical Specification Section 1 m., Reportable Occurrence, defines, among other items, a reportable occurrence as the occurrence of any facility condition that results in abnormal degradation of one of the several boundaries which are designed to contain the radioactive materials resulting from the fission process or an occurrence of a condition arising from natural events that affect or threaten to affect safe operation of the facility.

Contrary to the above, on January 14, 1981 a moderator (water) line connecting the reactor tank to the moderator storage tank failed due to water freezing in the line, thereby allowing the moderator to leak to the reactor sump, and the occurrence was not reported within 24 hours. These tanks and line are one of several boundaries designed to contain radioactive material resulting from the fission process. Further, on or about January 15, 1981, the Critical Facility was flooded as a result of a freezing drinking water line and this occurrence was not reported within 24 hours. The flooding of the facility resulted from freezing, i.e., a natural event, and caused the connecting cables from the reactor to the control panel to become wet, a condition that could affect or threaten to affect safe operation of the facility.

This is a Severity Level IV Violation (Supplement I).

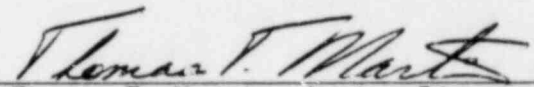
- B. 10 CFR 20.401, "Records of surveys, radiation monitoring and disposal" states, in part, in paragraph (b): "Each licensee shall maintain records in the same units used in this part, showing the results of surveys required by § 20.201(b)..." Paragraph (b) of 10 CFR 20.201 requires each licensee to make or cause to be made surveys as may be necessary to comply with 10 CFR Part 20. 10 CFR 20.106 places limits on the quantity of material that may be released. The limits are specified in units of microcuries per milliliter (uCi/ml).

Contrary to the above as of January 23, 1981, the results of surveys performed to comply with 10 CFR 20.106 for discharges from the Critical Facility reactor moderator tank, and all records of these surveys, were maintained in units other than uCi/ml.

This is a Severity Level VI Violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Rensselaer Polytechnic Institute is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 10 JUL 1981


Thomas T. Martin, Acting Director
Division of Engineering and
Technical Inspection