

NOV 11 1982

Docket: 50-112/82-01

The University of Oklahoma  
ATTN: Dr. Davis Egle, Director  
School of Aerospace, Mechanical  
and Nuclear Engineering  
1000 Asp Avenue  
Norman, Oklahoma 73019

Gentlemen:

This refers to the inspection conducted by Messrs. W. S. Schum, R. T. Redano, and M. E. Murphy of our staff during the period September 13-15, 1982, of activities authorized by NRC Operating License R-53.

The results of this inspection indicate the need for additional improvements in the management of your reactor program. NRC concerns relating to these areas were discussed between University of Oklahoma representatives and Messrs. J. E. Gagliardo and R. T. Redano of our staff at an Enforcement Conference held at the University of Oklahoma on October 7, 1982.

Principal areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures, drawings, representative records, interviews with personnel, and observations by the NRC inspectors.

During this inspection, it was found that certain of your activities were in violation of NRC requirements. Consequently, you are required to respond to these violations, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation attached to this letter.

In addition, we are concerned about the implementation of your program for management control of your licensed activities that permitted these violations to occur. Your repeated failure to fully implement your approved operator requalification program as required by 10 CFR 50.54 becomes more significant when one considers that it was first identified as an NRC concern during the 1978 inspection of your facility and again identified as a violation of NRC regulations during the 1981 inspection of your facility by members of our

RPS-B <i>Wsch</i> WSchum/dsm 11/ /82	RPS-B <i>Wsch</i> WCrossman 11/5 /82	RPS-A <i>Wsch</i> TWesterman 11/5 /82	RPB1 <i>Wsch</i> GMadsen 11/5 /82	RPS-C <i>Wsch</i> WJohnson 11/9 /82	RPB2 <i>Wsch</i> WSeidle 11/8 /82	DRRP&EP <i>Wsch</i> JGagliardo 11/8 /82	RA <i>Wsch</i> JCollins 11/10 /82
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staff. The September 13-15, 1982, inspection revealed that the operator requalification program has not been conducted in accordance with 10 CFR 50.54, nor your facility requalification procedure. This deficiency was addressed several times in your audit reports and RSC meetings, yet you failed to take any corrective action. Your failure to correct an ongoing program deficiency which constitutes a repetitive violation evidences a lack of management controls. Also, the significance of failure to maintain records of test procedures or test results dealing with the design change performed on the safety rod drive motor sprocket as required by 10 CFR 50.59(b) is enhanced by the fact that a violation was issued to you in 1981 for failure to conduct a safety review of this design change as required by 10 CFR 50.59(b). Your failure to implement a design change program which fully complies with regulatory requirements manifests a lack of management controls and awareness. Lack of compliance with NRC regulations in areas of repetitive violations and improper or untimely corrective actions identify a lack of management control and may constitute the need for escalated enforcement action if not properly corrected. Consequently, in your reply you should describe, in particular, those actions taken or planned to improve the effectiveness of your management control of the requirements of your license.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within 10 days from the date of this letter of your intention to file a request for withholding; and (b) submit within 25 days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than 7 days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons on the basis which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, PL 96-511.

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

"Original Signed by:  
G. L. MADSEN"

G. L. Madsen, Chief  
Reactor Project Branch 1

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report 50-112/82-01

cc w/encls:

The University of Oklahoma  
ATTN: Dr. E. H. Klehr, Chairman  
Reactor Safety Committee  
1000 Asp Avenue  
Norman, Oklahoma 73019

The University of Oklahoma  
ATTN: Dr. Charles W. Terrell, Professor  
Nuclear Engineering School of  
Aerospace, Mechanical and Nuclear  
Engineering  
1000 Asp Avenue  
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bcc to DMB (IE01)

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