

APR 3 1990

In Reply Refer To:
Docket: 50-128/90-01

Dr. K. R. Hall, Deputy Director
Texas Engineering Experiment Station
301 WERC
Texas A&M University
College Station, Texas 77843-3126

Gentlemen:

Thank you for your letter of March 9, 1990, in response to our letter and Notice of Violation dated February 21, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

We have also reviewed the information you provided concerning two open items identified in Inspection Report 50-128/90-01.

Sincerely,

Original Signed By:
LAWRENCE A. YANDELL

for
A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
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Mr. Feenan Jennings, Chairman
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C:FRPS
BMurray

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for Yandell
4/3/90

D:DRSS/
BBeach

4/3/90

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Texas State Department of Health
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Radiation Control Program Director
Bureau of Radiation Control
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bcc to DMB (IE01)

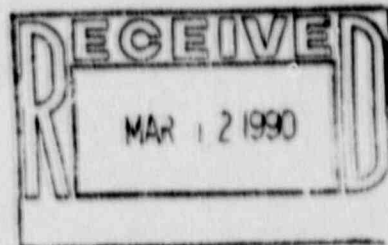
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March 9, 1990



Mr. Larry A. Yandell, Deputy Director
Division of Radiation Safety and Safeguards
U. S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Reference: Docket 50-128/90-01
Facility License R-83

Dear Mr. Yandell:

With reference to the inspection of the Nuclear Science Center Reactor (NSCR) conducted by Messrs. B. Murray and L. Ricketson of the USNRC Region IV office during the period January 10-12, 1990, the following reply is submitted:

(128/9001-01) - Apparent Violation - Failure to Fully Implement All Provisions of the NSCR Physical Security Plan

Response to Apparent Violation

The licensee acknowledges an apparent oversight of a requirement of the NSCR Physical Security Plan which states that licensed reactor operators at the NSCR be given written examinations on physical security as part of the annual reactor operator retraining program. The approved retraining program for the NSCR is a two year program and not a one year program as it existed at the time of the initial implementation of the Physical Security Plan. The training requirement of the Physical Security Plan predates the present approved Operator Requalification Program which is referred to by NSC Management for reactor operator retraining and testing requirements. The present Operator Requalification Program is a two year

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program requiring retraining and written examinations each 4 months covering six topics over the two year period of the program. Under the assumption that the testing of licensed reactor operators falls under the Operator Requalification Program, and with no requirement in the program to test on physical security, licensed operators have received documented annual training on physical security without testing. Physical security training has been conducted in conjunction with emergency preparedness training. Written examinations covering emergency preparedness training is a requirement of the two year Operator Requalification Program and on occasion these examinations have included physical security.

Immediate Corrective Action

Emergency Preparedness and Physical Security has been designated as the next scheduled Operator Requalification Program topic for lecture and examination of licensed NSCR operators and is to be completed by April 30, 1990. This will establish full compliance with the Physical Security Plan.

Future Corrective Action

The licensee desires to establish agreement between the approved Physical Security Plan and the approved Operator Requalification Program regarding the training requirements for licensed reactor operators on physical security. The licensee plans to submit to the Office on Non-Power Reactor, Decommissioning and Environmental Project Directorate, USNRC, Washington, D. C. a proposed amendment to the NSCR Operator Requalification Program to include retraining requirements of licensed operators on physical security as part of the Operator Requalification Program. The amendment will require that the topic of Emergency Preparedness be expanded to include Physical Security.

Upon approval of the amendment to the NSCR Operator Requalification Program, the licensee will submit under the provisions of 10CFR50.54(p) changes to the NSCR Physical Security Plan to implement the new training requirements.

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With all changes in place, the annual physical security training of licensed NSCR operators will continue to be a requirement under the Physical Security Plan with the requirement for written examinations on this topic to be a part of the Operator Requalification Program. The licensee concludes that the proposed changes to the Operator Requalification Program and the Physical Security Plan will not reduce the effectiveness of either program and will continue to maintain the proficiency of licensed operators in this area.

Date of Compliance

Compliance with present physical security requirements will be established by April 30, 1990.

Response to Open Items

Open Item (128/9001-02) - Organization and Management Control (NSC Health Physicist Position)

Action regarding the assignment of a full-time NSC Health Physicist to be responsible to the licensee for the NSCR Radiation Protection Program is contingent upon the hiring of this individual. An active search is underway on a national scale to fill this important position. Dr. John Poston is chairman of the search committee which has established requirements and qualifications for the selection of this individual.

Open Item (128/9001-03) - Radiological Controls (Posting of Loading Dock Area)

A requirement for the posting of additional radiological warning signs has been implemented by placing appropriate signs on the loading dock during sample handling activities. The current signs on the loading dock are visible when the doors leading to the materials handling area are closed, but the signs are hidden when the doors are open. This action was taken immediately following the inspection of January 10-12, 1990.

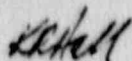
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Should there be any questions regarding this reply, please contact me at 409/845-3357 or D. E. Feltz, Director, Nuclear Science Center at 409/845-5907.

Respectfully submitted,



Kenneth R. Hall, Deputy Director
Texas Engineering Experiment Station

KRH/DEF/ja

xc: Dr. K. L. Peddicord, Assistant Director
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