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OFFICE OF THE CHANCELLOR
SANTA BARBARA, CALIFORNIA 93106

December 2, 1981

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, CA 94596

Attention: D. M. Sternberg, Chief
Reactor Operations Projects Branch

Gentlemen:

Re: License R-124, Docket No. 50-433

In reply to your letter of November 3, 1981 concerning a violation found in our L-77 nuclear training reactor as a result of the inspection conducted by Mr. D. J. Willet on October 13-14, 1981, enclosed is a response.

Sincerely,

Robert J. Kroes

Robert J. Kroes
Associate Vice Chancellor,
Administrative Services

Enclosure

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REPLY TO NOTICE OF VIOLATION DATED NOVEMBER 3, 1981

As a result of the inspection of the L-77 nuclear training reactor (License R-124, Docket No. 50-433), conducted by Mr. D.J. Willet on October 13-14, 1981, a Notice of Violation was issued, requiring this written statement and explanation.

The violation referred to modification and installation of an adjustable snubber (shock absorber) on the safety rod of the reactor, which we had carried out in February, 1980 in order to correct the bouncing of the rod upon scram. Because the snubber is actuated only in the last 1/2 inch or less of the rod motion, it does not interfere with the rapid shutdown of the reactor, and in fact the Technical Specifications requirement of less than or equal to 500 milliseconds rod drop time was satisfied both before and after the modification to the snubber. The amount of bounce was small as no increase of reactivity was noted after initiation of scram. However, we were concerned that inadequate snubbing was putting a strain on the rod mechanism.

The snubber was very similar to the old, hydraulic (oil-filled piston and cylinder) snubber, with the addition of an adjustable flow restriction so the degree of snubbing action could be controlled and the bounce eliminated. The modification was discussed in a meeting of the Reactor Operations Committee, but unfortunately a record was not kept. Notes were made in the Maintenance Log, including approval of the completion of the modification and satisfaction of the rod drop test without bounce. However we did not follow the written procedure of preparing the Maintenance Request Form and filling out the necessary signatures. The work was inspected by the Reactor Director (A.E. Profio) and in fact the adjustments and tests were done under his immediate personal supervision. The fault was in keeping all records, in particular the Maintenance Request Form.

No additional corrective steps can be taken for this violation as it was a matter of record keeping. Corrective steps to avoid further items of noncompliance include a combination of the items on the Maintenance Request Form into the Maintenance Log (as recommended by the inspector) so that the Maintenance Request Form is not overlooked in the future. This has been done so that full compliance has been achieved.

11-25-81

Date

A. E. Profio

A.E. Profio
Reactor Director