APPENDIX A

NOTICE OF VIOLATION

University of Oklahoma

Docket No.: 50-112

Based on the results of an NRC inspection conducted during the period of September 21-22, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

 10 CFR Part 50.59(b) states in part that, "... The licensee shall maintain records of changes in the facility ... records shall include a written safety evaluation which provides the basis for the determination that the change ... does not involve an unreviewed safety question ... "

Technical Specification 7.0, "Administrative Requirements," Section 7.1.b states in part that, "... the committee shall be responsible for ... reviewing and approving all proposed ... modifications to the reactor and its associated components ... determining whether proposed ... modifications involve unreviewed safety questions ... "

Contrary to the above, on September 21, 1981, the NRC inspector determined that the maintenance completed on July 17, 1981, which involved replacement of the sprocket on Safety Rod #1 drive to change rod speed, was a modification to an associated reactor component and had not been reviewed, approved or evaluated for an unreviewed safety question by the Reactor Safety Committee.

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

2. 10 CFR 50.54 requires that licensees implement an operator requalification program which has been approved by the Nuclear Regulatory Commission and that the licensee shall not, except as specifically authorized, make changes in an approved program.

Contrary to the above, the NRC inspector observed that during the period from August 1979, through July 1981, the licensee failed to fully implement their approved requalification program.

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

 Technical Specification 7.2.a.1 requires that detailed written procedures shall be provided and followed for normal operation of the complete facility.

Contrary to the above, on September 22, 1981, the NRC inspector observed that the licensee's procedure for handling experiments and sample irradiations was not being followed in that the Experiment and Sample Irradiation Form was not filled out as required. Specifically, the form requires items numbered one through twenty to be completed for sample irradiations. On experiments 81-20 through 81-24 from four to eight items on each form were left blank.

This is a Violation Severity Level V. (Supplement I.E.)

 Technical Specification 7.2.a.5 requires that preventative or corrective maintenance procedures be provided and followed.

Contrary to the above on September 22, 1981, during record's review, the NRC inspector learned that the licensee's "Fuel Element Repair" procedure had not been followed in that fuel element repairs were accomplished and the persons doing the repairs did not wear the required finger monitors to accurately measure the radiation dose received to the fingers while handling the fuel.

This is a Violation Severity Level V. (Supplement IV.E.)

Pursuant to the provisions of 10 CFR 2.201, The University of Oklahoma is hereby required to submit to this office within 30 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 items of noncompliance; 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. Consideration may be given to extending your response time for good cause shown.

Dated December 7, 1981

G. L. Madsen, Chief Reactor Projects Branch