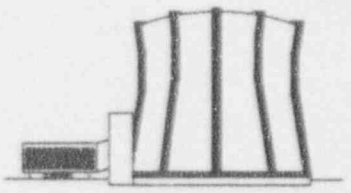
TEXAS ENGINEERING EXPERIMENT STATION

TEXAS A&M UNIVERSITY

COLLEGE STATION, TEXAS 77843-3575



NUCLEAR SCIENCE CENTER
409/845-7551

7 May 1993

93-0148

U.S. Nuclear Regulatory Commission
ATTN: DOCUMENT CONTROL DESK
Washington, DC 20555

Docket No: 50-128 License R-83

SUBJECT: Licensee Reply to Program Weakness Identifications Dated April 9, 1993 (NRC INSPECTION REPORT 50-128/93-01)

Dear Sir:

The following response is submitted by the Texas A&M University System/Texas Engineering Experiment Station (Licensee), in regards to the program weaknesses identified in the April 9, 1993 inspection report issued by the U.S. Nuclear Regulatory Commission Region IV Office.

Stated Weakness

A. NRC Regulatory Guide 2.6, "Emergency Planning for Research and Test Reactors" specifies that licensees should develop emergency action levels that relate directly to facility parameters. The licensee's failure to establish radiological emergency classification action levels related to facility parameters which could be promptly assessed was identified as a plan weakness.

Contrary to the above, the inspectors determined that the monitors for stack particulate (Channel #1) and Stack gas (Channel #3) were at least a magnitude less than the action levels for a NOUE and at least two orders of magnitude less than the action levels for an Alert.

Licensee Response

A. The program weakness discussed above was identified by the licensee in discussions between Ms. Martha Brown of the Nuclear Science Center and Mr. Larry Rickertson and Dr. Blair Spitzberger of the Region IV Office. In this discussion, Ms. Brown used this weakness as an example of one of the major reasons the emergency plan was being revised at the time of the inspection.

IE01
1/1

If the inspectors had looked at the proposed revisions to the Emergency Plan and the Implementing Procedures they would have been aware that corrective action regrading this weakness had already been proposed in the revision. The revised Emergency Plan and Implementing Procedures should be ready to submit to the Region IV office by the end of the summer.

CORRECTIVE ACTION

Until a submittal of the revised emergency plan and implementing procedures can be made, the NSC plans to retrain all of its operational staff in the new classification table (see enclosed Table I) developed for the revision.

STATED WEAKNESS

Through discussions, the inspectors confirmed that the licensee procedures do not direct the licensee to make notifications to the NRC except as required by 10CFR20 and the Technical Specifications. The licensee's failure to establish clear guidance in the emergency plan and the implementing procedures for emergency notifications to the NRC was identified as a program weakness.

LICENSEE RESPONSE

The licensee admits to the program weakness.

CORRECTIVE ACTION

The Emergency Plan and Implementing Procedures were under revision at the time of the inspection and changes have been made to the revision to make it clear to the Emergency Director when notifications are required and the time period in which they need to be completed (See enclosed Table I). In order to facilitate these notifications additional changes were made to the NSC Emergency Plan to document the notifications and ensure the information provided is consistent with the actual events at the time of declaration of the emergency class (see enclosed NSC Form 854).

Should there be any questions regarding this reply, please contact me at (409) 845-7551.

Respectfully submitted,

W. D. Reece

Warren D. Reece
Director
Nuclear Science Center

WDR/ym

xc: Dr. K. R. Hall, Deputy Director
Texas Engineering Experiment Station
Texas A&M University

Dr. K. L. Peddicord, Director
Texas Engineering Experiment Station
Texas A&M University

Feenan Jennings, Chairman
Reactor Safety Board
Texas A&M University

Milton McLain, Director
Office of Radiological Safety
Texas A&M University

U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza, Suite 400
Arlington, Tx 76011
Attn: L. J. Callan, Director
Division of Radiological Safety and Safeguards

NSC Form 854

Emergency Notification

A. Point of Contact

1) Name: _____
2) Title: _____
3) Telephone Number: _____ _____

B. Information Given

1) Location of Incident
   a) Your Name: _____
   b) Name of Facility: _____
   c) Address: _____
   d) Phone Number: _____

2) Description of Emergency Event: _____
   _____
   _____
   _____ _____

3) Emergency Class: _____

4) Date of Incident Initiation: _____

5) Time of Initiation: _____

6) Type of Expected or Expected or Actual Release:
   ___ airborne
   ___ waterborne
   ___ surface spill
   ___ other _____ _____

7) Duration of Release (estimate or actual): _____

8) Quantity and type of Nuclides Released (expected or actual):

Nuclide	Amount Released

9) Projected or Actual Dose Rates (circle one):
   Operations Boundary (confinement building): _____
   Site Boundary: _____

TABLE I

EMERGENCY CLASSIFICATION GUIDE

Incident	Action Level	Classification
Fire	Minor fire non-specific to the reactor or its control systems in location where radioactive material is used or stored.	Operational Event (EPIP-IXB.1)
	Prolonged Fire non-specific to the reactor or its control systems in a location where radioactive material is used or stored.	Notification of Unusual Event* (EPIP-IXB.1)
	Fire which could adversely effect the reactor or its control systems	Alert* (EPIP-IXB.1)
Tornado	Report of a tornado which could strike the facility and adversly effect the reactor safety systems	Notification of Unusual Event* (EPIP-IXB.2)
Personnel Injury	With or without radiological complications	Operational Event (EPIP-IXB.3)
Bomb Threat	Non-specific to the reactor	Operational Event (EPIP-IXB.4)
	With possible radiological release implications	Notification of Unusual Event* (EPIP-IXB.4)
Explosion	Non-specific to the reactor	Operational Event (EPIP-IXB.5)
	Which might adversly affect the reactor or its safety systems	
Experiment Failure	Minor releases of fission products	Notification of Unusual Event* (EPIP-IXB.6)

	Minor releases of radioactive material	Notification of Unusual Event* (EPIP-IXB.6)
Pool Level Alarm	Leakage which can be corrected by isolation of the leak or by adding makeup water	Notification of Unusual Event* (EPIP-IXB.7)
	Leakage which indicates abnormal loss at rate exceeding makeup capacity	Alert* (EPIP-IXB.7)
Facility Air Monitor Alarm	Alarm on Channel #1 (Stack Particulate)	Operational Event (EPIP-IXB.8)
	Alarm on Channel #2 (Fission Gas Monitor)	Notification of Unusual Event* (EPIP-IXB.8)
	Alarm on Channel #3 (Stack Gas)	Operational Event (EPIP-IXB.8)
	Alarm on Channel #4 (Building Particulate)	Operational Event (EPIP-IXB.8)
	Alarm on Channel #6 (Building Gas)	Operational Event (EPIP-IXB.8)

* Declaration of this class of event <u>requires</u> notification of the NRC operation center in Bethesada, MD within 15 minutes of declaration. (See NSC Form 854.)