

APPENDIX A

NOTICE OF VIOLATION

University of California, Irvine
Irvine, California 92727

Docket No. 50-326
License No. R-116

As a result of the inspection conducted on March 24 to March 25, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9787 (March 9, 1982), the following violations were identified:

- A. Technical Specification Section 3.1, "Limiting Conditions for Operation," states:

"The reactor shall not be operated unless the following conditions exist: ...D. The excess reactivity is less than \$3.00;...."

Contrary to the above, on June 8, 1981, the reactor was operated on three consecutive occasions with core excess reactivities of \$3.75, \$3.12, and \$3.03, respectively.

This is a Severity Level *IV* violation.

- B. Technical Specifications Section 6.5, "Actions to be Taken in the Event of an ^{ation} Abnormal Occurrence," states:

"In the event of an abnormal occurrence, as defined in Section 1.13 of the specifications, the following action shall be taken:

- a. The Reactor Supervisor shall be notified and corrective action taken prior to resumption of the operation involved.
- b. A report shall be made which shall include an analysis of the cause of the occurrence, efficacy of corrective action and recommendations for measures to prevent or reduce the probability of reoccurrence. This report shall be submitted to the Reactor Operations Committee for review.
- c. Where appropriate, a report shall be submitted to the AEC in accordance with Section 6.7 of these specifications."

Operation of the reactor on June 8, 1981, with core excess reactivity greater than the limiting condition for operation, as cited in Paragraph A, above, constituted an Abnormal Occurrence as defined in Section 1.13 of the specifications. These occurrences were not reported at the time to the Reactor Supervisor nor was adequate corrective action taken after the first abnormal occurrence.

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No report of the occurrences was made to the Reactor Operations Committee for review.

No report of the occurrences was made to the Nuclear Regulatory Commission.

This is a Severity Level *IV* violation.

- C. Technical Specifications Section 6.3, "Operating Procedures," states: "Written procedures, reviewed and approved by the Reactor Operations Committee, shall be in effect and followed for the following items. "...B. installation or removal of fuel elements, control rods...."

Standard Operating Procedures Section 4.1.5-B states: "The excess reactivity worth of the reactor core shall be estimated and recorded in the reactor log book before and after any change that may affect the reactivity of the core."

Contrary to the above, on June 8, 1981, the licensee did not estimate the reactivity effect of adding fuel and record this estimate in the operations log book before moving fuel. This resulted in exceeding a Limiting Condition of Operation as cited in Paragraph A, above.

This is a Severity Level *IV* violation.

Pursuant to the provisions of 10 CFR 2.201, the University of California, Irvine is hereby required to submit to this office within twenty-five 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.

APR 15 1982

Date

Willett
D. J. Willett, Reactor Inspector