

College of Engineering Campus Box 8060 Pocatello, Idaho 83209-8060 July 14, 1994

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Dear Sirs:

The Idaho State University AGN-201 Reactor Facility (License # R-110, Docket # 50-284) is officially self-citing a violation. On four separate occasions, radiation surveys performed were not recorded. This a violation of 10 CFR 20.401(b).

The details of the events that led to the violation, the corrective actions taken, the corrective action to be taken, and the date of full compliance are described in the enclosed report.

The facility will notify the USNRC after full compliance has been achieved.

If you have questions regarding the details of the violation, please feel free to contact me at (208) 236-3637 or Dr. Alan Stephens (Reactor Administrator) at (208) 526-4907.

Sincerely,

R. David Clovis

R. David Clovis Reactor Supervisor

cc: w/ attachments

USNRC Attn: Mr. Marvin Mendonca, ISU AGN-201 Project Manager Washington, D.C. 20555

USNRC, Region IV Attn: Regional Administrator 611 Ryan Plaza Drive, Suite 400 Arlington, Texas 76011

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Idaho State University Dr. Alan Stephens, Reactor Administrator P.O. Box 8060 Pocatello, Idaho 83209

Idaho State University Dr. Michael Gallagher, Vice President of Academic Affairs P.O. Box 8063 Pocatello, Idaho 83209

Mr. Frank Just, Reactor Safety Committee Chair 620 Adell Ave. Idaho Falls, Idaho 83402

Idaho State University Dr. Richard Wabrek, Dean of College of Engineering P.O. Box 8060 Pocatello, Idaho

Idaho State University Dr. Thomas Gesell, Radiation Safety Officer P.O. Box 8106 Pocatello, Idaho 83209

REPORT OF SELF-CITED VIOLATION

Item A:

Failure of the licensee to maintain radiation survey results in accordance with 10 CFR 20.401(b).

1) <u>Background of violation</u>: On November 10, 1993, the reactor was used to perform a Perturbation Experiment. This particular experiment required the use of a spare Fine Control Rod fuel piece. The fuel piece was moved through the reactor's glory hole traversing the reactor while it was critical. Contamination and radiation surveys were performed on the fuel piece and contamination surveys were performed on the fuel piece. However, the results of the survey were not recorded.

On November 11, 1993, the same experiment performed on November 10, 1993 was performed again. Contamination and radiation surveys were performed. Radiation survey results were recorded, however, the contamination survey results were not recorded.

On February 28, 1994 and March 2, 1994, the reactor was used to perform a Reactor Transient Experiment. An aluminum tube and cadmium foil were inserted into the reactor's glory hole. With the reactor critical, the cadmium was removed from the glory hole to place the reactor on a positive period. After the experiment was secured, a radiation survey was performed on the aluminum tube and cadmium foil. However, the results of the radiation survey were not recorded.

2) <u>Reason for violation:</u> The reactor operator responsible to record the results of the radiation and contamination surveys failed to do so because he was overburdened with his duties to instruct the class, operate the reactor, and perform and record radiological control surveys.

Corrective actions taken and results achieved:

a) A revision to Operating Procedure #1, Operating Procedure #2, and the Reactor Operations Log Form (ROL-101) approved on April 26, 1994 requires that the reactor operator make necessary radiation and contamination survey entries in the Health Physics Log.

b) A standing order was made on July 8, 1994 by the Reactor Administrator: The reactor lab instructor/professor shall not operate the reactor and instruct class at the same time. A reactor operator, other than the reactor lab instructor/professor, wili be provided to operate the reactor and assist in reactor experiments for the purposes of reactor lab instruction.

c) Implementation of items 3.a and 3.b have achieved the level of compliance needed to prevent this violation from occurring again.

4) Additional corrective actions to be taken:

a) The Reactor Administrator's standing order discussed in item 3.b will be recommended to be approved as General Operating Rule #14 at the Fall 1994 Reactor Safety Committee meeting.

b) Radiological control training will occur at the earliest opportunity available of the Fall Semester for 1994. This training will emphasize radiation and contamination survey recording requirements and will be mandatory for all licensed senior reactor operators and reactor operators before they may operate the reactor.

5) Date when full compliance will be achieved: After the radiological control training is given in the beginning of the Fall 1994 Semester, full compliance will be achieved. After training is complete and documented, the reactor facility will notify the USNRC in writing that full compliance has been achieved. The reactor facility projects that the date of full compliance will occur on or before September 30, 1994.