

APPENDIX A  
NOTICE OF VIOLATION

University of Virginia  
2 MW Pool Reactor

Docket No. 50-62  
License No. R-66

As a result of the inspection conducted on November 15-17, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified.

- A. Technical Specification 6.3 requires that written procedures, reviewed and approved by the Reactor Safety Committee shall be in effect and followed for the items listed. Standard Operating Procedure for UVAR, Chapter 10, paragraph 9 requires that swipe surveys be performed within all controlled areas by the user each day they are used, to assure that the loose surface contamination is less than 200 dpm/100 cm<sup>2</sup>.

Contrary to the above, written procedures reviewed and approved by the Reactor Safety Committee were not followed in that on November 15 and 16, 1982, while work in controlled areas occurred, daily swipe surveys of the controlled areas, required by Standard Operating Procedures, were not performed.

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

- B. The licensed operator Requalification Training Program requires that the Operations Manager make periodic independent evaluations of each individual in the program by observing the completion of check lists and startup and control manipulations. Comments on these observations will be noted in the individual's file. Licensee procedures supporting the requalification program also require that a review log with up-to-date procedures, facility design changes or proposed changes will be maintained. The student operators will check off once per month they have read the changes or proposed changes.

Contrary to the above, the evaluation of requalification personnel and the maintenance of an up-to-date review log was not met in that the personnel files for individuals in the requalification program did not contain comments on the licensed operator's performance and the review log did not contain up-to-date procedure changes checked off by the student operators.

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

- C. Technical Specification 6.5.1 requires that changes to operating procedures be retained for 5 years, and that these records be maintained in a manner convenient for review.

Contrary to the above, changes to the operating procedures were not retained for five years nor maintained in a manner convenient for review in that copies of temporary changes to the UVAC Standard Operating Procedures were not being retained for five years nor being maintained in a manner convenient for review.

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

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: DEC 06 1982