

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-433/84-02

Docket No. 50-433 License No. R-124

Licensee: University of California at Santa Barbara  
Santa Barbara, California 93106

Facility Name: UCSB L-77 Reactor

Inspection at: Santa Barbara Campus, Santa Barbara, California

Inspection conducted: June 14, 1984

Inspectors:

*A. Johnson*  
A. Johnson, Enforcement Officer

7/6/84  
Date Signed

*M. Cillis*  
M. Cillis, Radiation Specialist

7/3/84  
Date Signed

Approved By:

*G. P. Yuhas*  
G. P. Yuhas, Chief, Reactor Radiation  
Protection Section

7/6/84  
Date Signed

Summary:

Inspection on June 14, 1984 (50-433/84-02)

Areas Inspected: Special announced inspection involving a Region V Confirmatory Action Letter of June 13, 1984 (see paragraph 3), including administrative controls, procedures, logs and records, licensee action on previous inspection findings, and a tour of the facility. The inspection involved 8 hours of an in office inspection and 6 hours of onsite time by two inspectors.

Results: Of the six areas examined, one violation was identified in the area of operation of the facility by an operator with an expired license (see paragraph 3).

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## DETAILS

### 1. Persons Contacted

- \*Dr. R. Mehrabian, Dean of Engineering
- \*Professor A. E. Profio, Reactor Director
- \*Mr. F. E. Gallagher, Radiation Safety Officer

\*Denotes those individuals attending the exit interview on June 14, 1984.

### 2. Licensee Action on Previous Inspection Findings

An examination of the corrective actions discussed in the licensee's responses of April 18, 1984 and May 14, 1984 to the violations identified in an NRC Notice of Violation dated March 23, 1984 was performed during the inspection. The results of the examination are as follows:

- a. (Closed) Violation (50-433/84-01-01): Failure to conduct semiannual Reactor Operation (ROC) meetings and required audits specified in Technical Specifications (TS), Section 6.2, "Review and audits." The inspection disclosed that the licensee has issued directives to the ROC members reminding them of the TS requirements. The directives also provided guidance for accomplishing the audits. The licensee has appointed a new ROC Chairman as a means to ease the Reactor Directors workload. The new Chairman will be responsible for scheduling timely ROC meetings. This matter is closed (84-01-01).
- b. (Closed) Violation (50-433/84-01-02): Operation and Maintenance of the facility using unapproved and obsolete procedures and failure to comply with existing procedures. The inspector found that the Operations Manual for the L-77 reactor facility was revised. The revisions were reviewed and approved by both the Reactor Operations and Radiation Safety Committee. Licensee personnel were also instructed in the need for procedure compliance. This matter is closed (84-01-02).
- c. (Closed) Violation (50-433/84-01-03): Failure to submit an annual report pursuant to TS, Section 6.6.3. The inspection disclosed that this item will be verified by the licensee's quarterly audits as a means for assuring timely distribution of subsequent reports. This matter is closed (84-01-03).
- d. (Closed) Violation (84-01-04): Failure to maintain current copies of the regulatory requirements prescribed in 10 CFR 19.11. The inspector found that the licensee had current copies of the appropriate regulatory requirements and has established a method for assuring they are maintained current. This matter is closed (84-01-04).

No violations or deviations were identified.

### 3. Licensed Operators

On June 12, 1984, a Region V review of reactor operators licensing files disclosed that Dr. A. E. Profio, the only licensed operator for the L-77 reactor facility had not applied for renewal of his senior reactor operators license prior to its expiration date on July 31, 1982. Therefore, on July 31, 1982, Dr. Profio's senior reactor operators license had expired. The review revealed that no other individual was currently licensed to operate the reactor.

This matter was brought to the attention of Dr. Profio on June 12, 1984, by the NRC's Region V staff. After a search of the L-77 reactor facility Dr. Profio agreed his senior reactor operators license had expired.

On June 13, 1984, the Region V Deputy Regional Administrator discussed the matter with Vice Chancellor, R. A. Kroes who agreed that the reactor would remain shutdown until an individual was properly licensed to operate the L-77 reactor facility. This understanding was confirmed by a Confirmatory Action Letter directed from the Region V Deputy Regional Administrator to Vice Chancellor Kroes on June 13, 1984.

On June 14, 1984, an inspection of the L-77 reactor facility was conducted by the Region V staff. A tour of the reactor facility and further discussions were held with the licensee to verify that a public health and safety issue did not exist during the period for which the facility did not have a licensed operator. The reactor operations log book was examined during the inspection.

The inspection disclosed that upon learning of this situation Dr. Profio immediately submitted an application for the renewal of his senior reactor operators license. Dr. Profio stated that since 1974 he had always received a notice from the NRC informing him when his license was due to expire along with the necessary forms to apply for the renewal of his license. He added that he recognized he was responsible to assure that timely application was made for renewal of his license. He added that he simply forgot to apply for renewal after the July 31, 1982 date because he had not received the NRC notice as he has in the past. To assure against a future oversight, a provision will be added to the Reactor Operation Committee's (ROC) audit plan to verify the validity of reactor operators license. The licensee's Technical Specification, Section 6.2, "Review and Audit" requires the ROC to conduct quarterly audits of reactor activities.

The tour and discussions did not reveal any concerns which would indicate an adverse affect on public health and safety while the facility did not have a licensed operator. The inspection disclosed that routine surveillances of the facility by the licensee's security and radiation safety offices would continue and that an effective emergency plan is in effect.

The review of the reactor operations log confirmed that the reactor had been routinely operated by Dr. Profio during the period of August 1, 1982 through May 6, 1984. The records disclosed that the reactor had

accumulated 18.7 watt-hours of operations during the period that Dr. Profio's operators license was expired.

The above observations were discussed with the licensee at the exit interview. The licensee was informed that failure to maintain Dr. Profio's senior reactor operators license up to date was considered to be a violation of 10 CFR 50.54(k), "Conditions of Licenses" (84-02-01).

4. Exit Interview

The NRC inspectors met with the licensee's representatives (denoted in paragraph 1) at the conclusion of the inspection on June 14, 1984. The scope and findings of the inspection were summarized. The inspector informed the licensee representatives of the Confirmatory Action Letter of June 13, 1984 and the violation discussed in paragraph 3. The licensee's representatives confirmed that the reactor would remain shutdown until an individual was properly licensed to operate the facility.