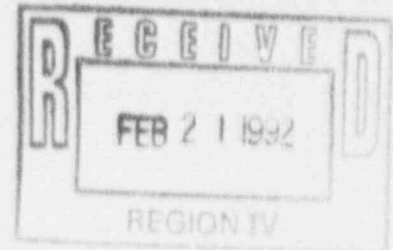




College of
Engineering
Campus Box 8060
Pocatello, Idaho
83209-8060

February 18, 1992



Mr. L. J. Callan, Director
Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission, Region IV
611, Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Ref: Docket No. 50-284
License No: R-110

Subject: NRC Inspections Report No. 50-284/91-01
Reply Notice of Violation.

Dear Mr. Callan:

I am enclosing a copy of Idaho State University's response to notice of violation, referred to above. Our response contains (1) the reason for the violation (2) the corrective steps that have been taken (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Please note that Dr. Michael C. Gallagher has replaced Dr. John M. Hutchinson as Vice President for Academic Affairs and Dr. Kevan Crawford has replaced Dr. A. E. Wilson as the Reactor Supervisor.

We appreciate the careful and professional manner in which the inspection was conducted. If you find any of our responses need further clarification please let us know.

Sincerely,

Dr. V. Charyulu, Reactor
Administrator and Dean
College of Engineering

cc:
USNRC Document Control Desk Wash. DC. 2055

Mr. Blaine Murray, Chief, Facilities Inspection Program
Section, Region IV

Dr. M. C. Gallagher, Vice President for Academic Affairs,
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Dr. T. Gesel, Radiation Safety Officer, Box 8106, Idaho
State University

Radiation Control Program Director, Division of Environment
450 West State, 3rd Floor, Boise, ID

RESPONSE TO NOTICE OF VIOLATION
IDAHO STATE UNIVERSITY

This is the response to the Notice of Violation issued to Idaho State University in the NRC Inspection Report No. 50-284/91-01 on License R-110 pursuant to 10CFR2 App. C.

Item A: Failure of the Reactor Safety Committee to administer an annual written examination to two senior reactor operators in 1990. (284/9101-01)

This violation was caused by insufficient audit procedures for the Reactor Safety Committee (RSC) and insufficient procedures for the Operator Requalification Plan. To correct this problem, the RSC has commissioned the Acting Reactor Supervisor to draft an Audit and Review Plan, an updated Operator Requalification Checklist, and a RSC Charter. These actions are documented in items 6, 8, 10, 12, and 13 of the attached RSC Minutes of February 4, 1992.

The Audit and Review Plan contains procedures for the audit of the Operator Requalification Checklist. The new Audit and Review Plan has been reviewed and approved by the RSC as a working document to be implemented on February 4, 1992. This action is recorded in item 10 of the attached RSC Minutes. In addition, the operator requalification checklist will be updated to include the annual written examination as shown in the attached draft of the updated operator licensee checklist within the new plan.

Full implementation of the corrective actions will be completed by July 1, 1992.

Item B: Failure of the licensee to conduct a drill of the ISU Emergency Plan during 1990. (284/9101-02)

This violation was caused by insufficient audit procedures for the RSC and inadequate oversight. To correct these problems, the RSC has approved an Audit and Review Plan as shown in item 10 of the RSC Minutes. In addition, the Acting Reactor Supervisor has been authorized to hire a 3/4 time Reactor Supervisor who will oversee performance of the Emergency Plan. The hiring notice is attached.

The Reactor Supervisor will be maintained on staff beginning July 1, 1992. Full implementation of the corrective actions will be completed by July 1, 1992.

Item C: Failure of the Reactor Safety Committee to audit conformance of facility operation to the Technical Specifications and applicable license conditions. (284/9101-03)

This violation was caused by insufficient audit procedures for the RSC. The RSC has reviewed and approved the implementation of a new Audit and Review Plan which was implemented on February 4, 1992 as shown in item 10 of the attached RSC Minutes. Within this plan, audit procedures are provided to ensure conformance of facility operation to the Technical Specifications and applicable license conditions. In addition, the Acting Reactor Supervisor has been authorized to hire a 3/4 time Reactor Supervisor who will oversee performance of the Audit and Review Plan.

The Reactor Supervisor will be maintained on staff beginning July 1, 1992. Full implementation of the corrective actions will be completed by July 1, 1992.

Minutes
Idaho State University
Reactor Safety Committee
February 4, 1992

Members Present:

Frank Just
Hary Charyulu
Frank Harmon
Mike Vaughn

Others Present:

K. Crawford
D. Levinskas
RSO Tom Gesell

Members Absent:

Terry Smith

The meeting was called to order at 3:00 p.m.

1. The meeting was called to review and respond to the NRC Notice of Violation.
2. The level of the severity of violations was discussed. All three violations are Level IV.
3. It was decided that a meeting consisting of 4 members and 1 ex-officio made a quorum.
4. Paul Napper resigned as a member of the Radiation Safety Committee.
5. It was decided to respond to the minutes of the last meeting after addressing the NRC response.
6. Kevan Crawford summarized the violations. He submitted an Audit and Review Plan for review. He summarized the Audit & Review Plan and discussed the Emergency Plan as an example of how to use the review plan.
7. Retention of records and the problems of access and tracking of records was discussed.
8. A motion was made and seconded to establish a Charter for the Radiation Safety Committee. The motion was approved unanimously.
9. The need for Administrative procedure policy was discussed. It should include a list of members of the committee and facility staff.
10. The Draft Review and Audit Plan was discussed. It was then moved and seconded to approve the plan.
11. A motion was made and seconded to establish and Administrative Procedure Committee concerned with procedure approval and document storage control. It would include committee members and staff members.

12. The committee discussed a response to our failure to administer a reactor exam. It was determined that the Audit and Review Plan adequately addressed this problem.
13. The committee discussed a response to our failure to conduct a drill. It was determined that the Audit and Review Plan adequately addressed this problem.
14. The committee discussed the wording of annual requirements. It was decided that we would use "calendar year" and provide details in Administrative Procedure.
15. It was decided to have another meeting to cover open items from the previous meeting and track items from this meeting pending response from the NRC.
16. Dr. Charyulu informed the committee that letters of agreement between ISU and Emergency Response Organizations had been sent out.

The meeting was adjourned at 4:26 p.m.