



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 17 1992

MEMORANDUM FOR: Seymour H. Weiss, Chief
Non-Power Reactors, Decommissioning
and Environmental Projects Directorate
Division of Reactor Projects - III/IV/V, NRR

FROM: Robert M. Gallo, Chief
Operator Licensing Branch,
Division of Licensee Performance
and Quality Evaluation, NRR

SUBJECT: GENERIC CONCERN IDENTIFIED AT THE UNIVERSITY OF VIRGINIA

This memorandum describes deficiencies associated with the University of Virginia's implementation of their Emergency Plan Implementation Procedures (EPIP). These deficiencies were identified during the administration of the requalification examination at the University of Virginia in July 1992. In addition, this memorandum provides documentation of a conference call held between NRC and University of Virginia management on August 6, 1992.

Operator licensing requalification examinations were conducted at the University of Virginia Reactor (UVAR) on July 13-16, 1992 in accordance with Examiner Standard ES-606. The Chief Examiner identified a common deficiency in use of the EPIPs that was observed by both the facility and the NRC examiners. Each of the three operators failed one task because they neglected to open and use the EPIPs during a scenario in which pool coolant inventory was lost. The actions taken by the operators to add water to the pool were in accordance with those described in the procedures but, in every case, the operator failed to use the procedures to ensure proper notifications, classification of emergency response levels, and activation of the Emergency Plan. A particular reticence was observed with respect to issuance of emergency notification involving organizations outside of the University. The facility cited difficulty with using the EPIPs and suggested that these difficulties might result in an operator's reluctance to use the procedures.

A conference call, between NRC management (both Headquarters and Region II) and University of Virginia management, was held on August 6, 1992, to discuss the generic concern with the implementation of the emergency plan. This concern involved the failure of each of the operators tested to enter the EPIPs, to properly classify the emergency, and to make the required notifications. The facility acknowledged the inadequate implementation of the emergency plan during the requalification examination and postulated the following root causes:

- a. Only Dr. Mulder had performed the duties involving the implementation of the EPIPs during the practice drills, therefore none of the SROs tested were familiar with the implementation of the EPIPs.

200077

9208260246 920817
PDR ORG NRRB
PDR

NRC FILE CENTER COPY

DR03/10

AUG 17 1992

- b. The EIPs were cited as being confusing and hard to use.
- c. One SRO stated that he didn't believe that the required minimum staff was adequate to take the actions required to mitigate the event and implement the emergency plan.

In addition the facility stated that the following corrective actions either had been or will be taken:

- a. A discussion was held with each of the licensed operators concerning the importance of properly implementing the EIPs.
- b. During the upcoming requalification training sessions each of the operators will have to act in the Emergency Director's position to demonstrate proficiency in implementation of the emergency plan.
- c. A review will be conducted to determine whether or not to change the EIPs to make them more user friendly.
- d. A review will be conducted to determine whether or not the staff size is adequate to implement the emergency plan.

During the call NRC management emphasized the importance of the proper implementation of the emergency plan and their concern with the licensee's performance during the requalification examinations. The licensee was requested to document their determination of the root causes and corrective actions in a letter to the NRC. The facility agreed and stated the letter would be set to the NRC by the end of August.

It is our understanding that follow up and review of the licensee's corrective actions to ensure that they are both adequate and properly implemented will be the responsibility of the Non-Power Reactor, Decommissioning, and Environmental Project Directorate. Subsequent revisions to the licensee's EIPs and staffing requirements will be reviewed and coordinated by PDNP.

Original signed by:
Robert M. Gallo

Robert M. Gallo, Chief
Operator Licensing Branch
Division of Licensee Performance
and Quality Evaluation, NRR

DISTRIBUTION:

Central Files	OLB RF	PDR	DLange	WDean
JCaldwell	RGallo	DMcCain	CThomas	JRoe
RErickson	JStohr	WCline	DCollins	EMcAlpine
WRankin	AAdams	LCohen		

OFC	OLB:DPD	OLB:DLPO	DDIR:DMC	DIR:DLPO	
NAME	JCaldwell:rc	RGallo	CThomas	JRoe	
DATE	8/13/92	8/14/92	8/17/92	8/17/92	

OFFICIAL RECORD COPY
Document Name: WEISS.MEM

AUG 17 1992

- b. The EIPs were cited as being confusing and hard to use.
- c. One SRO stated that he didn't believe that the required minimum staff was adequate to take the actions required to mitigate the event and implement the emergency plan.

In addition the facility stated that the following corrective actions either had been or will be taken:

- a. A discussion was held with each of the licensed operators concerning the importance of properly implementing the EIPs.
- b. During the upcoming requalification training sessions each of the operators will have to act in the Emergency Director's position to demonstrate proficiency in implementation of the emergency plan.
- c. A review will be conducted to determine whether or not to change the EIPs to make them more user friendly.
- d. A review will be conducted to determine whether or not the staff size is adequate to implement the emergency plan.

During the call NRC management emphasized the importance of the proper implementation of the emergency plan and their concern with the licensee's performance during the requalification examinations. The licensee was requested to document their determination of the root causes and corrective actions in a letter to the NRC. The facility agreed and stated the letter would be set to the NRC by the end of August.

It is our understanding that follow up and review of the licensee's corrective actions to ensure that they are both adequate and properly implemented will be the responsibility of the Non-Power Reactor, Decommissioning, and Environmental Project Directorate. Subsequent revisions to the licensee's EIPs and staffing requirements will be reviewed and coordinated by PDNP.

Original signed by:
Robert M. Gallo

Robert M. Gallo, Chief
Operator Licensing Branch
Division of Licensee Performance
and Quality Evaluation, NRR

DISTRIBUTION:

Central Files	OLB RF	PDR	DLange	WDean
JCaldwell	RGallo	DMcCain	CThomas	JRoe
RErickson	JStohr	WCline	DCollins	EMcAlpine
WRankin	AAdams	LCohen		

OFC	OLB: <i>[Signature]</i>	OLB: DLPO	DDIR: <i>[Signature]</i>	DIR: DLPO	
NAME	JCaldwell:rc	RGallo	CThomas	JRoe	
DATE	8/13/92	8/17/92	8/17/92	8/17/92	

OFFICIAL RECORD COPY
Document Name: WEISS.MEM