

UNIVERSITY OF VIRGINIA
DEPARTMENT OF NUCLEAR ENGINEERING AND ENGINEERING PHYSICS
NUCLEAR REACTOR FACILITY
SCHOOL OF ENGINEERING AND APPLIED SCIENCE
CHARLOTTESVILLE, VA 22901

February 20, 1985

Telephone: 804-924-7186

Director
Office of Inspection and Enforcement
USNRC
Washington, D.C. 20555

SUBJECT: Unsolicited and spontaneous response to NRC INSPECTION REPORT 50-62/84-01, received on January 30, 1985, pertaining to a routine unannounced inspection made during Oct. 1-3, 1984 of the University of Virginia Reactor Facility, Docket No. 50-62, License No. R-66.

Gentlemen:

A. Time Lag Between NRC Inspector's Report Issuance (10/25/84) and Submittal of the Same to the Reactor Facility (01/25/85)

Given that the NRC inspector had in hands a finished draft of his inspection report at the time of the exit interview with the licensee, it is unreasonable that so much time was allowed to expire before the report was sent to the licensee. Under general expectations of reciprocity, this exchange should have been concluded within the customary 30 days given the licensee for his response. Since an Enforcement Conference was called for by the NRC as a result of issues raised during the inspection, the inspector's report would have become a vital starting point for this licensee's defense.

B. Change of Emphasis of NRC Inspector's Findings with Time

It was noted by U.Va. Reactor Facility Management and Staff, with regard to the "hot spot" found by the inspector, that the NRC characterization of the infraction changed from the time of the exit interview to the time of the Enforcement Conference. At the exit interview, the NRC inspector alleged an infraction of 10 CFR part 20.203. B concerning the posting of a radiation area. This brought up the issue of whether the field occupied sufficient volume to constitute a "radiation area". Later, during the Enforcement Conference, after the licensee made his defense on this basis, the characterization was changed to failure to conduct an adequate survey.

The inspector's report unfortunately omitted facts about the hot spot that very likely had a bearing on the NRC staff's final point of view that it was of safety significance. The radiation field was localized to a very small area of relatively free access but extremely low occupancy rate. The radiation levels exceeding permissible limits

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existed within a distance of about 32 inches from the ground and a radius of about 39 inches from a point at the base of the reactor building wall. Only if an individual had crouched against this wall for a substantial time period at precisely the optimum location would a significant exposure have occurred. The area is not suited to traffic and is essentially never occupied, so the overexposure assumption is not credible.

C. Comments on the NRC Inspector's Report

In general, the report is consistent with the issues raised at the exit interview on Oct. 3, 1984. However, the NRC inspector did not mention during the exit interview his discovery of HP survey records completed in pencil, and that assurances were given by a "licensee representative" that future records would be completed in ink. As a matter of fact, a recent HP trainee did complete some surveys in pencil. Normally, they are and will be completed in ink.

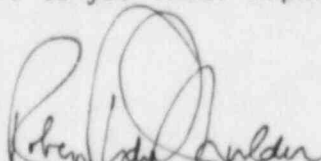
The NRC inspector failed to note in his inspection report that the hot spot found by him was centered at ground level. The adequacy of the survey performed by the Facility's HP technician was not made an issue at the exit meeting. Instead, the infraction was characterized at that time as a violation of 10 CFR part 20.203.B concerning the posting of a radiation area.

During his inspection, the NRC inspector found the vault to the waste holding tank unlocked because a staff member was performing maintenance on the circulation pump. The area was temporarily unattended because the staff member had left to get some tools. The vault in question is kept locked at all times other than for maintenance or waste liquid release and the key is kept in the Facility safe.

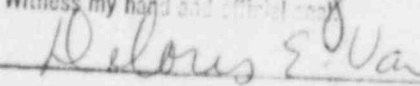
D. Response to the NRC Notices of Violations and Deviation

Responses to the recent Notice of Violation and Notice of Deviation are in a Facility Response Package sent to you under separate cover.

Date: February 20, 1985


Robert U. Mulder, Director
U.Va. Nuclear Reactor Facility

cc: Mr. James P. O'Reilly, USNRC
Regional Adm., Region II

Sworn to and subscribed before me this 20th
day of February, 19 85.
Witness my hand and official seal

Notary Public

My Commission Expires October 14, 1985