

## 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: 804-924-7136

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

Subject: Response to NOTICE OF DEVIATION of January 25, 1985 addressed to the University of Virginia Reactor Facility, Docket No. 50-62, License No. R-66, EA 84-111

Gentlemen:

A. Admission or Denial of Alleged Deviation

It is true that, in a letter dated Dec. 14, 1978 and addressed to the NRC, the Reactor Facility committed itself to measuring the flow rates in its laboratory fume hoods on a quarterly basis and to maintain records of the measurements. It is also true that the NRC inspector could not be shown records of these measurements during an inspection on Oct. 1-3, 1984, although the flow rates were being measured on a quarterly basis with inspection stickers to that effect placed in the fume hoods.

## B. Reason for the Deviation

It is probable that flow rate inspection records were maintained after 1978, at least for a while. However, the Health Physics staff at the Facility has had a high turn-over rate and so it is very likely that during a change in personnel these records were disposed of or transferred from the Facility. At some point in time a new HP technician must have failed to continue keeping official records. However, the <u>actual measurements</u>, which are of greater importance than the records themselves, were not discontinued.

C. Corrective Steps

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The new HP staff (effective May 1984) has begun to keep the required flow measurement check records. Additionally, the Director of the Reactor Facility has asked the Reactor Health Physicist to prepare, keep and regularly update a master list of HP duties at the Facility. This request was made notwithstanding the fact that the Director has no authority over the HP staff, because they do not belong to the Facility staff.

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Director, Office of Inspection and Enforcement Page 2 February 20, 1985

## D. Date of Full Compliance

Full compliance in this matter was achieved by the time the NRC inspector left the Facility on Oct. 3, 1984.

E. Oath

I affirm under oath that the statements made above are true and correct, to the best of my knowledge.

Date: Telenary 20, 1985

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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 26). 19 81 day of June Witness my hand and and and the SSGI 'DI JAQUIN SOLICX J UDISSIUNDOS DAPUBLIC