

APPENDIX A  
NOTICE OF VIOLATION

University of Texas  
Triga Mark I

Docket: 50-192  
Operating License: R-92

During an NRC inspection conducted on February 9-10, 1988, violations of NRC requirements were identified. The violations involved failure to document and review procedure changes adequately and failure to have all required procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

A. Failure to Adequately Document and Review Procedure Changes

Technical Specification 6.5, "Operating Procedures," states that temporary changes may be made to procedures, but the specification further requires that there be proper documentation and subsequent review of the changes by the Reactor Committee.

Contrary to the above, the NRC inspector identified, during an inspection on February 9-10, 1988, that the following procedures had either inadequate change documentation or were changed but not subsequently reviewed by the Reactor Committee:

- Reactivity Calculations,
- Fuel Inspection and Management,
- Semiannual Measurement of Rod Drop Times,
- Console Calibration Check,
- Weekly Calibration of Area Radiation Monitors, and
- Emergency Plan

This is a Severity Level IV violation. (Supplement I)(192/8801-02)

B. Failure to Have Procedures

Technical Specification 6.5, "Operating Procedures," requires that, "Operating procedures shall be in effect for . . .

- a) Testing and calibration of reactor operating instrumentation and controls . . .
- f) Routine maintenance of control rod drives and . . . other routine maintenance that could have an effect on reactor safety; and
- g) Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms and abnormal reactivity changes."

Contrary to the above, the NRC inspector found during the period of February 9-10, 1988, that:

1. The licensee had failed to have, in place, procedures to respond to alarms or to conduct routine maintenance activities.
2. The licensee had on several occasions determined reactivity worths of control rods as required by Technical Specification 4.2.1.a by utilizing the "positive period" method without having a procedure to control this test activity.

This is a Severity Level IV violation. (Supplement I)(192/8801-03)

Pursuant to the provisions of 10 CFR 2.201, the University of Texas is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 24<sup>th</sup> day of March 1988.