

NOTICE OF VIOLATION

University of Lowell
University of Lowell Research Reactor

Docket No. 50-223
License No. R-125
EA 88-108

On March 14-16, and 22, 1988, a routine NRC safety inspection was conducted at the University of Lowell Research Reactor. During the inspection, three violations of your Technical Specifications were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are set forth below:

- A.1 Technical Specification 4.2.4c requires calibration of the pool water level instrument annually.

Contrary to the above, the pool water level instrument was not calibrated during the 17 month period between July 1985 and December 1986.

- A.2 Technical Specification 4.2.8 requires a semi-annual verification of the operability of the health physics office protective channel manual scram.

Contrary to the above, during the 12 month period between December 1986 and December 1987, the operability of the health physics office protective channel manual scram was not verified.

- A.3 Technical Specification 4.2.4b requires calibration of the primary coolant flow rate instruments annually, and Technical Specification 6.7.1 requires, in part, that equipment and component surveillance activity records shall be kept in a manner convenient for review and retained for a period of at least five years.

Contrary to the above, no calibration records exist for calibration of the primary coolant flow rate instrument during the twenty-four month period between June 1985 and June 1987.

- B. Technical Specifications, Section 6.2 requires that: (1) the Reactor Safety Subcommittee (RSS) meet at a quarterly frequency; and (2) formal, documented evidence of the performance of its required review functions be provided.

Contrary to the above, the Reactor Safety Subcommittee: (1) on several occasions did not meet at the required quarterly frequency between January 1986 and January 1987; and (2) there was no formal method for documenting its required review and approval of normal, abnormal and operating procedures, as well as maintenance procedures and records.

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- C. Technical Specifications, Section 6.3 requires that changes to the facility operating procedures be reviewed by the Reactor Safety Subcommittee either: (1) prior to implementation, if substantive; or (2) post implementation, if they do not constitute a change of intent.

Contrary to the above, all of the facility Special Procedures (including surveillance procedures), involving both substantive changes and changes that did not change the intent of the original procedures, were revised and implemented in August 1987 and as of March 1988, the procedures had not been reviewed and approved by the Reactor Safety Subcommittee.

These are Severity Level IV violations.

Pursuant to the provisions of 10 CFR 2.201, the University of Lowell is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC responsible Section Chief within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that 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. If an adequate reply is not received within the time specified in this Notice of Violation, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

William F. Kane, Director
Division of Reactor Projects

Dated at King of Prussia, Pennsylvania
this day of July 1988