



UNIVERSITY OF MISSOURI-ROLLA

Nuclear Reactor Facility

Nuclear Reactor
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December 22, 1987

Doc #et No. 50-123

Mr. W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Shafer:

This letter refers to your letter dated November 24, 1987, which was concerned with a Notice of Violation of the same date, which resulted from a routine safety inspection conducted by Mr. W. J. Slawinski on October 28-30, 1987.

It is our contention that the citation is not proper and, therefore, should be dismissed for the following reasons:

1. The inspector used as a basis for the citation an out-dated version of SOP 600. The one currently in effect is dated June 19, 1985. That revision has the word "or" omitted from item B(4) immediately before the last phrase "while handling radioactive materials."

There are only two official, controlled copies of the Standard Operating Procedures for our facility. Copy 1 is kept in the control room and Copy 2 is kept in the lobby.

During his inspection, Mr. Slawinski was provided with a copy of SOP 600 dated June 19, 1985, but he apparently did not use it when he compiled his findings.

2. SOP 600, entitled "Laboratory Rules", pertains to the situation when irradiated materials are being handled in the bay area. At the frisker station (referred to in SOP 600) a visible sign is posted which reads: "All personnel who have handled radioactive materials must check for possible contamination prior to exiting the bay area." At the time the inspector visited the facility, no laboratory or maintenance work involving irradiated materials was in progress in the bay area.

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Therefore, according to the SOP 600, the personnel were not required to use the frisker station. We explained the above interpretation of the SOP 600 to the NRC inspector during the exit interview.

3. As a point of clarification we will add to SOP 600 in the purpose, "These rules apply to students in the laboratory courses, such as NE 304 and 308, as well as other persons (including reactor staff) who are irradiating samples or are counting irradiated samples.

To item 15 of SOP 600 we will add the introductory phrase in order to clarify the policy, "All personnel who have handled radioactive materials must (rest the same -- "always use the frisker station when leaving the bay area.")

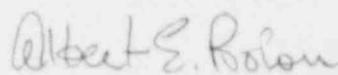
4. The NRC inspector states in point 16C, regarding his exit interview, "Acknowledged the inspector's comments regarding failure to adhere to SOP 600, "Laboratory Rules", and that this represents a technical specification violation (Section 7).

Those of us who were present simply listened to his presentation. We did not acknowledge that this matter represents a technical specification violation.

As a matter of fact, we are seriously concerned that he has treated SOP-related matters as though they were Technical Specifications.

Thus, we believe that the Notice of Violation should be dismissed.

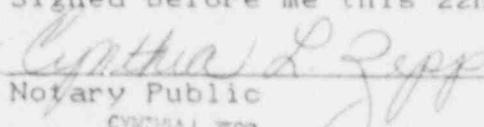
Sincerely,



Albert E. Bolon
Reactor Director

AEB/lp

Signed before me this 22nd day of December, 1987.



Notary Public

CYNTHIA L. ZEPP

NOTARY PUBLIC STATE OF MISSOURI

PULASKI COUNTY

MY COMMISSION EXPIRES JULY 1, 1991

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