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THE VICE CHANCELLOR
IRVINE, CALIFORNIA 92717

April 4, 1988

Ross A. Scarano, Director
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane
Walnut Creek, CA 94596

RE: UCI TRIGA REACTOR - REPLY TO NOTICE OF VIOLATION DATED March 3, 1988

Docket: 50-326, License: R-116

Gentlemen:

May we please ask you to correct your records in one point. The correct name for the Chair of the Chemistry Department is Professor M. Caserio, and not as printed throughout the report.

In regard to the notice, we respond as follows:

Item A. Monthly maintenance checklists were incomplete and/or not reviewed contrary to Standard Operating Procedures.

- (1) As noted to the inspector, this occurred mostly as a result of reassignment of responsibilities within the Chemistry Department of the Assistant Reactor Supervisor. An additional factor was the lack of a detailed list of items to review on the part of the Reactor Supervisor and the Radiation Safety Officer (on behalf of the Reactor Operations Committee (ROC)).

We would wish to note that there is no evidence that the lack of completion or review resulted in an actual safety problem, or increased the likelihood of a safety-related incident. Most of the checklists relate to items that even if totally non-functional would not contribute to a hazard to personnel or the community.

- (2) The Reactor Supervisor, Assistant Supervisor, and the Radiation Safety Officer have met to review the issue. The facility maintenance has been thoroughly checked and any outstanding items already brought up-to-date.
- (3) A review sheet is being created that will help to assure thorough review of all checklists during quarterly inspections so that any delinquencies can be brought to the attention of the Reactor Supervisor and the Reactor Operations Committee at quarterly meetings. A review is being made of all checklists to see if the items thereon are appropriate. If unneeded items are to be removed, this will be done only with approval of the ROC, but may help speed up completion of such lists.

- (4) We assert that the facility is now in compliance with respect to maintenance and surveillance, and will remain so.

Item B. Implementation of the Emergency Plan failed to meet certain requirements.

- (1) Rather than review the non-compliance point by point, we choose to deal with this issue as one involving inadequate attention to review and full implementation of the plan. Clearly our staff do need to exert more effort in this direction to assure that maintenance of the plan is effective.
- (2) The Reactor Supervisor and the Radiation Safety Officer have met specifically to review this issue. Actions are being taken within the Office of Environmental Health and Safety to correct several specific omissions. (Your items 1, 5, 6).

With respect to item B.2, the reactor staff have calibrated the high volume air sampler unit as to air flow. However, the staff are not in agreement with the inspector that this is an "instrument" in the usual sense of that definition. It is not our intent that this item be used for quantitative measurements at our facility and we do not believe that our procedures imply such use so that strict calibration is felt to be unnecessary, and perhaps misleading. So many immediate factors can affect the performance of such a sampler, that unless it is calibrated immediately prior to use in an emergency, the data from quantitative utilization could be seriously in error. We propose only to use this device as a "grab" sampler, and as such, calibration is really unimportant.

- (3) The EH&S Office will schedule a meeting of senior personnel (to include the Radiation Safety Officer, the Reactor Supervisor, the Chief of Police, and the Public Information Officer) during the month of January each year for the specific purpose of reviewing the status of the Facility Emergency Plan, and to schedule an annual exercise.

This review shall include, but not be limited to, the following:

- (a) Adequacy of training for new personnel and documentation thereof.
- (b) Adequacy of retraining and plan familiarization for existing personnel.
- (c) Adequacy of supplies and equipment available in support of the plan.
- (d) Adequacy of off-site response, and status of agreements to provide assistance.

Minutes of this meeting will be made and retained for future inspections.

Prior to the first of such meetings, the Reactor Supervisor, Radiation Safety staff, and facility personnel will meet on a regular basis to update knowledge regarding the emergency plan and review any other items that need correction. One item for immediate discussion is planning for a 1988 exercise as a training and test event. Attendance at such meetings will be recorded and reported during quarterly reviews to ROC.

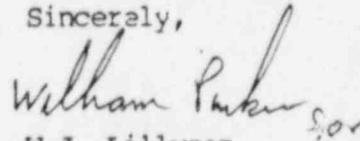
- (4) We believe that further efforts are needed to reach full compliance in this area. As an anticipated level of needed emergency response at a facility such as ours is very low it is not anticipated that this will result in any realistic reduction in safety of operation of the facility. It is intended

that all immediate emergency needs be filled at once. Implementation of full annual events should be in place by next January 31st (1989).

Your letter of transmittal requests that we consider the issue of management oversight. We are of the opinion that this has been addressed within the context of the two specific areas cited. However, the Chemistry Department Chair and the Dean of the School of Physical Sciences are continuing to review this issue. If significant changes in administration are anticipated, we will inform you accordingly.

We hope that this response will enable you to conclude that the UCI facility continues to operate in a manner consistent with protection of the health and safety of the public. We will be pleased to cooperate in any further way that you see fit.

Sincerely,

A handwritten signature in cursive script that reads "William Lillyman". The signature is written in dark ink and is positioned above the typed name.

W.J. Lillyman
Executive Vice Chancellor

cc: U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555