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OFFICE OF
ACADEMIC AFFAIRS

May 19, 1988

William F. Kane, Director
Division of Reactor Projects
United States Nuclear Regulatory Commission
Region 1, 475 Allendale Road
King of Prussia, PA 19406

Gentlemen:

To summarize our response to the concerns raised in NRC Region I Inspection Report No. 50-223/88-01 and during the Enforcement Action Meeting held at the University of Lowell on April 29, 1988, I would first like to address three apparent violations concerning (1) failures to meet Technical Specification required activities, (2) degradation in the performance of the Reactor Safety Sub-Committee and (3) inadequate review and approval of procedures as required by Technical Specifications.

The apparent violations involving surveillance (50-223/88-01-01) were discussed in detail at the enforcement meeting. The third listed (primary flow rate calibration) was performed, however the documentation of the calibration is missing. The Reactor Operating log book does have an entry, dated 3-27-86, indicating that this item was in fact performed. However, these missing documents for all three tests indicate the need for a more rigorous review of all surveillance including activities required by Technical Specifications, routine maintenance activities and unscheduled maintenance activities.

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The Reactor Supervisor has instituted a formal monthly meeting with the Chief Reactor Operator. At this monthly meeting, they will review all maintenance activities and surveillance requirements and records for the previous month. At this meeting, they will review this data for completeness, proper frequency, for determination if results are consistent with previous records and if they indicate any trends which may predict potential future problems or equipment failures or inadequacies. In addition, we will review the up coming requirements for the next month and determine who is responsible for the test. This meeting, implemented by the Reactor Supervisor, will be the mechanism for determining responsibility for the performance of the test or procedure and will provide for confirmation of performance and review of results at two levels (CRO and Reactor Supervisor); up to now this has not been formally done. In addition, the Reactor Supervisor is maintaining a master record of these activities so that they can be easily reviewed by myself, the Reactor Safety Sub-Committee or others.

The apparent violations (50-223/88-01-03) concerning the activities of the Reactor Safety Sub-Committee (RSS) were addressed individually at the Enforcement Meeting and are summarized as follows:

- 1) That the RSS has not met at the frequency internal required by Technical Specifications, i.e., specifically the RSS did not meet between October 1986 and May 1987. We feel there are mitigating circumstances since it was we who identified the lapse.

- 2) On one occasion, the T.S. requirement of at least one member from outside the reactor facility line organization was not met. We have identified a meeting at which only three members were present and the permanent chairman was absent. It is, however, our interpretation that the RSO, who was present, is outside the reactor facility line organization.

- 3) On the question of issuance of minutes without review signatures of the attendees, this omission will be rectified by including a sign-off sheet with the minutes. However, it should be pointed out that, up to the present, this issue has never been brought up in prior inspections and is not specifically required by Technical Specifications, and consequently we view it as a new requirement.

A number of other concerns were also brought out by this inspection and Enforcement meeting.

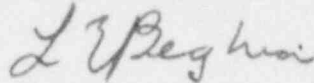
Without restating each concern, separately, the following steps have been taken by myself and/or the Reactor Safety Sub-Committee.

- 1) A new charter has been drafted for the RSS and after review by the RSS will be submitted to the University of Lowell Radiation Safety Committee. This charter includes sections requiring specific membership review and signature and delineates responsibility for maintaining minutes and review and to follow up on any actions the RSS requires. The charter is to be amended to define the independent status of the Radiation Safety Officer and clarify the line function of this position.
- 2) The RSS has approved a proposal by the Reactor Supervisor to have a yearly review and audit of reactor operations by the manager of another research reactor. The Reactor Supervisor has arranged for the manager of the Rhode Island Nuclear Science Center and the University of Michigan Ford Reactor to perform an audit on a yearly basis. This audit will be reviewed by the RSS when it is submitted.

- 3) I have received permission from the President of the University to fill the position of Chief Reactor Operator. The job has been posted according to the procedures agreed to with the appropriate union, the candidate for the position has been selected and will be submitted to the Board of Trustees for final approval.
- 4) As the person in overall charge of the Research Reactor and other research facilities, I am making frequent visits (at least weekly) for survey purposes and for the purpose of communications with the reactor personnel. In addition, I plan to sit-in on the Reactor Supervisor's weekly staff meeting and/or the monthly surveillance review meeting. I plan to have full staff meetings at least 6 times a year.
- 5) I have already designated the RSO as responsible for the scheduling of RSS meetings, assuring member affirmation of sub-committee minutes and to follow up on sub-committee action items and to report back to the sub-committee on such items. I have also asked the RSO and Reactor Supervisor to review all licensed activities of the facility and to recommend to me those persons who should be responsible for each required activity so that I can insure that responsibility and authority are clearly delineated.
- 6) The Reactor Safety Sub-committee has requested that the Reactor Supervisor submit a proposal for the implementation of non-substantive changes in reactor operating procedures. The Reactor Supervisor has submitted a letter outlining what constitutes substantive changes in procedure and proposes that the RSS must review any procedural changes made this way at the next quarterly meeting. The RSS will review the letter at its next meeting.

I feel that the steps outlined above, namely, 1) the formalized review by the CRO and Reactor Supervisor of surveillance activities, 2) the more active and documented role of the Radiation Safety Sub-committee and 3) my increased management oversight role will result the proper adjustments necessary for us to insure that the facility is safely operated and meets the requirements of our license.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "L E Beghian".

Leon E. Beghian
Associate Vice President for Research

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