



# Georgia Institute of Technology

NEELY NUCLEAR RESEARCH CENTER  
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ATLANTA, GEORGIA 30332-0425

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November 23, 1988

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTENTION: Document Control Desk

Subject: Georgia Institute of Technology  
License No. R-97, Docket No. 50-160  
Reply to a Notice of Violation  
Inspection Report No. 50-160/88-03

Gentlemen:

Pursuant to 10CFR2.201, please find attached a response to the violation which was identified in USNRC Inspection Report No. 50-160/88-03. Georgia Institute of Technology does not consider any information contained in this response to be proprietary.

Very truly yours,

R.A. Karam  
Director

Attachment

RAK:jlr

pc: Mr. M. Ernst, Acting Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II  
101 Marietta Street, N.W., Suite 2900  
Atlanta, Georgia 30323

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GEORGIA INSTITUTE OF TECHNOLOGY  
REPLY TO A NOTICE OF VIOLATION  
INSPECTION REPORT NO. 50-160/88-03

VIOLATION 50-160/88-03-04, Severity Level V (Supplement VIII)

10 CFR 50.54(q) requires that a licensee authorized to possess and/or operate a research reactor or fuel facility shall follow and maintain in effect emergency plans which meet the requirements in Appendix E of Part 50. Section 10.1 of the Emergency Plan states that individuals with emergency response responsibilities will complete an initial training program and an annual retraining program to include classroom training and practice drills.

Contrary to the above, personnel designated in Section 3.1.1 of the Emergency Plan as assuming the responsibilities of the Emergency Director had not been trained as required. The Radiological Safety Officer was one of three individuals identified as filling the role of Emergency Director in the absence of the Director of the Nuclear Research Center. However, personnel currently assigned as the Radiological Safety Officer had not attended any initial or annual training specific to the Emergency Director's role.

REPLY

1. Admission or denial of the violation:

Georgia Institute of Technology admits the violation occurred as stated.

2. Reason for the violation:

Georgia Institute of Technology has recently undergone a reorganization during which the responsibilities for radiation safety at the facility were realigned through approval of Amendment 7 to the Technical Specifications. The radiation safety function at Georgia Institute of Technology is now executed by the Manager, Office of Radiation Safety (MORS). An oversight occurred in that the Emergency Plan was not updated to reflect this change. Although the position of Radiation Safety Officer still exists at Georgia Institute of Technology, this position now functions primarily in the realm of safety policy. Additionally, immediately prior to the inspection documented in Report No. 50-160-88-03, the MORS had undergone a change in personnel and training for this individual as alternate Emergency Director had not been performed.

3. Corrective steps which have been taken and the results achieved:

The Emergency Plan has been revised to reflect the current organizational and functional management of the Neely Nuclear Research Center in that the MORS has been delegated the responsibility of alternate Emergency Director. In addition, initial training is being provided for the MORS.

4. Corrective steps which will be taken to avoid further violations:

The above described corrective actions will ensure that recurrence will not occur.

5. Date when full compliance will be achieved:

Distribution of the revised Emergency Plan was completed on October 12, 1988 and training of the MORS will be completed by November 29, 1988.