



UNIVERSITY OF VIRGINIA  
DEPARTMENT OF NUCLEAR ENGINEERING AND ENGINEERING PHYSICS  
NUCLEAR REACTOR FACILITY  
SCHOOL OF ENGINEERING AND APPLIED SCIENCE  
CHARLOTTESVILLE, VA 22901

October 13, 1988

Telephone: 804-924-7136

Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: REPLY TO A NOTICE OF VIOLATION  
(Docket No. 50-62, License No. R-66)

Gentlemen:

Please find enclosed the University of Virginia's reply to the Notice of Violation of September 14, 1988 (NRC Inspection Report No. 50-62/88-02). Our reply addresses three examples of a violation of 10 CFR 50.54(q) cited in the notice, in the format requested by the NRC. Security or safeguards information is not submitted at this time.

FOR THE UNIVERSITY OF VIRGINIA

Robert U. Mulder, Director  
U. of Virginia Reactor Facility

Sworn to and subscribed before me this 13th

day of October, 1988

Witness my hand and official seal.

Dale E. Van Notary Public

My Commission Expires 9/17/89.

cc: Regional Administrator, USNRC Region II, Atlanta, Ga.  
Dr. J. S. Tulenko, University of Florida  
Dr. Ratib Karam, Georgia Institute of Technology  
Dr. Paul J. Turinsky, N. Carolina State University

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LICENSEE RESPONSE TO NRC VIOLATION CITATIONS

VIOLATION 1: 10 CFR 50.54(q): Not all requirements of Appendix E, Part 50 were met.

LEVEL: IV.

DESCRIPTION: Four reactor staff members did not attend all of classroom training sessions required by section 10.1 of the Reactor Facility's Emergency Plan.

PLEA: Infraction is admitted.

MITIGATING OR  
EXTENUATING  
CIRCUMSTANCES: The classroom training is provided by the staff for the staff during requalification meetings. It is difficult to schedule meetings dates such that all emergency personnel are present at the same time. Some may be engaged in reactor operations, in research, in teaching, on vacation, or on sick leave.

SIGNIFICANCE: There was no degradation in emergency preparedness as a result of the incomplete retraining. The inspector found the staff sufficiently knowledgeable in the emergency procedures, because almost all staff participated in the development of the emergency plan.

CORRECTIVE  
STEPS: A two-year schedule board, listing dates for emergency training sessions, drills and other required actions, has been developed. Future retraining in emergency response procedures of requalification meeting absentees will be accomplished with the utilization of video tapes of previously held training sessions. A classroom emergency plan training session is to take place before the next major emergency drill, scheduled for this autumn.

DATE FOR FULL  
COMPLIANCE: Full compliance with the retraining requirement will have been achieved by the time the next major drill is held this autumn.

VIOLATION 2: 10 CFR 50.54(g): Requirements of Appendix E, Part 50 not met.

DESCRIPTION: Some evacuation drills were not conducted on the six month frequency required by section 8.4.2.c of the Emergency Plan.

LEVEL: V.

PLEA: Infraction is acknowledged.

SIGNIFICANCE: The emergency evacuation drill scenario is described during yearly training and retraining of personnel attending the Reactor Facility. Some weeks following this training, the evacuation alarm has been sounded and evacuation drills conducted. It is unlikely that the yearly frequency for evacuation drills, which has been observed instead of the required semi-annual frequency, resulted in a lack in emergency preparedness, because all evacuation drills that were performed were very successful.

MITIGATING  
OR EXTENUATING  
CIRCUMSTANCES: For lack of a schedule board, the semestral requirement was overlooked. Mental recollection of this requirement was faulty. Also, due to a reduction in the staff size and subsequent reorganization, the responsibilities for emergency preparedness were shifted from one reactor supervisor to another.

CORRECTIVE  
STEPS: A two-year schedule, listing emergency training sessions, drills and other required actions, has been developed.

DATE FOR FULL  
COMPLIANCE: An evacuation drill, with the sounding of the alarm, will be held during the month of October, 1988.

VIOLATION 3: 10 CFR 50.54(q): Not all requirements in Appendix E, Part 50, were met.

LEVEL: V.

DESCRIPTION: Updated written commitments of support from offsite emergency organizations (Letters of Agreement) were requested after the two-year renewal period specified in the Emergency Plan.

PLEA: Infraction is acknowledged.

SIGNIFICANCE: The significance of the lapse in securing renewed agreements is judged to have been small. Since the offsite emergency agencies are in the business of providing emergency support, it is unlikely that this support would have been withheld had it actually been needed. Of course, reminders of commitments to this facility by these agencies serves a useful purpose.

CORRECTIVE  
STEPS:

Again, the explanation for the lapse is due to reliance on memory for an action that required bi annually. The requests should have been mailed out in the summer of 1987. In July of 1987 the staff was heavily involved in an analysis of and recovery from the neutron beamport incident. This served to deviate staff attention from the required action.

The adoption of a two-year schedule board should prevent re-occurrence of this and similar infractions.

Requests for Letters of Agreement were mailed out before the recent NRC inspection in emergency preparedness was held. It is believed that the synchronization between the bi-annual holding of major emergency drills and the receipt of the Letters of Agreement has been improved as a result of the lapse. In the future, renewed commitments should be in hand shortly before the execution of the major emergency drills.

DATE FOR  
COMPLIANCE: Full compliance has been achieved.