



August 31, 2020

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: REPLY TO A NOTICE OF VIOLATION; 50-120/2020-201-01
LICENSE NO. R-120
DOCKET NO. 50-297

Dear Mr. Tate:

We are in receipt of your letter dated August 5th, 2020 and the enclosed notice of violation (NOV) and inspection report.

In the enclosed Level IV NOV, it is stated that *“contrary to the TS 6.7.4, since 2015, tritium and other radioactive material has been released via a reactor pool leak to the environment and this release has not been documented in any of the annual operating reports required to be submitted to the NRC from 2016 to the present.”* Previously, such pool leaks were not interpreted as to be documented under TS 6.7.4, paragraph f. Consequently, this violation is a result of the recent interpretation of the documentation requirement under TS 6.7.4, paragraph f.

Effective immediately, the Nuclear Reactor Program commits to the following:

- 1) Document such leaks in the PULSTAR reactor’s annual report according to TS section 6.7.4, paragraph f. Supplements to the annual reports containing this information for 2015, 2016, 2017, 2018, and 2019 are being finalized and will be submitted to NRC by 9/30/2020.
- 2) PULSTAR procedure 2.1 “Review and Approval of Documentation” has been revised to clearly specify the documentation requirements and verify that all TS paragraphs are documented in the annual report as needed. This procedure will be reviewed and approved at the next Reactor Safety and Audit Committee (RSAC) meeting to be held by 9/30/2020.
- 3) Following RSAC approval, fully implement the revised PULSTAR procedure 2.1 to verify that this and all TS paragraphs are documented in the annual report as needed.

Since 1972, the NRP has operated the PULSTAR reactor with full adherence to established regulations and according to the highest safety and security standards and will always continue to do so.

I declare under penalty of perjury that the forgoing is true and correct. Executed on 31 August 2020.

Sincerely,

Ayman I. Hawari, Ph.D.
Director, Nuclear reactor Program
Distinguished Professor, Nuclear Engineering