

October 28, 2020 2020-002

Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-001

Re: Violation of Requalification Plan

Docket 50-288

This is a self-report of a violation of Reed Research Reactor's Requalification Plan.

The Violation

On October 12, 2020 it was discovered that two licensed operators had not fully completed the requirements of the 2019-20 requalification year. Reed's requalification year runs from July 1 to June 30.

Specifically, the two operators had missed a mandatory requalification meeting on March 30, 2020. Reed College administration had closed the campus to students in mid-March 2020 due to the pandemic and all Reed students were sent home. A requalification meeting was held on March 30, 2020 using video sharing software. The students were not on campus and it was our first virtual requalification meeting. The normal remedial action for missing a requalification meeting is having operators review the materials from the missed meeting within 30 days. This was not documented for these two operators.

Since students were no longer allowed on campus, most of Reed's licensed operators fell out of requalification due to their inability to perform their required reactivity manipulations by the end of the 2019-2020 requalification year. When the 2020-21 requalification year started on July 1, 2020, most operators, including the two operators in question, were out of requalification because they had not performed the required reactivity manipulations during the 2019-20 requalification year.

The new school year started September 31, 2020. The operators completed their reactivity manipulations under the direct observation and control of a licensed operator. After this was documented, the two operators in question were considered to be back in requalification and they then performed licensed duties. When we discovered on October 12, 2020 that the they had missed the requalification meeting from March 2020, the two operators stopped performing licensed duties until they had completed the necessary review of the missed materials.

The Cause

The cause of the violation was an error by the Reactor staff in not verifying that all of the previous year's requirements had been met for all operators at the beginning of the current requalification year.

A contributing cause was the requalification database. It automatically indicates whether an operator has completed their requalification requirements for the current year, but it was difficult to review the past requalification year in a simple manner.

Another contributing cause was the disruption in our normal operations and documentation when Reed College closed the campus during the pandemic.

The Immediate Correct Action

When it was discovered that the two operators stopped performing licensed duties until they had completed and documented the necessary review of the materials from the March 30, 2020 requalification meeting.

Preventing Future Occurrences

Male

SOP 63, Requalification, will be revised to specifically require that supervisory staff review the requalification status of each operator at the beginning of each requalification year, semester, and quarter.

A mandatory requalification lecture will be given on the cause of the violation.

The requalification database will be modified to make it easier to review an operators requalification status.

I declare under penalty of perjury that the foregoing is true and correct. Executed on: October 28, 2020

Sincerely,

Jerry Newhouse Reactor Director

Reed College

cc Kathryn Oleson, Ph.D., Dean of Faculty
Geoffery Wertz, Project Manager
Greg Casto, Chief, Non-Power Production and Utilization Facility Licensing Branch
Travis Tate, Chief, Non-Power Production and Utilization Facility Oversight Branch