



Reply to a Notice of Violation

University of New Mexico  
University of New Mexico AGN-201M Reactor

Docket No. 50-252  
License No. R-102

Date: 13 December 2023

This letter serves as the UNM AGN-201M reactor unit's formal response to the U.S. NRC Notice of Violation (NOV 05000252/2023201-1).

The reason for the violation of operating over our licensed operating power stems from a misunderstanding within our operations manual where in section 3.5.B of UNM's AGN-201M operations manual reads:

*Sometime, during the course of an experiment or training, a student will let the power drift up to the 6 Watt limit, whereupon a reactor scram occurs. The RSAC decided that such an observed (by the reactor supervisor, but not by the student) unintentional Safety Channel scram is not a reportable event. It was pointed out that in these cases, the reactor supervisor could have kept the scram from occurring but allowed it to happen as part of the educational process for the student(s). In this sense, the scram becomes part of the learning process. Clearly, no Technical Specification is violated under such circumstances as long as a Safety Channel scram does occur and the Reactor Supervisor is aware of the situation, yet permits the scram to occur as part of the educational process. The student invariably gets the message "loud and clear." The RSAC agreed (May 2006) that such events during student training should be treated as observed unintentional scrams, permitted for education/training; thus, not reportable events.*

The event noted occurred during a controlled training exercise in which all SROs and the Chief Reactor Supervisor was present, and the safety system operated as anticipated.

Given that our understanding of the allowability of this type of event has changed, we will re-train all SROs and ROs on this procedure in the December 2023 annual requalification exam and will further strike this from our Operations manual going forward.

Full compliance will be achieved on 31 January 2024.

ATTN: Document Control Desk, Washington, DC 20555-0001

*Rowdy Davis*

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