



**Nuclear Reactor Facility**  
Department of Nuclear and Radiological Engineering

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US Nuclear Regulatory Commission  
Washington, DC 20555

Reply to a Notice of Violation – Inspection Report No. 50-83/2000-201

Inspection Report No. 50-83/2000-201 cites the UFTR facility for a Severity Level IV violation for failure to comply with Technical Specification 6.6.1 requiring the facility to submit to the NRC a routine annual report covering the activities of the reactor facility during the previous calendar year (which ends August 31 for the UFTR) within six months following the end of each prescribed year. Specifically, the licensee failed to submit routine operating reports for two reporting periods: September 1, 1997 to August 31, 1998 and September 1, 1998 to August 31, 1999.

1. Reason for the Violation

The violation is admitted. The annual audit by the University Reactor Safety and Review Subcommittee had noted the failure to submit the reports in a timely manner and was tracking the completion of the reports on its "Open Items" list. Facility management was in the process of generating the reports but had allowed many other facility commitments especially those related to regulatory requirements as well as service to its users to interfere with generation of the reports. The need to submit a document to address conversion of the UFTR from HEU to LEU fuel also involved considerable administrative time. This document is now also nearly ready for submission. The loss of some staff members in the past several years had also contributed to these delays as has the desire to generate a very large report with extra information to meet other needs as noted by the inspection report.

2. Corrective Action Taken to Date/Results Achieved

Facility administrative staff have logged many hours in late December 2000 and in January 2001 to generate these two reports. The first report for 1997-98 containing all the necessary information and some supplementary information will be submitted by February 5, 2001 and is intended to meet and address all the requirements of Technical Specifications Section 6.6.1. In addition, data collection and reduction are nearly complete to support generation of the 1998- 99 annual report which is well under way. In addition, the parallel effort is being used to generate the 1999-00 report at the same time to take advantage of economy of effort as all three reports are being addressed to assure this violation is not repeated.

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3. Corrective Action to be Taken to Avoid Further Violations

Though it is much easier to generate a single large report to meet the needs of several agencies including the Nuclear Regulatory Commission via Technical Specification 6.6.1, for the Department of Energy for its Fuel Assistance Grant and other support, and for various internal administrative officials within the University of Florida, it is fully recognized that NRC requirements must take precedence. Therefore, in the future, a streamlined report will be generated to meet Technical Specifications Section 6.6.1 requirements alone whenever it appears that meeting the needs of all the constituencies for whom a report is to be generated could possibly delay the report. This report generation effort will be started immediately upon the end of each reporting year instead of postponing the effort and not meeting the requirement.

4. Date of Full Compliance

A large effort is currently in progress to generate the required 1997-98 annual report. This report will be submitted by February 5, 2001. Submission of the second report for 1998-99 will be achieved by February 21, 2001 when full compliance will be met. In addition, the current effort will assure that the 1999-00 report is submitted in a timely fashion to meet the regulatory requirement.

We trust this response satisfies the requirements delineated in Inspection Report No. 50-83/2000-201. If there are any further questions, please advise.

Sincerely,

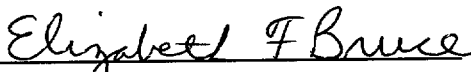


William G. Vernetson  
Director of Nuclear Facilities

WGV/dms

Copies: NRC Region II Regional Administrator  
J. Wolf  
Reactor Safety Review Subcommittee (RSRS)

Sworn and subscribed this 29 day of January 2001

  
Notary Public



Elizabeth F. Bruce  
MY COMMISSION # CC686414 EXPIRES  
October 6, 2001  
BONDED THRU TROY FAIR INSURANCE, INC.