



HITACHI

GE Hitachi Nuclear Energy

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M170025

February 1, 2017

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-001

Subject: Reply to a Notice of Violation

References: 1) NRC License R-33, Docket 50-73
2) NRC Inspection Report No, 50-73/2016-202 and Notice of Violation, 12/13/16
3) Letter, M.J. Feyrer (GEH) to NRC Document Control Desk - Request for
Change in NOV Response Date, 1/6/17

Attached to this letter is GE Hitachi Nuclear Energy, L.L.C (GEH) response to the Notice of Violation described in Reference 2.

If you have any questions regarding this matter, please contact me at (925) 918-6018.

Sincerely,

Matt Feyrer, Site Manager
Vallecitos Nuclear Center

Attachment: GEH response to violation

Commitments: Complete longer term preventive actions

cc: NRC Region IV Administrator
O. Font, NRC NRR/DPR
D. Hardesty, NRC NRR/DPR
T. Mendiola, NRC NRR/DPR
MJF 17-004

Attachment

The information provided below summarizes Notice of Violations 01 and 02 dated December 13, 2016 associated with NRC Inspection Report 50-73/2016-202 from an NRC inspection conducted October 3-6, 2016.

VIOLATION NO. 2016-202-01

In accordance with Technical Specification (TS) 1.2.20.2.b, the reactor is considered secured when the console key is in proper custody. Nuclear Test Reactor (NTR) Standard Operating Procedure (SOP) 6.1, "Staffing Requirements," Section 4.3.2 also states that the reactor is considered secured when the console key is locked in the safe or in the custody of a licensed operator. Additionally, TS 6.1.3.1.a, states that the minimum staffing when the reactor is not secured shall be composed of a licensed operator in the control room.

Contrary to the above, a non-licensed operator had access to the safe where the console key was stored. Additionally, General Electric (GE) did not meet the minimum staffing TS requirement because there was not a licensed operator in the control room when the reactor was not secured.

This is a Severity Level IV violation Section 6.1.d.

GEH's Response to Violation:

GEH does not contest the violation.

1) The reason for the violation

An investigation determined that the violation was caused by the NTR Manager giving a verbal instruction to a reactor operator trainee to obtain a cell door key, but did not clarify and address that the instruction also made the operating console key unsecure. Neither the NTR Manager or the trainee recognized that trainee access to the safe made the operating console key unsecure as defined by procedure.

2) Short term corrective actions taken

- The console key was returned to a licensed reactor operator.
- The combination to the console key safe was immediately changed so that only licensed operators have access to the key.
- Reactor operators were briefed regarding the event and proper operating console key custody/security.

Attachment

3) Longer term preventive actions

- 1) Revise NTR Operating Procedure to clarify that only licensed operators have access to the key control safe.

Scheduled completion – April 28, 2017

- 2) Update the lock-box configuration such that cell door entry key and operating console key are maintained separately.

Scheduled completion – May 31, 2017

4) Date when full compliance will be achieved

Full compliance has been achieved. Two longer term preventive actions have been scheduled.

VIOLATION NO. 2016-202-02

Additionally, in accordance with TS. 6.4.1.h, GE is required to have procedures for Radiation protection. NTR SOP 7.6, "Protective Clothing," Section 5.6 requires the use of protective clothing, including gloves. Vallecitos Safety Standards (VSS) 8.1 states that visitors are not allowed in High Radiation areas. Also, VSS 5.5 "Radiation Work Permits," requires workers to move away from the source of any dose rate alarm and notify a radiation monitoring technician (RMT), and workers to exit the radiological controlled area upon receipt of an accumulated dose alarm and immediately notify the RMT responsible for job coverage.

Contrary to the above, there was a failure to adhere to the radiation safety procedures in place on three occasions during the facility walkthrough portion of an operator license exam.

This is a Severity Level IV violation Section 6.7.d.

GEH's Response to Violation:

GEH does not contest the violation.

1) The reason for the violation

The violation was caused by a lack of understanding by a reactor operator trainee of contamination control and radiation work permit requirements.

Attachment

2) Short term corrective actions taken

- A radiation monitor technician was immediately notified and performed a survey of the individual to confirm there was no contamination.
- The NTR reactor operators responsible for controlling reactor cell entries were briefed of the event and acknowledged they understand radiation safety procedures and radiation work permit requirements.
- Additional training was provided to NTR personnel on the proper use of personal protective equipment and alarming dosimeters.

3) Longer term preventive actions

- Revise or replace the NTR operating procedure on the use of protective clothing in posted radioactive materials areas to ensure the VNC site personal protective clothing requirements are appropriate for NTR; reconcile with the VNC site procedure(s) governing use of protective clothing/equipment.

Scheduled completion – April 28, 2017

- Revise the VNC site radiological training procedure to allow visitor access to areas posted as high radiation and radiologically contaminated areas, subject to escort and/or other appropriate controls.

Scheduled completion – April 28, 2017

4) Date when full compliance will be achieved

Full compliance has been achieved. Two longer term preventive actions have been scheduled.