



## VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

Blacksburg, Virginia 24061

NUCLEAR REACTOR LABORATORY

August 25, 1981

Mr. R. C. Lewis, Director  
Region II, U.S. Nuclear Regulatory Commission  
101 Marietta St., N.W., Suite 3100  
Atlanta, Georgia 30303

Re: License No. R-62  
Docket No. 50-124

Dear Sir:

This letter addresses the Severity Level V Violation received as the result of a routine inspection conducted by your office on August 3-7, 1981.

Pursuant to the provisions of 10 CFP 2.201 we submit the following explanations to this Notice of Violation:

1. Admission or denial of the alleged violation:

We admit to the violation of nuclear reactor procedure VI.6.

2. The reasons for the violation:

An oversight by the reactor staff occurred when the interim procedure change to II.2 Control Rod Reactivity Worth and Rate Measurements was not submitted to the next regularly scheduled Reactor Safety Committee (RSC) meeting. The procedure modification was not properly filed and thus was overlooked when the RSC meeting agenda items were being prepared. This procedure is performed only on an annual basis; therefore it has not been performed since the interim change in December 1980.

3. The corrective steps which have been taken and the results achieved:

The interim procedure change has been properly documented and approved according to procedure VI.6. Procedure II.2 will be reviewed by the RSC prior to its performance during the next annual maintenance period scheduled for December 1981.

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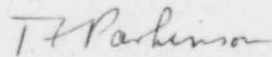
4. Corrective steps which will be taken to avoid further violations:

A new administrative control for procedure changes has been generated. The form attached to this letter will be used to document any procedure change and filed in the copy of the procedure manual located at the reactor control console. These forms will be included in the next regularly scheduled RSC meeting agenda and reviewed by the committee. This form will then be kept on permanent file and the procedures promulgated to all copies of the procedure manual in their final form. This should prevent any further oversight in the procedure review process.

5. The date when full compliance will be achieved:

Full compliance will be achieved by October 30, 1981. The procedure will be reviewed at the next meeting of the RSC scheduled for late October 1981.

Sincerely yours,



T. F. Parkinson, Director  
Nuclear Reactor Laboratory

cc: Alan P. Curtner, Reactor Supervisor  
A. K. Furr, Deputy Director, NRL  
R. A. Teekell, Chairman, RSC

PROCEDURE MODIFICATION

PROCEDURE: \_\_\_\_\_

Describe changes below: (use continuation sheet if necessary)

I certify this change meets the requirements of VI.6 Procedure on Reactor Procedures, step II.B Procedure Modification:

\_\_\_\_\_  
Reactor Supervisor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Senior Reactor Operator

\_\_\_\_\_  
Date

\_\_\_\_\_  
Reactor Radiation Safety Officer

\_\_\_\_\_  
Date

Final review and approval:

\_\_\_\_\_  
Chairman, Reactor Safety Committee

\_\_\_\_\_  
Date