

USNRC REGION II  
ATLANTA, GEORGIA

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

82 MAY 25 1982 SCHOOL OF ENGINEERING

DEPARTMENT OF NUCLEAR ENGINEERING  
NUCLEAR REACTOR PROGRAM  
Box 5636 ZIP 27650

May 18, 1982

NRP-RGC-82-108

Mr. F. J. Long, Acting Chief  
Reactor Projects Branch 1  
Division of Project and Resident Programs  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W., Suite 3100  
Atlanta, GA 30303

Subject: Report Nos. 50-297/82-01 and 50-111/82-02

Gentlemen:

In response to your letter dated April 21, 1982, submitting the referenced Inspection Reports and a Notice of Violation, attached are written statements regarding the alleged violations pursuant to the provisions of 10CFR 2.201 as stated in Appendix A of your letter.

We concur with the finding stated as Item B in Appendix A, but we do not think that Item A in Appendix A should be called "Severity Level V Violation." The following information from the Federal Register (Vol. 47, No. 46/Tuesday, March 9, 1982/Rules and Regulations 9991, first column) supports our position on this matter:

"Because the NRC wants to encourage and support licensee initiative for self-identification and correction of problems, NRC will not generally issue a notice of violation for a violation that meets all of the following tests:

- (1) It was identified by the licensee;
- (2) It fits in Severity Level IV or V;
- (3) It was reported, if required;
- (4) It was or will be corrected, including measures to prevent recurrence, within a reasonable time; and
- (5) It was not a violation that could reasonably be expected to have been prevented by the licensee's corrective action for a previous violation."

This incident and the reporting of its occurrence satisfies all five (5) tests listed in the Federal Register. Therefore, we respectfully request that the NRC Region II Office explain why we received a Notice of Violation. If the action taken by the Region II Office was appropriate, then

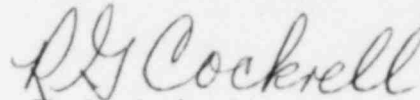
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Mr. F. J. Long, Acting Chief  
Reactor Projects Branch 1  
U. S. Nuclear Regulatory Commission, Region II

Page 2

what additional action should NCSU have taken to avoid receiving a Notice of Violation. If the action taken by the NRC Region II Office was not in accordance with the Federal Register, then what action will Region II take to correct the error?

Very truly yours,



R. G. Cockrell  
Director  
Nuclear Reactor Program

RGC:lpe

Attachment:

Statement by Dr. L. W. Seagondollar,  
Chairman, Reactor Safeguards Advisory  
Group re Notice of Violation

Statement by R. G. Cockrell, Director,  
Nuclear Reactor Program, re Notice  
of Violations.

cc: Mr. James R. Miller  
USNRC, Washington, D. C.  
Dr. L. W. Seagondollar  
Mr. Thomas C. Bray  
(all with attachments)

1. STATEMENT OF VIOLATION

*10CFR 50.54k requires that an operator or senior operator licensed pursuant to Part 55 be present at the controls at all times during the operation of the facility. Technical Specification 1.4 defines operation as any condition when the reactor is not secured. Technical Specification 1.2.b requires, as a condition for reactor secured, that power to the control rod magnets and actuating circuits be switched off and the console key removed.*

*Contrary to the above, a licensed individual was not at the controls during the night of March 11-12, 1982 when the console key was left in the lock and ON with the control room unattended and locked for approximately six hours.*

*This is a Severity Level V Violation (Supplement J.D.).*

2. RESPONSE

*a) Admission or denial of the alleged violation.*

This incident occurred on March 12, 1982, and was reported to Mr. Caudle Julian, the inspector from Region II, by telephone on March 12. Mr. Julian arrived on the campus of North Carolina State University on March 15 to begin his week-long inspection. As a result of our March 12 phone call, he was aware of the incident prior to his arrival. We discussed the matter with Mr. Julian and submitted a written report to Region II on March 22, 1982, a copy of which is attached, in pursuance to NCSU PULSTAR Technical Specification 6.2.7.c.

*b) The reasons for the violation if admitted.*

See the attached letter.

*c) Corrective steps which have been taken and the results achieved.*

The corrective measures that have been taken are delineated in the attached letter. The result of these corrective measures is that the operators now have an increased awareness of the possibility of the likelihood of such an incident and will be more careful in the future.

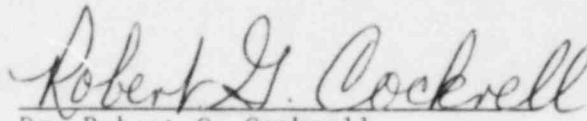
*d) Corrective steps which will be taken to avoid further violations.*

An additional step to be taken to reduce the likelihood of a recurrence of the subject event will be to increase the intensity of the "Reactor On" sign in the reactor console. This sign is illuminated when the reactor console key is in the key switch and turned "On".

*e) The date when full compliance will be achieved.*

The Administrative Controls necessary to assure full compliance

have already been accomplished. We anticipate the modification to the reactor console to be complete by the first week of June.

A handwritten signature in cursive script, reading "Robert G. Cockrell". The signature is written in dark ink and is positioned above the printed name.

Dr. Robert G. Cockrell

Director, Nuclear Reactor Program  
North Carolina State University

Attachment:

Our letter to Mr. Caudle Julian  
dated March 22, 1982

Reference: NRC Reports Nos. 50-297-80-01 and 50-111/82-02, Appendix A.

1. STATEMENT OF VIOLATION

*Technical Specification 6.2.7 requires that the Reactor Safeguards Advisory Group (RSAG) shall meet at least every six calendar months. Contrary to the above, RSAG meetings were not held at least every six calendar months in that, no meetings were held in the intervals of August 7, 1978 to April 15, 1979 and November 19, 1980 to March 19, 1982.*

*This is a Severity Level V Violation (Supplement I.E.).*

2. RESPONSE

*a) Admission or denial of the alleged violation.*

The Reactor Safeguards Advisory Group fully acknowledges and admits that the above-stated violation is correct.

*b) The reasons for the violation if admitted.*

The Reactor Safeguards Advisory Group has concluded that the reason for the violation is oversight and lack of attention to insuring that the reactor appraisal inspection visits were performed at the proper intervals required by the Technical Specifications.

*c) Corrective steps which have been taken and the results achieved.*

See Item d) below.

*d) Corrective steps which will be taken to avoid further violations.*

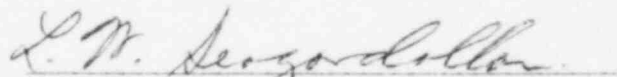
The Reactor Safeguards Advisory Group held a meeting on March 31, 1982 to specifically address Items c) and d). In this regard, it was concluded that:

The management of the scheduling of all future Reactor Safeguards Advisory Group reactor appraisals will be performed by Mr. D. W. Morgan through the auspices of the Radiation Protection Office. Such reactor appraisals will be held at intervals no longer than six months. Furthermore, as a matter of business during any given appraisal visit, the date and time for the next such meeting will be established.

The Minutes of this March 31, 1982 meeting are attached in support of this letter.

*e) The date when full compliance will be achieved.*

The administrative controls necessary to insure full compliance have already been established and upon commencement on May 18, 1982, full compliance will be achieved.



L. W. Seagondollar, Chairman  
Reactor Safeguards Advisory Group  
North Carolina State University at Raleigh

REACTOR SAFEGUARDS ADVISORY GROUP  
MINUTES - MEETING 1981-82/1

31 March 1982

29 March 1982 - 1:00 P.M. Room 1121 Burlington Engineering Laboratories

In attendance: Dr. L. W. Seagondollar, Chairman; Mr. D. W. Morgan;  
Dr. Jimmie J. Wortman

Visitor: Mr. T. C. Bray

I. ITEMS FOR REACTOR SAFEGUARDS ADVISORY GROUP (RSAG) CONSIDERATION

A. Discussion of Recent Nuclear Regulatory Commission (NRC) Inspection

The RSAG members were informed by Chairman Seagondollar of the results of a recent NRC Inspection which points out that even though the RSAG met several times during the period from January 1979 to date, there were two occasions when such meetings were not properly spaced in time to meet the condition that "independent appraisals of reactor operations" be made every six months.

It was concluded that in order to insure that this circumstance does not arise again, the management of the scheduling of all future RSAG reactor appraisals will be performed by Mr. Morgan through the auspices of the Radiation Protection Office. It was further concluded that such reactor appraisals will be held twice annually in the months of June and December or as close thereto as possible. Furthermore, it was concluded that as a matter of business during any given appraisal visit the date and time for the next such meeting will be established. In this regard, the first appraisal of reactor operations for 1982 will take place on May 18, 1982 at 9:00 A.M.

B. Discussion of RSAG Duties

A full discussion of the history of the development of the RSAG and its duties was held to further familiarize Dr. Wortman with the overall mission of this group.

C. Review of Draft Appraisal Checklist

A draft appraisal checklist was prepared by Mr. Morgan for the consideration of the RSAG members. It was concluded that each RSAG member would consider the checklist along with the larger question of defining the scope and content of future reactor appraisal visits. This topic is to be further discussed during the May 18th meeting.

D. Agenda for May 18, 1982 Appraisal Visit

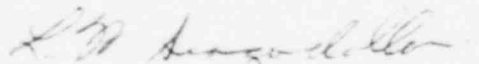
It was concluded that the RSAG will consider the question of how the ALARA Radiation Protection philosophy is being factored into the reactor operations program during this appraisal visit.

II. ITEMS REFERRED TO RSAG BY THE RADIATION PROTECTION COUNCIL (RPC)

No items for review by the RSAG have been transmitted from the RPC since the last RSAG meeting.

Distribution:  
Office of the Chancellor  
Dr. N. N. Winstead  
Chairman, RPC  
Dr. P. J. Turinsky  
Dr. R. G. Cockrell  
Mr. L. T. Caruthers  
RSAG Members  
University Archives

APPROVED:

  
L. W. Seagondollar, Chairman

# NORTH CAROLINA STATE UNIVERSITY | AT RALEIGH

SCHOOL OF ENGINEERING

DEPARTMENT OF NUCLEAR ENGINEERING  
NUCLEAR REACTOR PROGRAM  
Box 5636 Zip 27650

March 22, 1982  
ADM 1-1-16-1

Mr. Caudle Julian  
Project Inspector, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N.W., Suite 3100  
Atlanta, Georgia 30303

Docket No. 50-297  
Facility License No. R-120

Dear Sir:

This letter is transmitted in pursuance to North Carolina State University PULSTAR Technical Specification 6.7.2.c. and describes a Reportable Event (Abnormal Occurrence per our Technical Specification 1.17.f.).

At 0606 on 12 March 1982, when commencing a routine reactor start-up checklist, the reactor operator observed the console key in the key-switch and the keyswitch in the "ON" position. The reactor was shut down (control rods fully down) and subcritical by the same margin as would be expected under routine conditions. At that initial step of the checklist procedure, the console keyswitch should have been "OFF" and the key removed. The Senior Operator who came on duty at 0606/12 March 1982 reviewed the operating log and concluded that the console keyswitch had been left "ON" since the preceeding reactor shutdown had been performed, six (6) hours prior to the 0606/12 March 1982 discovery. The reactor control room was doubly locked, as usual, and the facility intrusion alarm was properly set and armed. Hence the reactor controls were not accessible to the public.

The Reactor Operator who failed to turn off the keyswitch and remove the console key was interviewed by the Reactor Manager and asked to describe the circumstances leading to the event. At the conclusion of the interview, it was determined that failure of the Reactor Operator to follow the established shutdown procedure was due to inattention on the part of the Reactor Operator to the final steps of the shutdown procedure.

~~82-03300109~~

March 22, 1982

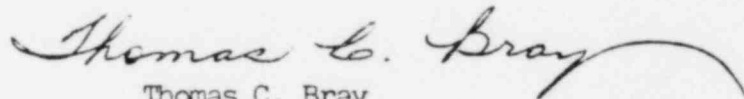
Corrective measures have been taken to avoid further occurrences of this type being reported and they are:

1. Interview with the operator responsible to determine why the shutdown procedure was not followed in its entirety.
2. Requalification lecture of all Reactor Operators and Senior Operators concerning the subject occurrence.
3. Issuance of PULSTAR Standing Order No.47 entitled Guidance for Performing Reactor Checklists.

An additional step to be accomplished toward eliminating a recurrence of the subject event will be to increase the intensity of the "Reactor On" sign in the reactor console. This sign is illuminated when the reactor console key is in the keyswitch and turned "ON".

Please contact me at (919)737-2323 should you desire addition information concerning this report.

Sincerely,



Thomas C. Bray  
Reactor Operations Manager

TCB/bwl

cc: Mr. James R. Miller  
USNRC, Washington, D.C.

Dr. R. G. Cockrell, Director  
Nuclear Reactor Program  
Department of Nuclear Engineering  
North Carolina State University