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15 August 1994

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: REPLY TO NOTICE OF VIOLATION
Docket No.: 50-297 License No.: R-120

Reference: Letter, Notice of Violation (NRC Inspection Report No. 50-297/94-01),
dated 18 July 1994

Dear Sirs:

Pursuant to the provisions of 10CFR2.201, North Carolina State University is hereby submitting a reply to the referenced notice of violation. The attached response addresses the reasons for the violation and the corrective steps that have been or will be taken to avoid further violations.

We also take this opportunity to discuss a statement in the **Report Details** attached to the reference letter. Specifically, page 17, item 11, *Exit Interview*, states: "Licensee management was also informed that problems had been noted in the areas of emergency preparedness and radiation surveys of the reactor bay." The inspection report or exit interview comments did not raise any questions concerning problems in emergency preparedness. The licensee has subsequently telephoned Region II to discuss this statement and it was concluded that the reference to the area of emergency preparedness was not applicable and should be disregarded.

Should you have any questions concerning this reply, please contact us.

Sincerely yours,

Pedro B. Perez

Pedro B. Perez
Associate Director
Nuclear Reactor Program

Charles W. Mayo

Charles W. Mayo, Ph.D.
Director, Nuclear Reactor Program

Gerald D. Wicks

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1. USNRC, Region II, Regional Administrator
2. Dr. Christopher R. Gould, Chairman, Reactor Safety and Audit Committee
3. Dr. Donald J. Dudziak, Head, Department of Nuclear Engineering

**REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 50-297/94-01**

**NORTH CAROLINA STATE UNIVERSITY
PULSTAR Reactor - License No. R-120**

VIOLATION: Severity Level IV

Technical Specifications 6.3.a.8 requires that operating procedures pertaining to radiation control be written, updated periodically, and followed. HP Procedure 20-11, "Preparation of Air Sample Filters for Laboratory Proportional Counting", Revision 3, dated 4 October 1990 and HP Procedure 20-12, "Changing Continuous Air Monitor (CAM) Filters", Revision 2, dated 1 March 1989, both stipulate in section 4 that CAM filters will be changed and analyzed weekly. HP Procedure 20-11 stipulates in Section 5.(4) that a second count analysis of CAM filters will be completed approximately one week after the first count.

Contrary to the above, on two occasions, the time period between changing the CAM filters exceeded a week. The CAM filter was changed on 26 August 1993, but not changed again until 10 September 1993, a period of 15 days. On 29 March 1994, the CAM filter was changed but not again until 11 April 1994, a period of 13 days. Also, on three occasions, the CAM filters were not analyzed a second time as required by procedures. The filters were changed out on 25 February 1993, on 8 April 1993, and on 31 January 1994, and were analyzed but were not analyzed a second time a week later as required.

RESPONSE TO VIOLATION:

- (1) Reason: Management oversight. Specifically, the procedures cited in the Inspection Report do not include review upon completion by the Reactor Health Physicist (RHP).
- (2&3) Corrective Steps: Review of CAM filter change-out and counting results by the RHP is being performed each week. Since the inspection CAM filters have been changed-out, counted, and re-counted weekly.
- Procedures HP 20-11 and HP 20-12 will be revised to include RHP review of CAM change-out and counting results.
- (4) Date of Compliance: Revision of procedures HP 20-11 and HP 20-12 will be implemented by 30 November 1994.