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August 12, 1994

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

Subject: Reply to Notice of Violation resulting from the NRC Inspection 50-150/94001  
conducted at The Ohio State University May 23-26, 1994.

Enclosed is the reply to the Notice of Violation from Inspection 50-150/94001 at The  
OSU Research Reactor. This reply was prepared by the staff of The OSU Nuclear  
Reactor Laboratory. It was reviewed by the University's Reactor Operations Committee  
(ROC) on August 11, 1994. The ROC concurs with this response to the Notice of  
Violation.

Sincerely,

Jose B. Cruz, Jr., Director

c. USNRC Region III

Don W. Miller, Director Nuclear Reactor Laboratory

Richard D. Myser, Assoc. Director Nuclear Reactor Laboratory

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**REPLY TO NOTICE OF VIOLATION  
AT THE OSU RESEARCH REACTOR**  
(NRC Inspection Report 50-150/94001)

Violation #1 The ROC failed to meet annually to perform an audit in 1992, 1993, and 1994 within three months of the end of each of the years.

Admitted there is a violation but not as stated in the notice.

Technical Specification 6.2.5 does not specify that the ROC shall meet within three months of the end of the year to perform an audit. It says they shall meet annually to do this. Only the audit for 1992 which was not completed until February of 1994 was a violation. However, the ROC does recognize the need for more timely audits as is already indicated in the procedure for completing audits, AP-08. This procedure indicates the audit should be conducted from January through March and be presented to the full ROC by July 1 of each year.

1. Reasons for this violation:

While the ROC has recognized the need for timely audits, historically the audit process has begun 6-10 months after the year's activities were completed. This is the first time that audits were not completed in that time frame. It is also the first time the NRC has stated that audits are to be done within three months of the end of the year being audited.

2. Corrective steps that have been taken and results achieved:

Per T.S. 6.2.5, the staff of the Nuclear Reactor Laboratory (NRL) had an audit completed for 1993 on June 21, 1994. It was responded to by the staff and reviewed and accepted by the ROC on 8/11/94.

3. Corrective steps to avoid further violations:

The NRL staff will, when necessary, have an outside group complete the audit in a timely manner. An outside agency may complete the audit per T.S. 6.2.5.

4. Date when full compliance will be achieved:

Full compliance will be achieved by March 31, 1995.

Violation #2 An operator whose active duty status had lapsed did not complete the required six shift hours of reactor operations under the direction of a licensed individual prior to resuming licensed duties.

Admitted as stated in the notice of violation

1. Reason for this violation:

The training supervisor for the NRL followed his NRC approved requalification plan to recertify the inactive operator. This plan references 10 CFR 55.53(f) but

does not specify the number of hours of supervision required before resumption of duties.

2. Corrective steps that have been taken and results achieved:

The training supervisor verified the operator in question has completed the annual requalification exam successfully.

3. Corrective steps to avoid further violations:

Procedure AP-09 "RO/SRO Requalification" will be amended to include 10CFR55.53 (f), which requires six hours of supervised operation.

4. Date when full compliance will be achieved:

Full compliance will be achieved by September 30, 1994.

Violation #3 No facility written or performance requalification examinations were administered to the licensed staff in 1993.

Admitted as stated in the notice of violation.

1. Reason for the Violation :

The training supervisor reviewed the NRC administered requalification exam given in December 1992 and June 1993. He decided the average completion date for the exam was March 1993 and therefore did not complete the next exam until March of 1994. He still believes that if the exam had been given in early March instead of late March it would have met the annual definition of the Technical Specifications. Extensions beyond 15 months must have a valid reason and the span of 16 months without such a reason is a violation.

2. Corrective steps taken and results achieved:

Even though it resulted in a violation, the NKL staff still considers the exam completed in March of 1994 as the "annual" exam for 1993. All operators passed this exam.

3. Corrective steps to avoid further violations:

Because the NKL staff considers the March 1994 exam the one for 1993, another exam needs to be completed in 1994. The training supervisor will administer this exam in 1994.

4. Date when full compliance will be achieved:

Full compliance will be achieved by December 31, 1994.

Violation #4 The NRL staff failed to adequately follow two procedures, RS-02 "Radioactive Waste Disposal" and RS-07 "NRL Weekly Direct Frisk".

Admitted as stated in the notice of violation.

1. Reasons for the violation:

Since the last transfer of waste to the OSU Office of Radiation Safety small quantities of radioactive waste have been generated. Therefore no radioactive waste disposal logsheet had been attached to the waste can to log disposal. The "NRL Weekly Direct Frisk" had been deactivated in December of 1991. While it remained on the index of active procedures it had not been used since the above date.

2. Corrective steps that have been taken and results achieved:

A "Radioactive Waste Disposal Logsheet" has been added to the waste can and 20  $\mu$ Ci of Co-60 has been recorded on the log. The "NRL Weekly Direct Frisk" procedure was officially deleted by the ROC during its meeting of 8/11/94.

3. Corrective steps to avoid further violations:

The NRL staff is reviewing and bringing Radiation Safety procedures to the ROC for review and approval from July-Dec. 1994.

4. Date when full compliance will be achieved:

Full compliance will be achieved by December 31, 1994.