



MEMPHIS STATE UNIVERSITY

MEMPHIS, TENNESSEE 38152

July 13, 1983

USNRC REGION II
ATLANTA, GEORGIA
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Center for Nuclear Studies
Office of the Director
(901) 454-2687

USNRC, Region II
ATTN: Mr. D.M. Verrelli
101 Marietta Street N.W.
Suite 3100
Atlanta, GA 30303

re: License R-127, Docket No. 50-538

Gentlemen:

Your letter of June 21, 1983, promulgated results (Report No. 50-538/83-01) of a routine safety inspection conducted at the Memphis State University (MSU) Reactor Facility on May 24-26, 1983, and identified a Severity Level V Violation of the Facility's Technical Specifications. The following response is hereby submitted pursuant to 10 CFR 2.201 and the requirements of the Notice of Violation.

- (1) Technical Specification 6.4.4.d of the facility license requires that an audit of the Facility Emergency Plan and implementing procedures be conducted at least once per 24 months. The last formal audit of the approved plan was performed on February 6, 1981, and constitutes a period of 27 months to the date of the safety inspection.
- (2) On January 10, 1983, the MSU Reactor Safety Committee (RSC) Chairman assigned certain audit responsibilities to selected committee members. These responsibilities included an audit of the Facility Emergency Plan. Since each RSC member had previously received a copy of the existing emergency plan for individual review to enhance discussions that were held during meetings on September 1 and November 11, 1982, regarding an upgraded plan prepared pursuant to 10 CFR 50.54(r), the significance of conducting a formal audit of the existing plan prior to February 6, 1983, was not emphasized. This, in addition to other demands on the RSC auditor at that time in the university's academic semester, resulted in exceeding the 24 month requirement of Technical Specification 6.4.4.d.
- (3) The RSC Chairman was informed of the Notice of Violation and a formal audit of the existing emergency plan was conducted on June 27, 1983.
- (4) The need for proper planning and priorities of audits required by Technical Specification 6.4.4 as well as the significance of formally documenting these audits will be discussed with all RSC members at future meetings in an effort to avoid further violations.


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(5) It is considered that full compliance with Technical specification 6.4.4 was achieved on June 27, 1983.

Thank you for calling this matter to my attention. If you have further questions I will be glad to discuss them with you.

Sincerely,

A handwritten signature in dark ink, appearing to read "D.W. Jones", written in a cursive style.

D.W. Jones
Director

RLD/DWJ/mlm

cc: Mr. A.K. Hardin, USNRC Region II
Dr. D.K. Holmes, RSC Chairman
Mr. R.L. Dietz, Operations Supervisor