



DEPARTMENT OF MECHANICAL ENGINEERING  
THE UNIVERSITY OF TEXAS AT AUSTIN

*Nuclear Engineering Teaching Laboratory • (512) 471-5787 • FAX (512) 471-4589*

May 24, 1995

US Nuclear Regulatory Commission  
Document Control Desk  
Washington DC 20555

Subj.: Reply to a Notice of Violation  
602/95-01

Dear Sir:

The University of Texas is providing the following response to NRC Inspection Report 50-602/95-01.

A violation of administrative requirements was noted by inspection March 27-31. The enclosure describes the licensee's explanation, corrective actions, and compliance schedule.

Sincerely

*Bernard W. Wehring*

Bernard W. Wehring  
Director of the Nuclear Engineering Teaching Laboratory

Enclosure: Affidavit  
Proprietary Information

cc: Regional Administrator, Region IV  
D. Klein (H. Woodson)  
R. Charbeneau  
T.L. Bauer

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of

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The University of Texas

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at Austin

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Docket No. 50-602

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J.J. Pickle Research Campus

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Nuclear Engineering Teaching

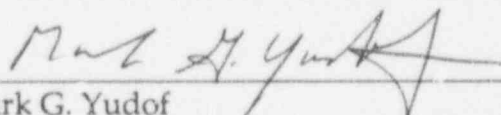
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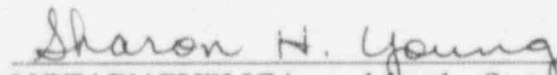
AFFIDAVIT

Mark G. Yudof being duly sworn, hereby deposes and says that he is Executive Vice President and Provost, The University of Texas at Austin; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the enclosed Reply to Notice of Violation 50-602/95-01 of license R-129 condition Technical Specification 6.2.4 (b) and (c), for docket 50-602; that he is familiar with the content thereof; and the matters set forth therein are true and correct to the best of his knowledge and belief.



Mark G. Yudof  
Executive Vice President and Provost

Subscribed and sworn to before me, a Notary Public in and for the State of Texas,  
this 25<sup>th</sup> day of May, 1995

  
NOTARY PUBLIC in and for the State of Texas



Response to NRC Inspection Report 50-602/95-01  
Notice of Violation

A violation was noted during the inspection on 3/27 thru 3/31, 1995. The violation consisted of three parts, each a failure to perform a different action involving audits.

The following information refers to the inspection report 50-602/95-01. Each of the 3 parts of the violation is stated with:

- 1) reason for violation and
- 2) corrective steps that were taken.

Presented as a common response to all three parts of the violation are:

- 3) corrective actions to prevent reoccurrence and
- 4) time to reach full compliance.

Part A. Failure to perform annual audits of actions to correct reactor facility deficiencies.

1) Reason for violation

Facility deficiencies are reported to the reactor committee as part of the routine items of business at each committee meeting. Actions taken and followup, if any, are recorded as part of reactor committee minutes. An explicit audit of the committee minutes or other records that might indicate deficiencies was not done since it was felt that the minutes were a record of the actions on deficiencies.

2) Corrective steps

A review of the reactor committee minutes by the facility director was done for the period of 1/92 to 4/95. A list of deficiencies was made for the period of 1/92 to 4/95. The list will be presented for discussion at the next

reactor committee meeting 7/95. Nine items were noted as deficiencies. Four items occurring in 1992-93 included timely resolution. Of the five remaining items in 1994-95 only two are outstanding. Actions on both these deficiencies are in progress.

Part B. Failure to perform biennial audits of the retraining and requalification program for reactor operators.

1) Reason for violation

Information regarding elements of the program as exams, operating hours, and training status are routine business items of the reactor committee meetings. An explicit audit of the complete written records by the committee was not done in order to review other details of the requalifications records regarding reactor operator training.

2) Corrective steps

The training records have been reviewed by the facility director and were found to be in order. A report of the review will be made at the next reactor committee meeting, 7/95.

Part C. Failure to provide a report of a completed audit to the Director and Nuclear Reactor Committee within 3 months of the completion of the audit.

1) Reason for violation

An audit program including schedule was developed during 1993. Implementation of this schedule began in 1994. The schedule was not met because of the inexperience with the audit process by persons performing the audit. Although portions of the audit were done within the time frame allotment, the complete audit including report was not done.

2) Corrective steps

The audit of subgroup F was complete at the time of the inspection, and the report was being prepared. The report was made to the reactor committee on 4/6/95. The period of time to initiate, complete, and report this particular audit activity exceeded the license requirements.

The following apply to all three parts of the violation.

3) Corrective actions to prevent reoccurrence

The following corrective steps will be taken for each of the three parts of the violation.

- a. Reactor committee meeting agenda will be arranged to explicitly address one or more audit areas at each meeting. The purpose of this change is to emphasize the purpose of the audit.
- b. The original audit schedule will be revised to reflect the lessons learned from previous audit cycles most of which were being done for the first time.
- c. Audit instructions (drafts) have been written as guidance for the two audit areas, deficiencies and reactor operator requalification. Audit instructions have already been developed for most other audit areas.
- d. A written report will be made at each reactor committee meeting, instead of annotations in the committee meetings.

4) Time to reach full compliance

Corrections made to prevent reoccurrence of the violation are in progress with substantial progress made on the administrative changes. Implementing the administrative changes, including review of the audit

schedule and instructions, will be done by the 7/95 reactor committee meeting. Completion of all corrective actions, including a report for each of the audit areas will take nine months. In this period a reexamination will be made of each of the Technical Specifications areas of 6.2.4.