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ROBERT A. HUTTENBACK
Chancellor at Santa Barbara

April 18, 1984

R.A. Scarano, Director
Division of Radiological Safety
and Safeguards Program
Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Scarano;

Subject: NRC Inspection of UCSB L-77 Reactor//Docket No. 50-433

Please find enclosed the requested response to your letter of March 23, 1984 regarding the NRC inspection of UCSB's L-77 reactor. The response was reviewed and approved by the Reactor Committee on April 11, 1984.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. J. Kroes".

Robert J. Kroes
Vice Chancellor
Administrative Services

cc: A.E. Profio

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In reply to Notice of Violation resulting from inspection by Mr. M. Cillis on January 23-25, 1984:

A. Reporting Requirements (Annual Report)

The report of operations for the period January 1, 1982 through December 31, 1982 had been written and a copy was handed to Mr. Cillis on his visit when he inquired about it. Unfortunately, the report was somehow lost in the transmission to NRC in 1983. This is the first time this has happened, and should not happen again. The report of operations for the period January 1, 1983 through December 31, 1983 was transmitted to NRC on January 30, 1984. If you have not received it, please let us know.

B. Posting of Notices to Workers (Regulations)

Mr. Cillis is correct in that the copies of 10CFR19 and 10CFR20 in the Operations Manual were the original versions from 1974. Mr. Cillis has obtained up-to-date editions of these regulations for us and they are being incorporated in the Operations Manual. The Manual is being revised including updated procedures. It is expected that the revisions will be completed in approximately a month. We will try to keep the regulations and procedures more current in the future.

C. Reviews and Audits (Reactor Operations Committee)

The last documented meeting of the Reactor Operations Committee (ROC) was January 27, 1984 and the one before that was October 20, 1982. Other business was handled by circulating memos. We have been informed that this does not substitute for a semiannual meeting, even if there is no business to transact. At Mr. Cillis' suggestion, we have designated Professor Henri Fenech as Chairman of the ROC, and he will be responsible for scheduling timely ROC meetings. The Quarterly Audits did include

a review of the operating records (which would include any unusual or abnormal occurrences), but did not always include an inspection of the reactor operating area, or a quarterly review of standard and emergency procedures. We are issuing a directive to all members of the ROC reminding them of the Technical Specification requirements and guiding them in the type of audit needed.

D. Written Procedures and Records (Operations Manual)

- a) Semiannual contamination checks of beam ports and exposure tubes are not really required. At Mr. Cillis' suggestion, we are revising the procedure to call for contamination checks (swipe test) when the port or exposure tube plug is removed, as this will be the time when knowing of any contamination is most important.
- b) Calibration procedures are being revised to apply to the Eberline area radiation monitors and Technical Associates monitor, as these have now been installed to replace the Tracerlab monitors. The calibration procedures are very similar.
- c) The revised Startup Checklist, Operations Log, and Shutdown Check List have been reviewed and approved by the ROC and have been submitted for review and approval at the next scheduled meeting of the Radiation Safety Committee (RSC). The approved lists/log will be included in the updated Operations Manual. The pencil changes will be removed in this process, although most were guides and did not really alter the procedure.
- d) A new procedure for replacement of the room exhaust filters is being written and will be included in the updated Operations Manual. The problem has been that the exhaust fans and filters fall between the responsibilities of the reactor staff, and the campus Facilities Management staff. This will be clarified.