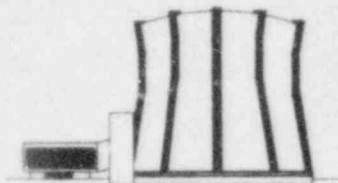


TEXAS ENGINEERING EXPERIMENT STATION

THE TEXAS A&M UNIVERSITY SYSTEM

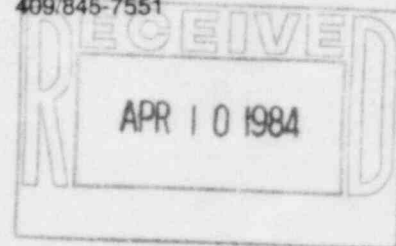
COLLEGE STATION, TEXAS 77843-3575

2 April 1984



NUCLEAR SCIENCE CENTER

409/845-7551



Mr. E. Johnson
Office of Inspection and Enforcement
Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

RE: Reportable Occurrence: Non-Compliance with NSCR Technical Specification
Requirements in Conducting Confinement System Surveillance

Dear Mr. Johnson:

In accordance with the Nuclear Science Center (NSC) Technical Specification reporting requirements (section 6.6.2) for the reportable occurrence of 19 March 1984, I am submitting the final report dealing with this matter. You will note, as I discussed in our telephone conversation of 22 March, that I did not include the procedural non-compliance involving the Weekly Intrusion Checks in the report. This item is addressed in the NSC Security Plan and is scheduled and performed on a weekly basis in much the same manner as the Weekly Electronic Maintenance Checks. It is the determination of the NSC staff that this does not constitute a reportable occurrence as the NSC provides physical protection of SNM in accordance with 10 CFR 73.67(f).

Sincerely,

Barry Willits

Barry Willits, Manager
Reactor Operations

BW/ym

cc: Dr. C. A. Erdman, Head, Nuclear Eng. Research, TEES
Dr. W. Arthur Porter, Director, TEES

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Reportable Occurrence
Non-Compliance With NSCR
Technical Specification Requirements
in Conducting Confinement System Surveillance

Reportable Occurrence

On 19 March 1984 during preparations to conduct the Weekly Electronic Maintenance Checks (NSC Form 316) it was discovered that the performance of this surveillance was not accomplished during the previous week of operation. The performance of this check includes the weekly surveillance of the Nuclear Science Center Reactor (NSCR) confinement system ventilation. This surveillance is addressed in section 4.4 of the NSC Technical Specifications. The objective is to assure proper operation of the equipment necessary to achieve confinement. The surveillance is specified as being performed on a weekly basis and basically involves a check of the various automatic and manual modes of ventilation system shutdown, such that any release of radioactive airborne contamination would be controlled.

The timely completion of this surveillance is the responsibility of the Reactor Supervisor (normally day shift). The surveillance is routinely performed by the Reactor Operations support personnel of the electronics maintenance shop. During the operation week of 12 through 16 March 1984, this check was not performed, despite the fact that the NSCR was operated and normal business was conducted on just two days (12 through 13 March). This surveillance was performed satisfactorily during the previous week on 9 March, and again performed satisfactorily on 20 March, once it was verified that the check had not been performed the previous week.

The NSC staff and management has determined that the failure to perform this surveillance does not constitute a safety question or directly violate a limiting condition for operation. The report of this non-compliance with Technical Specifications is being submitted as it involves an inadequacy in procedural controls that could conceivably have developed into an unsafe condition. This report is submitted as specified in section 6.6.2 of the NSC Technical Specifications involving a reportable occurrence, as were the initial mailgram and telephone report, to the USNRC Region IV.

Corrective Action

The completion of a satisfactory surveillance check following the week of non-compliance is considered adequate by the NSC staff as initial corrective action. As a long term solution, the staff of the NSC feel that the performance of this surveillance should be made more visible as far as completion or non-completion is concerned. A maintenance and surveillance master schedule or planning sheet is to be developed and placed in a location where a review can be readily accomplished by the Reactor Supervisor and Manager of Reactor Operations. Until such a schedule is developed and as a temporary measure, the Manager of Reactor Operations will review and sign the weekly check sheet upon completion by the assigned personnel.