



Georgia Institute of Technology

NEELY NUCLEAR RESEARCH CENTER
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USA

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June 19, 1995

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Georgia Institute of Technology
License No. R-97. Docket No. 50-160
Reply to a Notice of Violation
Inspection Report No. 50-160/92-04

Gentlemen:

Pursuant to 10 CFR 2.201, please find attached a response to a Notice of Violation in Inspection Report No. 50-160/95-02.

Should you have any question, please call me at (404) 894-3600.

Sincerely,

R.A. Karam, Ph.D., Director
Neely Nuclear Research Center

RAK/ccg
Enclosure

cc: Mr. S. Ebnetter
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Atlanta, GA 30323

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Attachment 1

Georgia Institute of Technology
Reply to Notice of Violation 50-160/95-02

Violation 50-160/95-02, Severity Level V (Supplement III)

10 CFR 74-13(a)(1) states that the licensee must compile a material status report on DOE/NRC Form 742 as of March 31 and September 30 of each year and submit this report no later than 30 days after the end of the period covered by the report.

Contrary to the above, for the inventory periods of April 1, 1993 - September 30, 1993; October 1, 1993 - March 31, 1993; and October 1, 1994 - March 31, 1995 the licensee failed to submit material status reports within 30 days. In addition, licensee Procedure 3600, "Special Nuclear Materials Inventory," Revision 2, dated May 9, 1991 was incomplete in that the 30 day time period required by 10 CFR.13(a)(1) was not acknowledged.

Reply

1. Admission or denial of violation

The Georgia Institute of Technology admits the violation as stated.

2. The Reason for the Violation:

The Neely Nuclear Research Center's Procedure that governs the inventory for Special Nuclear Material is Procedure 3600. This procedure is deficient in that it only required submission of DOE/NRC Form 742 to DOE in a timely manner. Additionally, the operational culture at the GTRR is based on Technical Specification 1.27 of our license, which states "periodic surveillance tests, checks, calibrations and examinations shall be performed within the specified intervals. These intervals may be adjusted plus or minus 25%." The adjustment to intervals of $\pm 25\%$, allowed in T.S. 1.27, violates the requirement in 10 CFR 74.13(a)(1), i.e. licensee must compile a material status report on March 31 and Sept. 30 of each year and submit this report no later than 30 days after the end of the period covered by the report. Our reports to NRC and DOE were within the $\pm 25\%$ but not the 30 days requirements.

3. Corrective steps which have been taken and results achieved:

U.S. NRC-Reply to Notice of Violation
by Neely Nuclear Research Center
Attachment 1 -Page 2
June 19, 1995

Work orders for Special Nuclear Material Inventory have been revised. The work orders now require that a report to all federal officials be issued within 30 days after the end of the period covered by the report.

4. Corrective steps which will be taken to avoid further violations:

Procedure 3600 "Special Nuclear Material Inventory", will be revised to require that a Material Status Report be issued within 30 days after March 31 and Sept. 30 of each year to appropriate federal agencies.

5. Date when full compliance will be achieved:

The revision to procedure 3600 will be submitted to the Nuclear Safeguards Committee for review and approval July 20, 1995.