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Docket No. 50-223

March 7, 1984

Mr. Richard Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission, Reg. I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: Inspection No. 50-223/83-02

Dear Sir,

The University of Lowell is submitting this letter, as required, in response to your Notice of Violation reported in your inspection report.

- A. Technical Specification 6.2.6, Review and Audit, requires that the Reactor Safety Subcommittee shall meet at least quarterly. Contrary to the above, the Reactor Safety Subcommittee did not meet during the first quarter of 1982 and the first and third quarters of 1983. Steps have been taken, via an automatic notification to all members of the committee, to assure that this requirement is not overlooked in the future. In addition, all members of the committee were reminded that it is their responsibility to not rely solely on this notification and to call a meeting, if required.
- B. Technical Specification 4.1.2, Surveillance Requirements for Control and Regulating Rods, requires, in part, that control rod and regulating rod drive times shall be measured at intervals not to exceed 13 months. Contrary to the above, the control rod and regulatory rod drive times were not determined during a 21 month interval between March 1980 and December 1981.

This discrepancy was identified by our own internal audit. Since that time, a "tickler" system has been set up to minimize the probability of this kind of oversight.

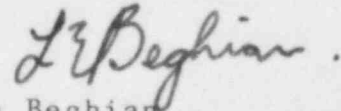
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C. Technical Specification 6.3, Operating Procedures, requires, in part, that written procedures, reviewed and approved by the Reactor Safety Subcommittee shall be in effect and followed for periodic surveillance of reactor instrumentation and safety systems, area monitors, and continuous monitors. Contrary to the above, during the period of June 1981 through July 1983, properly reviewed and approved procedure SP-1 Calibration of Radiation Monitoring System, Revision 1, was not followed during the periodic surveillance of the radiation monitoring system.

A new procedure was written and the Reactor Safety Subcommittee reviewed and approved it for use. All personnel were reminded that if a procedure needs to be changed, proper approvals must be obtained for use of the revised procedure.

The responses and corrective actions to the above violations have been reviewed by the Reactor Safety Subcommittee.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "L. Beghian", followed by a period.

Leon Beghian
Associate Vice-President
for Technical Research

LB:slf