

Appendix A
Notice of Violation

Reed College

License No. R-112
Docket No. 50-288

As a result of the inspection conducted during the period of March 27 through April 22, 1985 and in accordance with NRC Enforcement Policy 10 CFR, Part 2, Appendix C, the following violations were identified.

A. 10 CFR Part 19.11, "Posting of Notices to Workers" requires:

"(a) Each licensee shall post current copies of the following documents:
(1) The regulations in this part and in Part 20 of this chapter; (2) the license, license conditions, or documents incorporated into a license by reference, and amendments thereto; (3) the operating procedures applicable to licensed activities; (4) ...

(b) If posting of a document specified in paragraph (a) (1), (2) or (3) of this section is not practicable, the licensee may post a notice which describes the document and states where it may be examined....

(d) Documents, notices, or forms posted pursuant to this section shall appear in a sufficient number of places to permit individuals engaged in licensed activities to observe them on the way to or from any particular licensed activity location to which the document applies, shall be conspicuous, and shall be replaced if defaced or altered...."

Contrary to the above, on March 27-29, 1985 documents specified in 10 CFR Part 19.11(a) were not posted at the licensee's facility.

This is a Severity Level V Violation (Supplement IV).

B. 10 CFR Part 50.54 "Conditions of Licenses" states in part (i-1) that "Holders of operating licenses in effect on September 17, 1973 shall implement an operator requalification program which, as a minimum, meets the requirements of Appendix A of Part 55 of this chapter which was submitted for approval by the Atomic Energy Commission."

The licensee's NRC approved operator requalification program, revised on November 27, 1980, requires: (1) "Each reactor operator (RO) and senior reactor operator (SRO) take a requalification examination once every year, ... (2) each SRO and RO will be responsible for making at least 10 reactivity control manipulations per year, and (3) once every six months, a meeting of all RO's and SRO's will be held to make them aware of recent changes in the Reed College Reactor Facility License, Facility design changes, recent abnormal occurrences, and changes in emergency procedures."

Contrary to the above, during 1983 and 1984 the reactor operator requalification program was not implemented in that:

- 1). One SRO had not taken the yearly requalification examination since May 1983.

- 2). During 1983 one SRO made only 3 reactivity control manipulations and another SRO made only 5 such manipulations in 1984.
- 3). No RO or SRO meetings were held between the period of November 1983 and January 1985.

This is a Severity Level IV Violation (Supplement 1).

C. 10 CFR Part 50.54(i) requires:

"(i) Except as provided in § 55.9 of this chapter, the licensee shall not permit the manipulation of the controls of any facility by anyone who is not a licensed operator or senior operator as provided in Part 55 of this chapter." and

10 CFR Part 55.31(e) states:

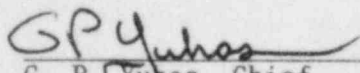
"(e) If a licensee has not been actively performing the functions of an operator or senior operator for a period of four months or longer, he shall, prior to resuming activities licensed pursuant to this part, demonstrate to the Commission that the knowledge and understanding of facility operation and administration are satisfactory. The Commission may accept as evidence, a certification by an authorized representative of the facility licensee by which the licensee has been employed."

Contrary to the above, at least four individuals holding NRC operator licenses who had not performed the functions of a reactor operator for periods of four or more months were subsequently permitted to manipulate the controls of the Reed TRIGA facility without being certified by an authorized representative of the facility or receiving the approval of the Commission. The individuals holding the below listed docketed licenses and the respective dates involved are as follows:

- 1) Docket No. 55-8696 April 26, 1983 through September 29, 1983
- 2) Docket No. 55-9442 January 12, 1984 through June 26, 1984
June 26, 1984 through January 14, 1985
- 3) Docket No. 55-7177 May 16, 1984 through October 12, 1984
- 4) Docket No. 55-7180 August 25, 1983 through March 28, 1984
June 5, 1984 through February 15, 1985

This is a Severity Level IV Violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Reed College is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation addressing each alleged violation and including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.


 G. P. Yumas, Chief
 Facilities Radiological Protection Section

MAY 10 1985

Date Signed