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DEPARTMENT OF NUCLEAR ENGINEERING AND ENGINEERING PHYSICS
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September 12, 1985

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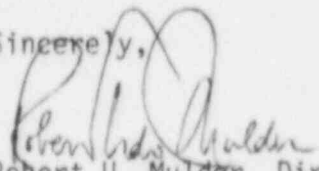
U.S. NRC
ATTN: Mr. J. Nelson Grace
Region II Regional Administrator
101 Marietta Street, N.W.
Atlanta, Georgia 30323

SUBJECT: Licensee (NRC Operating Licenses No. R-66 and No. R-123)
Response to NRC Health Physics Inspection Report No.
50-62/85-01 of August 13, 1985

Gentlemen:

Please find enclosed the description of corrective actions taken by us with regard to the NRC Notices of Deviation and Violation which were received with the above referenced inspection report. We trust that our response will be judged adequate. Should further questions arise, please contact us.

Sincerely,


Robert U. Mulder, Director
U.Va. Reactor Facility

Enclosure: Corrective Actions to Notices of Deviation and Violation

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Sworn to and subscribed before me this 12th
day of September, 1985
Witness my hand and official seal
Delores F. Van Notary Public

My Commission Expires October 14, 1985

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ENCLOSURE

CORRECTIVE ACTIONS TO NOTICES OF DEVIATION AND VIOLATION

1. Notice of Deviation. (Reference NRC Inspection Report 50.62/85-01).

"Failure to replace previous survey meter with an audible rate indicating survey meter"

A. Corrective Actions: An audible-alarming ratemeter, Eberline ESP-1 "Smart Portable", S.N. 227 with an Eberline HP-270 energy compensated G.M. probe, was calibrated on August 15, 1985 and was placed into daily service as a survey meter on August 16, 1985.

B. Actions Taken to Avoid Further Deviation: Health Physics Procedure Manual has been amended to specifically state that all area surveys are to be performed with an audible rate-indicating survey meter.

C. Date of Corrective Actions Completion: Ratemeter was placed into service on August 16, 1985. Revised written procedures will be in place by or before September 30, 1985.

2. Notice of Violation (Reference NRC Inspection Report 50-62/85-01).

"Failure to establish and adhere to radiation control procedures."

A. Corrective Actions:

1. (Reference S.O.P. 10.4.B.3). Health Physics Daily Survey Form has been amended to require an entry showing exposure levels in the uncontrolled areas in the UVAR Room. Hence, exposure levels in this area will now be performed daily instead of weekly.

2. (Reference UVA Radiation Safety Guide). Tests performed on the G.M. "frisker" (Eberline RM-14 with HP-260 probe) in the step-down area between the controlled and uncontrolled areas of the UVAR room show that, under normal background conditions of full reactor power, and with a detector efficiency of 11%, 10,000 disintegrations per minute (dpm) can be detected above background. Similarly, the hand and foot monitor located outside the exit to the UVAR room will detect 5,000 dpm above background. Therefore the S.O.P. will be rewritten to delete reference to the UVA Radiation Safety Guide. The S.O.P. will now reference a two-tiered action level of 10,000 dpm above background for personnel and material contamination with the G.M. "frisker" at the controlled area step-down area and 5,000 dpm above background alarm point (for the same type of contamination) with the hand and foot monitor located outside of the reactor room.

Adequate personnel procedures regarding contamination are posted in a prominent location at the entrance/exit to the UVAR room. However, an additional comment regarding the new two-tiered action level will be added. The addition will also state that all contaminated material will remain in the UVAR room if the contamination is discovered in the step-down area and/or will be returned to the step-down area if the contamination is discovered at the hand and foot monitor. The HP will be notified and decontamination will take place in the controlled area.

3. (Please note incorrect NRC inspection report reference to S.O.P. 10.5.A.1. No such paragraph exists in the UVAR S.O.P. Apparent reference is to S.O.P. 10.5.B.1). All radioactive waste containers will be checked during the weekly survey to insure compliance with S.O.P. procedures.

B. Actions Taken to Avoid Further Deviations:

1. HP daily survey form has been amended to show exposure levels and the procedure manual will be amended to reflect proper procedure in this matter.
2. The S.O.P. will be rewritten to reflect the two-tiered action level. The HP procedure manual will contain this change and future HP training programs for staff, faculty and students will emphasize the new level. Further, the revised personnel procedures will be posted outside the UVAR room.
3. The weekly survey form was amended to add the necessary checks of all dry waste containers. The HP procedure manual will also be changed to include this additional step.

C. Dates of Corrective Actions:

1. Daily survey form was amended on July 26, 1985. The HP procedure manual will be changed on or before September 30, 1985.
2. The S.O.P. will have been rewritten by or before October, 31, 1985. The HP procedure manual will be rewritten on or before September 30, 1985. HP training programs containing the new procedure will commence during the week of September 2-6, 1985. The new procedure will be posted by September 30, 1985.
3. The weekly survey form was amended on August 28, 1985. The HP procedure manual will be rewritten to include this change on or before September 30, 1985.