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1985 JUN 24 PM 12:50

DEPARTMENT OF CHEMISTRY

IRVINE, CALIFORNIA 92717

REGION V I&E

U.S. Nuclear Regulatory Commission,  
Region V,  
1450 Maria Lane, Suite 210,  
Walnut Creek, CA 94596

Ref: Docket 50-326 License R-116

June 19th, 1985

Gentlemen:

Item 1. Subject: Failure of Reactor Operations Committee to meet.

We wish to report that our Reactor Operations Committee has not met for formal review of reactor operations between November 8th, 1984 and June 20th, 1985 in violation of a Tech Spec requirement:

6.2.f. The (ROC) Committee shall meet at least quarterly.

It will be noted that this has occurred before with the UCI facility, the most recently being in 1983. This was reviewed in correspondence to the Commission dated February 16th, 1984 in response to a notice of violation dated January 18th, 1984.

Unfortunately the procedures outlined as preventive measures have not been successful in preventing recurrence. Meetings regularly scheduled had to be postponed because of conflicts and difficulties in preparing the documents for the meeting. One change in facility radiological safety staff has occurred during the Spring 1985, necessitating more attention to training and review, with less time available for formal meeting preparation as a result. Additional responsibilities, having nothing to do with the reactor, assumed by the Reactor Supervisor have certainly been a factor.

The Committee intends to discuss this issue fully at a meeting tomorrow (June 20th). It is anticipated that no new "magic answers" will be found but that a new commitment will be made to abide by the corrective steps implemented approximately two years earlier. One additional item will be the promise that word-processing facilities will be acquired by the facility in the next month, which should help with preparation of needed paper work for committee business ( minutes, supervisor reports, operational summaries, etc). A full schedule of "twice a quarter" meetings will be established with the renewed hope that this can really be accomplished.

Item 2. Subject: Senior Operator License Expired.

We wish to report that a Senior Operator at this facility, Ms Pat Rogers, continued to operate the reactor beyond the expiry date of her senior operator's permit ( March 7, 1985). Specifically, she operated on 28 separate days beyond this date until May 27th, 1985 when the issue was discovered by the Reactor Supervisor checking through some document records. The discovery was reported by telephone to Region V, Operator Licensing on the following day ( May 28 1985 ). Since that time, Ms Rogers has operated as a trainee status under the direct supervision of G.E. Miller, the only other operator actively licensed at this facility, whilst a new application for a license is prepared.

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It is tempting to connect the lack of ROC meetings with the issue of license expiration. It is extremely doubtful, however, that meetings of the Committee or any other routine check would have brought this issue to light. With only two licensed operators, it is rare that anyone checks the Operator Permit file to ascertain expiry dates. Since the Commission ceased issuing reminder notices, there have been other instances of licenses not being renewed in a timely fashion, although this is the first time that actual operation by an individual has continued beyond the expiration date.

It is clear that Ms Rogers is still a fully competent Senior Operator. She has remained fully involved with operation and maintenance activities and remained fully requalified. Thus no danger or loss of safety of operation of the facility has resulted from this violation.

Now that formal certificates are being issued by the NRC, one remedial step to guard against future recurrence will be the framing and posting of the certificates within the control room. This should enable frequent observation of the expiry date. Current personnel will be very aware, now, of the need to establish regular renewal timelines for active operators. It is not felt that further corrective action is needed.

Sincerely,

*George E. Miller*

George E. Miller  
Lecturer in Chemistry and  
Reactor Supervisor

GEM/mm

cc: ROC Members  
Executive Vice-Chancellor Lillyman  
Patricia Rogers