

APPENDIX A
NOTICE OF VIOLATION

University of Arizona
Nuclear Reactor Laboratory

Docket No. 50-113
License No. R-52

During an NRC inspection conducted on January 25-26, 1988, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. 10 CFR Part 50.54 (i-1), "Conditions of License," states, in part:
"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, Part 55."

The licensee's NRC approved operator requalification program of August 29, 1974, requires that reactor operator's yearly examinations include the topics given in the previous year's lectures.

Contrary to the above, the reactor operator/senior reactor operator examination for 1987 did not include the topic area of Normal, Abnormal, and Emergency Operating Procedures that was provided in the previous years lectures.

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

- B. 10 CFR Part 50.54(q) states, in part: "...A licensee authorized to possess and/or operate a research reactor or fuel facility shall follow and maintain in effect emergency plans which meet the requirements in Appendix E of this part."
- I. Section 10.1, "Training" of the licensee's NRC approved Emergency Plan, dated December 12, 1983, states, in part: "NRL operators and staff, and members of the Radiation Control Office with emergency response responsibilities will complete an initial training program and an annual review program. For NRL operators, this may be a part of the Reactor Operator Requalification Program. Specific training in protective action decisionmaking will be included in the initial and periodic training for those individuals who may serve as Emergency Director during an emergency."

Contrary to the above,

- (1) At least four members of the Radiation Control Office having emergency response responsibilities were not provided with initial training and did not complete an annual review program for 1986 and 1987.
- (2) Specific training in protective action decisionmaking was not included in the initial and periodic training for at least

three individuals who may serve as the Emergency Director during an emergency.

- II. Section 10.4 of the licensee's Emergency Plan states, in part: "...Applicable portions of the plan, agreements, and implementing procedures shall be distributed to the University Police, the Radiation Control Office, and the Arizona Radiation Regulatory Agency, and any revisions to implementing procedures affected by the plan shall be approved by the Reactor Committee and sent to authorized recipients within 30 days after the revised plans have been issued."

Contrary to the above, a copy of the plan and implementing procedures had not been distributed to the Radiation Control Office as of December 1987.

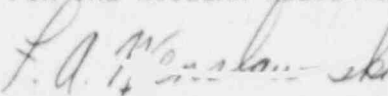
- III. Section 10.5.2 of the licensee's Emergency Plan states, in part: "Portable health physics instruments used in the NRL and those in the emergency kit are checked for operability quarterly and calibrated by the staff of the Radiation Control Office semiannually."

Contrary to the above, the portable health physics instruments in the NRL and emergency kit were calibrated annually for the period of January 1986 through January 1988.

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

Pursuant to the provisions of 10 CFR 2.201, Nuclear Reactor Laboratory at the University of Arizona is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that have been taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such action as may be proper should not be taken. Consideration may be given to extending your response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION



F. A. Wenslawski, Chief
Emergency Preparedness and
Radiological Protection Branch

Dated at Walnut Creek, California
this 3rd day of March 1988