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COLLEGE OF ENGINEERING
VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

Blacksburg, Virginia 24061

NUCLEAR ACTIVATION ANALYSIS LABORATORY

April 18, 1979.

Mr. R. C. Lewis, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission
101 Marietta St. NW
Atlanta GA 30303

Ref: RII: CJ. 50-124/79-02

Dear Mr. Lewis:

In response to your letter of March 23, 1979 pertaining to Inspection Report No. 50-124/79-02, I enclose our comments and actions taken. Because of the very time-consuming process of re-writing all our procedures and having them reviewed and approved by the Radiation Safety Committee, we request an extension of the completion deadline from June 30, 1979 to August 30, 1979.

With respect to two items of non-compliance, we do not concur that we should receive citations. Our reasons for this viewpoint are given in paragraphs A.2 and C. of the enclosed document. Accordingly, we respectfully request that the citations for these two items be deleted.

As for the other items of non-compliance, we believe that the actions we have taken bring us into full compliance with the provisions of our license No. R-62.

Sincerely yours,

T. F. Parkinson, Director
Nuclear Reactor Laboratory

Encl.

cc: Dr. Roger A. Teckell, Chairman, RSC
Dr. A. Krebs, Vice-President for Administration

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Comments on Inspection Report No. 50-124/79-02

A. Operator Re-qualification Plan

1. With respect to the requirement for monthly meetings of all reactor operators, such meetings have been held. However no minutes of the meetings held during the period April-June 1978 were on file. We are now recording all such meetings in the "Conversational Log" so that verification of the meetings can be established.

2. With respect to the requirement that a list of qualified reactor operators be maintained "at the reactor console", such a list was posted in the reactor console room. We have now moved this list to the immediate vicinity of the console. In our judgement, a citation is not warranted since the phrase "at the reactor console" is subject to different interpretations by different NRC inspectors.

3. To insure that all reactor operators review new and revised procedures, a check list has been distributed to each operator indicating the dates by which he or she must complete all requalification requirements.

4. Reactor operators are now recording the in operating times in the "Conversational Log". Individual records of operating times are also maintained in the "Requalification Notebook" and are logged on the Reactor Run Sheet.

B. Since the NRC has mandated that we completely re-write all our operating, maintenance and emergency procedures, approximately 6 man-months have been devoted to this task with the objective of completing the documentation by June 30, 1979. We also maintain a schedule showing when required maintenance items are due. A status report on all items is reported quarterly to the Radiation Safety Committee. In the period before the deadline, some interim procedures are being utilized while the permanent procedures are in preparation and are being reviewed by the RSC. In our judgement the extensive documentation effort now in progress will, upon completion, preclude future infractions of the type cited.

C. We do not concur that an infraction should be given for the fission product monitor being set at a value of 100 mr/hr. According to the Technical Specifications, the set-point should be at a value 10 times its "normal background reading". The value of the normal background reading is subject to differing interpretations by different individuals. The "normal background reading" for this instrument depends on a number of factors such as the past operating history of the reactor. Furthermore, the actual set-point was at 100mr/hr., which amounts to about 2mm on the meter scale as compared to a value of 80 mr/hr. which the NRC inspectors ruled should be the proper set-point. We question whether the

accuracy of the meter movement and its associated magnetic latch make this small discrepancy of any actual significance.

We plan to revise the Technical Specifications when we apply for renewal of our reactor license to remove this ambiguity.

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