

AUG 27 1986

In Reply Refer to:  
Docket: 50-252/86-01

University of New Mexico  
ATTN: Dr. Frank Williams, Reactor  
Administrator  
Chemical & Nuclear Engineering  
Department  
Albuquerque, NM 87131

Gentlemen:

Thank you for your letter of August 15, 1986, in response to our letter and Notice of Violation dated July 18, 1986. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

"Original Signed by:"

J.E. Gagliardo, Chief  
Reactor Projects Branch

cc:  
R. D. Busch, Chief  
Reactor Supervisor  
University of New Mexico  
Albuquerque, NM 87139

W. L. Tabor, Director  
Occupational Safety  
University of New Mexico  
Albuquerque, New Mexico 87139

State of New Mexico Environmental Improvement Agency

bcc: (see next page)

RIV:RFPS  
REBaer:cd  
8/25/86

C:FRPS  
BMurray  
8/25/86

C:R&S  
WLFisher  
8/25/86

C:RPB  
JEGagliardo  
8/26/86

8609030180 860827  
PDR ADOCK 05000252  
Q PDR

JEG 04/1

bcc w/copy of licensee's response w/safeguards:

Physical Security File

G. McCorkle, NMSS

J. Gibson, SSPD/NRR

IE File

R. Martin

Inspector

Chief, EPSPS

J. J. Dosa, NRR, Project Manager

D. A. Powers

bcc w/copy of licensee's response w/o safeguards:

DMB IE-04

RPB

D. Weiss, LFMB (AR-2015)

RIV File

MIS

RSTS Operator

R&SPB

Section Chief (RPSB)

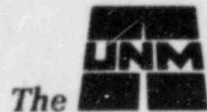
RSB

B. Murray

R. L. Bangart

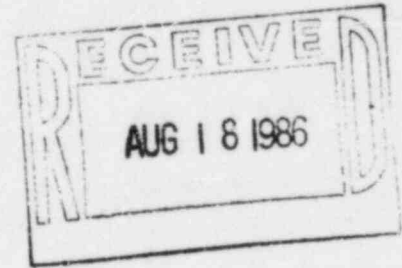
E. H. Johnson

W. L. Fisher



The University of New Mexico

DEPARTMENT OF CHEMICAL AND NUCLEAR ENGINEERING  
Albuquerque, NM 87131  
Telephone 505: 277-5431



August 15, 1986

J.E. Gagliardo  
Chief, Reactor Projects Branch  
US Nuclear Regulatory Commission, Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76001

Ref: Docket - 50-252/86-01

Gentlemen:

Enclosed is a reply to the Notices of Violation from the inspection conducted at our facility during the period May 19-23, 1986. The reply provides the following information for each violation:

1. Reason for the violation,
2. Corrective steps taken to date and results,
3. Corrective steps to be taken in the future, and,
4. Date when full compliance is expected.

We believe we have responded to each of the violations and indicated corrective actions which will bring our facility into full compliance with the applicable NRC requirements.

Sincerely,

Frank L. Williams  
Reactor Administrator

FW/kml

cc: (w/o Safeguards Attachment)  
NM Environmental Improvement Division  
R.D. Busch, Chief Reactor Supervisor, UNM  
W.L. Tabor, Director, Occupational Safety, UNM

~~86-1250314~~

Hpp.

86-1250314

## Failure to Implement Operator Requalification Program

### Operational recertification in March and October

1. Operational recertification programs are held during the spring and fall semesters but not specifically during the months of March and October. It was felt the the intent of the Feb. 21, 1977 letter was to propose a semester-based schedule with a list of activities which occurred within each semester, not necessarily identifying specific months. Based on this, the recertification programs are scheduled during each semester based on the availability of the reactor and operating staff. Since 1981, the written examination has been administered every other year in the spring semester. This was based on guidance from the NRC indicating that biannual examinations were acceptable for our facility. However, we failed to notify the NRC of this change in our operator recertification program.
2. Written examinations have been administered during the summer to the operations staff to get us back on an annual examination schedule.
3. In the application for license renewal on the AGN-2C1M submitted June 6, 1986, a revised operator requalification program was included. This clarified the schedule to read, "A one day requalification training session will be scheduled semi-annually, during the Fall and Spring". The annual written examination is now scheduled to be administered during the Spring.
4. Full compliance is expected sometime in the fall when notice of the disposition of our license renewal application is received. If approved, then our retraining program should comply with the revised requirements submitted in the application.

### Operator requalification program documentation

1. Over the last four years, we have had four different Chief Reactor Supervisors and three different Reactor Administrators. Due to internal communications problems, details on the documentation requirements for the operator requalification program were lost. The retraining sessions have been held during the Fall and Spring, but the content of some of those sessions was not described in the documentation of those sessions. In addition, a copy of the written examination for one of the senior operators was misplaced in the transfer of responsibility and documents between Chief Reactor Supervisors.
2. All of the records for the requalification program are now kept in one place so there will not be future need to transfer records when a transfer of responsibility occurs.

3. A standard documentation form for the retraining sessions is being developed which indicates the content of the sessions and the rod manipulations performed by each participant in the sessions. This form will be used for all future retraining sessions starting with the one in the Fall of 1986. To avoid future problems with misplaced and incomplete documentation, the Reactor Safeguards Advisory Committee (RSAC) has been tasked with an annual review of the records for the Operator Requalification Program.
4. The expected date of full compliance is December 31, 1986 after the RSAC has met and reviewed the records and standard documentation forms.

#### Failure to Perform Adequate Surveys

##### Failure to properly calibrate neutron survey meters

1. The neutron survey meter, PNC-4, was checked against PuBe source measurements annually. We assumed that this was sufficient, but according to the inspectors this did not constitute a calibration but only a operating check.
2. We have developed a calibration procedure and schedule which includes the method for converting cpm to mRem/hr. We have also sent the neutron meters to an outside vendor for calibration.
3. We have changed our survey meter use procedure so that meters will not be in service for longer than one year before being sent to an outside vendor for calibration.
4. Full compliance should be achieved by October 1, 1986 when the meters have returned and a survey is performed.

It was also noted in the inspection that the model 3 neutron meter, PAC-4S alpha meter and Model CPMU gamma meter were not calibrated. These instruments are used in the nuclear engineering lab for course work and demonstration purposes. They are not used in the reactor laboratory and are not readily accessible in the case of a reactor emergency.

##### Failure to properly calibrate remote area monitors

1. Remote area monitors (RAMs) were calibrated with the internal check sources. We assumed that this was sufficient, but according to the inspectors, there needed to be a calibration check on the check sources or a separate calibration on each RAM.
2. We are currently developing a calibration procedure for the RAMs.

3. We will calibrate the monitors according to manufacturer's instructions and then use the internal source and an external source to provide calibration checks at different levels on different ranges.
4. Compliance will depend on availability of an external calibration source, full compliance is expected by March 1, 1987.

Failure to properly calibrate self reading dosimeters

1. We were unaware of the utility of calibration of an instrument which can not be adjusted.
2. We are currently developing a procedure for checking and calibrating the self reading dosimeters.
3. Dosimeters will be in service for no more than one year before being checked for calibration. The calibration check will involve at least two points on the range.
4. Full compliance is expected by March 1, 1987.

Failure to comply with Physical Security Plan

Included as an attachment to this report containing Safeguards Information.