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1920-00-20018
February 2, 2000

U.S. Nuclear Regulatory Agency
Attention: Document Control Desk
Washington, DC 20555

Gentlemen,

Subject: Saxton Nuclear Experimental Corporation (SNEC)
SNEC License Termination Plan (LTP)
Operating License No. DPR-4
Docket No. 50-146

The purpose of this letter is to resubmit the application for the termination of the Saxton Nuclear Experimental Corporation (SNEC) facility license: DPR-4. The original submittal from GPU Nuclear, dated February 23, 1999, was returned by the NRC on April 27, 1999 requesting GPU Nuclear to provide additional information. Public meetings between GPU Nuclear and the NRC were held on July 1, 1999, August 16, 1999 and November 2, 1999. Those meetings constituted a forum in which the GPU Nuclear approach to revising the SNEC LTP could be discussed and consensus sought. GPU Nuclear has incorporated the insights gained from those meetings into the attached LTP. Additionally, included with this submittal are E-size copies of LTP Figures 2-11 and 2-12 to assist in your review.

GPU Nuclear is applying for license termination at this time because it is within two years of completing the decommissioning and remediation activities at the SNEC facility site. Pursuant to the requirements of 10 CFR 50.82(a)(9), this license termination application is accompanied by the facility License Termination Plan which has been designated as Supplement 1 to the SNEC Facility Updated Final Safety Analysis Report.

The license amendment application has been reviewed pursuant to 10 CFR 50.91(a)(1) and an analysis supporting a determination of no significant safety hazards consideration is included.

The License Termination Plan addresses both the criteria of 10 CFR 50.82(a)(9) and 10 CFR Part 20, Subpart E, radiological criteria for unrestricted release of the site.

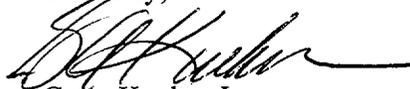
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Pursuant to 10 CFR 50.91(b), a copy of this license amendment application and supporting analysis, which indicates no significant hazards consideration is involved, have been provided to the designated representatives of the Commonwealth of Pennsylvania.

If you have any questions or require additional information regarding this license amendment, please contact Mr. James Byrne at (717) 948-8461.

Sincerely,

A handwritten signature in black ink, appearing to read "G. A. Kuehn, Jr.", with a long horizontal flourish extending to the right.

G. A. Kuehn, Jr.
Director, SNEC Facility

1. License Amendment Application

GPU Nuclear requests that the following amendment facility license be made to the Saxton Nuclear Experimental Corporation (SNEC) License DPR-4:

- 2.E. The licensee shall implement the approved SNEC Facility License Termination Plan as approved in the SER dated _____. The license may make changes to the SNEC Facility License Termination Plan without prior approval provided the proposed changes do not:
- (a) involve a change to the Technical Specifications or require NRC approval pursuant to 10 CFR 50.59;
 - (b) violate the criteria of 10 CFR 50.82(a)(6);
 - (c) reduce the required final status survey requirements for a specific classification of survey area;
 - (d) increase the radioactivity level relative to the applicable derived concentration guideline level at which an investigation occurs; or
 - (e) affect the methodology for statistical treatment of final survey data in a manner that reduces the confidence that the site meets the criteria for unrestricted use.

II. Reasons for the Proposed Changes

SNEC permanently ceased operation of the Saxton facility on May 1, 1972. The objective of the decommissioning of the Saxton facility is to remove the remaining original facility structures and reduce residual radioactivity to the level that permits release of the site for unrestricted use. In accordance with 10 CFR 50.82(a), approval of the License Termination Plan by license amendment is a prerequisite for terminating the license and accomplishing this objective.

The proposed license amendment will ensure that the remainder of decommissioning activities will be performed in accordance with NRC regulations, will not be inimical to the common defense and security or to the health and safety of the public, and will not have a significant effect on the quality of the environment. The License Termination Plan (Attachment 2) conforms to the requirements of 10 CFR 50.82(a)(9). The proposed site release criteria are consistent with the criteria identified of 10 CFR 50.82(a)(9) and 10 CFR Part 20. Subpart E, Section 20.1402.

Overall, the License Termination Plan demonstrates that:

- (1) there are adequate funds to complete decommissioning and release the site for unrestricted use,
- (2) the site release criteria ensure that exposure to residual levels of radiation is kept As Low As is Reasonably Achievable (ALARA), and
- (3) the final status survey will adequately demonstrate that the release criteria have been met.

III. No Significant Hazards Consideration Analysis

The proposed change is necessary to achieve the decommissioning objective of terminating the license and releasing the site for unrestricted use. As such, the proposed change:

1. Will not involve a significant increase in the probability or consequences of an accident previously evaluated since accidents which might occur during the active decommissioning phase of the SNEC facility are bounded by the twelve accidents addressed in section 3.0 of the Updated Safety Analysis Report (USAR). The accident analysis addressed in the USAR demonstrate that no adverse public health and safety impacts are expected from accidents that might occur during decommissioning operations at the SNEC facility. The greater part of radioactively contaminated materials and components originally located in the SNEC facility Containment Vessel are no longer on site, having been shipped as radioactive waste.

Implementation of the SNEC License Termination Plan involves a continuation of the decommissioning process including the final status survey activity to be performed prior to site closeout at the end of the dismantlement phase. These activities do not involve a significant increase in either the probability or consequences of an accident previously evaluated.

2. Will not create the possibility of a new or different kind of accident from any accident previously evaluated. Accidents previously evaluated in the USAR assess different methods of dispersing radioactive material to the environment, which include a loss of support systems and external events. Remaining dismantlement activities and final status survey work described in the License Termination Plan are similar to those previously performed and will not create the possibility of a new or different kind of accident from any previously evaluated.
3. Will not involve a significant reduction in a margin of safety. The Technical Specifications currently in place at the SNEC facility were developed to safely decommission the SNEC facility. Issuance of the proposed amendment would not

reduce the controls established by the technical specifications for activities performed at the SNEC facility. The proposed License Amendment establishes additional controls to ensure License Termination Plan activities are performed effectively. Thus, this change does not involve a significant reduction in a margin of safety.

IV. Implementation

It is requested that the amendment authorizing this license amendment application be issued expeditiously and become effective as of the date of issue.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
SAXTON NUCLEAR EXPERIMENTAL CORPORATION

LICENSE NO. DPR-4
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

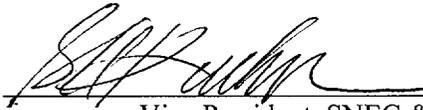
This is to certify that the SNEC Facility License Termination Plan, to amend Appendix A to Operating License DPR-4 for the Saxton Nuclear Experimental Corporation Facility as revised, has been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Protection, by deposit in the United States mail addressed as follows:

Mr. Donald Weaver, Chairman
Liberty Township Supervisors
R.D. #1
Saxton, PA 16678

Mr. David J. Thompson, Chairman
Bedford County Commissioners
County Courthouse
203 South Juliana Street
Bedford, PA 15522

Director, Bureau of Radiation Protection
PA Department of Environmental Protection
Rachael Carson State Office Bldg., 13th Floor
P.O. Box 8469
Harrisburg, PA 17105-8469
Attn: Kenneth Singh

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: 
Vice President, SNEC &
Program Director, SNEC Facility

DATE: 