



June 29, 2000
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Via Overnight Express Delivery

Document Control Desk
ATTN: Mr. Alexander Adams, Jr., Senior Project Manager
Events Assessment, Generic Communications and
Non-Power Reactors Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Docket Nos. 50-89, 50-163; License Nos. R-38 and R-67 Respectively; Submittal of Safeguards Contingency Response Plan and Physical Protection Plan for the GA TRIGA[®] Reactors Facility, both dated June 2000; Request for License Amendment

Reference: Secure Telephone Conversation on April 26, 2000 between General Atomics (Keith E. Asmussen, et. al.) and the U.S. Nuclear Regulatory Commission (Alexander Adams, Jr., et. al.)
Re: Voluntary Steps to Enhance Physical Protection and Response at GA TRIGA[®] Reactors Facility

Dear Mr. Adams:

Pursuant to the referenced telephone conversation, General Atomics (GA) has taken several voluntary steps to enhance the physical protection of the special nuclear material stored at its TRIGA[®] Reactors Facility. The steps GA has taken include: implementation of certain physical modifications, preparation and/or revision of certain physical protection and response related procedures, revision of its physical protection plan, and preparation of a safeguards contingency plan.

Previously, GA's "*Fixed Site and Transportation Plan for the Protection of Special Nuclear Material of Moderate and Low Strategic Significance*" served as the physical protection plan for the special nuclear material at its Mark I and Mark F TRIGA[®] reactors. GA has now taken those portions of that plan pertaining to its TRIGA[®] Reactors Facility, revised them accordingly to reflect recent security enhancements, and created a new "stand alone" plan titled "*Fixed Site and Transportation Plan for the Protection of Special Nuclear Material at the General Atomics TRIGA[®] Reactors Facility*," dated June 2000. It is to be noted that the resulting changes to the physical protection plan clearly do not result in a decrease in the effectiveness of the plan; rather they all contribute to a significant increase in its effectiveness. Hence the changes are being made pursuant to 10 CFR 50.54(p).

Additionally, GA has prepared a safeguards contingency plan titled "*Safeguards Contingency Response Plan for the General Atomics TRIGA[®] Reactors Facility*," dated June 2000. This plan and the physical protection plan include descriptions of: 1) the recent physical modifications and additions made to enhance physical protection at the TRIGA[®] Reactors Facility, and 2) the recent enhancements made regarding security alarm monitoring and response.

Copies of both of these plans are enclosed for NRC review and approval. While the changes made to the physical protection plan were implemented per 10 CFR 50.54(p), they represent a major revision and constitute significant improvement, therefore, GA hereby requests that License Condition 2.C.5 "Physical Security Plan" of its TRIGA[®] Mark F Reactor, R-67, be amended to document NRC approval of both plans. More specifically, GA hereby requests that License Condition 2.C.5 of License R-67 be amended to read as follows:

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“5. Physical Security Plans

The licensee shall maintain and fully implement all provisions of the Commission approved physical protection and safeguards contingency plans, including changes made pursuant to the authority of 10 CFR 50.54(p). These approved plans consist of documents withheld from public disclosure pursuant to 10 CFR 73.21 entitled:

- a) “Fixed Site and Transportation Plan for the Protection of Special Nuclear Material at the General Atomics TRIGA® Reactors Facility” dated June 2000, submitted by letter dated June 29, 2000; and
- b) “Safeguards Contingency Response Plan for the General Atomics TRIGA® Reactors Facility,” dated June 2000, submitted by letter dated June 29, 2000.”

GA also hereby requests that License Condition 2.C.3 “Physical Security Plan” of its Mark I TRIGA® Reactor, R-38, be deleted in its entirety. The justification for this request is based upon the fact that all reactor fuel has been permanently removed from the Mark I TRIGA® reactor, and, pursuant to Mark I Technical Specification 5.0 “Reactor Fuel,” no reactor fuel elements or control elements with fuel followers shall be located in, stored in, or moved into, the reactor core structure or reactor facility. Thus, there is, and will be, no fuel present in the Mark I reactor or reactor facility to protect. Accordingly, there is no reason to maintain and implement a physical security plan for the Mark I reactor or reactor facility. Please note that the possession, handling, and/or management of any residual/remaining radioactive materials in the Mark I facility will be conducted safely and responsibly pursuant to the requirements of GA’s TRIGA® Reactor Facility Decommissioning Plan, the Mark I Technical Specifications, and the requirements of 10 CFR 20.

Also enclosed, for your use in reviewing the physical protection plan, is a summary list of the major changes that were incorporated into the plan. If you have any questions regarding the above requests, please do not hesitate to contact me at (858) 455-2823.

Very truly yours,



Keith E. Asmussen, Ph.D., Director
Licensing, Safety & Nuclear Compliance

**NOTE: ENCLOSURES CONTAIN 10 CFR 2.790 INFORMATION
AND ARE NOT AUTHORIZED FOR PUBLIC DISCLOSURE**

- Enclosures:
- 1) Copy of “Fixed Site and Transportation Plan for the Protection of Special Nuclear Material at the General Atomics TRIGA® Reactors Facility,” dated June 2000
 - 2) Copy of “Safeguards Contingency Response Plan for the General Atomics TRIGA® Reactors Facility,” dated June 2000
 - 3) Summary List of Major Changes Incorporated into Physical Protection Plan dated June 2000