



AEROTEST OPERATIONS, INC.

3455 FOSTORIA WAY • SAN RAMON, CA 94583 • (925) 866-1212 • FAX (925) 866-1716



14 July 2000

Mr. Marvin M. Mendonca
U.S. Nuclear Regulatory Commission
PDNP
M.S. 11-B-20
Washington, D.C. 20555

50-228

Docket 50-228

Dear Sir:

At the Aerotest Radiography and Research Reactor (ARRR) there is no Technical Specification requirement for fuel element inspections. However, every year we have practiced a procedure of examining 20% of the total aluminum fuel elements in the core in addition to 100% of the stainless steel elements which presently number 15.

Since our reactor has no pulse capability and a relatively low power level (250 kw) for TRIGA reactors the potential for fuel degradation is low. We therefore request to change the time allowed to inspect 20% of all the fuel elements from 1 year to 2 years. This change will also reduce the potential for an accident or fuel damage during fuel handling.

Please consider this proposed change in the ARRR procedure and advise us of any difficulty you may foresee in its implementation.

Sincerely,

Alfredo W. Meren
Reactor Supervisor

ADD