

July 31, 2000

Mr. Alfredo W. Meren
Reactor Supervisor
Aerotest Operations, Inc.
3455 Fostoria Way
San Ramon, CA 94583

Dear Mr. Meren:

SUBJECT: AEROTEST RADIOGRAPHY AND RESEARCH REACTOR PROCEDURE
CHANGES FOR FUEL ELEMENT SURVEILLANCE (TAC NO. MA9567)

This letter is in response to your letter of July 14, 2000. In that letter you explained a planned procedure change for the Aerotest Radiography and Research Reactor (ARRR). Licensees are generally allowed to change procedures in accordance with 10 CFR 50.59, Technical Specifications, and any applicable requirements or administrative control procedures. Therefore, unless a licensee finds these requirements require NRC review and approval for the change to the procedure, the licensee need not seek NRC approval. The licensee's organization, including any appropriate safety committee, must make this determination.

From your July 14 letter, the proposed change is to inspect 20 percent of all fuel elements every two years. ARRR currently inspects 20 percent of the aluminum fuel elements every year and 100 percent of the stainless steel fuel elements every year.

From "Guidelines for Preparing and Reviewing Applications for Licensing Non-Power Reactors," NUREG-1537, February 1996, Part 1, Appendix 14.1, page 30, "[f]or non-pulsing TRIGA reactors, the fuel should be inspected and measured on at least a 5-year cycle. Approximately 20 percent of the fuel could be inspected and measured annually. If an annual inspection identifies damaged fuel, then the entire core should be inspected and measured." This is the current applicable guidance.

If your proposed change did require NRC review, ARRR would be required to show that compliance to Technical Specification 10.2 would be assured with the increased time between inspections. Specifically, "[t]he reactor shall not be operated wherever there are significant defects in fuel elements, control rods or control circuitry." NRC review could require a description of applicable industry experience of fuel performance. Also, the efficacy of monitoring equipment and operational controls to detect significant defects and prevent

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operation could be required. Finally, such analysis could be considered for ARRR license renewal in 2005.

If you should have any questions, please do not hesitate to call me at 301-415-1128.

Sincerely,

/RA/

Marvin M. Mendonca, Senior Project Manager
Events Assessment, Generic Communications, and
Non-Power Reactors Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No. 50-228

cc: Please see next page

Aerotest Operations, Inc.

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cc:

Ray Tsukimura, President
Aerotest Operations, Inc.
3455 Fostoria Way
San Ramon, CA 94583

Director
Energy Facilities Siting Division
Energy Resources Conservation
and Development Commission
1516 9th Street
Sacramento, CA 95814

Mr. Steve Hsu
Radiological Health Branch
State Department of Health Services
P.O. Box 942732
Sacramento, CA 94234-7320

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