

February 2, 2001

Mr. Gerald Wicks
Acting Associate Director
Nuclear Reactor Program
Department of Nuclear Engineering
North Carolina State University
Campus Box 7909
Raleigh, NC 27695-7909

SUBJECT: NORTH CAROLINA STATE UNIVERSITY - REQUEST FOR ADDITIONAL
INFORMATION RE: AMENDMENT FOR ADMINISTRATIVE CHANGES
(TAC NO. MA9912)

Dear Mr. Wicks:

We are continuing our review of your amendment request for Facility License No. R-120 for the North Carolina State University PULSTAR Research Reactor which you submitted on August 23, 2000, as supplemented. During our review of your amendment request, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter. In accordance with 10 CFR 50.30(b), your response must be executed in a signed original under oath or affirmation. Following receipt of the additional information, we will continue our evaluation of your amendment request.

If you have any questions regarding this review, please contact me at (301) 415-1127.

Sincerely,

/RA/

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

Docket No. 50-297

Enclosure: As stated

cc w/enclosure:
Please see next page

North Carolina State University

Docket No. 50-297

cc:

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Test, Research, and Training
Reactor Newsletter
University of Florida
202 Nuclear Sciences Center
Gainesville, FL 32611

Mr. Gerald D. Wicks, CHP
Reactor Health Physicist
North Carolina State University
P.O. Box 7909
Raleigh, NC 27695-7909

February 5, 2001

Mr. Gerald Wicks
Acting Associate Director
Nuclear Reactor Program
Department of Nuclear Engineering
North Carolina State University
Campus Box 7909
Raleigh, NC 27695-7909

SUBJECT: NORTH CAROLINA STATE UNIVERSITY - REQUEST FOR ADDITIONAL
INFORMATION RE: AMENDMENT FOR ADMINISTRATIVE CHANGES
(TAC NO. MA9912)

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TEMPLATE #: NRR-056

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REQUEST FOR ADDITIONAL INFORMATION
NORTH CAROLINA STATE UNIVERSITY PULSTAR RESEARCH REACTOR
DOCKET NO. 50-297

1. Proposed Technical Specification (TS) 6.2.2.(b) eliminated wording that the three members appointed from the general faculty are appointed by the University. Please state at what level of university management these appointments are made and propose wording for the TS or justify not stating this information in the TS. American National Standards Institute/American Nuclear Society (ANSI/ANS) 15.1 - 1990, "The Development of Technical Specifications for Research Reactors," states in section 6.2.1 that review and audit committee members shall be appointed by and report to Level 1 management.

2. You have proposed changes to TS 6.3 concerning procedures for the emergency plan. Response 8 in your letter of January 9, 2001, addresses emergency plan procedures. This response states that the RSC or RSAC are not required to approve emergency procedures. Your answer also states that a procedure exists that contains requirements for revising emergency plan implementing procedures. It appears that this procedure does not contain a requirement for RPC or RSAC review. However, TS 6.2.3 requires that all new procedures and major revisions thereto having safety significance be reviewed and approved by the RPC. This TS applies to emergency procedures. Also, current TS 6.3.g requires that substantive changes to emergency procedures shall be made effective only after documented review by the RPC or RSAC. Your existing procedure for revising emergency procedures may currently be inconsistent with TS 6.2.3 and 6.3.g. Please address this issue.

Your answer states that emergency procedures are audited by the RSAC. Although audits of the procedures are done by the committee, independent review of procedures is an important aspect in the development of acceptable procedures. Your answer states that during an emergency, the Emergency Director may be called on to develop situation specific procedures. The existing procedures should contain the flexibility for the Emergency Director to address emergencies without developing procedures. Emergencies do not allow time for developing procedures. Review of procedures by a licensee's review and audit committees is also required by ANSI/ANS - 15.1 - 1990 section 6.2.3(2). Please propose a TS that includes review of emergency procedures by your safety committee or further justify the proposed procedure development process.

Response 8 states that substantive changes, minor modifications and temporary deviations to emergency procedures are considered revisions. This would mean that minor modifications and temporary deviations from emergency procedures would not be allowed which could place a significant additional burden on the Emergency Director during an emergency. ANSI/ANS - 15.1 - 1990 section 6.4 contains requirements on minor modifications to or temporary deviations from procedures (as does your TS 6.3). Please provide TS requirements that allow minor modifications and temporary deviations or provide additional justification that these processes are not required.

3. You have proposed changes to TS 6.3 concerning your security plan and procedures for implementing the security plan. Response 9 in your letter of January 9, 2001, addresses the security plan and security plan procedures. The provisions of current TSs 6.2.3 b. and 6.3 g. apply to security plan implementing procedures. These TSs require that the RPC or RSAC review procedure changes. Licensees normally consider members of their safety committees as having need to know, or have additional review of security plans and procedures beyond management, e.g., the Associate Director. Please propose TS requirements or security plan requirements for a review process for the security plan and procedures. This process could include persons that have a need to know based on plan responsibility. Alternatively, provide additional justification of the adequacy of the proposed review process.

Your answer does not address substantive changes, minor modifications and temporary deviations to security procedures. This would mean that minor modifications and temporary deviations from security procedures would not be allowed which could place an additional burden on the operating staff. ANSI/ANS - 15.1 - 1990 section 6.4 contains requirements on minor modifications to or temporary deviations from procedures (as does your TS 6.3). Please provide TS requirements that allows minor modifications and temporary deviations or provide additional justification that these processes are not required.