



DEPARTMENT OF MECHANICAL ENGINEERING  
THE UNIVERSITY OF TEXAS AT AUSTIN

*Nuclear Engineering Teaching Laboratory • (512) 232-5370 • FAX (512) 471-4589*

February 26, 2001

Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington D.C., 20555-0001

Ref: Facility License R-129, Docket 50-602  
ANSI/ANS 15.1, *The Development of Technical Specifications for Research Reactors*

Subject: Requested changes to Section 6.0 of Technical Specifications

Sirs:

The Nuclear Engineering Teaching Laboratory (NETL) at The University of Texas at Austin respectfully requests changes to the Technical Specifications for license R-129. These changes will update the license to reflect the current facility organization structure and remove requirements to provide reports to NRC Region IV.

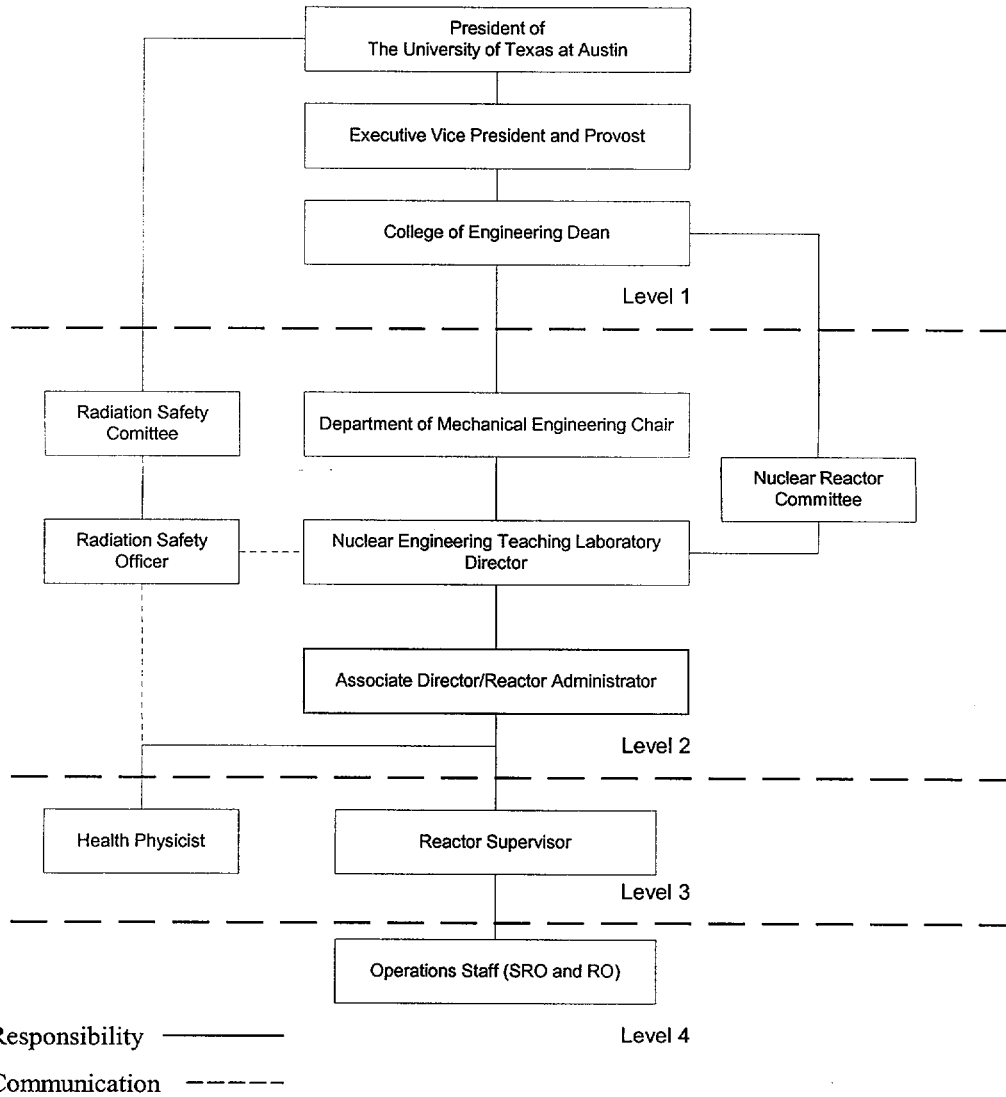
### **Section 6.0 Administration**

The management structure of the NETL was modified in 1999 to include the position of Associate Director. This position manages the daily facility operations and directly supervises the Reactor Operations and Health Physics groups. The Associate Director is therefore directly responsible for the facility and is delegated to act as NETL Director in his absence. An audit in November 2000 noted the Facility License, Security Plan and Emergency Plan did not address the change in NETL management structure and responsibilities and recommended immediate corrective actions. The changes are consistent with ANSI/ANS 15.1. The NETL requests the following modification to Section 6.1.1 and 6.1.2 of the Technical Specifications:

#### **6.1.1 Structure**

The facility shall be under the control of the Director, Associate Director or a Senior Reactor Operator. The management for operation of the facility shall consist of the organizational structure as follows:

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### 6.1.2 Responsibility

The Director shall be responsible to the Dean of the College of Engineering and the Chairman of the Department of Mechanical Engineering for safe operation and maintenance of the reactor and its associated equipment. These responsibilities may be delegated to the Associate Director during the Director's absence from the Facility. A member of Facility Management (Director or Associate Director) or a Senior Reactor Operator shall review and approve all experiments and experimental procedures prior to their use in the reactor. Line Management designated in Section 6.1.1 shall be responsible for the policies and operation of the facility, shall be responsible for

safeguarding the public and facility personnel from undue radiation exposures and for adhering to the operating license and technical specifications.

### **Section 6.6 Reports**

NRC Headquarters (HQ) Non-Power Division in Washington D.C. performs monitoring of licensed activities at non-power reactors. Region IV of the NRC no longer performs inspections and all regulatory concerns are directed to NRC HQ. The NETL requests the removal of the requirement in Section 6.6 to send a copy of any report to the Regional Administrator of Region IV.

The NETL requests the following change to section 6.6.2.1.a, Special Reports, to remain consistent with ANSI/ANS 15.1 (6.6.2).

From:

Permanent changes in the facility organization involving Director or Supervisor.

To:

Permanent changes in the facility organization involving Level 1 or Level 2 personnel.

The NETL requests a change in the immediate reporting requirements of Section 6.6.2.2 as follows:

From:

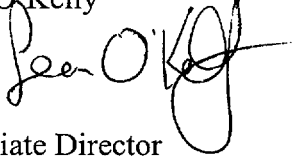
“A report to NRC Operations Center and Region IV by telephone not later than the following working day... “

To:

“A report to NRC Operations Center by telephone not later than the following working day...”

These changes reflect actual conditions existing at the facility or change the Technical Specifications to be consistent with national standard practice. Please contact me at 512-232-5373 if you require additional information.

Sean O'Kelly

A handwritten signature in black ink, appearing to read "Sean O'Kelly". The signature is stylized with a large, looped "S" and "K".

Associate Director

cc: CF#26  
C. Beard, Director  
K. Ball, Reactor Committee Chair  
A. Adams, Project Manager, NRC