September 30, 2004

Mr. Richard L. Holm, Reactor Administrator
Nuclear Reactor Laboratory
University of Illinois at Urbana-Champaign
214 Nuclear Engineering Laboratory
103 South Goodwin Avenue
Urbana, IL 61801-2984

SUBJECT: UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN — REQUEST FOR ADDITIONAL INFORMATION RE: TECHNICAL SPECIFICATIONS ADMINISTRATIVE CHANGES (TAC NO. MC4293)

Dear Mr. Holm:

We are continuing our review of changes to the technical specifications (TSs) for the University of Illinois Nuclear Reactor Laboratory which you submitted on September 8, 2004. During our review of your TSs changes, 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 TSs changes.

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

Sincerely,

/RA/

Alexander Adams, Jr., Senior Project Manager
Research and Test Reactors Section
New, Research and Test Reactors Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No. 50-151

Enclosure: As stated

cc w/enclosure: See next page

cc:

The Honorable Tod Satterthwaite
Mayor of the City of Urbana
P.O. Box 219
Urbana, IL 61803

Illinois Emergency Management Agency
Bureau Chief
Bureau of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, IL 62705

Dr. James Stubbins, Head
Department of Nuclear Engineering
University of Illinois at Urbana-Champaign
103 South Goodwin Avenue
Urbana, IL 61801-2984

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REQUEST FOR ADDITIONAL INFORMATION
UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN
DOCKET NO. 50-151

1. The existing technical specification (TS) 6.1.1 c. requires the Reactor Health Physicist to be responsible for assuring the day to day and routine radiological safety activities at the Nuclear Reactor Laboratory. Please describe how these activities have changed with the permanent shutdown and removal of reactor fuel from the facility such that the Reactor Administrator and Radiation Safety Office staff can perform the remaining duties. Your proposed changes to the TS 6.1.1 c. removes the entire first sentence which removes all responsibility for assuring the day to day and routine radiological safety activities. Please justify deletion of this entire sentence or replace the position of Reactor Health Physicist with Reactor Administrator and Radiation Safety Office staff to reflect the transfer of responsibility as discussed in your justification.

2. You have proposed deleting TS 6.1.2 a.2. requiring the Reactor Health Physicist as part of the minimum staffing requirements. In addition to health physics duties, this position also has reactor operations responsibility as indicated by meeting the requirements for a Level Three individual as given in ANS/ANSI-15.4-1988. Please discuss how the change in activities at the facility following permanent reactor shutdown and removal of fuel justifies a minimum staffing of the Reactor Administrator. Please note that ANS/ANSI-15.1-1990, "The Development of Technical Specifications for Research Reactors," indicates the minimum staffing requirement is for periods when the reactor is not secured. If the reactor will be shut down or secured with the removal of reactor fuel complete, the need for a TS discussing minimum staffing may be eliminated given proper justification.

3. You have proposed deleting from TS 6.1.2 b. the requirement for designated personnel to be reachable and respond to the facility within approximately one hour. Your justification is with the removal of all reactor fuel from the facility, accident scenarios are similar to laboratories that use radioactive material on campus and that response is covered by the campus Radiation Safety Manual. Please discuss why the Radiation Safety Manual is applicable to accident scenarios at the Nuclear Reactor Laboratory. Please describe the response outlined by the Radiation Safety Manual and the ability of university staff responding in accordance with the Radiation Safety Manual to initiate the requirements of the reactor emergency plan if needed.