



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

**RHODE ISLAND ATOMIC ENERGY COMMISSION**  
Rhode Island Nuclear Science Center  
16 Reactor Road  
Narragansett, RI 02882-1165

26 October 2004

Mr. Daniel Hughes, Project Manager  
Non-Power Reactors, Decommissioning and  
Environmental Project Directorate  
Division of Reactor Projects - III/IV/V  
U. S. Nuclear Regulatory Commission (NRC)  
Washington, D. C. 20555

Docket No. 50-193

Dear Mr. Hughes :

This letter is a follow-up to our telephone conversation of 13 August 2004, and my letter dated 16 August 2004 regarding the Rhode Island Atomic Energy Commission request to change the License R-95 surveillance specification concerning the inspection of core components, from an annual inspection cycle, to a five year cycle. This request was submitted in conjunction with two other change requests that you have indicated need further consideration. We request that you separate these requests so that we can move forward with the approval of the core component inspection cycle change. We would like to change the wording of Specification 4.9.a to the following :

The maximum neutron fluence of a beryllium reflector shall be  $1E22$  neutrons /cm<sup>2</sup>. The exposure shall be determined annually in accordance with the operating procedures. The beryllium reflectors shall be visually inspected and functionally fit into the core grid box on a rotating basis not to exceed five years such that:

- 1) The surveillance shall include at least a fifth of the beryllium reflectors each year,
- 2) If a beryllium reflector is removed from use and the time since its last surveillance exceeds five years it shall be visually inspected and functionally fit into the core grid box prior to being placed in use, and
- 3) If damage is discovered the surveillance shall be expanded to include all of the beryllium reflectors prior to next use and annually thereafter.

And we would like to change the wording of Specification 4.9.b to the following :

The fuel elements shall be visually inspected and functionally fit into the core grid box on a rotating basis not to exceed five years such that:

- 1) The surveillance each year shall include at least a fifth of the fuel elements,
- 2) The surveillance each year shall include fuel elements that represent a cross section with respect to burnup,
- 3) If a fuel element is removed from use and the time since its last surveillance exceeds five years it shall be visually inspected and functionally fit into the core grid box prior to being placed in use, and
- 4) If damage is detected by Tech. Spec. 4.3.3 or otherwise discovered then the surveillance shall be expanded to include all of the fuel elements prior to next use and annually thereafter.

Thank you for your attention to this matter. If there are any questions, please call me at (401)789-9391.

Sincerely,

Michael J. Davis  
Reactor Supervisor

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