

July 10th, 2005

Marvin Mendonca
Project Director
Mail Stop 12 G13
US Nuclear Regulatory Commission
Washington, DC 20555

Mr. Mendonca,

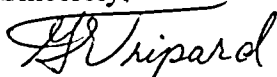
As a follow up to the letter dated May 2nd, 2005, I must inform the Commission that the Washington State University Nuclear Radiation Center (WSUNRC) will go out of compliance with our surveillance requirements on July 13th, 2005. Section 4.3.1 part (5) (page 26) of our Technical Specifications denotes "The reactor shall be pulsed semiannually to compare fuel temperature measurements and peak power levels with those of previous pulses of the same reactivity."

The date of our last test pulse (\$2.00) was November 29th, 2004. We are currently unable to perform a test pulse in accordance with the Technical Specifications due to the installation and current configuration of our new NLW-1000 wide range channel. At present, it is possible to violate the one kilowatt pulsing limit (as required in Table 3.2 of our Technical Specifications, page 12) through an indirect series of events and a loophole in the NLW-1000 as presently configured.

The WSUNRC will perform a test pulse as soon as the NLW-1000 channel can be configured to prevent rod withdrawal when in the pulse mode. We have a working solution, but it will take time to implement. In addition, the WSUNRC will inform the Commission when we return to compliance regarding this matter.

If you have any questions, please feel free to call.

Sincerely,



Dr. Gerald Tripard, Director