



# Nuclear Reactor Laboratory

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August 23, 2006

RSC 901

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Docket 50-156, License R-74  
Request for Amendment No. 16 to Facility License  
No. R-74

Dear Sirs:

The University of Wisconsin TRIGA research reactor requests to amend the Technical Specifications to facility license no. R-74. Specifically, Technical Specification 4.2.1.a, which states:

"The reactivity worth of the control elements and the shutdown margin shall be determined annually but at intervals not to exceed 14 months"

The proposed change to Technical Specification 4.2.1.a is to replace the time interval from 14 months to 15 months, to read as follows:

"The reactivity worth of the control elements and the shutdown margin shall be determined annually but at intervals not to exceed 15 months"

#### Basis for Proposed Change

The University of Wisconsin TRIGA research reactor facility is involved in two major construction projects during the current calendar year. These construction projects include modifications to the external Mechanical Engineering Building on the University of Wisconsin campus, in which the reactor is located, and a complete overhaul of the reactor control console.

These projects were scheduled to be performed concurrently, with the reactor control console upgrade commencing two weeks after the beginning of the external facility modifications. The external facility modifications were to commence on May 15, 2006. The reason for this was to ensure the new equipment to be installed in the reactor control console would not be damaged by dust and vibration during the demolition phase of the external facility modifications.

Due to construction delays during the demolition phase of the external facility modifications, the reactor control console upgrade project did not commence until July 10, 2006. As a result, the reactor has been shutdown since May 15, 2006 and upon current evaluation, reactor operation is unlikely to resume until September 15, 2006.

Surveillance requirement 4.2.1.a was last performed on June 30, 2005 and is due for completion prior to August 31, 2006.

The proposed amendment provides a one month deferral of requirement 4.2.1.a during this time that the reactor is shut down. Surveillance requirement 4.2.1.a must still be completed as soon as practical after reactor startup and no later than September 30, 2006.

#### Safety Evaluation by Facility

The American National Standard ANSI/ANS-15.1-1990 recognizes the measurement of reactivity worth of control rods shall be performed annually or following significant core or control rod changes. The definition of annually is the interval not to exceed 15 months.

The basis for this requirement, as explained in Technical Specification 4.2.1, is "Past experience with TRIGA reactors gives assurance that measurement of the reactivity worth on an annual basis is adequate to assure no significant changes in the shutdown margin".

There have been no changes to the reactor core or control rods during the interval of June 30, 2005 to present. The reactor will continue to remain shutdown until initial startup following the reactor control console upgrade. At which time surveillance requirement 4.2.1.a will be completed as soon as practical.

I believe this proposed change does not have any safety significance since it only affect the time interval for the performance of surveillance requirement 4.2.1.a by one month, which is consist with the American National Standard ANSI/ANS-15.1-1990.

I certify under penalty of perjury that the foregoing is true and correct.

Sincerely,



Robert J. Agaise  
Reactor Director

Executed on:

8/23/2006