



Nuclear Reactor Facility
1870 Miner Circle
Rolla, MO 65409-0630
Phone: 573.341.4236
Fax: 573.341.4237
reactor@umr.edu

April 9, 2007

U.S. Nuclear Regulatory Commission
Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Request for approval of two proposed technical specification amendments for the University of Missouri – Rolla Reactor Facility, license 79, docket 50-123.

Dear Sir:

The University of Missouri – Rolla Reactor (UMRR) Facility, respectively requests to modify the UMRR Technical Specifications 6.1.2 “Responsibility” and 6.3 “Operating Procedures”. The first proposed amendment request removing the requirement for the Facility Director to obtain a Senior Operator license. The second amendment requests a change of approval of UMRR Standard Operating Procedures (SOPs), the Facility Manager would approve SOPs in place of the Facility Director. Both proposed amendments have been reviewed and approved by the UMR Radiation Safety Committee as required by technical specification 6.2.3(3) prior to submission to the Nuclear Regulatory Commission.

Technical Specification 6.1.2 Responsibility

The first proposed amendment, UMRR is requesting is to eliminate the Facility Director being required to obtain and maintain a NRC Senior Operator license. Technical Specification 6.1.2 is listed as the following:

“The Director of the Nuclear Reactor Facility is the contact person for the NRC and will have overall responsibility for management of the facility (Level 2). The Director shall have a minimum of six years of nuclear experience. The Director shall have a Bachelor’s (or higher) degree in engineering or science. Equivalent education or experience may be substituted for a degree. The degree may fulfil four years of the six years of nuclear experience required. As soon as possible after being assigned to the position, the Director shall obtain and maintain a NRC Senior Operators license.”

UMRR is requesting to remove the last sentence "As soon as possible after being assigned to the position, the Director shall obtain and maintain a NRC Senior Operators license." from Technical Specification 6.1.2.

UMRR Technical Specifications require the Facility Manager to obtain and maintain a Senior Operator license. UMRR has several personnel with a senior operator's license, which include two full-time staff Mr. William Bonzer and Mr. Daniel Estel, UMR Health Physicist Ms. Michelle Minard, and several students. The necessity for the Facility Director to have a license to conduct reactor operations does not exist.

Technical Specification 6.3 Operating Procedures

The second proposed amendment, UMRR requests the Facility Manager to approve changes to the Standard Operator Procedures instead of the Facility Director. Technical Specification 6.3 is listed as the following:

"The reactor staff shall prepare and utilize written procedures for at least the items listed below. These procedures shall be adequate to ensure the safe operation of the reactor, but should not preclude the use of independent judgment and action should the situation require such.

- (1) startup, operation, and shutdown of the reactor.
- (2) installation or removal of fuel elements, control rods, experiments, and experimental facilities.
- (3) actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected coolant system leaks, and abnormal reactivity changes.
- (4) emergency conditions involving potential or actual release of radioactivity, including provisions for evacuation, re-entry, recovery, and medical support.
- (5) preventive and corrective maintenance operations that could have an effect on reactor safety.
- (6) periodic surveillance (including testing and calibration) of reactor instrumentation and safety systems.
radiation control procedures which shall be maintained and made available to all operations personnel.
- (8) implementation of emergency and physical security plans.

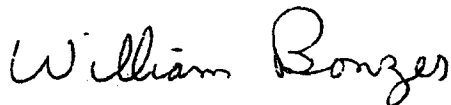
Substantive changes to the approved procedures shall be made only with the approval of the Radiation Safety Committee. Changes that do not change the original intent of the procedures may be made with the approval of the Facility Director."

The proposed amendment would change the last word in Technical Specification 6.3 from Director to Manager.

The Facility Manager is in charge of day to day operations of the UMRR Facility and the Facility Director has general oversight of the Facility. UMRR is requesting the person in charge of day to day operations, the Facility Manager, to approve changes to the UMRR Standard Operating Procedures in place of the person with general oversight of the facility, the Facility Director. The Facility Manager works with the standard operating procedures on a daily basis and is very capable of approving changes that do not change the original intent of the procedures. Substantive changes to the approved procedures shall continue to be made only with the approval of the Radiation Safety Committee as required in technical specification 6.3.

The UMRR Facility respectfully requests the Nuclear Regulatory Commission to review and approve the proposed amendments to Technical Specifications 6.1.2 and 6.3. These amendments are enclosed with this letter. Please contact me at 573-341-4384 or webonzer@umr.edu for further information or discussion regarding these proposed revisions.

Sincerely,



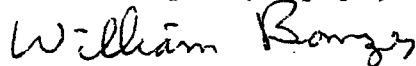
William Bonzer
UMRR Manager and Interim Director

Web

Enclosure

Cc: Mr. Marvin Mendonca
Dr. Mariesa Crow
Dr. Arvind Kumar
Dr. Mark Fitch
NRC region III

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



Executed on April 9, 2007.