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REFERENCE: Docket 50-407
The University of Utah – TRIGA Research Reactor (UUTR)
License No. R-126

SUBJECT 4): Justification for the change

We have provided the clarifications for the TS Chapter 14, Chapter 6.0 content and the flow chart depicting the facility organization and management. The main reasons for the clarifications we provided are:

- a. *The current flow chart shown as Fig. 6.1 in current TS Chapter 14, Chapter 6.0 Page 26 depicting the administrative organization of the facility, lines of communication and control was not clear.*
- b. *The structure of the current Chapter 6.0 did not follow in full the ANSI/ANS 15.1-2007 and ANSI/ANS15.4-2007.*
- c. *The wording of some of the paragraphs required clarification in compliance with the ANSI/ANS 15.1-2007 and ANSI/ANS15.4-2007 (refer to as ANSI standards in the explanations provided below).*

The changes are listed under the SUBJECT 3) letter; the list contains in total seventeen groups of changes. The basis of these seventeen groups of changes is justified as follows:

1) Page 26 in the current TS, Chapter 14, Chapter 6.0

The current TS Chapter 14, Chapter 6.0 starts with 6.1 Responsibility (This became 6.1.2 Responsibility in revised version). We changed to start with 6.1 Organization following the ANSI standards. This whole section is rewritten to better explain the organization chart (see explanation under 2)) and describe the roles of each of the levels using guidelines from the ANSI standards. We explained very clearly the lines of communication and reporting.

2)Figure 6.1: Page 27 in the current TS, Chapter 14, Chapter 6.0

The UUTR administrative organization flowchart was clarified to reflect clear administrative position in compliance with the ANSI standards, as well as to clarify the communication lines, and lines of responsibility and reporting. The new flow chart is easy to read.

3)Page 26 in the current TS, Chapter 14, Chapter 6.0

The section 6.1 Responsibility is renumbered into 6.1.2 according to ANSI standards. The text is clarified using the guidelines of the ANSI standards.

4)Page 26 in the current TS Chapter 14, Chapter 6.0

The current section 6.3 Facility Staff Qualifications is renumbered into 6.1.3 Staffing and reworded to follow the ANSI standards.

5)Page 26 in the current TS Chapter 14, Chapter 6.0

The current section 6.4 Training is renumbered into 6.1.4. according to ANSI standards. We clarified the requirements for personnel training using the guidelines provided under the ANSI standards.

6)Pages 26 and 27 in the current TS Chapter 14, Chapter 6.0

The current section 6.5 Reactor Safety Committee is renumbered to 6.2 Reactor Safety Committee according to ANSI standards. The current subtitle 6.5.1 Function is renumbered to 6.2.1 Function. The text is not changed, however for clarity reasons at the beginning of the first sentence we explained the used RSC abbreviation.

7) Page 28 in current TS Chapter 14, Chapter 6.0

The subsection 6.5.2 Composition and Qualifications is renumbered into 6.2.2. according to the ANSI standards. In addition, this subsection wording was clarified following the guidelines in ANSI standards. We added therefore a sentence to clarify the members and alternates shall be appointed by and report to Level 1 management, and that individuals may be either from within or outside the operating organization.

8)Page 28 in current TS Chapter 14, Chapter 6.0

The subsection 6.5.3 Operation was renumbered into 6.2.3 Operation according to the ANSI standards. The current wording was clarified in accordance to the guidelines provided within the ANSI/ANS standards.

9)Page 28 in current TS Chapter 14, Chapter 6.0

The subsection 6.5.4 Reviews was renumbered and changed into subsection 6.2.4 Review Function according to the ANSI standards. The first sentence in new version has designated subcommittees in plural which is in agreement with our Reactor Safety Committee practices. The subsection is not revised, except a new sentence is added at the end of the subsection to indicate that the written reports or minutes of the findings and recommendations of the review group shall be submitted to Level 1 and that the review and audit will be completed in a timely manner. The basis for this addition is to clarify the line of reporting.

10)Page 29 in current TS Chapter 14, Chapter 6.0

The subsection 6.5.5 Audits was renumbered into 6.2.5 Audits according to the ANSI standards.

11)Page 29 in current TS Chapter 14, Chapter 6.0

The subsection 6.5.6 Records was renumbered into 6.2.6 Records according to the ANSI standards.

12)Additional section to current TS Chapter 14, Chapter 6.0

The section on Radiation Safety is added according to the ANSI standards.

13)Page 29 in current TS Chapter 14, Chapter 6.0

The subsection 6.6 Quality Assurance is renumbered into 6.9 Quality Assurance according to the ANSI standards.

14)Page 29 in current TS Chapter 14, Chapter 6.0

The subsection 6.7 Action To Be Taken in the Event a Safety Limit is Exceeded is renumbered into 6.6 Required Actions and the subsection 6.6.1 . Action To Be Taken in the Event a Safety Limit is Exceeded, according to the ANSI standards.

We added under 2) that the immediate report of the occurrence shall also be reported to Level 2 and not only to Chairman of the Reactor Safety Committee following the ANSI standards; and we changed NRC into U.S.N.R.C.

15)Page 30 in current TS Chapter 14, Chapter 6.0

The current section 6.8 Operating Procedures was renumbered into section 6.4 Operating Procedures according to the ANSI standards.

16)Page 30 in current TS Chapter 14, Chapter 6.0

The current section 6.9 Facility Operating Records was renumbered into 6.8 Facility Operating Records according to the ANSI standards.

17)Page 31 in current TS Chapter 14, Chapter 6.0

The current section 6.10 Reporting Requirements was renumbered and renamed in according to the ANSI standards into 6.7 Reports. The NRC was changed into U.S.N.R.C.

18)New section added in current TS Chapter 14, Chapter 6.0

Section 6.5 Experiments Review and Approval is added according to the ANSI standards.