Department of Mechanical Engineering

THE UNIVERSITY OF TEXAS AT AUSTIN

Nuclear Engineering Teaching Laboratory · http://www.me.utexas.edu/~netl
1 University Station, R9000 · Austin, Texas · 78712 · (512) 232-5370 · Fax (512) 471-4589

April 1, 2010

Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D.C., 20555-0001

Ref: Letter of March 28 2008 (ML080920755) Docket 50-602

Subject: Request to withdraw previous Technical Specification change request and submission of new change request.

Sirs:

A request for a change to Facility License R-129 Technical Specifications was requested on March 28, 2008 (ADAMS accession number ML080920755). The Nuclear Engineering Teaching Laboratory (NETL) at The University of Texas at Austin respectfully requests withdrawal of that request and hereby submits a new request which includes corrections to several items in the original request and supplemental items. We request withdrawal of the original request which has not yet been acted on in the interest of preventing confusion. The submitted changes requested are:

CHANGE 1

Current Specification:

1.1 Certified Operators

An individual authorized by the U.S. Nuclear Regulatory Commission to carry out the responsibilities associated with the position requiring the certification.

1.1.1 Senior Reactor Operator

An individual who is licensed to direct the activities of reactor operators. Such an individual may be referred to as a class A operator.

1.1.2 Reactor Operator

An individual who is licensed to manipulate the controls of a reactor. Such an individual may be referred to as a class B operator.

Change specification to:

1.2 Licensed Operators

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An individual authorized by the U. S. Nuclear Regulatory Commission to carry out the responsibilities associated with the position and licensed in accordance with 10 CFR 55.

1.2.1 Senior reactor Operator

An individual who is licensed to manipulate the controls of a reactor and direct the activities of licensed reactor operators.

1.2.2 Reactor Operator

An individual who is licensed to manipulate the controls of a reactor.

Justification:

The terms "Certified" and "Class A or B Operators" pertain to operators at DOD or DOE facilities that are not licensed by U.S. NRC. This has introduced unnecessary confusion to staff and licensed operators. Typically, Senior Reactor Operators at the NETL will direct and manipulate the controls of the research reactor.

CHANGE 2

Current Specification:

1.5 Fuel Element, Standard

A fuel element is a single TRIGA element of standard type. Fuel is U-ZrH clad in stainless steel clad. Hydrogen to zirconium ratio is nominal 1.6.

Change Specification to:

1.5 Fuel Element, Standard

A fuel element is a single TRIGA element of standard non instrumented type. Fuel is U-$ZrH_{1.6}$ clad in stainless steel **or aluminum**. Hydrogen to zirconium ratio is nominal 1.6.

Justification:

Definition of standard element from General Atomic includes aluminum clad elements. NETL is currently in possession of two aluminum clad standard elements in storage. Second use of the word "clad" in second sentence is redundant.

CHANGE 3

Current Specification:

1.20 Reference core condition

The condition of the core when it is at ambient temperature (cold) and the reactivity worth of xenon is negligible (<.30 dollars).

Change Specification to:

1.20 Reference core condition

The condition of the core when it is at ambient temperature (cold), the reactivity worth of xenon is negligible (<.30 dollars), **excluding experiments (materials typically introduced and removed), but including normally installed fixed experiment facility hardware.**

Justification:
This proposed change clarifies that normally permanently installed experiment facility hardware does not have to be removed for the core to be considered in reference condition.

CHANGE 4

Current Specifications:

3.1 Reactor Core Parameters

3.1.1 Excess Reactivity

Specification (s)

Maximum excess reactivity shall be 4.9% Δk/k.

3.1.2 Shutdown Margin

Specifications (s)

The reactor shall not be operated unless the shutdown margin provided by control rods is greater
than 0.2% Δk/k with:

a. The reactor in the reference core condition.
b. The most reactive control rod fully withdrawn.

c. All moveable experiments in their most reactive state.

3.1.3 Transient Insertions

Specification (s)

Total worth of the transient rod shall be limited to 2.8% Δk/k, and the total withdrawal time for the rod shall not exceed 15 seconds.

Change Specifications to:

3.1 Reactor Core Parameters

3.1.1 Excess Reactivity

Specification (s)

Maximum excess reactivity shall be **7.00 dollars** (4.9% Δk/k) with:

a. The reactor in the reference core condition.
b. Positive worth experiments in their most reactive state.

3.1.2 Shutdown Margin

Specifications (s)

The reactor shall not be operated unless the shutdown margin provided by control rods is greater than **0.28 dollars** (0.2% Δk/k) with:

a. The reactor in the reference core condition.
b. The most reactive control rod fully withdrawn.
c. **Positive worth** experiments in their most reactive state.

3.1.3 Transient Insertions

Specification (s)

Total worth of the transient rod shall be limited to 4.00 dollars (2.8% Δk/k), and the total withdrawal time for the rod shall not exceed 15 seconds **in pulse mode**.

Justification:

Technical specifications and Safety Analysis Report (SAR) reference reactivity in percent and dollar units. Operators use the dollar unit of reactivity for experiment and control rod reactivity measurements. Specification should be changed to include dollar units calculated using Beta Effective of 0.0070 which is the accepted value for TRIGA reactors and listed in the SAR on page 4-47.

Including the conditions requisite during the measurement of excess reactivity brings this section into the same format as the section on shutdown margin and insures positive reactivity experiments are conservatively considered in evaluating reactivity limits.

The specification limit for transient rod withdrawal of 15 seconds is only applicable following a reactor pulse to reduce the delayed neutron "tail" following the pulse. As read, the current specification limits the transient rod withdrawal in all modes of operation to only 15 seconds. The specification should be changed to specify the 15 second limit is only required in the pulse mode of operation.

CHANGE 5

Current Specification:

3.4.2 Materials

Specification(s)

The reactor shall not be operated unless the following conditions governing experiment materials exist:

a. Experiments containing materials corrosive to reactor components, compounds highly reactive with water, potentially explosive materials, and liquid fissionable materials shall be doubly encapsulated. Guidance for classification of materials shall use the' "Handbook of Laboratory Safety" Tables of Chemical Information published by CRC Press.

b. If a capsule fails and releases material which could damage the reactor fuel or structure by corrosion or other means, removal and physical inspection shall be performed to determine the consequences and need for corrective action. The results of the inspection and any corrective action taken shall be reviewed by the Director, or his designated alternate, and determined to be satisfactory before operation of the reactor is resumed.

c. Explosive materials in quantities greater than 25 milligrams shall not be irradiated in the reactor or experimental facilities. Explosive materials in quantities less than 25 milligrams may be irradiated provided the pressure produced upon detonation

of the explosive has been calculated and/or experimentally demonstrated to be less than the design pressure of the container.

d. Each fueled experiment shall be controlled such that the total inventory of iodine isotopes 131 through 135 in the experiment is no greater than 750 millicuries and the maximum strontium inventory is no greater than 2.5 millicuries.

e. Experiment materials, except fuel materials, which could off-gas, sublime, volatilize, or produce aerosols under (1) normal operating conditions of the experiment or reactor, (2) credible accident conditions in the reactor, (3) possible accident conditions in the experiment shall be limited in activity such that if 100% of the gaseous activity or radioactive aerosols produced escaped to the reactor room or the atmosphere, the airborne concentration of radioactivity averaged over a year would not exceed the occupational limits for maximum permissible concentration.

f. In calculations pursuant to e. above, the following assumptions shall be used: (l) If the effluent from an experimental facility exhausts through a holdup tank which closes automatically on high radiation level, at least 10% of the gaseous activity or 5 aerosols produced will escape. (2) If the effluent from an experimental facility exhausts through a filter installation designed for greater than 99% efficiency for 0.25 micron particles, at least 10% of these vapors can escape. (3) For materials whose boiling point is above 55°C and where vapors formed by boiling this material can escape only through an undisturbed column of water above the core, at least 10% of these vapors can escape. (4) Limits for maximum permissible concentrations are specified in the appropriate section of 10CFR20.

Change Specification to:

3.4.2 Materials

Specification(s)

The reactor shall not be operated unless the following conditions governing experiment materials exist:

a. Experiments containing materials corrosive to reactor components, compounds highly reactive with water, potentially explosive materials, and liquid fissionable materials shall be doubly encapsulated. **Guidance for classification of materials should use the Material Safety Data Sheet (MSDS) or a similar source of information involving hazardous chemicals or materials.**

b. NO CHANGE

c. NO CHANGE

d. NO CHANGE

e. Experiment materials, except fuel materials, which could off-gas, sublime, volatilize, or produce aerosols under (1) normal operating conditions of the experiment or reactor, (2) credible accident conditions in the reactor, (3) possible accident conditions in the experiment shall be limited in activity such that if 100% of the gaseous activity or radioactive aerosols produced escaped to the reactor room the airborne concentration of radioactivity averaged over a year would not exceed the **derived air concentration limits (DAC) of 10 CFR 20 Appendix B, and averaged effluent from the reactor room to the environment would not exceed effluent limits of Appendix B.**

f. In calculations pursuant to e. above, the following assumptions shall be used: (1) If the effluent from an experimental facility exhausts through a holdup tank which closes automatically on high radiation level, at least 10% of the gaseous activity or aerosols produced will escape. (2) If the effluent from an experimental facility exhausts through a filter installation designed for greater than 99% efficiency for 0.25 micron particles, at least 10% of these vapors can escape. (3) For materials whose boiling point is above 55°C and where vapors formed by boiling this material can escape only through an undisturbed column of water above the core, at least 10% of these vapors can escape.

Justification:

(3.4.2.a) Section 3.4.2.a required ("... shall use ... ") any experiment material evaluation to use the CRC Press Handbook of Laboratory Safety. Material Safety Data Sheets provide more detailed chemical hazard information and are maintained up-to-date as required by OSHA regulations (29 CFR 1910.1200) since 1986. The NETL facility should be allowed to use any and all available information to evaluate materials used in an experiment with the MSDS as the first choice.

(3.4.2.e) Derived Air Concentration (DAC) has replaced the term Maximum Permissible Concentration (MPC). This change will update the license technical specifications to reflect the current 10 CFR 20.

(3.4.2.f) Paragraph refers to "assumptions" used in safety calculations. Item (4) states the location of concentration limits in 10 CFR 20 but the location is a fact, not an assumption, and does not belong in this list nor is the statement needed as the location of the legal limits are specified in 3.4.2.e.

CHANGE 6

Current Specification:
4.1.3 Transient Insertion

Specification(s)

Transient rod function shall be evaluated annually or after significant control rod or reactor core changes. The transient rod drive and associated air supply shall be inspected annually, and the drive cylinder shall be cleaned and lubricated annually.

A comparison of pulse data shall be made with previous measurements at annual intervals or each time the interval to the previous measurement exceeds the annual interval.

Change Specification to:
4.1.3 Transient Insertion

Specification(s)

Transient rod function shall be evaluated annually, after maintenance on the transient rod drive or following significant reactor core changes. The transient rod drive and associated air supply shall be inspected annually, and the drive cylinder shall be cleaned and lubricated as necessary annually.

~~A comparison of pulse data shall be made with previous measurements at annual intervals or each time the interval to the previous measurement exceeds the annual interval.~~

Justification:
Transient rod operability and reactivity worth is evaluated in 4.2.1. There is no safety basis in the Safety Analysis report for a Technical Specification assuming or requiring a comparison of pulse data. There is no limiting condition for operation associated with this surveillance, and no acceptance criteria. Reactor pulsing is a severe transient on the reactor components and may shorten the lifetime of the thermocouples in the instrumented fuel elements, the transient rod drive, and/or sensitive experimental facilities installed in the reactor core region.

CHANGE 7

Current Specification:

5.1.1 Location

Specification(s)

a. The site location is in the northeast corner of The University of Texas at Austin J.J. Pickle Research Campus.

b. The TRIGA reactor is installed in a designated room of a building constructed as a Nuclear Engineering Teaching Laboratory.

c. The reactor core is assembled in an above ground shield and pool structure with horizontal and vertical access to the core.

d. License areas of the facility for reactor operation shall consist of the room enclosing the reactor shield and pool structure, and the adjacent area for reactor control. (room 1.104, corridor 3.200; and rooms 3.202, 3.204, and 3.208)

Change Specification to:

5.1.1 Location

Specification(s)

a. The site location is in the northeast corner of The University of Texas at Austin J.J. Pickle Research Campus.

b. The TRIGA reactor is installed in room 1.104 of the Nuclear Engineering Teaching Laboratory building.

c. The reactor core is assembled in an above ground shield and pool structure with horizontal and vertical access to the core.

d. License areas of the facility for reactor operation shall consist of the room enclosing the reactor shield and pool structure, and the adjacent area for reactor control. (room 1.104, corridor 3.200; and rooms 3.202, 3.204, and 3.208)

e. License areas of the facility for radioactive materials, whose use or storage may be further restricted based on security controls, shall consist of the entire facility designated as the Nuclear Engineering Teaching Laboratory.

Justification:

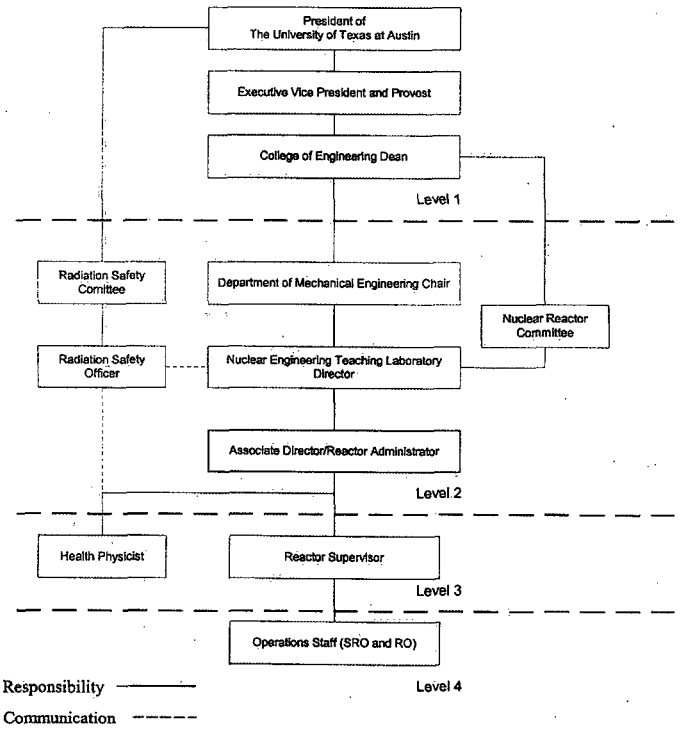
Previous specification only specified the reactor would be in a "designated room" because the building had not been built when the original license was issued. U.S. NRC license site for reactor facility must include the entire Nuclear Engineering Teaching Laboratory for byproduct material control as materials must be routinely moved within the building to support experiment and waste disposal activities.

CHANGE 8

Current Specification:

6.1.1 Structure

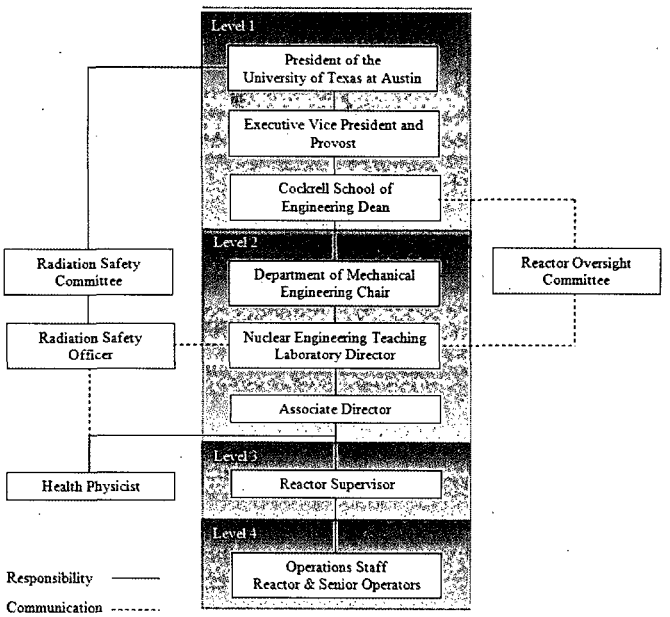
The facility shall be under the control of the Director, Associate Director or a delegated Senior Reactor Operator. The management for operation of the facility shall consist of the organizational structure as follows:



Change Specification to:

6.1.1 Structure

The facility shall be under the control of the Director, Associate Director or a delegated Senior Reactor Operator. The management for operation of the facility shall consist of the organizational structure as follows:



Justification:
In 2001 a change to the Technical Specifications provided an organizational chart that included line management for reactor operations integrated with radiation safety and oversight functions. The arrangement of labels for Level 1 and Level 2 personnel did not clearly delineate between line management and oversight responsibilities, and the committee tasked with oversight of facility safety is labeled Nuclear Reactor Committee (the name Reactor Oversight Committee is being used internally to avoid confusion in using committee initials). These changes are strictly administrative in nature.

CHANGE 9

Current Specification:

6.2 Review and Audit

6.2.1 Composition and Qualifications

A Nuclear Reactor Committee shall consist of at least three (3) members appointed by the Dean of the College of Engineering that are knowledgeable in fields which relate to nuclear safety. The university radiological safety officer shall be a member or an ex-officio member. The committee will perform the functions of review and audit or designate a knowledgeable person for audit functions. .

6.2.2 Charter and Rules
The operations of the Nuclear Reactor Committee shall be in accordance with an established charter, including provisions for:

a. Meeting frequency (at least once each six months).

b. Quorums (not less than one-half the membership where the operating staff does not represent a majority).

c. Dissemination, review, and approval of minutes.

d. Use of subgroups.

6.2.3 Review Function

The review function shall include facility operations related to reactor and radiological safety.
The following items shall be reviewed:

a. Determinations that proposed changes in equipment, systems, tests, experiments, or procedures do not involve an unreviewed safety question.

b. All new procedures and major revisions thereto, and proposed changes in reactor facility equipment or systems having safety significance.

c. All new experiments or classes of experiments that could affect reactivity or result in the release of radioactivity.

d. Changes in technical specifications or license.

e. Violations of technical specifications or license.

f. Operating abnormalities or violations of procedures having safety significance.

g. Other reportable occurrences.

h. Audit reports.

6.2.4 Audit Function

The audit function shall be a selected examination of operating records, logs, or other documents. An audit will be by a person not directly responsible for the records and may include discussions with cognizant personnel or observation of operations. The following items shall be audited and a report made within 3 months to the Director and Nuclear Reactor Committee:

a. Conformance of facility operations with license and technical specifications at least once each calendar year.

b. Results of actions to correct deficiencies that may occur in reactor facility equipment, structures, systems, or methods of operation that affect safety at least once per calendar year.

c. Function of the retraining and requalification program for reactor operators at least once every other calendar year.

d. The reactor facility emergency plan and physical security plan, and implementing procedures at least once every other year.

6.3 Operating Procedures

Written operating procedures shall be prepared, reviewed and approved by the Director or a supervisory Senior Reactor Operator and the Nuclear Reactor Committee prior to initiation of the following activities:

a. Startup, operation, and shutdown of the reactor.

b. Fuel loading, unloading and movement in the reactor.

c. Routine maintenance of major components of systems that could have an effect on reactor safety.

d. Surveillance calibrations and tests required by the technical specifications or those that could have an effect on reactor safety.

e. Administrative controls for operation, maintenance: and the conduct of experiments or irradiations that could have an effect on reactor safety.

f. Personnel radiation protection, consistent with applicable regulations or guidelines, and shall include a management commitment and programs to maintain exposures and releases as low as reasonably achievable.

g. Implementation of required plans such as the emergency plan or physical security plan.

Substantive changes to the above procedures shall be made effective after approval by the Director or a supervisory Senior Reactor Operator and the Nuclear Reactor Committee. Minor modifications to the original procedures which do not change the original intent may be made by a senior reactor operator but the modifications must be approved by the Director or a supervisory Senior Reactor Operator. Temporary deviations from the procedures may be made by a senior reactor operator in order to deal with special or unusual circumstances or conditions. Such deviations shall be documented and reported to the Director or a supervisory Senior Reactor Operator.

6.4 Experiment Review and Approval

All new experiments or classes of experiments shall be approved by the Director or a Supervisory Senior Reactor Operator and the Nuclear Reactor Operations Committee.

a. Approved experiments shall be carried out in accordance with established and approved procedures.

b. Substantive changes to previously approved experiments shall require the same review as a new experiment.

c. Minor changes to an experiment that do not significantly alter the experiment may be made by a supervisory senior reactor operator.

6.5 Required Actions

6.5.1 Action to be taken in case of a Safety Limit Violation

In the event of a safety limit violation, the following section shall be taken:

a. The reactor shall be shut down and reactor operation shall not be resumed until a report of the violation is prepared and authorization to restart by the Nuclear Regulatory Commission (NRC) is issued.

b. The safety limit violation shall be promptly reported to the Director of the facility or a designated alternate.

c. The safety limit violation shall be subsequently reported to the NRC.

d. A safety limit violation report shall be prepared and submitted to the Nuclear Reactor Committee. The report shall describe: (l) Applicable circumstances

leading to the violation including, when known the cause and contributing factors, (2) Effect of the violation on reactor facility components, systems, or structures and on the health and safety of the public, (3) Corrective actions taken to prevent recurrence.

6.5.2 Action to be taken in the Event of an Occurrence that is Reportable.

In the event of a reportable occurrence, the following action shall be taken:

a. Reactor conditions shall be returned to normal or the reactor shutdown. If it is necessary to shut down the reactor to correct the occurrence, operations shall not be resumed unless authorized by the Director or his designated alternate.

b. Occurrence shall be reported to the Director or his designated alternate and to the Nuclear Regulatory Commission as required.

c. Occurrence shall be reviewed by the Nuclear Reactor Committee at the next regularly scheduled meeting.

Change Specification to:

6.2 Review and Audit

6.2.1 Composition and Qualifications

A **Reactor Oversight Committee** shall consist of at least three (3) members appointed by the Dean of the Cockrell School of Engineering that are knowledgeable in fields which relate to nuclear safety. The university radiological safety officer shall be a member or an ex-officio member. The committee will perform the functions of review and audit or designate a knowledgeable person for audit functions.

6.2.2 Charter and Rules

The operations of the **Reactor Oversight Committee** shall be in accordance with an established charter, including provisions for:

a. Meeting frequency (at least once each six months).

e. b. Quorums (not less than one-half the membership where the operating staff does not represent a majority).

c. Dissemination, review, and approval of minutes.

d. Use of subgroups.

6.2.3 Review Function

The review function shall include facility operations related to reactor and radiological safety.
The following items shall be reviewed:

a. Determinations **in accordance with 10CFR50.59** that proposed changes in equipment, systems, tests, experiments, or procedures do not require a **license amendment**.

b. All new procedures and major revisions thereto, and proposed changes in reactor facility equipment or systems having safety significance.

c. All new experiments or classes of experiments that could affect reactivity or result in the release of radioactivity.

d. Changes in technical specifications or license.

e. Violations of technical specifications or license.

f. Operating abnormalities or violations of procedures having safety significance.

g. Other reportable occurrences.

h. Audit reports.

6.2.4 Audit Function

The audit function shall be a selected examination of operating records, logs, or other documents. An audit will be by a person not directly responsible for the records and may include discussions with cognizant personnel or observation of operations. The following items shall be audited and a report made within 3 months to the Director and **Reactor Oversight Committee**:

a. Conformance of facility operations with license and technical specifications at least once each calendar year.

b. Results of actions to correct deficiencies that may occur in reactor facility equipment, structures, systems, or methods of operation that affect safety at least once per calendar year.

c. Function of the retraining and requalification program for reactor operators at least once every other calendar year.

d. The reactor facility emergency plan and physical security plan, and implementing procedures at least once every other year.

6.3 Operating Procedures

Written operating procedures shall be prepared, reviewed and approved by the Director or a supervisory Senior Reactor Operator and the **Reactor Oversight Committee** prior to initiation of the following activities:

a. Startup, operation, and shutdown of the reactor.

b. Fuel loading, unloading and movement in the reactor.

c. Routine maintenance of major components of systems that could have an effect on reactor safety.

d. Surveillance calibrations and tests required by the technical specifications or those that could have an effect on reactor safety.

e. Administrative controls for operation, maintenance, and the conduct of experiments or irradiations that could have an effect on reactor safety.

f. Personnel radiation protection, consistent with applicable regulations or guidelines, and shall include a management commitment and programs to maintain exposures and releases as low as reasonably achievable.

g. Implementation of required plans such as the emergency plan or physical security plan.

Substantive changes to the above procedures shall be made effective after approval by the Director or a supervisory Senior Reactor Operator and the **Reactor Oversight Committee**. Minor modifications to the original procedures which do not change the original intent may be made by a senior reactor operator but the modifications must be approved by the Director or a supervisory Senior Reactor Operator. Temporary deviations from the procedures may be made by a senior reactor operator in order to deal with special or unusual circumstances or conditions. Such deviations shall be documented and reported to the Director or a supervisory Senior Reactor Operator.

6.4 Experiment Review and Approval

All new experiments or classes of experiments shall be approved by the Director or a Supervisory Senior Reactor Operator and the **Reactor Oversight Committee**.

a. Approved experiments shall be carried out in accordance with established and approved procedures.

b. Substantive changes to previously approved experiments shall require the same review as a new experiment.

c. Minor changes to an experiment that do not significantly alter the experiment may be made by a supervisory senior reactor operator.

6.5 Required Actions

6.5.1 Action to be taken in case of a Safety Limit Violation

In the event of a safety limit violation, the following section shall be taken:

a. The reactor shall be shut down and reactor operation shall not be resumed until a report of the violation is prepared and authorization to restart by the Nuclear Regulatory Commission (NRC) is issued. .

b. The safety limit violation shall be promptly reported to the Director of the facility or a designated alternate.

c. The safety limit violation shall be subsequently reported to the NRC.

d. A safety limit violation report shall be prepared and submitted to the **Reactor Oversight Committee.** The report shall describe: (1) Applicable circumstances leading to the violation including, when known the cause and contributing factors, (2) Effect of the violation on reactor facility components, systems, or structures and on the health and safety of the public, (3) Corrective actions taken to prevent recurrence.

6.5.2 Action to be taken in the Event of an Occurrence that is Reportable.

In the event of a reportable occurrence, the following action shall be taken:

a. Reactor conditions shall be returned to normal or the reactor shutdown. If it is necessary to shut down the reactor to correct the occurrence, operations shall not be resumed unless authorized by the Director or his designated alternate.

b. Occurrence shall be reported to the Director or his designated alternate and to the Nuclear Regulatory Commission as required.

c. Occurrence shall be reviewed by the **Reactor Oversight Committee** at the next regularly scheduled meeting.

Justification:

The name of the Nuclear Reactor Committee was changed to Reactor Oversight Committee to avoid confusion when using the initials of the Committee (NRC) with the U.S. Nuclear Regulatory Commission. The name change from "College of Engineering" to "Cockrell School of Engineering" was made by the University administration. Paragraph 6.2.3 was changed since Terminology in 10CFR50.59 has changed. This change is strictly administrative in nature, correcting terminology.

CHANGE 10

Current Specification:

6.6.2 Special Reports

A written report with 30 days to the NRC of:

a. Permanent changes in the facility organization involving Level 1 or Level 2 personnel.

b. Significant changes in transient or accident analysis as described in the Safety Analysis Report.

Change Specification to:

6.6.2 Special Reports

A written report with 30 days to the NRC of:

a. Permanent changes in the facility organization involving **line management** Level 1 or Level 2 personnel.
b. Significant changes in transient or accident analysis as described in the Safety Analysis Report.

Justification:

The University of Texas at Austin policy is to annually appoint the membership of safety committees. The inclusion of these as level 1 and level 2 management in the section

6.1.1 diagram and the use of the word "permanent" is inconsistent thus we request the diagram change to indicate line management and the reference to line management in this section.

CHANGE 11

The University of Texas at Austin requests Section 6.6.2.3 be removed entirely from the R-129
Technical Specifications as this license requirement is only applicable to the facility reactor startup report that was submitted to the NRC in 1992 following initial criticality.

Please contact me by phone (512-232-5373) or email (whaley@mail.utexas.edu) if you require clarification or further information.

P. Michael Whaley
Associate Director
Nuclear Engineering Teaching Laboratory
The University of Texas at Austin
512-232-5373

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

Steven R. Biegalski
NETL Director

cc: S. Biegalski, Director
H. Liljestrand, Reactor Oversight Committee Chair
L Tran, Project Manager, NRC