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 6, 2010

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

Subject: Requested Change to Section 6 of Technical Specifications

Sirs:

The Nuclear Engineering Teaching Laboratory (NETL) at The University of Texas at Austin respectfully submits the following separate request for change to Facility License R-129 Technical Specifications:

ITEM 1

Current Specification:
6. 6.1.3, Staffing, Paragraph 2:
Events requiring the direction of a senior reactor operator shall be:

a. All fuel element or control rod relocations within the reactor core region.
b. Relocation of any experiment with a reactivity worth of greater than one dollar.
c. Recovery from an unscheduled shutdown or significant power reductions,
d. Initial startup and approach to power.

Change Specification to:
6. 6.1.3, Staffing, Paragraph 2:
Events requiring the direction of a senior reactor operator shall be:

a. All fuel element or control rod relocations **or installations** within the reactor core region, **and subsequent initial startup and approach to power.**
b. Relocation **or installation** of any experiment **in the core region** with a reactivity worth of greater than one dollar**, and subsequent initial startup and approach to power.**
c. Recovery from an unscheduled shutdown or significant power reductions,
~~d. Initial startup and approach to power.~~

Justification:
10CFR50.54 states, "The following paragraphs with the exception of paragraphs (r) and (gg) of this section are conditions in every nuclear power reactor operating license issued under this part., subpart (m)(1)"

Subpart m requires that:

A020
NRR

"A senior operator licensed pursuant to part 55 of this chapter shall be present at the facility or readily available on call at all times during its operation, and shall be present at the facility during initial start-up and approach to power, recovery from an unplanned or unscheduled shut-down or significant reduction in power, and refueling, or as otherwise prescribed in the facility license."

Initial startup is not explicitly defined for test and research reactors in the regulation. The conditions of the University of Texas, Austin, TRIGA Mark II reactor that most closely correspond to initial startup for a fuel cycle at a nuclear power plant is an untested new core configuration such as following fuel element or control rod relocation or installation, or relocation or initial installation of an experiment with a reactivity worth of greater than one dollar.

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