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Rockville, MD 20852

Attention: Ms Linh Tran, Project Manager

Ref: Docket 50-326, Licence R-116 University of California, Irvine

I am pleased to submit, in an enclosure, an update response to the Request for Additional Information dated December 3rd, 2009 (TAC No. ME1579) in regard to our license renewal request.

Please contact me if there are further questions in this regard.

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

Executed on May 17th 2010

Sincerely yours,

A handwritten signature in black ink that reads "George E. Miller".

George E. Miller
Director Nuclear Reactor Facility
Senior Lecturer Emeritus,
Department of Chemistry,
University of California, Irvine

A020
NRO

Ref:Docket 50-326, License R-116 University of California Irvine

Addendum to RAI Response submitted 1/25/2010

The following changes/additions should be added to our application for license renewal.

1. In UCI's recent submission of a response to your RAI, I have reviewed the response, particularly appendix F, and realized that the thyroid exposure predicted for our MHA was over estimated in several ways. In addition to not adjusting for a realistic operating schedule instead of "infinite operation at full power", we did not allow for any plating of iodine isotopes on surfaces that would significantly reduce the airborne concentration, and hence significantly reduce the anticipated thyroid exposure rate and hence the total calculated exposure.
In Oregon State University's SAR, they adopted a method which suggests halogen release plates out to reduce the airborne concentrations to less than 25% of the initial release.
Thus I wish to revise my dose rate expected to the thyroid in the unlikely event of a water "free" fuel element cladding rupture, to $0.25 \times 0.45 \text{ rads/second} = 0.11 \text{ rads/second}$.
Given this rate and the 2 minute evacuation time for personnel from the facility, the revised maximum dose would be 13.2 Rads to the thyroid.
I hope you can accept this late revision to provide a more realistic, but still very conservative estimate of potential exposure.
2. I hereby state that no changes have been made to the reactor controls or safety related systems between the time of original application submission and the present time that resulted in any degradation of the functions or effectiveness of the safety systems, nor were any un-reviewed safety concerns introduced. Any changes thus were permitted under the provisions of the appropriate section of 10 CFR50.59.
3. I wish to state that no changes have been made to the Emergency Plan between the time of original application submission and the present time that resulted in any degradation of the effectiveness of the plan and so were not permitted under the provisions of the appropriate section of 10 CFR.50.54.
4. I wish to state that no changes have been made to the Physical Security Plan between the time of original application submission and the present time that resulted in any degradation of the effectiveness of the plan and so were not permitted under the provisions of the appropriate section of 10 CFR.50.54.