



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND ATOMIC ENERGY COMMISSION

Rhode Island Nuclear Science Center
16 Reactor Road
Narragansett, RI 02882-1165

Mr. William B. Kennedy, Project Manager
Research and Test Reactors Branch A
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

May 18, 2010

Re: Letter dated April 13, 2010
Docket No. 50-193

Dear Mr. Kennedy:

The Rhode Island Atomic Energy Commission met in an open meeting on 14 May 2010 to address your correspondence of April 13, 2010 requesting additional information from us for the license renewal. The Commission unanimously agreed that the questions that could be answered with the resources that are available would be provided to you in a letter no later than June 13, 2010. We are also attaching our original design basis safety analysis prepared in 1962 and updated in 1967 by General Electric, the designer of the research reactor since most of your questions on the license renewal concern the design of the reactor that was approved by the Atomic Energy Commission (prior to creation of the NRC).

Additionally, we want to be sure that you have reviewed the safety analysis that we submitted in 1993 when we changed the fuel design to low enriched fuel that was approved by the NRC in 1994 since this is the latest complete review of the safety basis of the Rhode Island Research Reactor. Many of your questions could be answered by a staff review of all these prior NRC approved safety analysis reports.

As you know from our prior discussions, we believe that the staff has placed an unnecessary regulatory burden on university research reactors by requiring what in fact is a new license process instead of a license renewal process which by definition focuses on the important issue of age related degradation and not the original reactor design which has been operating safely for over 45 years. As such, we have sent a separate letter to the NRC Commissioners on May 4, 2010 requesting a meeting to discuss the policy issues and the process the NRC is using to renew the few US remaining university research reactors. Once this meeting has occurred, we will have a better feel for the timeframe for

A020
NRR

completing the remaining questions but in any case you should consider this letter as a request for an extension of time since the 60 days you requested after a 4 year delay by NRC to review our original license renewal application is unreasonable since the total number of questions numbers over 250.

Very truly yours,

A handwritten signature in black ink, appearing to read "Terrence N. Tehan". The signature is fluid and cursive, with a prominent initial "T" and "N".

Terrence N. Tehan, Ph.D., Director
Rhode Island Atomic Energy Commission

Copy to: Governor Donald L. Carcieri (w/o attachment)
Chairman Jaczko (w/o attachment)
Commissioner Svinicki (w/o attachment)
Commissioner Apostolakis (w/o attachment)
Commissioner Magwood (w/o attachment)
Commissioner Ostendorff (w/o attachment)