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U.S. Nuclear Regulatory Commission
ATTN. Document Control Desk
Washington D.C. 20555

Re: License R-57, Docket # 50-131. Request Change to Technical Specifications.

The Alan J. Blotcky Reactor Facility is in a shutdown status not specifically addressed by the facility's Technical Specifications. The reactor has been permanently shut down and all of the fuel has been removed from the site. The Decommissioning and Decontamination plan has been submitted and is currently being reviewed by the NRC. The Reactor Safeguards Committee requests either the exemption from or removal of the following Technical Specifications:

2.1 Safety Limit of the Reactor Fuel Temperature
Technical Specification not applicable due to fuel elements and fission chamber removal

2.2 Limiting Safety Systems Settings
Technical Specification not applicable due to fuel elements and fission chamber removal

3.1.1 Excess Reactivity
Technical Specification not applicable due to fuel elements and fission chamber removal

3.1.2 Shutdown Margin
Technical Specification not applicable due to fuel elements and fission chamber removal

3.1.3 Core Configurations
Technical Specification not applicable due to fuel elements and fission chamber removal

The Reactor Safeguards Committee requests a change to TS 3.1.4. The change is as follows:

3.1.4 Pool Water Level

Applicability: This technical specification applies to the requirement for maintaining a minimum height of water above the reactor core.

Objective: To ensure that sufficient water covers the core to provide necessary shielding and acceptable limits of cooling temperature.

Specifications: A float alarm switch shall be operable so that if the water level drops to less than 12 feet above the core a visual and audible alarm shall sound at the Medical Center switchboard which is monitored 24 hours a day.

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Basis: This Technical Specification is to ensure that if there was a large leak or fracture of the reactor tank; attention would be called to the occurrence so that immediate action could be taken. The effect of a complete loss of cooling accident is analyzed in Appendix C of the SAR. Since there is a siphon break from the water skimmer 6" below the water surface, a drop in water level of 6" would cause the water circulation system to lose its prime and cease to operate. The core is cooled by natural thermal convection flow.

The Reactor Safeguards Committee requests the exemption from the following Technical Specifications:

3.1.5 Fuel Parameters
Technical Specification not applicable due to fuel elements and fission chamber removal

3.2.1 Operational Control Rods
Technical Specification not applicable due to fuel elements and fission chamber removal

3.2.2 Reactivity insertion Rates
Technical Specification not applicable due to fuel elements and fission chamber removal

3.2.3 Scram Channels
Technical Specification not applicable due to fuel elements and fission chamber removal

3.2.4 Interlocks
Technical Specification not applicable due to fuel elements and fission chamber removal

3.2.5 Control Systems Instruments Requirements of Operation
Technical Specification not applicable due to fuel elements and fission chamber removal

3.3 Coolant System
(1), (2), (3), and (5)
Technical Specification not applicable due to fuel elements and fission chamber removal

3.4 Confinement Systems
Technical Specification not applicable due to fuel elements and fission chamber removal

3.5 Ventilation Systems
Technical Specification not applicable due to fuel elements and fission chamber removal

3.6.1 Monitoring Systems
Technical Specification not applicable due to fuel elements and fission chamber removal

3.6.2 Effluents Systems
Technical Specification not applicable due to fuel elements and fission chamber removal

3.7 Experiments
Technical Specification not applicable due to fuel elements and fission chamber removal

4.1 Reactor Core Parameters
Surveillance deferred during reactor shut down as described in TS 4.0

4.2 Reactor Control and Safety Systems
Surveillance deferred during reactor shut down as described in TS 4.0

The current Technical Specifications allow us to defer all required surveillances except for sections 4.3, 4.5 and 4.6(1) during reactor shutdown. The bases for these surveillance requirements and their associated Limiting Conditions for Operation assume that, even though the reactor may be secured, the fuel elements are still located in the core or in the storage racks. These requirements are intended to monitor and protect fuel element integrity or to respond to a loss of fuel element integrity.

Clearly, with no fuel on site, fuel element integrity is no longer a concern at our facility. Therefore, we are requesting relief from the following Technical Specification surveillance requirements:

4.3.1 Analysis of Coolant for Radioactivity

This Technical Specification calls for monthly sampling and analysis of coolant water for radioactivity. The basis for this requirement is to "establish a trend to quickly identify fuel or heat exchanger failure". There is no fuel on site and a heat exchanger failure will not result in a change in system radioactivity. We therefore request relief from this surveillance requirement.

Technical Specification not applicable due to fuel elements and fission chamber removal

4.3.2 Conductivity and pH

This Technical Specification calls for weekly measurements of water conductivity and monthly measurements of water pH. The basis for this surveillance requirement is to "control corrosion of such components as the reactor fuel cladding, structure and pool and to maintain clarity of the reactor water." Corrosion of the fuel cladding is no longer a concern. This surveillance requirement supports LCO 3.3. The Action Statement for LCO 3.3 requires that the reactor shall not be operated unless conductivity, pH and water radioactivity meet the specified values. Therefore, even if the results of the conductivity and pH measurements were outside the specified values, no further action would be required.

Technical Specification not applicable due to fuel elements and fission chamber removal

4.4 Confinement

Technical Specification not applicable due to fuel elements and fission chamber removal

4.5 Ventilation Systems

This Technical Specification states "The automatic absolute damper and alarm shall be tested on an average monthly and following repair or maintenance." The basis for this specification states that "Testing of the above items will assure that the radioactive effluent concentration in the reactor room and that exhausted to the environs are as specified in the SAR." Although not credited in the SAR accident analysis, this damper could have been used to isolate the room exhaust following a fuel damage event. Fuel damage is no longer a concern at the facility.

Technical Specification not applicable due to fuel elements and fission chamber removal

4.6 Radiation Monitoring Systems

This Technical Specification requires monthly checks and annual recalibration of the radiation monitors listed in TS 3.6.1., a pool level area radiation monitor (gamma) and a continuous air monitor. The LCO for Technical Specification 3.6.1 requires operability of these monitors for reactor operation. Therefore, in our current status, no further action would be required if these monitors should fail.

These radiation monitors were designed to provide monitoring during reactor operation and fuel movement activities which no longer occur at the facility.

Technical Specification not applicable due to fuel elements and fission chamber removal

5.3 **Reactor Core and Fuel**

Technical Specification not applicable due to fuel elements and fission chamber removal

5.4 Ventilation System

Technical Specification not applicable due to fuel elements and fission chamber removal

6.1.3 Staffing

Technical Specification not applicable due to fuel elements and fission chamber removal. Also, since the AJBRF is in permanent shutdown status there are no Senior Reactor Operators or Reactor Operators on staff.

6.1.4 Selection and Training of Personnel

Technical Specification not applicable due to fuel elements and fission chamber removal. Also, since the AJBRF is in permanent shutdown status there are no Senior Reactor Operators or Reactor Operators on staff.

6.2.1 Composition and Audit

A request to change this Technical Specification was previously sent to the NRC in January of 2010 and we are waiting for the response.

6.2.2(4) Charter and Rules

The Reactor Safeguards Committee requests a change to TS 6.2.2(4). The change is as follows:

Dissemination, review in a timely manner (within a month of the meeting). Approval of the minutes will take place at the following meeting.

6.2.3 (3) and (6) Review Function

Technical Specification not applicable due to fuel elements and fission chamber removal.

6.2.4 (2) Audit Function

Technical Specification not applicable due to fuel elements and fission chamber removal. No need for a requalification program.

6.2.4 (4) Audit Function

A Request for exemption to emergency plan requirements was previously sent to the NRC in January of 2010 and we are waiting for the response.

6.4 (1), (2) and (6) Procedures

Technical Specification not applicable due to fuel elements and fission chamber removal.

6.5 Experiments Review and Approval

Technical Specification not applicable due to fuel elements and fission chamber removal.

6.6.1 Required Actions

Technical Specification not applicable due to fuel elements and fission chamber removal.

6.6.2 Required Actions

Technical Specification not applicable due to fuel elements and fission chamber removal.

6.7.2 (V) Special Reports

Technical Specification not applicable due to fuel elements and fission chamber removal.

Sincerely,

Debra J Romberger

Dr. Debra Romberger
Associate Chief Of Staff Research
Co-Chair Reactor Safeguards Committee