

Nuclear Reactor Laboratory
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September 20, 2010

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

10 CFR 50

Subject: Revision to Possession Only License for the University of Arizona Research Reactor,
Facility License No. R-52, Docket No. 50-113

This letter revises the attachment to our 'possession only' request dated August 13, 2010.

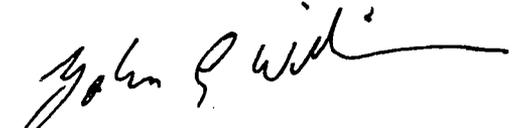
Per today's conference call portions of our proposed Technical Specifications Amendment 19 which mention "a person with knowledge and experience equivalent to that of a licensed...operator" are not acceptable. Hence, attached are revised sections 4.4c, 6.1b, and 6.1d which return the wording back to our existing Technical Specifications Amendment 18.

Since May 21, 2010, we have:

- Ceased reactor operations,
- Partially unloaded fuel from Arizona Research Reactor so it contains insufficient fissile material present in the reactor core to attain criticality under optimum available conditions of moderation and reflection,
- Maintained the reactor in a "secured" condition,
- Continued our possession of the nuclear fuel,
- Maintained our surveillance activities, and
- Maintained the facility—including the storage, control, and maintenance of the spent fuel—in a safe condition until the defueling is completed.

By prior agreement, the DOE through its Reactor Fuel Assistance Program will assist in defueling our nuclear reactor following the end of operations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 20, 2010.


John G. Williams, Director
University of Arizona Research Reactor

Attachment
Revised pages with sections 4.4c, 6.1b, and 6.1d

AORU
NR R

Revision to Possession Only License for the University of Arizona Research Reactor, Facility
License No. R-52, Docket No. 50-113 dated September 20, 2010

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4.4 Maintenance

Applicability

This specification applies to the surveillance requirements following maintenance of a control or safety system.

Objective

The objective is to assure that a system is operable before being used after maintenance has been performed.

Specification

- a. Following maintenance or modification of a control or safety system or component, it shall be verified that the system is operable prior to its return to service. A system shall not be considered operable until after it is successfully tested.
- b. Any additions, modifications, or maintenance to the ventilation system, the core and its associated support structure, the pool or its penetrations, the pool coolant system, the rod drive mechanism, or the reactor safety system shall be made and tested in accordance with the specifications to which the systems were originally designed and fabricated or to specifications approved by the Reactor Committee.
- c. A licensed reactor operator shall be present during maintenance of the reactor control and safety system.

Basis

This specification relates to changes in reactor systems which could directly affect the safety of the reactor. Changes or replacements to these systems which meet the original design specifications are considered to meet the presently accepted operating criteria.

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

- a. The reactor facility shall be maintained by the Nuclear Reactor Laboratory (NRL) at the University of Arizona. The Nuclear Reactor Laboratory Director shall report to the Vice President for Research and Graduate Studies at the University of Arizona as shown in the organization charts below.
- b. The reactor facility shall be under the supervision of a licensed senior operator for the reactor. He shall be responsible for assuring that all activities are conducted in a safe manner and within the limits prescribed by applicable federal regulations, by the facility license, and by the provisions of the Reactor Committee.
- c. There shall be a Health Physicist responsible for assuring the safety of the reactor from the standpoint of radiation protection.
- d. An NRC-licensed operator must be present in the control room when the key switch is on. The reactor shall remain shut down.