

REQUEST FOR ADDITIONAL INFORMATION

Application for Renewal of License SNM-142, TAC No L32882

Docket No. 70-152

1. Provide additional information to justify an exemption from the requirements of Title 10 of the *Code of Federal Regulations* 70.24 for the Physics Building Fast Breeder Blanket Facility (FBBF).

The applicant states that fuel movement is not allowed. However, a criticality accident alarm system (CAAS) is required even for storage only unless the applicant adequately demonstrates that the exemption will not endanger life or property or the common defense and security and are otherwise in the public's interest. Additionally, while movement of the special nuclear material (SNM) is not currently allowed, the applicant expects to eventually handle the fuel to move it out of this area. The applicant also states that only trained individuals have access to the areas and appropriate access restrictions and administrative controls are in place. While the application provides information on radiological safety training, there is no description of training with respect to nuclear criticality safety (NCS), or how the administrative controls for criticality safety are maintained.

Title 10 of the *Code of Federal Regulations* 70.24 requires a CAAS in each area where an applicant handles, stores, or uses SNM at or above the mass limits provided in 10 CFR 70.24. The applicant is currently storing SNM in the FBBF that exceeds the mass limits for which a CAAS is required.

2. Provide information that describes how NCS safety practices and procedures are established and maintained.

Information regarding how the applicant establishes and maintains the NCS safety practices and procedures for the activities described in the application was not provided as required by 70.22(a)(8) and 70.23(a)(4).

3. Provide information on the NCS training provided to the personnel that have access to and/or responsibility for the storage of the SNM.

The applicant has not provided information on NCS training for personnel who have access to and/or responsibility for SNM stored at the site.

Enclosure