



designated as original
per XIAOSONG YIN
UNITED STATES DEPARTMENT OF COMMERCE
National Institute of Standards and Technology
Gaithersburg, Maryland 20899-
NRR/DPR

May 14, 2013

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Statement of no significant hazards resulting from license amendment request dated
July 12, 2012

Reference: NBSR Facility License TR-5, Docket 50-184

Sirs:

In a license amendment request dated July 12, 2012, the NIST Center for Neutron Research (NCNR) requested an amendment to correct and clarify the environmental sampling requirements and the record retention requirements of the license Technical Specifications. As required by 10 CFR 50.91(a), the following analysis is presented to show the proposed amendment does not create a significant hazard using the criteria of 10 CFR 50.92(c).

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed amendment corrects a deficiency in the license issued in 2009 that created a disagreement in the periodicity of environmental sampling within the license Technical Specifications. Additionally, the proposed amendment aligns the record retention requirement (section 6.8) of the license technical specifications with the consensus standard ANSI/ANS 15.1. This standard has been endorsed by the NRC under Regulatory Guide 2.2. Neither of these proposed changes will have any influence or impact on reactor operations or previously analyzed accidents. There are no physical changes to the facility as a result of these administrative changes. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. No accident of any kind would be created by the proposed administrative changes. The sample periodicity will not change from the sampling periodicity used by the facility for over 40 years. Records are maintained and summarized in facility annual reports and there would be no loss of information. There are no physical changes to the facility as a result of these

administrative changes. Therefore, the changes would not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

No. Plant safety margins are established through limiting conditions of operation, limiting safety system settings, and safety limits specified in the Technical Specifications. The proposed changes do not alter any of the established safety margins and are administrative in nature. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

The NCNR appreciates the time required to process these administrative license changes and looks forward to an approved amendment in the near future. Please contact me directly at 301-975-6210 or by email at sean.okelly@nist.gov if you have any questions.

Sincerely,



Sean O'Kelly
Deputy Director

I certify under penalty of perjury that the following is true and correct.

Executed on May 14, 2013

By: Robert D. Sina

cc: U.S. Nuclear Regulatory Commission
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