

January 8, 2014

Dr. Radek Skoda, Director
Nuclear Science Center
Texas Engineering Experiment Station
1095 Nuclear Science Road
MS 3575
College Station, TX 77843

SUBJECT: TEXAS ENGINEERING EXPERIMENT STATION/TEXAS A&M UNIVERSITY
SYSTEM - REQUEST FOR ADDITIONAL INFORMATION RE: OPERATOR
REQUALIFICATION PROGRAM REVIEW FOR LICENSE RENEWAL
(TAC NO. ME1584)

Dear Dr. Skoda:

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. Your license renewal application letter indicated that there were no changes needed to your current Senior Reactor Operator and Reactor Operator Requalification Program, Revision No. 4, dated April 16, 1997. However, the NRC staff review of your license renewal application includes a review of your Operator Requalification Program, from which we identified some questions, which are provided in the enclosed request for additional information (RAI). Please provide your responses to the enclosed RAI within 30 days from the date of this letter.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.30(b), you must execute your response in a signed original document under oath or affirmation. Your response must be submitted in accordance with 10 CFR 50.4, "Written communications." Information included in your response that is considered sensitive, or proprietary, that you seek to have withheld from the public, must be marked in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." Any information related to security should be submitted in accordance with 10 CFR 73.21, "Protection of Safeguards Information: Performance requirements." Following receipt of the additional information, we will continue our evaluation of your license renewal request.

R. Skoda

- 2 -

If you have any questions, or need additional time to respond to this request, please contact me at (301) 415-0893 or by electronic mail at: Geoffrey.Wertz@nrc.gov.

Sincerely,

/RA Xiaosong Yin for/

Geoffrey A. Wertz, Project Manager
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 50-128

Enclosure:
RAI

cc: See next page

R. Skoda

- 2 -

If you have any questions, or need additional time to respond to this request, please contact me at (301) 415-0893 or by electronic mail at: Geoffrey.Wertz@nrc.gov.

Sincerely,

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Geoffrey A. Wertz, Project Manager
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Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 50-128

Enclosure:
RAI

cc: See next page

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***concurring via email**

NRR-106

OFFICE	DPR/PRLB: LRPM*	DPR/PRLB: LA	DPR/PROB: BC	DPR/PRLB: BC	DPR/PRLB: LRPM*
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DATE	12/31/2013	01/06/2014	01/07/2014	01/08/2014	01/08/2014

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Texas A&M University
cc:

Docket No. 50-128

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Governor's Budget and
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P.O. Box 13561
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Texas A&M University System
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Technical Advisor
Office of Permitting, Remediation & Registration
Texas Commission on Environmental Quality
P.O. Box 13087, MS 122
Austin, TX 78711-3087

Test, Research and Training
Reactor Newsletter
202 Nuclear Sciences Center
University of Florida
Gainesville, FL 32611

REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE OPERATOR REQUALIFICATION PROGRAM FOR
THE LICENSE RENEWAL FOR
THE TEXAS ENGINEERING EXPERIMENT STATION/TEXAS A&M UNIVERSITY SYSTEM
NUCLEAR SCIENCE CENTER TRIGA-TYPE RESEARCH REACTOR
LICENSE NO. R-83; DOCKET NO. 50-128

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-83, dated February 27, 2003 (Agencywide Documents Access and Management System Accession No. ML102920025), as supplemented, for the Texas Engineering Experiment Station/Texas A&M University System, Nuclear Science Center, TRIGA-type research reactor. The NRC staff review of your current Senior Reactor Operator and Reactor Operator Requalification Program identified some questions, which are provided below. Please provide your responses within 30 days from the date of this letter.

1. Title 10 of the *Code of Federal Regulations* (10 CFR) 55.59(a)(2) states:

(a) Requalification requirements. Each licensee shall-

(2) Pass a comprehensive requalification written examination and an annual operating test.

Section 2.2, "Licensee Evaluation," of your requalification program makes no mention of a comprehensive requalification written examination being administered at any point during the 24-month requalification program. Please propose changes to the plan to ensure that this requirement is met.

2. 10 CFR 55.53(e) states:

If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section. To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter. For test and research reactors, the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter.

Section 3.0, "Control Room Proficiency," of your requalification program makes no mention of the minimum of four hours per calendar quarter that the regulation requires for operators to maintain active status. Please propose changes to the plan to ensure that this requirement is met.

Enclosure

3. 10 CFR 55.53(e) states:

If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section. To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter. For test and research reactors, the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter.

The first sentence of Section 3.1, "Console Manipulations," of your requalification program states:

At intervals not to exceed four months, each licensee shall execute his licensed responsibilities.

The statement "intervals not to exceed four months" does not appear to be consistent with the regulations. Pursuant to 10 CFR 55.53(e), the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter. The term "calendar quarter" is defined as every three months. Please propose changes to the plan to ensure that this requirement is met.

4. 10 CFR 55.59(a)(2)(ii) states:

The operating test will require the operator or senior operator to demonstrate an understanding of and the ability to perform the actions necessary to accomplish a comprehensive sample of items specified in § 55.45(a) (2) through (13) inclusive to the extent applicable to the facility.

Section 3.2, "Licensee Evaluation," of your requalification program makes no mention of how the licensee will evaluate the operator's ability to perform actions specified in 10 CFR 55.59(a) (2) through (13). Please propose changes to the plan to ensure that this requirement is met.

5. 10 CFR 55.53(f)(2) states:

(f) If paragraph (e) of this section is not met, before resumption of functions authorized by a license issued under this part, an authorized representative of the facility licensee shall certify the following:

(2) That the licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The 40 hours must have included a complete tour of the plant and all required shift turnover procedures. For senior operators limited to fuel handling under paragraph (c) of this section,

one shift must have been completed. For test and research reactors, a minimum of six hours must have been completed.

Section 4.0, "Operator Reinstatement," of your requalification program makes no mention of the minimum of six hours that the regulation requires before resumption of functions authorized by a license. Please propose changes to the plan to ensure that this requirement is met.

6. 10 CFR 55.59(a)(2) states:

(a) Requalification requirements. Each licensee shall -

(2) Pass a comprehensive requalification written examination and an annual operating test.

Section 6.0, "Exemption," of your requalification plan states:

The Director or his designee will be responsible for evaluating the written examinations. The individual preparing a particular examination is exempt from that examination. This must be the qualified individual who has presented lectures and prepared the questions for that examination. No exemptions to the physical manipulation requirements will be granted to any licensee.

In theory, the first sentence of the above paragraph could exempt one person indefinitely from the requirement to take a written examination. It is not clear if the Director or his designee is exempt from taking the written examinations. Please propose changes to the plan to ensure that no one individual is permanently exempted from meeting the requirements of 10 CFR 55.59; for example, through the addition of a requirement that exam preparation is rotated among the senior reactor operators.