

January 22, 2014

Mr. Vito Nuccio
Reactor Administrator
Department of the Interior
U.S. Geological Survey
PO Box 25046 MS 975
Denver Federal Center
Denver, CO 80225-0046

SUBJECT: U.S. GEOLOGICAL SURVEY – REQUEST FOR ADDITIONAL INFORMATION
RE: REVIEW OF THE OPERATOR REQUALIFICATION PROGRAM FOR THE
LICENSE RENEWAL FOR THE GEOLOGICAL SURVEY TRIGA REACTOR
(TAC NO. ME1593)

Dear Mr. Nuccio:

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of the U.S. Geological Survey (USGS, the licensee) application dated January 5, 2009 (a redacted version of the safety analysis report provided with the application is available on the NRC's public Web site at www.nrc.gov under Agencywide Documents Access and Management System Accession No. ML092120136), as supplemented, for the renewal of Facility Operating License No. R-113 for the USGS TRIGA Reactor (GSTR). Your license renewal application letter indicated that there were no changes needed to your current Reactor Operator Requalification Program (a copy of the GSTR Reactor Operator Requalification Program was provided in the license renewal application). However, the NRC staff review of your license renewal application includes a review of your Reactor 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.

V. Nuccio

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If you have any questions about this review, or if you need additional time to respond to this request; please contact me by telephone at 301-415-0893 or by electronic mail at Geoffrey.Wertz@nrc.gov.

Sincerely,

/Alexander Adams for RA/

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

Docket No. 50-274

Enclosure:
RAI

cc: See next page

U.S. Geological Survey TRIGA Reactor
cc:

Docket No. 50-274

Environmental Services Manager
480 S. Allison Pkwy.
Lakewood, CO 80226

State of Colorado
Radiation Management Program
HMWM-RM-B2
4300 Cherry Creek Drive South
Denver, CO 80246

Mr. Timothy DeBey
Reactor Director
U.S. Geological Survey
Box 25046 - Mail Stop 424
Denver Federal Center
Denver, CO 80225

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

V. Nuccio

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If you have any questions about this review or if you need additional time to respond to this request; please contact me by telephone at 301-415-0893 or by electronic mail at Geoffrey.Wertz@nrc.gov.

Sincerely,

/Alexander Adams for RA/

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

Docket No. 50-274

Enclosure:
RAI

cc: See next page

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NRR-106

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NAME	GWertz	PBlechman	GBowman	AAdams	(AAdams for) GWertz
DATE	01/13/2014	01/16/2014	01/22/2014	01/22/2014	01/22/2014

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OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
FOR THE REVIEW OF THE REACTOR OPERATOR REQUALIFICATION PROGRAM
FOR THE RENEWAL OF THE FACILITY OPERATING LICENSE
FOR THE U.S. GEOLOGICAL SURVEY TRIGA REACTOR
LICENSE NO. R-113; DOCKET NO. 50-274

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of the U.S. Geological Survey (USGS, the licensee) application dated January 5, 2009 (a redacted version of the safety analysis report provided with the application is available on the NRC's public Web site at www.nrc.gov under Agencywide Documents Access and Management System Accession No. ML092120136), as supplemented, for the renewal of Facility Operating License No. R-113 for the USGS TRIGA Reactor (GSTR). The NRC staff review of your current 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)(1), states that each licensee shall successfully complete a requalification program developed by the facility licensee that has been approved by the Commission. This program shall be conducted for a continuous period not to exceed 24 months in duration.

The last sentence of Section 1, "Program," of the GSTR Reactor Operator Requalification Plan states:

They are: (1) annual written examinations, (2) annual operating examinations and (3) stipulated minimum tasks which must be performed during the requalification period of two years.

The "period of two years" is not defined and it could mean 24 months or beyond. For example, if a written examination is administered in January 2013 and the next one in September 2015, this practice could be interpreted to meet the two year requirement of the GSTR Reactor Operator Requalification Program, but would not be in accordance with 10 CFR 55.59(a)(1). Please provide a definition for the "period of two years" and/or revise the GSTR Reactor Operator Requalification Program to include that the requalification period would not exceed 24 months in duration as required by 10 CFR 55.59(a)(1).

Enclosure

2. 10 CFR 55.59(a)(2) states that each licensee shall pass a comprehensive requalification written examination and an annual operating test.

The GSTR Reactor Operator Requalification Program, Section 2, "Written Examination" states:

Since the annual written examination will be prepared and corrected by the Reactor Supervisor; who is also required to hold a Senior Operator License, these functions will be deemed adequate to demonstrate and document continuing competence.

Contrary to the requirement in the regulations, this sentence exempts one person indefinitely from the requirements of taking a written examination. Propose changes to the GSTR Reactor Operator Requalification Program 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 examination preparation is rotated among the senior reactor operators.

3. 10 CFR 55.59(c)(2), states that the requalification program must include preplanned lectures on a regular and continuing basis throughout the license period.

The GSTR Reactor Operator Requalification Program does not appear to contain a provision to include preplanned lectures on a regular and continuing basis in accordance with the requirement of the 10 CFR 55.59(c)(2). Explain or provide a provision to the GSTR Reactor Operator Requalification Program to ensure that this requirement is satisfied.

4. 10 CFR 55.59(c)(5)(i), states that the requalification program documentation must include a requirement that the facility licensee shall maintain records until the operator's or senior operator's license is renewed.

Section 6, "Records," of the GSTR Reactor Operator Requalification Program does not appear to provide a retention period for the facility to hold the records of the licensed operator and senior operator in the requalification program. Explain or provide a provision to the GSTR Reactor Operator Requalification Program to ensure that this requirement is satisfied.

5. Section 6, "Records," 2.(a), of the GSTR Reactor Operator Requalification Program states:

Table 1, Section III, Parts a, b, c, d, and e will be contained within normal facility operating records.

"Section III" is not defined in the GSTR Reactor Operator Requalification Program, Table 1. Please explain "Section III" and/or revise Table 1 of the GSTR Reactor Operator Requalification Program appropriately.

6. Section 6, "Records", 2.(d), of the GSTR Reactor Operator Requalification Plan states:

An annual statement by the Reactor Supervisor will be inserted in each Reactor Operators or Senior Reactor Operators file certifying continuing competency based on the (1) successful completion of the annual examinations plus any remedial work if required and (2) the actual performance of licensed duties as noted in Part 4-B.

The GSTR Reactor Operator Requalification Program does not contain a Part or Section "4-B". Please explain the reference "4-B," and/or revise the GSTR Reactor Operator Requalification Program appropriately.