

Docket Number 50-128  
Facility License R-83

M. Katherine Banks, Ph.D., P.E.  
Vice Chancellor and Dean of Engineering  
Director, Texas A&M Engineering Experiment Station  
3126 TAMU College Station, TX 77843-3126

October 26, 2015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

REFERENCE: License Amendment Request dated October 14, 2015 Requesting  
Approval to Receive and Store Radioactive Materials Currently  
Located in the AGN-201M Reactor

SUBJECT: REQUEST FOR AN EXPEDITED REVIEW AND APPROVAL OF  
THE REFERENCED LICENSE AMENDMENT REQUEST (LAR)  
AND A SECOND LAR TO BE SUBMITTED SHORTLY  
ASSOCIATED WITH THE PLANNED DISSASSEMBLY AND  
RELOCATION OF THE AGN-201M REACTOR TO THE  
NUCLEAR SCIENCE CENTER SITE

Attn: Mr. Alexander Adams, Jr., Chief,  
Research and Test Reactors Branch  
Office of Nuclear Reactor Regulation:

Duane Hardesty, Project Manager  
Research and Test Reactors Branch  
Office of Nuclear Reactor Regulation:

Patrick Boyle, Project Manager  
Research and Test Reactors Branch  
Office of Nuclear Reactor Regulation:

As the vice chancellor and dean of the Dwight Look College of Engineering at Texas A&M University (Texas A&M) and director of the Texas A&M Engineering Experiment Station (TEES), I am writing to request an expedited review of the license amendment requests coming from Texas A&M and TEES related to the

planned relocation of the Texas A&M AGN-201M reactor from the Zachry Engineering Center to the Nuclear Science Center (NSC) site.

My purpose is to inform the NRC staff of activities, both planned and underway, that have an impact on the AGN-201M reactor. Texas A&M is advancing a significant expansion of the Zachry Engineering Center including the design and construction of a major addition to the facility. The project plan includes new purposes for the room in which the AGN-201M reactor and support equipment are currently located. Availability of this room is essential to the planned expansion of the Zachry Engineering Center. The faculty of the Look College are very excited that expansion of the Zachry Engineering Center is now a financially viable opportunity.

It is of high importance to Texas A&M that NRC staff are aware of our project schedule and milestones. An amendment request for the NSC license was submitted on October 14, 2015 requesting authorization to receive and store the AGN-201M fuel and reactor components at our NSC facility. A second amendment request (for the AGN-201M license) for authorization to conduct the transfer will be submitted in the near term. The project plan identifies critical path work within Zachry Engineering Center that will commence in June 2016, including the area used for the AGN 201M reactor and support equipment. In support of the project schedule, Texas A&M is seeking approval of the two amendments no later than March 2016. This will provide approximately two months to move the AGN-201M reactor and ensure the area is free for unrestricted use for construction activities and ultimately building occupancy. Adhering to our project plan and schedule is of importance financially and, overall, to fulfilling our efforts to centralize all engineering activities on schedule.

As noted above, the expansion of the Zachry Engineering Center will encompass the area where our AGN-201M reactor is currently located. Early stages of the expansion of the Zachry Engineering Center have begun, with the AGN-201M reactor area isolated and protected from the ongoing work. It is important to note that all radiation protection, security and operational aspects of the facility remain as licensed and will continue to be maintained until the LARs are approved.

The Zachry Engineering Center expansion plan relies on unrestricted use of areas currently supporting the operation of the AGN-201M reactor. The sooner this area is released for unrestricted use, the faster our contractor can move forward with our expansion efforts. Operating history supports our expectation that the area does not contain any contamination; however a comprehensive effort will be undertaken to survey the area following removal of the AGN-201M reactor and associated equipment. Should contamination be identified in excess of release limits (Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) default screening values), then the area will be decontaminated, as necessary, to achieve unrestricted use conditions. Texas A&M also requests the license for the AGN-201M reactor not be terminated, although it will be temporarily in a disassembled state, as its reconstruction and continued operation is planned. These plans were introduced in our April 15, 2015 letter of intent, and are explained further in the LAR to be submitted in the very near future.

In summary, our goal is to completely empty the area and ensure it meets unrestricted use criteria. After receiving approval from the NRC, the unrestricted use of the Zachry Engineering Center will allow construction work to be performed in this area and surrounding areas while temporarily storing the AGN-201M special nuclear material and components at the NSC site.

Your cooperation, insights, and support of our efforts implementing our project plan will be greatly appreciated. We believe the enhancement to the Zachry Engineering Center and the construction of a new building to house the AGN-201M reactor will be significant to Texas A&M and the Department of Nuclear Engineering. We look forward to the opportunity to meet with your staff to discuss each amendment, as necessary.

M. Katherine Banks, Ph.D., P.E.

A handwritten signature in black ink that reads "M K Banks". The letters are cursive and somewhat stylized.

Vice Chancellor and Dean of Engineering  
Director, Texas A&M Engineering Experiment Station  
Harold J. Haynes Dean's Chair Professor