

February 22, 2016

Dr. Cornelis Van Der Schyf, Vice President
Research and Dean of the Graduate School
Idaho State University
921 South 8th Avenue, M/S 8130
Pocatello, ID 83209-8130

SUBJECT: IDAHO STATE UNIVERSITY - REQUEST FOR ADDITIONAL INFORMATION FOR
LICENSE AMENDMENT REQUEST REGARDING THE ORGANIZATIONAL
CHANGE FOR THE IDAHO STATE TRAINING REACTOR (TAC NO. ME6493)

Dear Dr. Van Der Schyf:

By letter dated May 27, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15188A054, Idaho State University (the licensee) requested an amendment to the Facility Operating License R-110 for the Idaho State AGN-201 Reactor.

The U.S. Nuclear Regulatory Commission is reviewing your amendment request regarding the organizational change which impacts the license technical specifications. After reviewing your request, questions have arisen that require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.30(b), Oath or affirmation," 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." Following receipt of the additional information, we will continue our evaluation of your amendment request.

Idaho State University

Docket No. 50-284

cc:

Dr. Richard R. Brey
Idaho State University
Interim Dean, College of Engineering
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Idaho State University
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Dr. Peter Farina, Director
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Test, Research and Training
Reactor Newsletter
202 Nuclear Sciences Center
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Gainesville, FL 32611

Adam Mallicoat
Idaho State University
Reactor Supervisor
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Pocatello, ID 83209-8060

Dr. Marylou Dunik-Gougar, Reactor Administrator
Professor and Chair of Nuclear Engineering
College of Science and Engineering
Idaho State University
Pocatello, ID 83209-8060

C. Schyf

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If you have any questions regarding this review, please contact me at 301-415-1404 or by electronic mail at Xiaosong.Yin@nrc.gov.

Sincerely,

/RA/

Xiaosong Yin, Project Manager
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 50-284

Enclosure:
As stated

cc: w/enclosure: See next page

C. Schyf

- 2 -

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Enclosure:
As stated

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ADAMS Accession No.: ML16040A119; *concurrence via e-mail

NRR-088

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OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT FOR
IDAHO STATE UNIVERSITY
THE IDAHO STATE UNIVERSITY TRAINING REACTOR
LICENSE NO. R-110; DOCKET NO. 50-284

By letter dated May 27, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15188A054), Idaho State University (the licensee) submitted a license amendment request (LAR) to the Facility Operating License R-110 for the Idaho State AGN-201 Reactor.

The U.S. Nuclear Regulatory Commission is reviewing your amendment request regarding the organizational change which impacts the license technical specifications. After reviewing your request, questions have arisen that require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter.

1. The LAR proposed to modify the current organizational chart and the personnel who are responsible for the safe operation of the Idaho State University Training Reactor.

NUREG-1537, Part 1, "Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors: Format and Content," Section 12.1.1, "Structure," states, in part, "The individual or group with legal responsibility for holding the reactor license . . . should be shown at the top of the organization."

- a) Clarify if the President of the University is now the University Officer as defined in the current Technical Specifications (TS) 6.1.1, "The University officer is an administrative officer responsible for the University and in whose name the application for licensing is made." Currently, "University Officer" is listed at the top of the organizational chart.
- b) Under the proposed organizational chart, a University Officer has been redefined as "a Vice President or the President," however, from the proposed TS 6.1.1, the definition remains the same as the current TS 6.1.1 definition. Clarify which definition would apply to a "University Officer."
- c) Though a University Officer is redefined under the organizational chart as in the "Notes," there is not a "University Officer" listed on the chart. Clarify if your intention is to keep the "University Officer" and, if the answer is yes, where you would like to incorporate the "University Officer" on the chart.

Enclosure

2. The LAR proposed to add another organizational structure to the current organizational chart.

NUREG-1537, Part 1, Section 12.1.2, "Responsibility," states "The applicant should discuss the individuals or groups that appear in the organizational structure and their respective responsibility for the safe operation of the reactor and the reactor facility . . ."

- a) Discuss what roles and responsibilities the Provost-chief administrative officer is having in relation to the operation of the reactor;
 - b) Discuss what roles and responsibilities the Dean, College of Science and Engineering is having in relation to the operation of the reactor;
 - c) Discuss what roles and responsibilities the Chair of Nuclear Engineering and health Physics is having in relation to the operation of the reactor;
 - d) Explain why safe operation of the reactor now goes in two seemingly separate reporting routes, and
 - e) Explain the relationship between the two seemingly independent structures that will oversee the safe operation of the reactor and why this is necessary.
3. The LAR proposed to change the personnel structure in the current organizational chart.

NUREG-1537, Part 1, Section 12.1.2, "Responsibility," states "The applicant should discuss the individual or groups that appear in the organizational structure and their respective responsibility for the safe operation of the reactor and the reactor facility . . ."

- a) Clarify if "Authorized Operators" and "Certified Observers" are still in your proposed organizational structure,
 - b) TS 6.1.6 was omitted from the proposed page 21 and the proposed page 23 starting from TS 6.1.11, which are different from the current TS pages 21 and 23. Provide the proposed TS page 22 with any changes clearly marked,
 - c) Justify all the changes you propose to modify the current TS with respect to the personnel responsibilities for the safe operation of the reactor, and
 - d) Provide all proposed pages (including pages 21, 22, 23, and any other potential affected pages) with all changes highlighted **with vertical lines placed on the right side of the proposed changes in word form.**
4. The LAR proposed to add another organizational structure to the current organizational chart.

NUREG-1537, Part 1, Section 12.1.5, "Radiation Safety," states "The applicant should describe the organizational aspects of the radiation safety program."

On the proposed organizational chart, "Reactor Safety Committee" was removed from the current organizational chart. Provide the justification of the removal and describe how the reactor radiation safety program will be carried out under the LAR proposal.