

September 7, 2016

Mr. Ralph Butler, Executive Director  
University of Missouri-Columbia  
Research Reactor Center  
1513 Research Park Drive  
Columbia, MO 65211

SUBJECT: UNIVERSITY OF MISSOURI AT COLUMBIA - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PROPOSED TECHNICAL SPECIFICATIONS FOR THE RENEWAL OF FACILITY OPERATING LICENSE NO. R-103 FOR THE UNIVERSITY OF MISSOURI AT COLUMBIA RESEARCH REACTOR (TAC NO. ME1580)

Dear Mr. Butler:

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-103, dated August 31, 2006 (redacted versions of the application and supplements are available on the NRC's public web site at [www.nrc.gov](http://www.nrc.gov) under Agencywide Documents Access and Management System (ADAMS) Accession Nos.: ML062540114 - cover letter; ML092110573 - Safety Analysis Report (SAR), Chapters 1-9; ML092110597 - SAR, Chapters 10-18), for the University of Missouri at Columbia Research Reactor.

The NRC staff reviewed your proposed Technical Specifications (TSs), provided by letter dated July 25, 2016 (ADAMS Accession No. ML16209A236), and identified several TSs items which need additional information or clarification. We request that you provide responses within 30 days from the receipt 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." 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 renewal request.

R. Butler

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If you need additional time to complete this request, or have any questions regarding this review, please contact me at (301) 415-0893, or by electronic mail at [Geoffrey.Wertz@nrc.gov](mailto: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. 50-186

Enclosure:  
As stated

cc: See next page

University of Missouri-Columbia

Docket No. 50-186

cc:

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Reactor Newsletter  
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202 Nuclear Sciences Center  
Gainesville, FL 32611

R. Butler

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**ADAMS Accession No: ML16239A425; \*concurrence via email**

**NRR-106**

<b>OFFICE</b>	DPR/PRLB/PM*	DPR/PRLB/LA*	DPR/PRLB/BC	DPR/PRLB/PM
<b>NAME</b>	GWertz	NParker (ABaxter for)	AAdams	(AAdams for) GWertz
<b>DATE</b>	09/01/16	08/31/16	09/07/16	09/07/16

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OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION

FOR THE RENEWED LICENSE FOR

THE UNIVERSITY OF MISSOURI-COLUMBIA RESEARCH REACTOR

LICENSE NO. R-103; DOCKET NO. 50-186

The U.S. Nuclear Regulatory Commission (NRC) is continuing its review of your application for the renewal of Facility Operating License No. R-103, dated August 31, 2006, as supplemented, for the University of Missouri at Columbia Research Reactor (MURR). The NRC staff reviewed your proposed Technical Specifications (TSs), provided by letter dated July 25, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16209A236), and identified several TSs which needed additional information or clarification. We request that you provide responses within 30 days from the receipt of this letter.

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 20, "Standards for Protection Against Radiation," requires that dose to members of the public be limited. To support meeting the public dose limits, 10 CFR Part 20 also limits the release of radioactive materials (e.g., 10 CFR Part 20, Appendix B, Table 3). Further, the relicensing renewal application is required by 10 CFR 50.34, "Contents of applications; technical information," paragraph (b)(2) to include information that provides a description and analysis of the structures, systems, and components of the facility, with emphasis upon performance requirements, the bases, with technical justification upon which such requirements have been established, and the evaluations required to show that safety functions will be accomplished. The description shall be sufficient to permit understanding of the system designs and their relationship to safety evaluations. The regulations in 10 CFR 50.9, "Completeness and accuracy of information," requires that information provided to the Commission by a licensee shall be complete and accurate in all material respects.

Technical Specifications (TSs) are fundamental criteria necessary to demonstrate facility safety and are required by 10 CFR 50.36, "Technical specifications," for each license authorizing operation of a production or utilization facility of a type described in 10 CFR 50.21, "Class 104 licenses; for medical therapy and research and development facilities." Additionally, 10 CFR 50.36(c) provides requirements to include safety limits, limiting safety system settings, limiting conditions for operation (LCO), surveillance requirements (SRs), design features, and administrative requirements. These TSs are derived from the analyses and evaluation included in the safety analysis report and submitted pursuant to 10 CFR 50.34.

NUREG-1537, Part 1, "Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors," provides guidance for the format and content for license renewal applications that is acceptable to the NRC staff for research and test reactors.

Enclosure

This guidance, and recent additional guidance under which this review is being conducted (SECY-08-0161) also includes American National Standards Institute/American Nuclear Society (ANSI/ANS)-15.1-2007, "The development of technical specifications for research reactors." The NRC staff takes the position that the statements in these documents provide acceptable guidance to licensees and, unless acceptable alternatives are justified by the licensee, should be utilized whenever appropriate.

1. Proposed TS 1.0, "Definitions," provides definitions useful in the TSs. However, the NRC staff finds that the term "Protective Action," does not appear in the TS 1.0, "Definitions." Proposed TS 1.13 uses the term "protective action."

ANSI/ANS-15.1-2007, provides guidance that includes a definition for Protective Action. Furthermore, NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, provides guidance that accepts the definitions in ANSI/ANS-15.1-2007, which includes Protective Action.

Revise TS 1.0 to include Protective Action, or justify why no change is needed.

2. Proposed TS 3.4, "Reactor Containment Building," Specification b, provides exceptions for maintaining the reactor containment integrity. However, the NRC staff finds that the exceptions do not appear to include other activities which could pose a potential for release of radioactive material, such as movement of fueled experiment, control rod maintenance, or high worth experiments.

ANSI/ANS-15.1-2007, Section 3.4.1, "Operations that require containment or confinement," provides guidance that include: movement of fueled experiments with significant fission product inventory outside of containers, systems, or storage areas; core or control rod work that could cause a change in reactivity of more than one dollar; or movement of experiments that could cause a change of total worth of more than one dollar.

Revise TS 3.4, Specification b, to include the guidance provided in ANSI/ANS-15.1-2007, or justify why no change is needed.

3. Proposed TS 3.5, "Reactor Instrumentation," provides the reactor instrumentation needed for the reactor operators to operate MURR safely. However, the NRC staff finds that instrumentation for power level monitors does not appear to be included.

NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, item (8), "Control Systems and Instrumentation Requirements for Operation (Added by NRC)," provides guidance that TSs for non-power reactors should have redundant and accurate power level monitors that cover the range from subcritical source multiplication to above the full power level.

Revise TS 3.5, to include the guidance in NUREG-1537, or justify why no change is needed.

4. Proposed TS 3.6, "Emergency Electrical Power System," provides requirements for the emergency electrical power system. However, the NRC staff finds that the term "vital equipment," used in the Objective section, does not appear to be not defined in the TSs.

NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 1.2.2, "Format," provides guidance that any information used to support the TSs should be explicitly referenced.

Revise proposed TS 3.6, Objective, to define what components constitute vital equipment at MURR, or justify why no change is needed.

5. Proposed TS 3.8, "Experiments," Specification i, limits the amount of explosive materials which can be irradiated. However, the NRC staff finds that there does not appear to be a limit on the amount of explosive material allowed in the containment building.

NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 3.8.2, "Materials," provides guidance that the TS should include a limit the amount of explosive material in the reactor facility.

Revise proposed TS 3.8, Specification i, to incorporate the guidance provided in NUREG-1537, or justify why no change is needed.

6. Proposed TS 3.8, "Experiments," Specification j, requires corrosive materials to be doubly encapsulated. However, the NRC staff finds that there does not appear to be any requirement associated the inspection of potentially damaged components as a result of a failure of encapsulation material.

NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 3.8.2, "Materials," provides guidance that the failure of an encapsulation of material that could damage the reactor should require removal and physical inspection of potentially damaged components.

Revise proposed TS 3.8, Specification j, to incorporate the inspection guidance provided in NUREG-1537, or justify why no change is needed.

7. Proposed TS 4.0, "Surveillance Requirements," provides general requirements for surveillances. However, the NRC staff finds that there does not appear to be a requirement for a surveillance test following a repair or replacement.

NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 4, "Surveillance Requirements," provides guidance that states that any time a reactor system or component is modified or repaired, the surveillance for that system should be performed as part of the operability check of the system or component. This should be done regardless of when the surveillance was last performed or when it is next due.

Revise proposed TS 4.0 to include the guidance in NUREG-1537, or justify why no change is needed.

8. Proposed TS 4.1, "Reactor Core Parameters," provides SRs for reactor core parameters. However, the NRC staff finds that the requirements do not appear to include a SR for the reactivity worth of the control blades.

ANSI/ANS-15.1-2007, Section 4.2, "Reactor control and safety systems," item (1), provides guidance that the reactivity worth of the control rods, including peak worth, should be determined annually to biennially and following significant core configuration and or control rod changes.

Revise proposed TS 4.1 to incorporate the guidance in ANSI/ANS-15.1-2007, or justify why no changes are needed.

9. Proposed TS 4.2, "Reactor Control and Reactor Safety Systems," provides SRs for the reactor control and safety systems. However, the NRC staff finds that this specification does not appear to include a SR for an operability test following maintenance or repairs.

ANSI/ANS-15.1-2007, Section 4.2, "Reactor control and safety systems," item (6) provides guidance that an operability test of the reactor control and safety systems should be performed following modifications or repairs.

Revise proposed TS 4.2 to incorporate the guidance in ANSI/ANS-15.1-2007, or justify why no changes are needed.

10. Proposed TS 4.2, "Reactor Control and Reactor Safety Systems," Specification h, requires a biennially test of the primary coolant relief valves. However, the NRC staff finds that there does not appear to be a corresponding LCO for the primary coolant relief valves. Proposed TS 5.2, "Reactor Coolant Systems," Specification k, requires the primary coolant system to contain at least two operable pressure relief valves.

ANSI/ANS-15.1-2007, Section 3.3, "Coolant systems," provides guidance that the minimum operating equipment should be specified in TS LCO Section 3.3.

Revise proposed TS 3.3, "Reactor Coolant Systems," to include the primary coolant relief valves, or justify why no change is needed.

11. Proposed TS 4.3, "Reactor Coolant Systems," provides SRs for the reactor containment building. However, the NRC staff finds that the SR does not appear to require a leak-tightness test following modifications or repair.

ANSI/ANS-15.1-2007, Section 4.4.1, "Containment," item (4) provides guidance that a leak-tightness test should be performed following modifications or repairs that could affect the integrity of the containment boundary.

Revise proposed TS 4.3 to include the guidance in ANSI/ANS-15.1-2007, or justify why no change is needed.



12. Proposed TS 3.7, "Radiation Monitoring System and Airborne Effluents," Specification b, provides limits for the release of radionuclides from the main exhaust stack. However, the NRC staff finds that a corresponding SR for the TS 3.7, Specification b, appears to be missing. Additionally, the subject header, "Specification," appears to be missing.

ANSI/ANS-15.1-2007, Section 4, "Surveillance requirements," provides guidance that TS Section 4, SRs will prescribe the frequency and scope of surveillance to demonstrate the performance criterion of the LCOs TS Section 3. ANSI/ANS-15.1-2007, Section 1.2.2, "Format," provides guidance that TS Sections 2, 3, and 4, should include the "Specification(s)" section.

Revise proposed TS 4.3, to include a SR for TS 3.7, Specification b, and a "Specification" heading, or justify why no changes are needed.

13. Proposed TS 6.1, "Organization," Specification a, Figure 6.0, provides requirements for the MURR organization. However, the NRC staff finds that TS Figure 6.0 does not indicate the organization levels (e.g., Level 1, etc.).

ANSI/ANS-15.1-2007, Section 6.1.1, "Structure," Figure 1, "Organizational chart," provides guidance for the organizational levels (e.g., Level 1, etc.).

Revise proposed TS 6.1, Figure 6.0, to include the organizational levels, or justify why no change is needed.

14. Proposed TS 6.1, "Organization," Specification b, provides a listing of the positions having responsibility for implementing the TSs. However, the NRC staff finds that the organization levels (i.e., Level 1, etc.) are not delineated within the list. Additionally, the NRC staff finds that the reactor operators and the organizational level described by Level 1 in ANSI/ANS-15.1-2007 do not appear to be listed.

ANSI/ANS-15.1-2007, Section 6.1.1, "Structure," provides guidance used to define the organizational levels (e.g., Level 1, Level 2, operating staff, etc.).

Revise proposed TS 6.1, Specification b, to include the organizational levels, including Level 1, and the reactor operators, or justify why no changes are needed.

15. Proposed TS 6.1, "Organization," Specification e, provides the requirements for the presence of a Senior Reactor Operator (SRO) at the facility. However, the NRC staff finds that the requirements associated with control rod relocations and movement of an experiment with a reactivity worth greater than one dollar do not appear to be listed in the specification. Furthermore, the NRC staff finds that the requirement associated with the "non-emergency power reduction," is not clearly understood by the NRC staff.

ANSI/ANS-15.1-2007, Section 6.1.3, "Staffing," item (3), provides guidance that an SRO should be at the facility during control rod relocations within the reactor core region and relocation of any experiment with reactivity worth greater than one dollar.

ANSI/ANS-15.1-2007 does not provide guidance for a non-emergency power reduction.

Revise proposed TS 6.1, Specification e, to include the guidance in ANSI/ANS-15.1-2007 for control rod relocations within the reactor core region and relocation of any experiment with reactivity worth greater than one dollar, or justify why no change is needed. Explain the non-emergency power reduction requirement for the presence of an SRO in contrast to an emergency power reduction.

16. Proposed TS 6.2, "Review and Audit," Specification a, provides a description of the Reactor Advisory Committee (RAC). However, the NRC staff finds that the composition and qualifications of the RAC do not appear to be described in the specification.

ANSI/ANS-15.1-2007, Section 6.2.1, "Composition and qualifications," provides guidance for the composition and qualifications for the oversight committee, including the use of alternate members. The guidance in ANSI/ANS-15.1-2007 also includes: (1) the minimum number of members for a committee and subcommittee; (2) the background and expertise of the members; (3) the authority responsible for the appointment of members (e.g., Level 1); (4) the organizational level to which the committee reports (e.g., Level 1); and (5) the use of alternates.

Revise proposed TS 6.2, Specification a, to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.1, or justify why no change is needed.

17. Proposed TS 6.2, "Review and Audit," Specification a.(1), provides requirements associated with changes to the MURR facility equipment, systems, and procedures. However, the NRC staff finds that this TS may be missing some of the criteria provided in the guidance in ANSI/ANS-15.1-2007, Section 6.2.3, "Review function," as described below:

- a. ANSI/ANS-15.1-2007, Section 6.2.3.(1) provides guidance that the proposed changes to equipment, systems or procedures should also include "tests and experiments."
- b. ANSI/ANS-15.1-2007, Section 6.2.3.(4), provides guidance that the review should include all proposed changes in technical specifications, license, or charter.
- c. ANSI/ANS-15.1-2007, Section 6.2.3.(1), provides guidance that the review should include a review of the "determinations" (as opposed to the actual change) that the proposed changes were allowed without prior NRC.

Revise proposed TS 6.2, Specification a.(1) to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.3, or justify why no change is needed.

18. Proposed TS 6.2, "Review and Audit," Specification a.(2), provides requirements associated with proposed experiments that are significantly different from any previously reviewed. However, the NRC staff finds that specification may not be consistent with the guidance in ANSI/ANS-15.1-2007.

ANSI/ANS-15.1-2007, Section 6.2.3, "Review function," item (3), provides guidance that the review should include all new experiments or classes of experiments that could affect reactivity or result in the release of radioactivity.

Revise proposed TS 6.2.3, Specification a.(2), to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.3, item (3), or justify why no change is needed.

19. Proposed TS 6.2, "Review and Audit," Specification b, provides requirements for the RAC and subcommittee meetings. However, the NRC staff finds that this specification may not be consistent with the guidance provided in ANSI/ANS-15.1-2007, Section 6.2.3, as it appears to be missing requirements for the review and approval of the minutes.

ANSI/ANS-15.1-2007, Section 6.2.3, "Review function," provides guidance that a written report or minutes of the findings and recommendations of the review group shall be submitted to Level 1 and the review and audit group members in a timely manner after the review has been completed.

Revise proposed TS 6.2, Specification b, to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.3, or justify why no change is needed.

20. Proposed TS 6.2, "Review and Audit," Specification e.(1), provides requirements for the audit functions. However, the NRC staff finds that this specification may not be consistent with the guidance in NUREG-1537 and ANSI/ANS-15.1-2007, Section 6.2.4, "Audit function," item (4), as the emergency plan and security plan do not appear to be included.

ANSI/ANS-15.1-2007, Section 6.2.4, item (4) provides guidance that the reactor facility emergency plan and implementing procedures be audited biennially. NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 6.2.4, provides guidance that all required plans, including the Emergency Plan and Security Plan, be audited.

Revise proposed TS 6.2, Specification e.(1), to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.4, item (4) and NUREG-1537, Part 1, Chapter 14, "Technical Specifications," Appendix 14.1, Section 6.2.4, to include biennial audits of the emergency and security plans, or justify why no change is needed.

21. Proposed TS 6.2, "Review and Audit," Specification e.(2), provides requirements for the audit findings to be immediately reported to the Reactor Facility Director. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.2.4, "Audit function."

ANSI/ANS-15.1-2007, Section 6.2.4, provides guidance that deficiencies uncovered that affect reactor safety shall immediately be reported to Level 1 management. A written report of the findings of the audit shall be submitted to Level 1 management and the review and audit group members within 3 months after the audit has been completed.

Revise proposed TS 6.2, Specification e.(2) to include the guidance in ANSI/ANS-15.1-2007, Section 6.2.4, or justify why no change is needed.

22. Proposed TS 6.4, "Procedures," Specification a.(6), provides requirements for procedures for implementation of the emergency plan. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.4.(7).

ANSI/ANS-15.1-2007, Section 6.4, "Procedures," item (7), provides guidance that procedures shall include implementation of required plans such as emergency or security plans.

Revise proposed TS 6.4, Specification a.(6), to include the security plan, or justify why no change is needed.

23. Proposed TS 6.4, "Procedures," Specification d, provides requirements for deviations from procedures. However, the NRC staff finds that this specification may not be consistent with the regulatory requirements of 10 CFR 50.59 which allows a licensee to make changes to the procedures as described in the final safety analysis report (as updated).

Revise proposed TS 6.4, Specification d, to include consideration of the requirements of 10 CFR 50.59, or justify why no change is needed.

24. Proposed TS 6.6, "Reportable Events and Required Actions," Specification a.(2), provides reporting requirements for a safety limit violation. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.6.1, "Action to be taken in case of safety limit violation," item (2), as it does not appear to require reporting to management.

ANSI/ANS-15.1-2007, Section 6.6.1, item (2), provides guidance that a safety limit violation should be promptly reported to the Level 2, or designated alternates.

Revise proposed TS 6.6, Specification a.(2), to include the guidance in ANSI/ANS-15.1-2007, Section 6.6.1, item (2), or justify why no change is needed.

25. Proposed TS 6.6, "Reportable Events and Required Actions," Specification b.(2), provides reporting requirements for a release of radioactivity from the site greater than the allowable limits from the facility boundary. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, "Action to be taken in the event of an occurrence of the type identified in Secs. 6.7.2(1)(b) and 6.7.2(1)(c)," item (2), as it does not appear to require reporting to management.

ANSI/ANS-15.1-2007, Section 6.6.2, item (2), provides guidance that a release of radioactivity from the site above allowable limit should be promptly reported to the Level 2, or designated alternates.

Revise proposed TS 6.6, Specification b.(2), to include the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, item (2), or justify why no change is needed.

26. Proposed TS 6.6, "Reportable Events and Required Actions," Specification b.(3), provides the requirement that, reactor operation, following a shutdown due to a release of radioactivity greater than the allowable limits, may not resume until authorized by the Reactor Manager. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, "Action to be taken in the event of an occurrence of the type identified in Secs. 6.7.2(1)(b) and 6.7.2(1)(c)," item (1).

ANSI/ANS-15.1-2007, Section 6.6.2, item (1), provides guidance that the reactor operations shall not be resumed unless authorized by Level 2 or designated alternates.

Revise proposed TS 6.6, Specification b.(3) to include the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, item (1), or justify why no change is needed.

27. Proposed TS 6.6, "Reportable Events and Required Actions," Specification c.(1), provides reporting requirements for Abnormal Occurrences. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, "Action to be taken in the event of an occurrence of the type identified in Secs. 6.7.2(1)(b) and 6.7.2(1)(c)," item (2), as it does not appear to require reporting to management.

ANSI/ANS-15.1-2007, Section 6.6.2, item (2), provides guidance that an abnormal occurrence be promptly reported to the Level 2, or designated alternates.

Revise proposed TS 6.6, Specification c.(1), to include the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, item (2), or justify why no change is needed.

28. Proposed TS 6.6, "Reportable Events and Required Actions," Specification c.(3), provides the requirement that reactor operation, following a shutdown due to an Abnormal Occurrence, may not resume until authorized by the Reactor Manager. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS 15.1-2007, Section 6.6.2, "Action to be taken in the event of an occurrence of the type identified in Secs. 6.7.2(1)(b) and 6.7.2(1)(c)," item (1).

ANSI/ANS-15.1-2007, Section 6.6.2, item (1) provides guidance that the reactor operations shall not be resumed unless authorized by Level 2 or designated alternates.

Revise proposed TS 6.6, Specification c.(3) to include the guidance in ANSI/ANS-15.1-2007, Section 6.6.2, item (1), or justify why no change is needed.

29. Proposed TS 6.6, "Reportable Events and Required Actions," Specification d.(2), provides requirements for a written report if permanent changes occur in the facility organization involving the Office of the Provost or the Director's Office. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.7.2, "Special reports," item (2)(a).

ANSI/ANS-15.1-2007, Section 6.7.2, item (2)(a).provides guidance that a written report is required when permanent changes occur in the facility organization involving Level 1 or 2 personnel. The NRC staff is not clear which positions are Level 1 or Level 2.

Revise proposed TS 6.6, Specification d.(2), to include the guidance in ANSI/ANS-15.1-2007, or justify why no change is needed.

30. Proposed TS 6.6, "Reportable Events and Required Actions," Specification e.(1) provides requirements for the Annual Reports. However, the NRC staff finds that this specification may not be consistent with the guidance in ANSI/ANS-15.1-2007, Section 6.7.1, "Operating reports," item (4), as annual reporting of new tests and experiments do not appear to be required.

ANSI/ANS-15.1-2007, Section 6.7.1, item (4), provides guidance that Operating Reports include a tabulation of new test and experiments.

Revise proposed TS 6.6, Specification e.(1), to include the guidance in ANSI/ANS-15.1-2007, Section 6.7.1, item (4) to include new tests and experiments, or justify why no change is needed.