



AEROTEST OPERATIONS, INC.

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ATTENTION: Document Control Desk
U.S. Nuclear Regulatory Commission
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AEROTEST RADIOGRAPHY AND RESEARCH REACTOR
DOCKET NO. 50-228/LICENSE NO. R-98.

SUBJECT: Clarification of TS 6.6

Ladies and Gentlemen:

The orientation of the detector to the neutron source and loading sequence are crucial to a successful and accurate subcritical multiplication plot ($1/M$ versus U-235 mass) used for the prediction of criticality. There appears to be confusing legacy language in the ARRR Technical Specifications 6.6 that requires clarification. I request that the existing TS 6.6 be amended so I can use an optimal method for the approach-to-criticality measurement and change the nomenclature "critical experiment" which is confusing based on the common definition of "experiment" to the more common title "approach-to-criticality measurement".

This is the current TS as written: 6.6 "During a critical experiment a subcritical multiplication plots shall be obtained from at least three instrument channels. These channels may be used in addition to the normal operating instrumentation in Table 1."

This is the proposed amended language for TS: 6.6 "During fuel loading of an empty core or a significant number of fuel additions, omissions, exchanges and/or shuffling of an existing core, a subcritical multiplication plot shall be obtained by performing an approach-to-criticality measurement."

Should you have any questions or require additional information regarding this submission, please contact AO President David M. Slaughter, Ph.D. at (801) 631 5919 or dmsraven@gmail.com

I declare under penalty of perjury that the statements above are correct and truthful.

Sincerely yours,

David M. Slaughter, Ph.D.
President and Reactor Admin.
Aerotest Operations, Inc.

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