



AEROTEST OPERATIONS, INC.

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April 3, 2018

ATTENTION: Document Control Desk
U.S. Nuclear Regulatory Commission
White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

AEROTEST RADIOGRAPHY AND RESEARCH REACTOR
DOCKET NO. 50-228/LICENSE NO. R-98.

Confirmatory Action Letter (CAL) no NRR-2011-001

Ladies and Gentlemen:

I request that the Confirmatory Action Letter (CAL) no. NRR-2011-001 dated February 26, 2011 be rescinded. The terms listed are no longer relevant and provide no safety protections for Aerotest workers, the ARRR or to the general public. The intent of the document allowed necessary operations for regulatory compliance (i.e. reactor thermal power, control rod calibrations, etc.). This limited operation allowed to maintain reactor readiness and to assure required level and operation proficiency of Aerotest staff. The CAL also suspended the use of the reactor for research and service operations until Aerotest can obtain necessary approvals. The other requirements listed specifically are out of date due to the completion of the indirect transfer.

The current circumstance places Aerotest in non-compliance of the CAL as written. The reactor core is currently defueled and the required TS surveillances and Requalification reactivity manipulations are not being performed. The other terms have not been completed by the schedule presented in the document.

Let me also clearly state, the ARRR-core was defueled in 2012, and the required ARRR TS surveillances concerning reactor performance (thermal power and rod worth calibrations, rod-drop times, core reactivity limits etc.) were suspended. The same can be said for the portion of operator requalification program performing the quarterly minimal number of reactivity

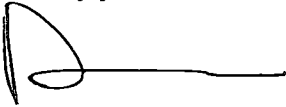
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manipulations. Both of these issues will be remediated in the ARRR Restart Plan (dated 4/3/2018). Also provided in the ARRR Restart Plan, the condition that no movement of fuel for an approach to criticality measurement will be attempted until the necessary RSC and NRC approvals are granted.

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 made are correct and truthful.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'D M Slaughter', with a long horizontal line extending to the right.

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