

April 26, 2018

Dr. David M. Slaughter  
President and Reactor Administrator  
Aerotest Operations, Inc.  
3455 Fostoria Way  
San Ramon, CA 94583

SUBJECT: AEROTEST OPERATIONS, INC. – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION REGARDING TECHNICAL SPECIFICATION 6.6 FOR THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR (EPID NO. L-2018-LLA-0098)

Dear Dr. Slaughter:

By letter dated March 29, 2018 (Agencywide Documents Access and Management System Accession No. ML18093A385), Aerotest Operations, Inc. (Aerotest) submitted a license amendment request (LAR) for the Aerotest Radiography and Research Reactor (ARRR). The proposed LAR would revise ARRR technical specification (TS) 6.6 to allow Aerotest to use an optimal method for measuring subcritical multiplication during a reactor core loading, and would also revise nomenclature used in the TS.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The NRC staff performed this acceptance review to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its satisfaction of the regulatory requirements or the characterization of the licensing basis for the facility.

Consistent with Section 50.90, "Application for amendment of license, construction permit, or early site permit," of Title 10 of the *Code of Federal Regulations* (10 CFR), whenever a holder of a license desires to amend the license, an application for an amendment must be filed with the Commission, as specified in 10 CFR 50.4, "Written communications," fully describing the changes desired, and following as far as applicable, the form prescribed for original applications. Section 50.34, "Contents of applications; technical information," of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed Aerotest's application, and concluded that the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed LAR in terms of meeting regulatory requirements, and protecting the public health and safety, and the environment. The NRC staff requests that Aerotest either 1) supplement the application to address the information needs described in the enclosure by May 29, 2018, in order to make the application complete; or, 2) withdraw and resubmit the application at a later date.

The supplemental information will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's information needs is not received by the above date, the application, if not withdrawn, will not be accepted for review pursuant to 10 CFR 2.101, "Filing of application," and the NRC staff will cease its review activities associated with the application.

If the application is subsequently accepted for review, Aerotest will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The information needs and associated response time frame in this letter were discussed with you on April 26, 2018.

If you have any questions regarding this review, please contact me at 301-415-4067, or by electronic mail at [Edward.Helvenston@nrc.gov](mailto:Edward.Helvenston@nrc.gov).

Sincerely,

*/RA/*

Edward Helvenston, Project Manager  
Research and Test Reactors Licensing Branch  
Division of Licensing Projects  
Office of Nuclear Reactor Regulation

Docket No. 50-228  
License No. R-98

Enclosure:  
As stated

cc: See next page

Aerotest Operations, Inc.

Docket No. 50-228

Sandra Warren, General Manager  
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SUBJECT: AEROTEST OPERATIONS, INC. – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION REGARDING TECHNICAL SPECIFICATION 6.6 FOR THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR (EPID NO. L-2018 LLA-0098) DATE: APRIL 26, 2018

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**ADAMS Accession No. ML18106A093**

**\*concurred via email**

OFFICE	NRR/DLP/PRLB/PM*	NRR/DLP/PRLB/LA*	NRR/DLP/PRLB/ABC	NRR/DLP/PRLB/PM
NAME	EHelvenston	NParker	SLynch	EHelvenston
DATE	4/24/2018	4/24/2018	4/24/2018	4/26/2018

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SUPPLEMENTAL INFORMATION NEEDS

LICENSE AMENDMENT REQUEST REGARDING TECHNICAL SPECIFICATION 6.6 FOR

THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR

AEROTEST OPERATIONS, INC.

DOCKET NO. 50-228

LICENSE NO. R-98

By letter dated March 29, 2018 (Agencywide Documents Access and Management System Accession No. ML18093A385), Aerotest Operations, Inc. (Aerotest) submitted a license amendment request (LAR) for the Aerotest Radiography and Research Reactor (ARRR). The proposed LAR would revise ARRR technical specification (TS) 6.6 to allow Aerotest to use an optimal method for measuring subcritical multiplication during a reactor core loading, and would also revise nomenclature used in the TS.

The U.S. Nuclear Regulatory Commission staff has determined that the following information is necessary to make the application complete and acceptable for docketing:

1. General

The application does not appear to contain a clear purpose of the proposed amendment request. The application should be supplemented to provide a complete, concise rationale for the requested changes (i.e., why or how the changes would allow Aerotest to use an optimal method for approach-to-criticality measurements).

2. Technical Specification

The application does not appear to contain a sufficient description of, or justification for, the proposed changes to TS 6.6. The application should be supplemented to provide a complete description of all of the changes to TS 6.6 (including the elimination of the requirement to obtain subcritical multiplication plots from at least 3 instrument channels), as well as a detailed analysis justifying the changes.

3. Proposed Technical Specifications Change Page

The application does not appear to include a proposed TSs change page to support the license amendment. The NRC staff recommends that the application be supplemented to include a proposed TS change page as an enclosure to the application.