

May 16, 2018

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

SUBJECT: AEROTEST OPERATIONS, INC. — ACCEPTANCE OF REQUESTED  
LICENSING ACTION REGARDING TECHNICAL SPECIFICATION 6.6 FOR  
THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR  
(EPID NO. L-2018-LLA-0096)

Dear Dr. Slaughter:

By letter dated March 29, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18093A385), as supplemented by letter dated April 30, 2018 (ADAMS Accession No. ML18127A075), Aerotest Operations, Inc. (Aerotest) submitted a license amendment request (LAR) for the Aerotest Radiography and Research Reactor (ARRR). The proposed LAR would delete ARRR technical specification 6.6.

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 acceptance review was performed 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 characterization of the regulatory requirements or the licensing basis of 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 it contains technical information in sufficient detail to enable the NRC staff to begin its detailed technical review to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. Aerotest will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The NRC staff will perform its review following the guidance of NUREG-1537, "Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors."

Based on the information provided in Aerotest's LAR, the NRC staff has estimated that this licensing request could be completed in approximately four months. If there are emergent complexities or challenges in the NRC staff's review that would cause changes to the initial forecasted completion date, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

This estimate is based on the NRC staff's initial review of the application and could change due to several factors, including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities.

If you have any questions, 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

cc: Sandy Warren, General Manager  
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**ADAMS Accession No. ML18129A056**

**\*concurred via e-mail**

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