



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 26, 2018

Captain John Gilstad, Director
Armed Forces Radiobiology
Research Institute
National Naval Medical Center
8901 Wisconsin Avenue
Bethesda, Maryland 20889-5603

SUBJECT: ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE –
SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF
REQUESTED LICENSING ACTION REGARDING REQUIRED
QUALIFICATIONS OF REACTOR FACILITY DIRECTOR FOR THE ARMED
FORCES RADIOBIOLOGY RESEARCH INSTITUTE REACTOR FACILITY
(EPID NO. L-2018-LLA-0286)

Dear Captain Gilstad:

By letter dated September 25, 2018 (Agencywide Documents Access and Management System Accession No. ML18276A077), Armed Forces Radiobiology Research Institute (AFRRI) submitted a license amendment request (LAR) for the AFRRI reactor facility. AFRRI requested the amendment to revise its technical specifications (TSs) to make the following changes: (1) to allow it to change the qualifications of the reactor facility director, (2) to allow the presence of a senior reactor operator in the reactor room, instead of the control room, during performance of maintenance and calibrations, and (3) to change the frequency of reviews and audits of the Operator Requalification Program, Emergency Plan, and Physical Security Plan.

The amendment would also make other changes to the TSs related to defining acronyms; clarifying word interpretations in the TSs; changing measurement frequencies; changing the organizational chart; eliminating the reference to specific guidance editions; referring to another AFRRI license unintentionally; and eliminating references to persons with specific titles. AFRRI stated that the amendment is necessary to correct problems that resulted in the issuance of a Notice of Violation on July 5, 2018, as well as to ensure more safe and efficient reactor operation.

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 AFRRRI'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 AFRRRI either 1) supplement the application to address the information needs described in the enclosure by November 30, 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, AFRRRI 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 your staff on October 17, 2018.

If you have any questions regarding this review, please contact me at 301-415-3398, or by electronic mail at Cindy.Montgomery@nrc.gov.

Sincerely,

/RA by William Kennedy for/

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

Docket No. 50-170
License No. R-84

Enclosure:
As stated

cc: See next page

Armed Forces Radiobiology Research Institute

Docket No. 50-170

cc:

Director, Maryland Office of Planning
301 West Preston Street
Baltimore, MD 21201

Montgomery County Executive
101 Monroe Street, 2nd Floor
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Test, Research and Training
Reactor Newsletter
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Mr. Dale Tomlinson (Acting)
Reactor Facility Director
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 (EPID NO. L-2018-LLA-0286) DATED OCTOBER 26, 2018

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***concurred via email**

OFFICE	NRR/DLP/PRLB/PM*	NRR/DLP/PRLB/LA*	NRR/DLP/PRLB/BC	NRR/DLP/PRLB/PM
NAME	CMontgomery	NParker	AAdams	CMontgomery (WKennedy for)
DATE	10/18/2018	10/22/2018	10/25/2018	10/26/2018

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SUPPLEMENTAL INFORMATION NEEDS
LICENSE AMENDMENT REQUEST REGARDING QUALIFICATIONS OF THE
REACTOR FACILITY DIRECTOR FOR
ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE
REACTOR FACILITY
DOCKET NO. 50-170
LICENSE NO. R-84

By letter dated September 25, 2018 (Agencywide Documents Access and Management System Accession No. ML18276A077), Armed Forces Radiobiology Research Institute (AFRRI) submitted a license amendment request (LAR) for the AFRRI reactor facility. AFRRI requested the amendment to revise its technical specifications (TSs) to make the following changes: (1) to allow it to change the qualifications of the reactor facility director, (2) to allow the presence of a senior reactor operator in the reactor room, instead of the control room, during performance of maintenance and calibrations, and (3) to change the frequency of reviews and audits of the Operator Requalification Program, Emergency Plan, and Physical Security Plan.

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

1. Oath or Affirmation

Your LAR was not submitted pursuant to Title 10 of the *Code of Federal Regulations* Section 50.30, "Filing of applications for licenses; oath or affirmation."

2. Description of Technical Specification Changes

Your application does not provide sufficient description of, or justification for, all of the proposed changes to the TSs. The application should provide a complete description of all of the proposed changes to the TSs and a comparison to the currently NRC-approved TSs (i.e., each deletion or modification of a portion of the current TSs, including minor numbering, formatting, or editorial changes, as well as each addition to the current TSs). The application should be supplemented to include a detailed discussion and/or analysis, as applicable, justifying each change.

3. Proposed Technical Specification Change Pages

The application does not include proposed TS change pages that are marked-up to indicate the areas of change (compared to the current NRC-approved TSs on the docket), to support the LAR. Only the marked up proposed TS change pages, pertaining to the amendment, should be submitted.