



Walker Department of Mechanical Engineering

THE UNIVERSITY OF TEXAS AT AUSTIN

Nuclear Engineering Teaching Laboratory · [nuclear.engr.utexas.edu](http://nuclear.engr.utexas.edu)  
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15 March 2019

ATTN: Document Control Desk  
Nuclear Regulatory Commission  
Washington, DC 20555-0001

T. D. Naquin, CHP  
NMSS/DFCSE/FFLB

SUBJECT: Docket No. 70-157, Request for Authorized Use and Authorized Place of Use Change of License SNM-180

Sir:

We respectfully request item 6.C. on license SNM-180 (Docket No. 70-157) be amended with authorized use and place of use as follows.

Storage of fuel owned by the U.S. Department of Energy (DOE), from the decommissioned Manhattan College Zero Power Reactor (MCZPR), is authorized in item 6.C. The material is not used at our facility, and has no known future use. DOE has agreed to remove the material from our facility; we are currently negotiating a schedule for shipment.

The DOE indicates preparation for packaging and transportation activities may require the conduct of radiological and physical measurements of the MCZPR fuel, and the removal of non-fuel components from the assemblies. However, the MCZPR fuel is currently only authorized for storage, and only in a specific room. Therefore we request that the authorization for the MCZPR fuel be amended to allow activities necessary to prepare and package this material for return to DOE, and the authorized place of use amended to allow activities necessary to properly prepare and package this material for transportation in Controlled Access Areas using the facility Physical Security Plan.

The proposed revision modifies lines 9. and 10.C. to allow additional uses and locations as follows:

9. Authorized use: For use in accordance with the statements, representations, and conditions specified in the licensee's application dated December 13, 2007, (Application and RAI Responses) and supplements dated January 29, February 20, 2009, and February 28, 2019.

ADZD  
NMSS01  
NMSS

10. Authorized place of use: The Nuclear Engineering Teaching Laboratory (NETL) located at the University's J. J. Pickle Research Campus.

C. License Condition 6C material – Used at NETL

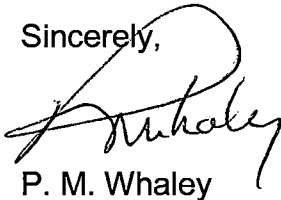
This proposed amendment will allow a significant reduction of SNM inventory in the facility. The security classification/categorization of 10 CFR Part 73 (Category III, *Special nuclear material of low strategic significance*) is unchanged. Therefore, the Physical Security Plan is not affected by this change. The Radiological Protection Program and the Emergency Plan are not affected by this change. No facility changes (physical or procedural) are required for this proposed amendment.

The proposed amendment does not change possession limits nor does it authorize activities significantly different from current routine facility activities. Therefore, there is reasonable assurance that the health and safety of the public will not be endangered by this proposed amendment.

Following removal of the MCZPR fuel and successful completion of two other activities (approval of a license amendment request for Docket 50-62 License R-129 to allow possession of the PuBe sources of SNM-180 line item 6.B - in process, and DOE removal of materials in line 6.A to a DOE facility - preparation for transport in process), we intend to request termination of license SNM-180.

If there are any questions, please feel free to contact P. M. Whaley at [whaley@mail.utexas.edu](mailto:whaley@mail.utexas.edu) or 512 232 5374.

Sincerely,



P. M. Whaley

I declare under penalty of perjury that the foregoing is true and correct.



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W. S. Charlton

For FedEx:

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