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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

Reference: Oregon State University TRIGA Reactor (OSTR)
Docket No. 50-243, License No. R-106

Subject: Supplement to letter dated of January 24, 2019, License Amendment Request to Remove Requirement for Fuel Temperature Measuring and Safety Channels while Transient Operation Modes are Precluded

Commission:

This letter serves a replacement to the license amendment request letter submitted on February 28, 2019. That letter requested a license amendment for the purpose of modifying the existing technical specifications (TS) to allow for operation without an instrumented fuel element (IFE) and thus operation without a fuel temperature measuring/safety channel.

The footnote proposed in the letter of January 24, 2019, says:

- (1) Sections 4.2.e (specifically the Fuel Element Temperature Safety Channel) and 4.2.f may be deferred if transient operation modes (Square Wave and Pulse) are precluded. They shall be completed prior to returning the Fuel Element Temperature Measuring Channel back to operations.**

We suggest replacing this with:

- (1) Requirements relating to the Fuel Element Temperature Channel (Section 4.2.e, Fuel Element Temperature SCRAM test, and Section 4.2.f, Fuel Element Temperature Measuring Channel calibration) may be deferred if transient operation modes (Square Wave and Pulse) are precluded. They shall be completed prior to declaring the Fuel Element Temperature Measuring Channel operable.**
- (2) For Section 4.2.e, the safety channel and interlocks from Table 2 and 3 that are only required for Square Wave and/or Pulse modes may be deferred if transient operation modes (Square Wave and Pulse) are precluded. They shall be completed prior to declaring the safety channel and interlocks operable.**

Furthermore, in the interest of clarity, we propose replacing the language in the letter dated January 24, 2019, for footnote 3 in TS Section 3.2.2 with the following:

- (3) The Fuel Element Temperature measuring channel is not required if transient operation modes (Square Wave and Pulse) are precluded, and if precluded, the Fuel Element Temperature measuring channel shall be considered removed from Table 1.**

Finally, in the interest of clarity, we propose replacing the language in the letter dated January 24, 2019, for footnote 3 in TS Section 3.2.3 with the following:

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(3) The Fuel Element Temperature safety channel is not required if transient operation modes (Square Wave and Pulse) are precluded, and if precluded, the Fuel Element Temperature safety channel shall be considered removed from Table 2.

The issue at hand is that while the IFE is not being utilized, in addition to the IFE itself, the surveillances required for interlocks and safety channels associated with the IFE should also be deferred.

I hereby affirm, state, and declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/23/19.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Steve Reese
Director

cc: Craig Bassett, USNRC
Dr. Irem Tumer, OSU
Dan Harlan, OSU
Robert Schickler, OSU
Ken Niles, ODOE