

NUCLEAR REACTOR LABORATORY
MASSACHUSETTS INSTITUTE OF TECHNOLOGY

O. K. HARLING
Director

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L. CLARK JR
Director of Reactor Operations

January 22, 1982

PROPOSED RULE PR 50
(46 FR 6335)

Secretary of the Commission
U. S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D. C. 20555

Subject: Proposed Rulemaking 10 CFR 50.54(r)

Dear Sir:

Massachusetts Institute of Technology wishes to be recorded as supporting the proposed rulemaking published in the Federal Register, Vol. 46, No. 251 on pages 63315 and 63316, December 31, 1981.

As indicated in MIT's letter of October 29, 1981 to Mr. James R. Miller, Chief, Standardization and Special Projects Branch, USNRC Division of Licensing, the Institute favors an extension of the due date for submittal of revised emergency plans required by 10 CFR 50.54(r). The reason for the desired extension is to permit MIT to give consideration to a revised version of Regulatory Guide 2.6, Emergency Planning for Research Reactors, which we understand is to be published shortly. If the revised guide has already been published, it has not yet come to our attention, and we would appreciate receiving a copy at an early date.

Sincerely,

Lincoln Clark, Jr.
Lincoln Clark, Jr.
Director of Reactor Operations

LC/sbs

cc: J. Bernard, MIT
O. Harling, MIT

820429 0010

1/28/82

THE PENNSYLVANIA STATE UNIVERSITY

UNIVERSITY PARK, PENNSYLVANIA 16802

'82 FEB -1 P3:53

College of Engineering
Breazeale Nuclear Reactor

Area Code 814
865-6351

28 January 1982

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER
PROPOSED RULE

(2)
PR-50
(46 FR 63315)

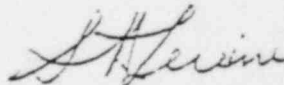
Attention: Docketing and Service Branch

Subject: Federal Registrar Notice of the September 31, 1981 regarding
10CFR Part 50.

We were pleased to receive the latest notice of "Proposed Rule Making for 10CFR Part 50, Emergency Planning and Preparedness for Research and Test Reactors: extension of submittal dates, dated December 31, 1981". In my October 14, 1981 letter to Mr. James R. Miller we requested an extension of submission date for the Emergency Plan for the Penn State Breazeale Nuclear Reactor. The extension for submission of the revised Emergency Plans until the date of November 3, 1982 is consistent with my October 14, 1981 letter and will be extremely helpful to us provided the revised guidance criteria for the preparation of emergency plans for research reactors is issued within the next six months.

We appreciate your consideration for our problems and we intend to meet the extended date for submittal.

Sincerely yours,



S. H. Levine, Director
Breazeale Nuclear Reactor
Professor of Nuclear Engineering

SHL/r

- cc: E. H. Klevans
- W. F. Witzig
- I. B. McMaster
- R. E. Totenbier

Acknowledged by card... 2/4/82 emp

TEXAS ENGINEERING EXPERIMENT STATION

THE TEXAS A&M UNIVERSITY SYSTEM

COLLEGE STATION, TEXAS 77843



26 January 1982

NUCLEAR SCIENCE CENTER
713/845-7551

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Service Branch

DOCKET NUMBER
APPROVED BULE PR-50
(46 FR 63315)

Reference: Federal Regulations/Vol. 46, No. 251, pgs. 63315 and 63316

Dear Sir:

In reference to 10 CFR 50 "Emergency Planning", I am pleased to note that an extension of time has been granted for submission of our Emergency Plan. A new submission date of one year seems adequate but without proper guidance from the NRC the same problem will exist. I would rather have the extension date tied to our receiving this guidance. Perhaps the change should read:

"and for one year from the date of receipt of updated NRC guidance criteria for the preparation of emergency plans for etc."

This would then give the < 2 MW research reactors a reasonable time to comply with your updated overall revised criteria for submission of emergency plans.

In any event I am glad we have additional time to submit our plan.

Sincerely,

H. J. Deigl
Sr. Health Physicist
Nuclear Science Center

HJD/ym

2/4/82 emp
... by card...

REED COLLEGE



Portland, Oregon 97202

REACTOR FACILITY

'82 FEB -5 P1 53

February 2, 1982

emp

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

DOCKET NUMBER PR-50
PROPOSED RULE (46 FR 6331)

Attn: Docketing and Service Branch

Dear Sirs:

On behalf of the Reed Reactor Facility (License R-112; 250 KW) I would like to comment on the proposed rulemaking 10CFR50 Federal Register Vol. 46 No. 251, Thursday, December 31, 1981, "Emergency Planning and Preparedness for Research and Test Reactors: Extension of Submittal Dates".

It is stated in the supplementary information that "revised guidance criteria for the preparation of emergency plans for research and test reactors that are consistent with the amended regulations" have not yet been developed let alone promulgated. While larger research reactors (greater than 2MW) have staffing commensurate with their size and scope of operations, many smaller research reactors, and the Reed Reactor Facility specifically, operate with very small paid staff and rely on student operators (Reactor Supervisor, SROs, and ROs). I will find it very difficult to completely rewrite the RRF Emergency Plan again by November 3, 1982, when I don't even have the guide yet. As was stated, all research and test reactors have such plans currently on file with the NRC. In our case, our Emergency Plan has been updated for the State of Oregon Emergency Preparedness Training by personnel of the State Executive Branch. I request that the smaller research and test reactor facilities be given (1) one year from the date of promulgation of the guidelines (when the ANSI standard is published) to submit their revised plans. This appears to be the intent of the original rule, had the standards been available.

I do not see the health or safety of the public compromised by such an extension. In the case of the Reed Reactor Facility, the 250KW full power rating is very conservative for our TRIGA Mark I Standard Fuel Elements, and minimal cladding degradation (no cladding failures, few scratches, etc.) has occurred over 13 years of intermittent operation. I hope you will consider this extension as part of the rulemaking, rather than having to apply for extensions after it is promulgated.

Sincerely,

Michael Kay

Michael A. Kay, Director

MK/rr

Acknowledged by card. 2/9/82 emp

ENCLOSURE F