



70-754

GE Nuclear Energy

General Electric Company
Vallecitos Nuclear Center
P.O. Box 460, Vallecitos Road
Pleasanton, CA 94566

September 14, 1990

Charles J. Haughney, Chief
Fuel Cycle Safety Branch
Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: 1) License SNM-960, Docket 70-754.
2) Application for Renewal of License SNM-960; April 21, 1989.

Dear Mr. Haughney:

Pursuant to 10CFR70.24(d), the General Electric Company, Vallecitos Nuclear Center (VNC) requests an exemption from the requirements of 10CFR70.24(a)-(c).

This request is based on the following premises:

1. There have been no increases in fissile material limits in criticality analyses involving any locations other than subcritical areas (Ref: SNM-960, Appendix A, Section 3.14) for several years, and none are planned. This is a result of the stabilization of the work load at VNC and the elimination of a number of activities (e.g., mixed oxide fuels, isotope recovery).
2. There are no liquid or metal systems at VNC. SNM is dissolved on a laboratory scale only.
3. Under License SNM-960, VNC is permitted to implement and modify criticality analyses without prior NRC review/approval. Under the proposed exemption:
 - a. Criticality analyses established prior to the date of the exemption would remain in place.
 - b. Except for subcritical areas, changes and modifications to those analyses and new analyses will require NRC review and approval prior to implementation.
 - c. VNC would continue to establish and modify subcriticality areas.
4. All currently established analyses have been inspected by the NRC-Region V to assure that all requirements for multiple contingencies, etc., have been met.

9009240174 900914
PDR ADOCK 07000754
C PDC

NF12/1

September 14, 1990

In addition, VNC requests that the first sentence in Section 3.14 of Appendix A to SNM-960 be amended to read:

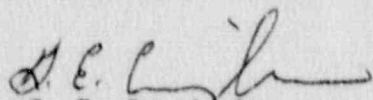
"Subcritical Area means a physically identified area or location involving special nuclear materials in quantities of less than 500 grams of U-235, 300 grams of U-233, or 300 grams of plutonium or a prorated combination of such materials under the direction of a single SNM custodian and which is unrelated to any other area where special nuclear materials are handled or an area in which is stored one (1) shipment of packages containing special nuclear material certified pursuant to 10CFR71."

This amendment would change the requirement that a subcritical area be under the direction of a single area manager to the direction of a single SNM custodian (the custodian is the individual actually responsible for maintaining the SNM inventory for a given area). The change would recognize the situation where several laboratories with more than one area manager but a single SNM custodian would comprise a single subcritical area. As the custodian is the individual knowledgeable as to the total SNM content of the laboratories, he is the most logical person to assure that subcritical area criteria are met.

Enclosed in support of these requests are updated pages for Appendix A to License SNM-960 and proposed changes to the License.

If you or your staff has any questions concerning this application, please contact me at (415) 862-4330. Thank you.

Sincerely,



G. E. Cunningham
Senior Licensing Engineer

/ca

Enclosures

ENCLOSURE A

Proposed Change To License SNM-960

EXEMPTIONS AND SPECIAL AUTHORIZATIONS

The following exemptions and special authorizations are hereby granted:

- A. The licensee is hereby exempted from the requirements of 10 CFR 20.203(c)(2) provided that the safety conditions described in Section 8.14, "High Radiation Alarm Exemption," of Appendix A of the application are satisfied.
- B. Exemption to the requirements of 10 CFR 70.24, "Criticality Accident Requirements," is hereby granted pursuant to 10 CFR 70.24(d).
- C. Pursuant to 10 CFR 20.106(b), the licensee is hereby authorized to release radioactive materials in accordance with Section 8.11, "Airborne Effluent Control," of Appendix A of the application.