

EXECUTIVE VICE CHANCELLOR
IRVINE, CALIFORNIA 92717Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

April 15, 1994

Re: Request for Revisions to Technical Specifications for UCI Reactor Facility
Docket 50-326 License R-116

Ladies and Gentlemen:

Revisions are hereby proposed for Sections 4.1, 4.2, 4.3, and 6.2 to the Technical Specifications for the UCI Nuclear Reactor Facility.

The purpose of this proposal is to adjust the surveillance schedules for certain core components at the facility in accordance with nearly 25 years of experience with the reactor fuel, operational cycles, calibrations, and safety system reliability. This adjustment will allow surveillance in accord with prudent practice to reduce the risks of damage to facility components from un-necessary handling of fuel and control rods and un-needed re-adjustments of satisfactorily operating instrumentation. This will also permit staff personnel to operate at lower risk from radiation exposure and other safety hazards by requiring less frequent work around the reactor pool for purely surveillance purposes. Our facility has operated almost exclusively as a radiochemistry facility where samples are routinely irradiated in standard irradiation positions. Thus no core changes, or other changes that might be approved under the provisions of 10CFR Part 50.59, have been implemented for many years, or will be made in ensuing years. Neither reactor physics nor nuclear engineering training have ever been carried out or planned for at the UCI facility.

We would be pleased to provide actual data from our records should you need them to show that parametric changes have been very small since initial criticality in 1969.

With respect to the extension of meeting times for the Reactor Operations Committee, we enclose a brief report of a violation for last calendar year based on our current quarterly requirement. This has been a repeated issue at our facility. Past inspections by Regional and Headquarters staff from NRC have examined this issue and have recommended a less frequent meeting schedule requirement based on the lack of key business for such meetings, mostly due to the style of operations mentioned in the previous paragraph. They also have noted that the excellent and thorough safety surveillance inspection provided on a routine quarterly basis by staff from the Campus Office of Environmental Health and Safety provides adequate external supervision of the facility operations. We are satisfied that sufficient mechanisms exist to bring attention to any mismanagement at the facility if the oversight Committee meets on a semi-annual rather than a quarterly basis.

We request that approval of these changes at this time be provided in a timely manner to assist staff with planning for immediate future operations. It will be most helpful if the new cycles could begin at the time of the most recent surveillance for each system prior to the date of this request. We are currently in an extended shut-down period for instrumentation upgrades that has been much longer than originally planned because of delivery and installation delays. Thus major handling activities would be required to be completed on the former schedule cycle before we could resume operations. Staff would prefer to resume operations temporarily so the former and newer instrumentation can be properly compared before complete recalibrations are conducted.

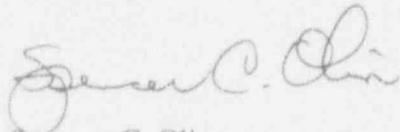
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An exemption of fees for this licensing action is requested under the provisions of 10CFR Part 170.11(a)(4).

If you have any questions about this matter, please address them to Dr. George Miller, the Reactor Supervisor, at (714) 856-6649 (FAX (714) 856-6571).

Sincerely,



Spencer C. Olin
Acting Executive Vice Chancellor

enclosures:

1. Proposed wording for revised Technical Specifications Sections 4.1, 4.2, 4.3, and 6.2.
2. Licensee Report of Violation of Technical Specification 6.2.