



Georgia Institute of Technology

NEELY NUCLEAR RESEARCH CENTER
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February 5, 1991

Director, Office of Nuclear Reactor Regulations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-160, License No. R-97

Attention: Document Control Desk

Gentlemen:

On behalf of the Georgia Institute of Technology, I hereby request that the U.S. Nuclear Regulatory Commission approve an amendment to modify the organizational structure (Figure 6.1, Page 39) of Facility Operating License No. R-97. Currently, the Technical Specifications state that the Chair of the Nuclear Safeguards Committee (NSC) will also hold the title of Radiation Safety Officer (RSO). We request that the RSO title requirement be deleted. The "old" and the proposed organizational charts are attached for your evaluation.

Justification: It should be recognized that the chairman of the NSC does not function as the RSO for the campus in the traditional sense of the word. Instead, radiological safety matters at Georgia Tech are managed and implemented by the Manager, Office of Radiation Safety (MORS). The conflicting designations of RSO and MORS have led to considerable confusion in particular with the Georgia Department of Human Resources who regulates the radioactive materials license on the Georgia Tech campus.

This matter was brought before the NSC at its July 19, 1990 meeting. The organizational structure of the Office of Radiation Safety and the role of its manager were reviewed and it was recommended that the title, RSO, be eliminated for the Chair of the NSC. Since it is desirable to enhance the understanding of State and Federal regulations, we request that the USNRC review our request and act favorably on discontinuance of the above title.

We appreciate the cooperation of the USNRC in the review of this request.

Sincerely,

R.A. Karam, Director
Neely Nuclear Research Center

VICKIE K. CLARK
NOTARY PUBLIC
GEORGIA DOUGLAS COUNTY
MY COMMISSION EXPIRES JULY 24, 1993

RAK/ccg
Enclosures
cc: Mr. S.B. Ebnetter, Regional Administrator
U.S. Nuclear Regulatory Commission

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A Unit of the University System of Georgia

An Equal Education and Employment Opportunity Institution

MINUTES OF THE NUCLEAR SAFEGUARDS COMMITTEE MEETING OF
July 19, 1990

Members Present: E. Cobb, P.V. Desai, N. Gordon, L. Gucwa, B. Kahn (Chair), L. Petherick, J. Vickery

Others Present: B. Copcutt, R. A. Karam, G. Poehlein

Distributions: (i) Agenda for the current meeting
(ii) Copy of Letter from the Georgia Dept. of Human Relations to B. Revsin
(iii) Form A approval draft from R. A. Braga

Chairman B. Kahn called the meeting to order at 1:07 P.M. The minutes of the previous committee meeting of June 28th were not ready, and will be available at the next Committee meeting on August 30th.

1. In response to the letter from the Georgia Department of Human Resources concerning conflicting roles of the Radiation Safety Officer (RSO) and the manager of the Office of Radiation Safety (MORS), the Committee decided to do away with the title of RSO for the chair of the NSC. It was recommended to ask the MORS to keep the NSC informed on issues related to radiation safety. The Committee asked R. Karam to send a copy of his response to the Georgia DNR to the members of the NSC.
2. The Committee heard from Dr. Poehlein regarding the advisability to limit the period of service on the Committee to three consecutive years. It was agreed to divide the members into those serving for three years, those for two years and those for one year. Each year, one-third of the membership will be appointed for three year terms. B. Kahn encouraged the members to suggest possible candidates to serve on the Committee.
3. The Committee gave Form A approval to Dr. R. A. Braga.
4. The Committee approved a minor change in previously approved Procedure 9155.

The Secretary of the Committee had to leave the meeting at this time (3:05 P.M.). L. Petherick prepared the remaining minutes which follow.

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for July 19, 1990
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5. Dr. Karam briefed the Committee on the responsibility and liability to Committee members. He stated that the Nuclear Safeguards Committee Members rendered their decisions based on the information given them by the Neely Nuclear Research Center personnel with no liability for decisions or recommendations made by the Committee members. However, Institute faculty and staff who are members of the Committee are afforded protection through Board of Regents' insurance policies. Non-Institute members of the Committee, of which there are two, may not be protected as Institute members are. The two non-Institute Committee members recommended that they be furnished a letter from the Institute guaranteeing them indemnity against any liability charges brought against them for service on the Committee they render free of charge to Georgia Tech, with the exception of their knowingly giving false or misleading information.

The two non-Institute members stated that they would send to Dr. Karam a suggested or recommended wording for a letter of indemnification.

Dr. Karam also briefed the Committee on present reactor operations: Mitsubishi contract; Department of Energy considering the reactor as a back up for research and development; and the Savannah River Project is still on go awaiting approval from the NRC.

Dr. Karam briefed the Committee on hot cell operations: They have a contract with TVA for radiation qualification testing of cables and circuits. They would be irradiating this material with 80 to 100 mega-rads of radiation.

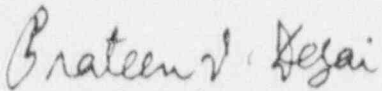
There were two NRC inspections held at the Neely Nuclear Research Center. One inspection resulted in 0 violations. The other inspection resulted in one violation in which the NRC inspectors discovered a graphite stringer with an excess of 100 milli-rem of radiation per hour that was not locked in a physical space. This violation was abated immediately upon being found and response to the NRC is being prepared.

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Reactor has been in operation up to a power output of 4.5 megawatts. The reactor has been operating mainly during the night time hours because of the high daytime temperatures. Everything appears satisfactory in all reactor operations.

6. The meeting was adjourned at 3:15 P.M.

Respectfully submitted,


Prateen Desai

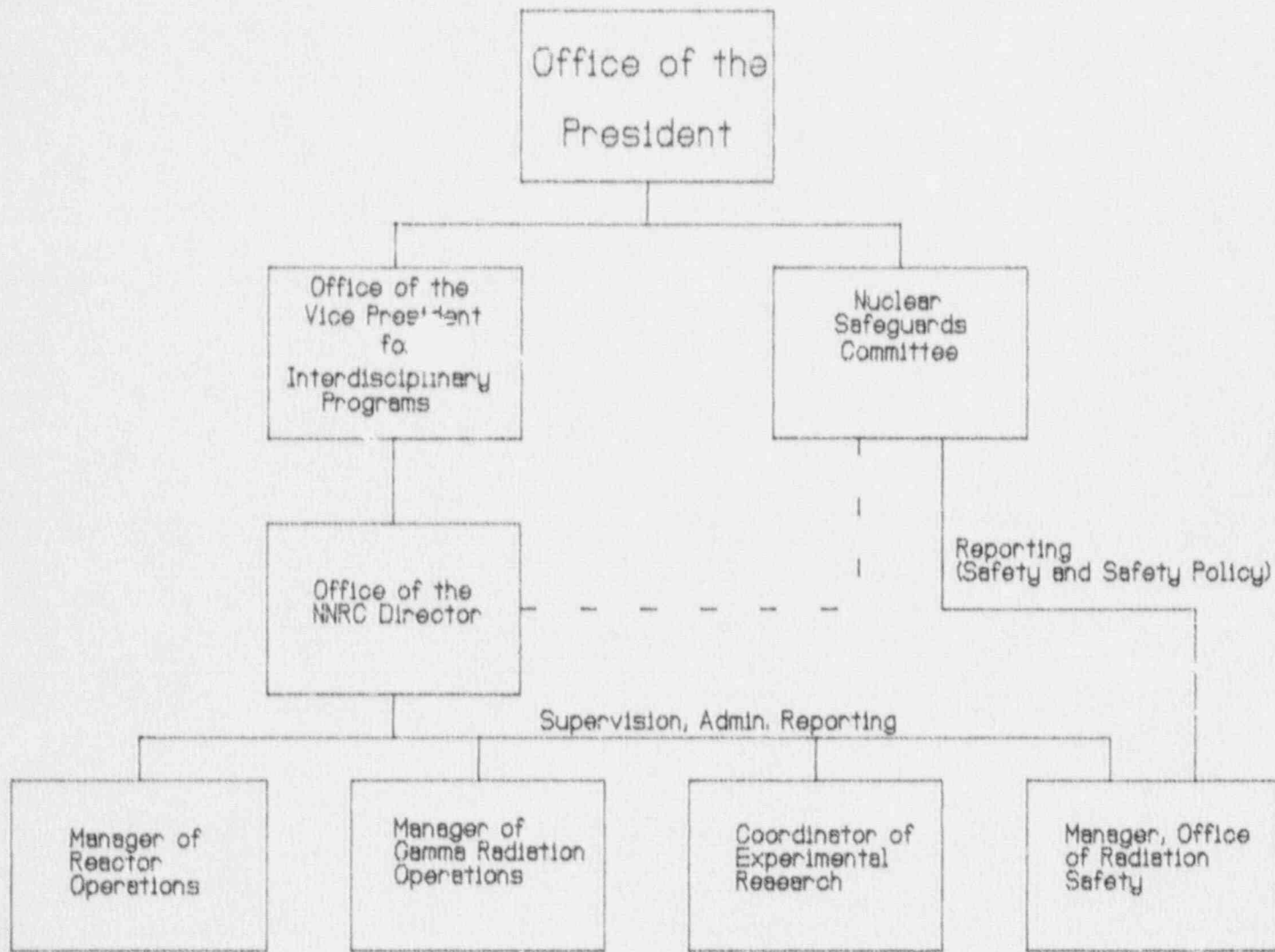


Figure 8.1 Georgia Tech Organization for Management and Operation of GTRR.

old "

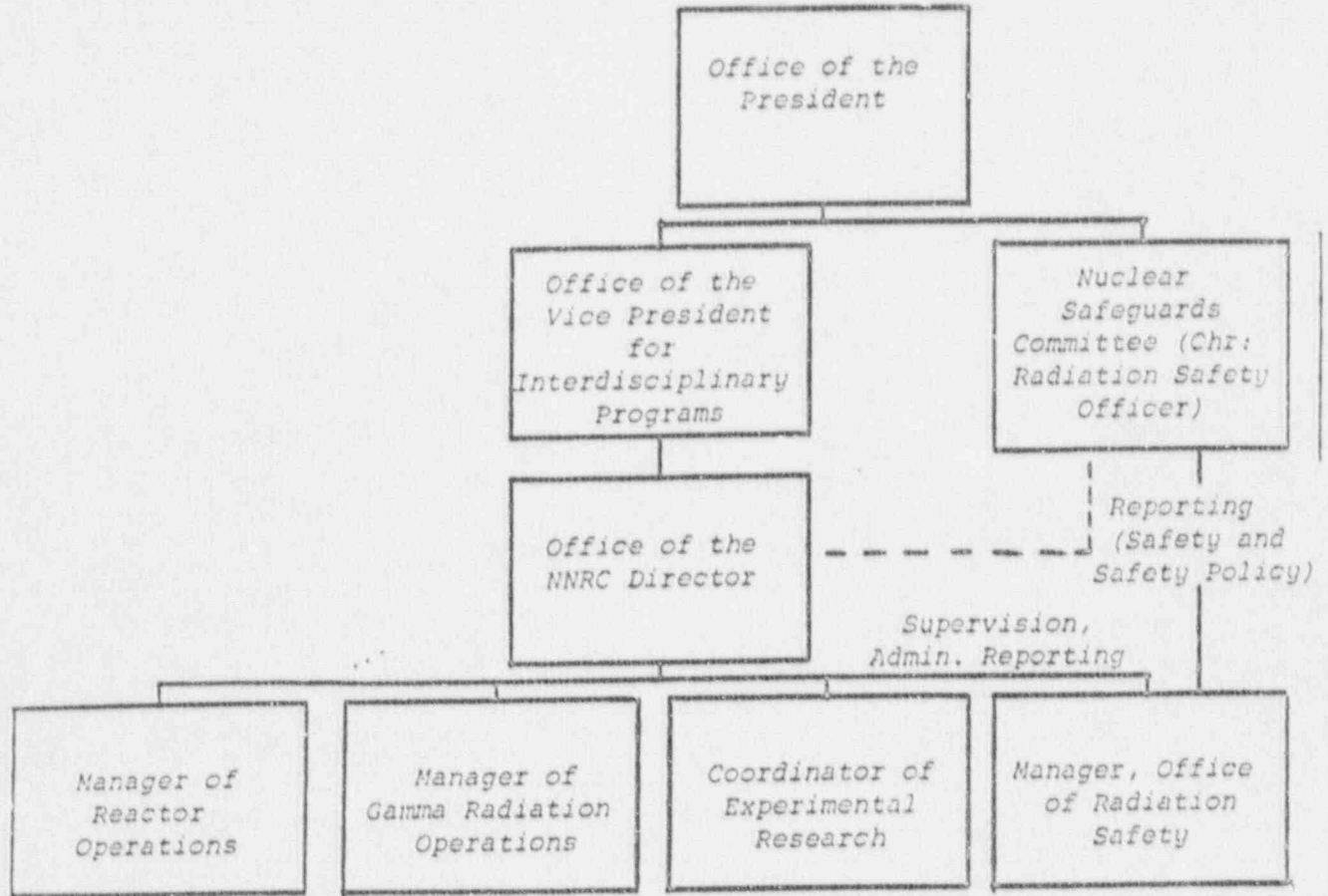


Figure 6.1 Georgia Tech Organization for Management and Operation of GTRR.