



February 24, 1994
38-2203

Document Control Desk
ATTN: Mr. Alexander Adams, Jr.
Non-Power Reactors & Decommissioning
Projects Directorate
Division of Reactor Projects III/IV/V and
Special Projects
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Facility License R-38; Docket 50-89; Response to Request for Additional Information
Re: Request for Technical Specification Amendment

References: 1) Adams, Alexander, Jr., Letter to Keith E. Asmussen, "Request for Additional Information," dated February 8, 1994
2) Asmussen, Keith E., Letter No. 38-2165, to Document Control Desk/ATTN: Mr. Alexander Adams, Jr., "Request for Technical Specification Amendment," dated January 7, 1994

Dear Mr. Adams:

This letter is in response to a request for additional information (Ref. 1) and amends General Atomics' (GA's) initial request (Ref. 2) for a Technical Specification change to GA's TRIGA Reactor Facility License No. R-38. As a result of reduced funding/utilization of its TRIGA reactors and other economic considerations, General Atomics (GA) has found it necessary to consolidate its TRIGA Reactors Facility organization. One consequence of this overall consolidation is the elimination of the position titles, Associate Physicist-in-Charge (PIC) and Deputy Physicist-in-Charge.

There is no mention of an Associate or Deputy PIC in the Technical Specifications for GA's Mark F Reactor (R-67) and there is only a single reference to these titles in the Technical Specifications for GA's Mark I Reactor (R-38).

The only mention of an Associate PIC and Deputy PIC is in paragraph (a) of Section 9.4 in the R-38 Technical Specifications, which simply says that, in the event of a reportable occurrence, the following action shall be taken:

"The Physicist-in-Charge, Associate Physicist-in-Charge, or Deputy Physicist-in-Charge shall be notified and corrective action taken with respect to the operation involved."

To reflect the elimination of the titles of Associate PIC and Deputy PIC, GA hereby requests that Paragraph (a) of Section 9.4 of the Technical Specifications for its TRIGA Mark I (R-38) reactor be amended to read as follows:

"The Physicist-in-Charge or designated alternate shall be notified and corrective action taken with respect to the operation involved."

Though the titles of "Associate PIC" and "Deputy PIC" have been eliminated, GA will, of course, continue to staff its TRIGA Reactor Facility with fully qualified personnel at a level to assure its continued safe operation. The duties that had been assigned to the Associate PIC and Deputy PIC will merely be assigned to designated, equally qualified senior reactor operators without conveying on them a title of "Associate Physicist-in-Charge" or "Deputy Physicist-in-Charge". The intent of the technical specification requirement to notify the PIC, Associate PIC, or Deputy PIC was to ensure that a qualified person designated by management was advised and consulted, in a timely manner, regarding appropriate response(s) and corrective action(s) in the event of a reportable occurrence.

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That intent will be completely met in every respect by the requested amendment which requires that the PIC or designated alternate be notified. As mentioned above, only fully qualified senior reactor operators will be designated alternates. Thus, it is concluded that no safety considerations are affected by this request.

Finally, note that the requested amendment offers the advantage of making the R-38 Technical Specifications consistent with those for GA's R-67 Technical Specifications, thereby eliminating an unnecessary potential source of confusion.

Enclosed is a revised Page 13 of GA's TRIGA Mark I (R-38) Technical Specification reflecting GA's requested rewording of Paragraph (a) of Section 9.4.

We appreciate your assistance in considering this request. If you should have any questions or require additional information regarding this matter, please do not hesitate to contact me at (619) 455-2823.

Very truly yours,



Keith E. Asmussen, Director
Licensing, Safety and Nuclear Compliance

KEA:shs

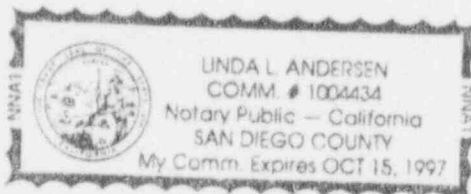
Enclosure: Revised Page 13 to R-38 Technical Specifications

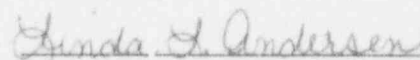
xc: Mr. B. Faulkenberry, Regional Administrator, NRC Region V

STATE OF CALIFORNIA }
COUNTY OF SAN DIEGO }

On February 25, 1994 before me, Linda L. Andersen, personally appeared Keith E. Asmussen, Director, Licensing, Safety and Nuclear Compliance, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.




Signature