



Radiation Center

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May 25, 1983

U.S. Nuclear Regulatory Commission
Region 5
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Attention: Regional Administrator

Reference: Oregon State University TRIGA Reactor (OSTR),
NRC License No. R-106, Docket No. 50-243

Gentlemen:

In accordance with our telephone conversation on May 23, 1983 with Mr. Dennis Willett, we would like to submit the following report for your consideration.

Section 4.3.1.c of the OSTR Technical Specifications requires that the control rods be "visually inspected for deterioration at intervals not to exceed two years." Prior to May 23, 1983 the previous inspection of the transient control rod was conducted on March 17, 1981.

Many of the surveillance items and other time-related requirements in the OSTR Technical Specifications have an allowance on the time interval to allow for efficient scheduling of manpower and resources. For example, even such an important item as the reactivity of the control rods has to be determined "annually but at intervals not to exceed 14 months" (OSTR Technical Specification 4.3.1.a). Thus, the Reactor Supervisor, believing that the visual inspection requirement for control rods also had a two-month allowance, decided to take advantage of this to schedule the inspection close to the summer months when most of the other annual reactor maintenance is performed.

It is our evaluation that while we have apparently exceeded the surveillance time period as specifically stated, we have still met the intent of the Technical Specifications. This is evidenced by the fact that of the 12 surveillance items with a time interval in the OSTR Technical Specifications, all but three of them have a two-month allowance. In addition, the latest edition of ANSI/ANS 15.1-1982 entitled "The Development of Technical Specifications for Research

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Reactors," states:

"Maximum intervals are to provide operational flexibility and not to reduce frequency... Allowable surveillance intervals shall not exceed the following:

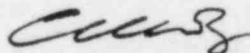
- a. Five-year (interval not to exceed six years).
- b. Two-year (interval not to exceed two and one-half years).
- c. Annual (interval not to exceed 15 months).
- d. ..."

This standard has been developed with the full cooperation and consultation of the NRC, and is considered to be the most recent guidance on this matter. Our inspection interval was well within the two and one-half years recommended by this standard.

As a result of noticing some of the inconsistencies in our Technical Specifications, it is our intent to apply to the NRC licensing staff to bring the surveillance time intervals in line with the latest guidance of ANSI/ANS 15.1-1982.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely yours,



C. H. Wang
OSTR Reactor Administrator
Director, Radiation Center

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