

July 23, 1991
38/67-1771

Document Control Desk
ATTN: Mr. Alexander Adams, Jr.
Non-Power Reactor, Decommissioning and
Environmental Project 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: Dockets 50-89 and 50-163; Licenses R-38 and R-67 Respectively; Request for Technical Specification Amendment - Supplemental Request for Regulatory Exemption

References:

- 1) Asmussen, Keith E. letter no. 38/67-1716 to NRC Document Control Desk, ATTN: Alexander Adams, Jr., "Request for Technical Specification Amendment," dated March 29, 1991/Revised April 11, 1991;
- 2) Adams, Alexander, Jr. letter to Keith E. Asmussen, "Request for Additional Information", dated May 1, 1991;
- 3) Asmussen, Keith E. letter no. 38/67-1745 to NRC Document Control Desk, ATTN: Alexander Adams, Jr., "Additional Information/Revised Request," dated June 7, 1991;
- 4) Asmussen, Keith E. letter no. 696-1715 to Mr. Theodore S. Sherr, U.S. NRC, "Request for Exemption Relative to 10 CFR 70.51(d)", dated March 29, 1991.

Dear Mr. Adams:

In Reference 1, General Atomics (GA) submitted a request which was subsequently revised in response to an NRC request (Reference 2) for additional information. This revised request and the additional information was submitted in Reference 3, wherein GA requested that Sections 4.4(a) and 5.5.1(a) of the Technical Specifications for its TRIGA Mark I (R-38) and Mark F (R-67) reactors, respectively, be amended, as follows:

"All fuel elements shall be inspected visually for damage or deterioration annually, with no interval between inspections to be less than nine (9) months (279 days) nor exceed fifteen (15) months (465 days). Additionally, all uninstrumented fuel elements shall be measured for length and bend annually, with no interval between such measurements to be less than nine (9) months (279 days) nor exceed fifteen (15) months (465 days)."

Concurrent with the above mentioned initial request, GA submitted a separate request (Reference 4) to NMSS asking for an exemption from the similar requirements for conducting physical inventories as stated in 10 CFR 70.51(d), i.e.: "... each licensee ...

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shall conduct a physical inventory of all special nuclear material in his possession under license at intervals not to exceed twelve months." GA now understands that this request for an exemption from the requirements of 10 CFR 70.51(d) should be addressed to the Non-Power Reactor, Decommissioning and Environmental Project Directorate. Accordingly, GA hereby requests an exemption from the requirement of 10 CFR 70.51(d) to conduct a physical inventory of all special nuclear material possessed under its two TRIGA reactor licenses (i.e., R-38 and R-67) at intervals not to exceed twelve months. GA proposes instead, to conduct a physical inventory of all special nuclear material it possesses under its two TRIGA reactor licenses (i.e., R-38 and R-67) annually, with no interval between inventories to be less than nine (9) months (279 days) nor exceed fifteen (15) months (465 days). This proposed schedule for conducting physical inventories of the special nuclear material possessed under GA's TRIGA reactor licenses is consistent with the above described Technical Specification amendment request. The justification for this request is as provided in Reference 3.

We appreciate your assistance in considering this request and are hopeful of its approval at your earliest convenience. Should you have any questions, please contact me at (619) 455-2823.

Very truly yours,



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

KEA:shs

cc: Mr. John B. Martin, Regional Administrator, NRC Region V
Mr. Theodore S. Sherr, NMSS, NRC Headquarters

STATE OF CALIFORNIA)
COUNTY OF SAN DIEGO)



On July 23, 1991 before me, LINDA L. ANDERSEN, personally appeared Keith E. Asmussen, Manager, 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