UNIVERSITY OF FLORIDA TRAINING REACTOR LICENSE NUMBER: R-56

UPDATED PROPOSAL SUBMITTED TO THE NUCLEAR REGULATORY COMMISSION TO MEET 10 CFR 50.64 REQUIREMENTS FOR UPDATING SCHEDULING OF UFTR CONVERSION FROM HEU TO LEU FUEL



Dr. William G. Vernetson Director of Nuclear Facilities

March 26, 1992
DEPARTMENT OF NUCLEAR ENGINEERING SCIENCES

College of Engineering

University of Florida

Gainesville

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UNIVERSITY OF FLORIDA TRAINING REACTOR

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UNIVERSITY OF FLORIDA TRAINING REACTOR FUEL CONVERSION FROM HIGH ENRICHED TO LOW ENRICHED URANIUM FUEL

INTRODUCTION

This proposal is submitted to the Nuclear Regulatory Commission to meet the requirement that the licensee for the University of Florida Training Reactor (UFTR), as a licensee of a non-power reactor authorized to possess and use high enriched uranium (HEU) fuel shall develop and submit a proposal to replace all HEU fuel possessed under the R-56 license with available low enriched uranium (LEU) had acceptable to the Nuclear Regulatory Commission on a schedule determined pursuant to 10 CFR 50.64 Paragraph (c) (2). This proposal addresses the overall process of conversion from initial preparations following receipt of funding to support conversion to final verification, testing, and summary reporting on the converted UFTR. Three primary phases have been identified for control and administration of the overall process of conversion as follows:

- I. Preparation for Conversion.
- II. Conversion (assuming NRC order to convert).
- III. Review and Verification of Conversion.

Table I contains a listing of key activities involved in each phase of the conversion from receipt of funding for conversion from the Department of Energy (DOE) to final submittal of summary reports to DOE and NRC on the conversion.

PHASE 1: PREPARATION FOR CONVERSION

Phase I commenced with receipt of funding for conversion from DOE to cover Phase I only. This funding was considered to be certified per the letter contained in Appendix I

of the 1987 proposal; this proposal was submitted to the Department of Energy and official notice of receipt of funding was received with a letter dated November 12, 1987. Because of errors in the contract description provided by DOE, the full approval for receipt of funding was delayed until receipt of the confirming letter dated December 21, 1987. Copies of both letters as well as the 1987 certification letter are enclosed in Appendix I along with documentation showing the extension of the current DOE grant to support Phase I work which has been delayed beyond the original two-year grant period.

Initial efforts in the process to convert the UFTR from use of high enriched to low enriched fuel (HEU-LEU) consisted of preliminary tests and an evaluation to determine whether the SPERT-type fuel available to the R-56 licensee but currently under license SNM-1050 could be qualified for use in the UFTR. Visual and radiographic test results to date were positive in this regard. Unfortunately, equipment failures and the need to move the SPERT (SNM-1050) fuel storage facility impacted the schedule during the 1988 year so the radiographic tests were not completed until April, 1989 along with relicensing the SPERT fuel storage facility. Overall, the results of the radiographic tests of the SPERT fuel were positive showing that the condition of the fuel was such that its integrity was assured. Phase I then continued with activities to justify a fuel selection, either SPERT or silicide, based upon results of prequalification testing of existing SPERT fuel) and identifying any modifications in existing reactor systems pecessitated by use of the new fuel.

Several previously unconsidered potential complications noted in late 1988 were investigated in 1989. This effort was directed to maintaining and/or improving the UFTR neutronics characteristics while minimizing the overall cost of UFTR conversion. The only two fuels that have been considered are the existing SPERT UO₂, stainless steel clad fuel

presently under the SNM-1950 license and the newly developed silicide fuel available through the RERTR program at Argonne National Laboratory.

The first choice had been to use the already existing SPERT fuel for which a number of neutronics and the: mal-hydraulics analyses are in existence. This would be the cheaper fuel if acceptable since it is already manufactured. However, even after completion of the prequalification program for the qualification tests used to assure the SPERT fuel can meet UFTR requirements without compromising safety, it was necessary to assure this SPERT fuel could be used without requiring costly modifications which could outweigh the low initial cost of SPERT fuel (no manufacturing costs) and have impact on core neutronics per earlier analyses. The Department of Energy was receptive to this evaluation of the two fuels and work in this area progressed well in 1989. Unfortunately, the complexity and cost of potential structural (the SPERT fuel loading would weigh about 2000 pounds versus the present 50 pound core loading), shielding, fuel arrangement and cooling system changes necessitated by use of the SPERT fuel resulted in a milestone decision in August, 1989 not to atilize the SPERT fuel for conversion but rather to utilize the standard plate-type silicide fuel. The anticipated cooling system fuel arrangement and shielding changes potentially necessitated by use of the SPERT fuel were especially strong factors in the decision since space in the UFTR facility is already limited and the facility had been cited for two violations in this area in 1989.

In parallel with selection of the plate type silicide LEU fuel and identification of necessary reactor systems changes, safety analysis were being performed for the selected LEU fuel conversion and associated system changes. Implementation of the neutronics codes to be used was underway during 1989 and several codes had been implemented and

run for test cases. Therefore, UFTR conversion calculations were progressing reasonably well until the loss in August, 1989 of the graduate student performing the neutronics leulations as he decided to pursue his advanced degree at another university. Unfortunately, he left with much of his work inadequately undocumented. The unavailability of another qualified student committed to assume this responsibility has resulted in further delays. Nevertheless, a student project in Fall, 1989 resulted in some progress in assuring neutronics methodology would be adequate though many calculations had to be updated and repeated due to errors in and poor documentation of the previous work. It was hoped that this individual would remain on the project for his thesis work. This retention effort was successful and the neutronics analyses were able to move forward in 1990.

Several errors due to poor documentation necessitated restarting the safety analysis when the student began work on it in early 1990. Although he spent a period at Argonne National Laboratory working with the RERTR group to receive training in the use of the codes, it still required some time for the student to become proficient in use of the codes in-house. Unfortunately several formatting and other flaws in the implemented codes used for the neutronics analysis also slowed progress in 1990. These were cleared up as part of the work on assuring proper code methodology during 1990.

Early in 1991 a student thesis project had resulted in good progress in assuring the neutronics methodology to be adequate and the necessary "benchmark" modelling of the existing core was nearly complete. Only scoping calculations had been completed for the LEU core with the number of fuel plates per bundle not yet set when the 1991 proposal required by 10 CFR 50.64(c)(2) was submitted. It was expected that DOE-supplied funding support of this work would be extended beyond the April 30, 1991 end date per verbal

communications so this work could be concluded along with basic thermal-hydraulic analyses to conclude the required HEU-to-LEU conversion safety analyses. Unfortunately this grant was not officially extended until March, 1992. It was also expected that the individual working on this neutronics analysis would complete his thesis work by mid-1991. The "berichmark" static calculations on the existing UFTR HEU core were completed and an internal report generated in April, 1991. The individual working on the neutronics analysis completed his thesis work in May, 1991 making his defense on May 10, 1991 but continuing his work until May 23, 1991. After the number of fuel plates per bundle was set at 14 from the neutronics analysis, thermal hydraulics analyses were begun August, 1991 and will have to be completed before the package can be assembled for submission to NRC in mid-1992. A graduate assistant has nearly concluded working on the thermal hydraulics area as the 14 plate fuel bundle arrangement has been selected for the conversion. The lack of official grant extension has made the financial support of this effort more difficult but a draft report of this thermal hydraulics work has been produced.

A no-cost extension of the Department of Energy Grant DE-FG05-88FR75387 entitled "Conversion of University of Florida Reactor to Low Enriched uranium(LEU)" was submitted to Ms. Ann Rydaich via a letter dated April 25, 1991 with a copy supplied to Keith Brown. The extension was agreed to be until April 30, 1992. Unfortunately, no further information had been received on the no-cost extension until March, 1992 making some plans and efforts difficult to implement. In addition, time consuming efforts have also been in progress with the Department of Energy representatives in Idaho to investigate the possibility of replacing the UFTR core fuel boxes which make reloading and unloading the core difficult and time consuming. DOE representatives have even visited the UFTR facility

and observed operations as well as reviewed drawings. This unexpected work effort has occupied much time and is progressing slowly but a decision on how to handle the fuel boxes should be reached by mid-May, 1992.

At this time, work is progressing to incorporate all the analysis completed to date into a single FSAR update to include the Technical Specifications. Some kinetics calculations remain in the neutronics area and the final report on thermal hydraulics is in progress. This work is proceeding slowly but is expected to progress more quickly after the end of the spring semester in May, 1992. Nevertheless, the entire package of results will then be assembled as a Revision to the UFTR Safety Analysis Report by August, 1992 with the project then expected to progress as indicated in the updated Table II.

As indicated, previous delays had necessitated an extension in the initial DOE grant which had been received as documented in Appendix I with another extension requested and verbally agreed to pick up from April, 1991 to April, 1992 requested as indicated above. Another funding extension is being requested to run forward from April 30, 1992 to assure continuous funding throughout the remainder of the conversion process with a new grant to be required for Phase II. In addition to neutronic and thermal-hydraulic analysis, shielding and effluent analyses will be documented to identify any changes in procedures, security plan, technical specifications or other license documents that must be considered as part of conversion. These should be minimal. This submittal will also contain documentation detailing the various tests and surveillances planned as part of the conversion. At this point a complete set of licensing documents for the conversion will be submitted along with a conversion application for review and approval. This result is now expected by August, 1992. Assuming resolution of all questions, this submittal will conclude

the Phase I licensee efforts. Phase I will then conclude with the issuance by the NRC of the specific Order to Convert.

PHASE II. CONVERSION (Assuming NRC Order to Convert)

Phase II (Conversion) will begin with receipt of the NRC Order directing the conversion and any necessary changes to the license, facility and/or procedures per 10 CFR 50.64(c)(3). This second phase is not yet funded by the existing DOE grant for which an extension will be requested and will include all final tests conducted with the HEU fuel to serve primarily as the basis for later comparison with similar tests with LEU fuel. Phase II will then involve a number of key activities aimed ultimately at having LEU fuel replace HEU fuel at the UFTR facility to include:

- 1. Shutdown core decay for several weeks followed by core unloading and shipment of irradiated HEU fu
- 2. Qualification of the selected LEU fuel (as applicable).
- Implementation of required facility changes necessitated for use of LEU fuel; this may involve some changes related to having both HEU and LEU fuel on site simultaneously for a brief time.
- 4. Receipt of unirradiated LEU fuel.
- 5. Shipment of irradiated HEU fuel.
- 6. Documentation of all changes.
- Completion of all requirements for core loading with LEU fuel followed by loading of the LEU fuel and startup testing to low power.
- 8. Documentation and record organization for the LEU fuel implementation.

PHASE III: REVIEW AND VERIFICATION OF CONVERSION

Phase III (Review and Verification of Conversion) will consist of a series of activities designed to verify the quality of the conversion process to include both the physical implementation of the LEU fuel and the documentation of the implementation. Activities in Phase III will include:

- Completion of startup as well as power testing and related surveillances.
- 2. Verification and evaluation of UFTR operational characteristics.
- 3. Review of conversion plan and data for consistency.
- 4. Approval for return of UFTR to normal operations.
- 5. Retain to normal operations.
- Submission of Final Report to NRC/DOE summarizing HEU operational
 conditions and comparing these results with the predictions contained in the
 Safety Analysis submitted to NRC at the end of Phase I and approved as part of
 the Order to Convert.

SUMMARY CONCLUSIONS

As noted earlier, a relatively detailed list of the various elements that must be obtained, produced or otherwise generated as required throughout the three phases of the UFTR conversion from HEU to LEU fuel is presented in Table I. The current plan continues to be to generate as much of the required safety analysis and design work in-nouse as possible. Only items such as silicide fuel, (now the selected fuel) would be designed and manufactured outside the administrative control of the UFTR licensee. At this point, without having identified all required changes, it is not possible to delineate exactly what other external support may be needed. The neutronics and thermal-hydraulics analyses are

all being conducted in-house which has necessitated some external support from the RERTR program at Argonne National Laboratory to assure proper code implementation at the University of Florida to carry out the required safety analysis. Work is now progressing though with delays due to SPERT fuel inspection delays, graduate studenchanges and inability to identify qualified graduate students to work on the project for their thesis work up until the last two years when progress on the use of the neutronics methodology was delayed by several code inconsistencies and lack of documentation which have now been corrected. The effort to generate the submittal package has begun and is expected to progress more rapidly during May with submittal in August, 1992.

The overall flow diagram for HEU to LEU conversion of the UFTR is presented in Figure 1. Key stages in the three phases, as well as key input items at the various stages, are indicated at each stage. Nevertheless, there is still some uncertainty in the exact plan of events in Phase II such as whether LEU fuel will be accepted on site prior to shipping HEU fuel off site. These items are now under consideration.

Finally, Table II contains an updated tentative schedule (Revision 6) for the major milestone events in the UFTR conversion process commencing with the notification of receipt of funding effective in November, 1987 and concluding with submittal of a final report to NRC and DOE summarizing the results of the conversion by December, 1994. It should be noted that this schedule is tentative and, as required by 10 CFR 50.64, will be updated yearly. There has been considerable schedule slippage during the past few years. The schedule is also subject to variations caused by availability of replacement fuel or other items involved in required facility changes as well as variations in the level of DOE funding after the first two year period (now extended) for which funding has been received. Other

areas which may impact the schedule are the availability of a shipping cask especially forirradiated IEU fuel (we are currently using our HEU fuel at a rate of about 1.5 MW-Days energy generation per year so it will probably require a fuel cask versus a 6M container though this may depend on the cooling period) and final usage of the UFTR with HEU fuel to provide a basis for comparison of changes in operating characteristics or to meet education, research and service commitments. Within these constraints and conditions, the schedule in Table II is one which the licensee is committed to meeting and which the licensee considers relatively realistic based upon expected resources, and recent progress with neutronics calculations.

Although much of the detail of the conversion process has depended upon the final selection of fuel types, this selection is now finalized; therefore, the information, especially the tentative schedule in Table II provided in this updated proposal, shows that the LEU conversion at the UFTR has progressed during this year although significant delays have occurred during the year again due to requirements to obtain a student assistant to perform the thermal hydraulies calculations now nearing conclusion. In the meantime we have an individual working on the submittal package. The key decisions remaining will involve identification and evaluation of system changes required by the conversion, especially concerning utilization of the existing fuel boxes, shipment of used fuel and delivery of new fuel as well as development and implementation of a test program for both the HEU and LEU cores some of this uncertainty is also involved with the possibility of DOE replacement of UFTR fuel boxes. The schedule will likely be most impacted, however, in the near future by the times required for completing and documenting the safety analysis in a submittal package and perhaps for manufacture of the LEU fuel. The schedule presented in Table

H is considered to be realistic and should be attainable now that the neutronics methodology has been proven acceptable, static neutronics calculations are complete for both the HEU and LEU core and thermal hydraulics calculations are proceeding well to analyze the selected 14 plate fuel bundles in the LEU core. The associated thermal-hydraulics calculations will follow the selection of the LEU core design and should be able to be concluded in a few additional months making the proposed schedule for first submittal realistic.

NEUTRONIC ANALYSIS TEST SPERT FUEL HEU to LEU CONVERSION THERMAL HYDRAULIC ANALYSIS DEVELOP A PREQUALIFICATION SPIELDING ANALYSIS PLAN FOR SPERT FUEL TREPARATION RADIOACTIVE EFFLUENT ANALYSIS SELECT FUEL OFTION SAFETY ANALYSIS IDENTIFICATION OF PREPARATION OF REQUIRED FACILITY LICENSING DOCUMENTS TECH SPEC CHANGES SECURITY PLAN CHANGES CHANGES PROCEDURE CHANGES SUBMITTAL OF APPLICATION ORDER TO CONVERT TO NEC WITH ALL CONVERSION DOCUMENTATION ARRANGEMENT FOR POSSESSION DISCONTINUATION OF OF HEU AND LEU ON INTERIM USE OF HEU FUEL BASIS

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STARTUP TESTING AND SURVEILLANCE ACTIVITIES

REVIEW/APPROVAL
OF FULL DOCUMENTATION

REVIEW/APPROVAL OF CONVERSION DOCUMENTATION BY NRC ANALYSIS FOR SHIPMENT OF IRRADIATED FUEL CONVERSION DESIGN/IMPLEMENTATION ACTIVITIES OF FACILITY CHANGES FUEL LOAD PREPARATIONS REVIEW AND VERIFICATION OF HEU TO LEU CONVERSION RETURN TO SERVICE SUBMISSION OF FINAL REPORT TO NRC/DOE

SUMMARIZING HEU OPERATIONAL CONDITIONS
AND COMPARING WITH SAR PREDICTIONS

Figure 1. University of Florida Training Resctor HEU to LEU Conversion Flow Diagram

TABLE !

University of Florida Training Reactor Key Activities for HEU-to-LEU Fuel Conversion

I. PHASE I - PREPARATION FOR CONVERSION

- A. Receipt of Funding from Department of Energy
- B. Analysis of UFTR-Specific LEU Conversion Options
 - 1. Protesting of Selected SPERT Fuel Pins
 - 2. Development of a Qualification Program for SPLIRT Fuel Pins
 - 3. Completion of Pre-Qualification Testing of Spert Fuel
 - Evaluation of Comparative Conversion Options(SPERT VS. SILICIDE)
 - 5. Selection of LEU Fuel Option for UFTR Conversion
- C. Safety Analysis/Licensing Studies
 - 1. Neutronic Analysis of LEU-Fueled UFTR
 - 2. Thermal-Hydraulic Analysis for LEU-Fueled UFTR
 - 3. Snielding Analysis for LEU-Fueled UFTR
 - 4. Radioactive Effluent Analysis as Required
- D. Identification of Changes in the R-56 License, Technical Specifications, Facility, Security Documents and Procedures Under the Scope of 10 CFR 60.64(c)(3) as Necessitated by Fuel Conversion
- E. Preparation of Full Submittal to NRC to Support Conversion Including all Supporting Documents

PHASE II - CONVERSION

- A. NRC Order to Convert
- B. Fuel-Related Activities
 - 1. Qualification of Selected LEU Fuel
 - 2. Final UFTR Operations with HEU Fuel
 - 3. Shipment of Irradiated Fuel
 - 4. Receipt of LEU Fuel
- C. Emplementation of Required Charges in R-56 License per Item ID.
- D. LEU Fuel Loading Activities
 - 1. Completion of Preparations for Core Load
 - 2. Loading of LEU Fuel
 - 3. Startup Testing and Surveillance
- E. Completion of Startup Documentation

III. PHASE III - REVIEW AND VERIFICATION OF CONVERSION

- A. Completion of Startup Testing and Related Surveillances
- B. Completion of Fower Testing and Surveillances
- C. Determination of UFTR Operational Characteristics
- D. Return to Normal Operations
- E. Submission of Final Conversion Report to NRC/DOE

TABLE II

(Revision 6)

University of Florida Training Reactor Tentative Milestone Schedule for HEU to LEU Fuel Conversion

I.	Effective Date of Receipt of Funding	November, 1987
Π.	Date of Full Submittal to NRC of Application to Convert (including all necessary documents)	August, 1992
III.	Date of NRC Order to Convert	November, 1992
	A. Date of Completion of All Plans to Convert	July, 1993
	B. Date of Receipt of LEU Fuel	September, 1993
	C. Date of Completion of Any Final Tests With HEU Fuel	December, 1993
	D. Date of Removal of HEU Fuel	February, 1994
	E. Date of Shipment of HEU Fuel	May, 1994
	F. Date of Loading of LEU Fuel	July, 1994
	G. Date of Completion of Determination of Initial Operational Parameters With LEU (Startup and Power Operations Testing)	October, 1994
	H. Date of Submittal of Report to NRC/DOE Summarizing New Operational Characteristics and Comparing With Predictions of Safety Analysis	December, 1994

APPENDIX I

FEDERAL GOVERNEMENT FUNDING FOR UFTR CONVERSION IS AVAILABLE AND HAS BEEN RECEIVED FROM THE DEPARTMENT OF ENERGY



Department of Energy

Oak Ridge Operations
Post Office Box E
Oak Ridge, Tennessee 37831

November 12, 1987

2 0 5 NOV 1 7 1987

Mr. Dillard C. Marshall Assistant Director Office of Research Administration University of Florida Gainesville, FL 32611

Dear Mr. Marshall:

GRANT NO. DE-FG05-88ER75387 - AMENDMENT NO. A000

Enclosed are two copies of the subject grant document which have been signed on behalf of the Department of Energy.

If this document is satisfactory, please have the two enclosed copies signed by the proper official on behalf of your organization and return one fully executed copy to this office. The remaining fully executed copy is for your retention.

In addition, please have executed the enclosed Assurance of Compliance - Nondiscrimination in Federally Assisted Programs, and return the signed original to this office together with the executed copy of the grant and a completed Form DOE-538. Notice of Energy RD&D Project. Please return two copies of the DOE-538.

Sincerely,

Contracting Officer

Contract Management Branch

Procurement & Contracts Division

AD-423:Lyle

Enclosures:

1. Grant (2 cys.)

2. Assurance of Compliance

3. DOE 538 (3 cys)



RECEIVED DEC 2 7 1987



Department of Energy

Oak Ridge Operation:
Post Office Box E
Oak Ridge, Tennessee 37831

December 21, 1987

Or. William G. Vernetson Director of Nuclear Facilities College of Engineering University of Florida Gainesville, FL 32611

Dear Dr. Vernetson:

GRANT NO. DE-FGOS-88ER7536; (REVISED PROJECT DESCRIPTION)

In response to telephone conversations with you and with Keith Brown at Argonne, enclosed is a revised project description for your grant from the Department of Energy to cover cost of the conversion from MEU to LEU fuel in University of Florida's training reactor. I applicate for the confusion and delay in this revision reaching you.

Please substitute the attached Part II, Project Description and Reporting Requirements, for the one transmitted to Dillard Marshall on November 12, 1987, and have Mr. Marshall sign the award and return an original to us as soon as possible. You will not be able to draw down any money from Letter of Credit on this award until the original copy is returned to us.

Thank you for calling our attention to the fact that your award is different from the other reactor fuel conversion awards the Department of Energy has.

Sincerely,

Martha a. Tyle

Contract Specialist

Contract Management " ranch

Procurement and Contracts Division

AD-423:Lyle

Enclosure: Part 11 of Grant DE-FG05-88ER75387

cc: Dillard C. Marshall, Asst. Dir.
Research Administration
University of Florida
223 Grinter Hall
Gainesville, FL 32611





Department of Energy

idaho Operations Office 785 DOE Place Idaho Falls, Idaho 83402 December 19, 1989 205 DEC 20 89

Mr. Dillard C. Marshall University of Florida 223 Grinter Hall Gainesville, Florida 36211

SUBJECT: Grant No. DE-FG07-88ER75387

Dear Mr. Marshall:

We are enclosing three copies of the subject grant which have been signed on behalf of DOE. Please have all three copies signed by an authorized official and return two fully executed copies to this office within two weeks from the date of this letter. The third fully executed copy is for your retention.

Should you have any questions, please contact Ann Rydalch on (208) 526-9617.

Sincerely,

Trudy A. Thorne Contract Specialist

Financial Assistance Branch

Enclosure

UNIVERSITY OF FLORIDA OFFICIAL AWARD ACCEPTANCE

DATE PRINTED: 12/21/89 QUESTIONS - PLEASE CONTACT THE UF DIVISION SPONSORED RESEARCH, AWARD ADMINISTRATION OF THE PROPERTY OF THE PRO

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