

MAY 21 1984

Docket No. 50-199

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A. Chu

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Region I

Dr. Ronald S. Kane  
Reactor Administrator  
Zero Power Reactor  
Manhattan College  
c/o Mechanical Engineering Dept.  
Riverdale, New York 10471

Dear Dr. Kane:

We have reviewed your reply of January 9, 1984, concerning our request for additional information for the Manhattan College Operator Requalification Program. We have determined that you have provided acceptable responses to our comments with two exceptions. These include waiver of theoretical portions of biennial written examinations and performance of ten reactivity manipulations during the two-year requalification period.

Appendix A of 10 CFR Part 55 allows deviations to the requalification programs at research and test reactors. In lieu of annual written examinations, the Commission has approved programs with biennial examinations, but has not granted waivers for any portions of the written examination. Therefore, the theoretical portion of the written examination may not be waived.

With regard to the ten reactivity control manipulations over the two-year period required by Appendix A of 10 CFR 55, we believe that these manipulations provide part-time staff the necessary practice and opportunity to demonstrate competence. Our position is that the ten manipulations must be performed, as required, and you have not given adequate justification for waiving this requirement. Your program, submitted on August 17, 1983, requires a reactivity change in the form of a reactor start-up every four months, which accounts for six manipulations during a two-year period. The required additional four actions during any two-year period, to satisfy the required total of ten, can be done in conjunction with experimental programs and should not impose any undue burden on your staff.

We request that you resubmit the program, as amended by your letter of January 9, 1984, and in conformance with the staff positions contained in this letter, to this office for final review and approval within 30 days of the date of this letter. If you have any questions, contact your Project Manager, Angela Chu, at (301) 492-9798.

Sincerely,

Cecil O. Thomas, Chief  
Standardization & Special  
Projects Branch  
Division of Licensing

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