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June 15, 1984

Cecil O. Thomas, Chief
Standardization and Special Projects Branch
Division of Licensing
United State Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thomas:

We have received your notification of May 29, 1984, that the PULSTAR Emergency Plan, Docket No. 50-297, submitted November 3, 1982, has been approved for full implementation.

It is hereby requested that the implementation of the specified Emergency Plan be delayed to allow processing of a revised version of the Emergency Plan to be completed. Specifically, it is our expectation that the revised Emergency Plan we have prepared will be ready for submittal to the Nuclear Regulatory Commission within 60 days of this date. Note that we have received a commitment from our Radiation Protection Council review body to meet the proposed schedule for submittal to the NRC.

The revision of the Plan was necessary because of organizational changes and recently finalized regulatory guides for the development of Emergency Plans for research and test reactors. The Plan submitted to the Commission on November 3, 1982, was developed using ANSI-15.16-2982, "Emergency Planning for Research Reactors" and NUREG-0849 (For Interim Use and Comments), "Standard Review Plan for the Review and Evaluation of Emergency Plans for Research and Test Reactors." NUREG-0849 has now been issued in final form with significant revisions from the interim use version. The revised PULSTAR Emergency Plan incorporates the latest guidelines of NUREG-0849 and the present organizational structure of the PULSTAR Facility. Note that it is our understanding that NUREG-0849 is the NRC document used to ascertain the acceptability of a research reactor emergency plan. If this is not the case, please advise what NRC guideline/document is used as the review basis such that an appropriate revision can be generated.

The principle justification for the proposed delay is to avoid the development and personnel training of an Emergency Plan version that would be in effect for probably less than two months. In the existing scenario of implementing within 120 days, and then implementing a revised version possibly 60 days later, the possibility of personnel confusion between the various plans will be present. Thus to make a more orderly transition from our existing Emergency Plan to a revised Emergency Plan, developed in accordance with NUREG-0849, a single emergency procedure development and personnel training effort is deemed the logical course of

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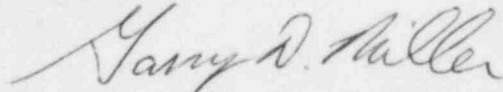
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action.

With Commission approval of the proposed delay and concurrent submission of the revised Emergency Plan within 60 days, we would require significantly less than the standard 120 days to implement the revised Emergency Plan. It is, therefore, proposed that 30 days would be the specified time interval for full implementation of the revised Plan. The net effect of the proposed delay is on the order of 30 to 60 days from the original implementation date.

It is requested that the Commission consider the proposed implementation delay and advise NCSU of your decision in this matter as soon as possible. If you have any questions concerning this matter, feel free to contact me at (919) 737-2321.

Sincerely,



Garry D. Miller
Associate Director and
Nuclear Operations Administrator

GDM:lpe

cc: Chancellor Bruce Poulton
Chairman, Radiation Protection Council
Dr. Paul J. Turinsky
Dr. Bernard Wehring
Mr. T. C. Bray
Dr. K. V. Mani