



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 26, 1984

Docket

Docket No. 50-5

R. G. Cunningham, Vice President
Research and Graduate Studies
Pennsylvania State University
207 Old Main Building
University Park, Pennsylvania 16802

Dear Dr. Cunningham:

This letter is to remind you that the Operating License No. R-2, for the Pennsylvania State University research reactor is scheduled to expire on June 30, 1985, and to provide you guidance for preparing your application for a renewal of the license. Title 10 of the Code of Federal Regulations (10 CFR 2.109) allows continued operation under your current license until the Nuclear Regulatory Commission (NRC) acts on an application for renewal, provided the application is received at least 30 days prior to the expiration date of your current license.

The NRC considers the renewal of a non-power reactor operating license to be equivalent to reissuing the license. Therefore, renewal is not merely a routine administrative step, but involves in-depth reviews of all documentation related to the facility, an on-site review, and publication in the Federal Register of a notice of your request that provides the opportunity for public participation, as well as a notice of the results of our review of your application.

Your renewal application should address the requirements in applicable sections of Title 10 of the Code of Federal Regulations, and should demonstrate that the reactor can continue to be operated safely and without adverse environmental impact. For the review of your renewal application, the NRC staff will apply the guidance contained in the Division 2 Regulatory Guides for Research Reactors and the industry standards in the ANS-15 Series.

In order for us to perform an adequate review, you are requested to include, as part of your application, all of the following documentation, in accordance with 10 CFR 50.33 and 50.34:

1. Updated Safety Analysis Report (SAR)

A complete updated edition of your Safety Analysis Report, including Technical Specifications, are required to be submitted with your renewal application. The SAR should include information that describes

the facility and all changes made during the license period; the design bases and limits on its operation; and a safety analysis of the structures, components and systems to ensure that they will be able to continue to perform their intended functions. Potential and reasonable accident scenarios and their consequences should be analyzed using the best current input data and computational techniques, and should rely, wherever possible, on facility operating experience.

Furthermore, the SAR should include updated information and analyses on demography, meteorology, geology, seismology and other natural and unnatural phenomena.

2. Financial Qualifications to Continue Operation [10 CFR 50.33(f)]

This information must show that there is reasonable assurance that you will be able to obtain the funds necessary to cover estimated operating costs for the period of the requested license renewal plus the estimated costs of permanently shutting down the facility and either decommissioning it or maintaining it in a safe condition. To facilitate our review, we request that the following information be provided, appropriately certified:

- a. The most recently published annual financial statement of the University. Indicate the source of funds utilized to cover costs of operation of the reactor facility,
- b. The estimated annual cost to operate the reactor for the requested period of renewal, and a certification that future budgets will include these funds, and
- c. The estimated costs of eventually shutting down the reactor and safely disposing of it, a listing of what is included in these costs, the assumptions underlying these estimated costs, the type of shutdown contemplated, and the source of funds to cover these costs.

3. Environmental Report (10 CFR 51)

Your Environmental Report (ER) should include sufficient operational data, analyses and discussions to provide a substantial basis for NRC to develop its environmental assessment (see enclosure for an example of an Environmental Report).

4. Technical Specifications

The content and format for Technical Specifications should be in conformance with ANSI/ANS 15.1-1982, "The Development of Technical Specifications for Research Reactors." Any substantive changes to the current Technical Specifications should be proposed at the time of the license renewal application so they can be evaluated during the review. Note that in following the ANSI/ANS 15.1-1982 format, bases must be included to support all "specifications."

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5. Operator Requalification Program [10 CFR 50.54 (i-1) and 10 CFR 55 Appendix A]

A copy of your current and implemented operator requalification program must be submitted to ensure that it is reviewed with your renewal application and meets current NRC requirements for non-power reactors (guidance contained in ANS 15.4-1978).

6. Emergency Plan [10 CFR 50.54(q) and (r) and 10 CFR 50 Appendix E]

As your Emergency Response Plan (ERP), dated October 29, 1982, as amended, has been approved by NRC, you need only reference those respective Penn State and NRC documents. However, if you wish to modify your ERP, any changes must be submitted for NRC review and approval.

7. Physical Security Plan (10 CFR 73.67)

You already have an approved Physical Security Plan on file with NRC. Accordingly, you need only reference the license amendment containing that documentation. However, if you wish to modify your Physical Security Plan, changes should be made in accordance with the requirements of 10 CFR 50.54(p) or 10 CFR 50.90.

8. Filing of Application

The requirements for submitting your renewal application and all other formal documentation relating to your license with respect to addressee, notarization, signatory and number of copies, are defined in NRR Generic Letter No. 84-18, "Filing of Applications for Licenses and Amendments," from Darrell G. Eisenhut to All Non-Power Reactor Licensees, dated July 6, 1984. Please follow the guidance in this letter.

For your further guidance in preparing the proper information to be included in your license renewal application, we are enclosing copies of license renewal packages recently issued for a TRIGA facility similar to yours. This includes the staff's Safety Evaluation Reports, Environmental Assessments and the Technical Specifications. Upon completion of our review and a favorable evaluation of your facility, similar documents will be issued in conjunction with renewal of your reactor operating license. We emphasize that these enclosures were developed and issued by the staff and are provided as examples of the types of findings we must make. Your documentation must provide the technical and descriptive information that will support our issuance of similar evaluations for your facility.

July 26, 1984

We also want to inform you that Mr. Harold Bernard has been assigned as the Licensing Project Manager for your facility, replacing Mr. Robert Carter. We ask that you keep Mr. Bernard informed of your planned schedule for submittal of your application and of any changes to the scheduled submittal date. If you have any further questions or comments, please contact Mr. Bernard, at (301) 492-9797.

Sincerely,

Cecil O. Thomas

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

Enclosures:
As stated

cc: See next page

cc w/enclosure(s):

Governor's Office of State Planning
and Development

ATTN: Coordinator, Pennsylvania
State Clearinghouse

P. O. Box 1323

Harrisburg, Pennsylvania 17120

Dr. S. Levine, Director

Breazeale Nuclear Reactor

College of Engineering

Pennsylvania State University

207 Old Main Building

University Park, Pennsylvania 16802

Attorney General

Department of Justice

Capitol Annex

Harrisburg, Pennsylvania 17120

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Sincerely,

ORIGINAL SIGNED BY
Cecil O. Thomas, Chief
Standardization and Special Projects
Division of Licensing

Enclosures:
As stated

cc: See next page

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HBerkow
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SSPB;DL*
CThomas
07/26/84

R. G. Cunningham

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We are also taking this opportunity to inform you that, due to an increase projected workload for Mr. Robert Carter, Mr. Harold Bernard has been assigned as the Licensing Project Manager for your facility. If you have any further questions or comments, please contact Mr. Bernard, at (301) 492-9799.

Sincerely,

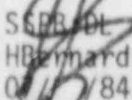
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