

January 3, 1996

Mr. Mark L. Moore
Armed Forces Radiobiology
Research Institute
Reactor Facility Director
8901 Wisconsin Avenue
Bethesda, Maryland 20889-5603

SUBJECT: RESPONSE TO AFRI COMMENTS ON NRC DRAFT DOCUMENTS

Dear Mr. Moore:

By letter dated December 7, 1995, you provided comments on Chapter 11 of the draft "Format and Content for Applications for the Licensing of Non-Power Reactors" and "Standard Review Plan and Acceptance Criteria for Applications for the Licensing of Non-Power Reactors." Thank you for taking the time and effort to review our draft documents. The attachment to this letter is our analysis of your comments and changes made to the drafts as a result of your comments.

If you have any questions concerning our effort on these documents, please contact me at 301-415-1127.

Sincerely,

Original signed by:

Alexander Adams Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-170

Attachment: As stated

cc w/attachment:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script, appearing to read "Alexander Adams Jr.", written over the typed name.

Alexander Adams Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-170

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cc w/attachment:
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Armed Forces Radiobiology Research
Institute

Docket No. 50-170

cc:

Director, Maryland Office of
Planning
301 West Preston Street
Baltimore, Maryland 21201

County Executive
Montgomery County Government
Rockville, Maryland 20850

Reactor Facility Director
Armed Forces Radiobiology
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8901 Wisconsin Avenue
Bethesda, Maryland 20889-5603

NRC response to AFRI comments - Chapter 11, Radiation Protection Program and Waste Management

Comment - Format and content section 11.1.1, Radiation Sources, page 11-3. The document states that identification of such wastes should indicate which are associated with the operation and with the utilization of the reactor. You commented that the meaning of this section is unclear. You asked is the intent to distinguish between "wastes from operations" versus "wastes from utilization"? You suggested that we modify this section to more clearly state the requirement.

NRC response - Your interpretation of the guidance is correct. We are interested in the distinction, if possible, between waste generated by operation of the reactor and by utilization of the reactor. We will change the statement in section 11.1.1 on page 11-3 of the format and content to read as follows:

Identification of such wastes should distinguish, if possible, which are associated with the operation of the reactor and which are associated with the utilization of the reactor if utilization occurs under the reactor license.

Comment - Review plan section 11.1.6.4, Contamination Control, Evaluation Findings, pages 11-19 and 11-20. The document states that the review included provisions for recordkeeping and historical information about occurrences of radioactive contamination at the facility was examined, which helps confirm that the program is effective. You commented that the meaning of this section is unclear and you suggested that we modify this section to clarify.

NRC response - We will change this section of the review plan to read as follows:

The review included an examination of recordkeeping for contamination and historical information about occurrences of radioactive contamination at the facility, which helps to confirm that the program is effective.