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December 20, 1995

Director of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-37 Washington, DC 20555

- Reference: Docket 50-186 University of Missouri Research Reactor License R-103
- Subject: Notification of changes to the University of Missouri Research Reactor (MURR) Emergency Plan as required by NRC Memoranda and Orders CLI-95-01, CLI-95-08, CLI-95-11 and CLI-95-17.

Enclosed are the December 20, 1995, revisions to the Emergency Plan for the University of Missouri Research Reactor (MURR). These changes were required by NRC Memor and and Orders CLI-95-01 dated February 28, 1995; CLI-95-08 dated June 22, 1995, CLI-95-11 dated August 22, 1995; and CLI-95-17 dated December 14, 1995.

We agree with the NRC determination in CLI-92-11 that the site boundary is the critical distance from the MURR to consider off-site consequences to classify a Site Area Emergency. We do not agree with the determination in CLI-95-11 that the critical distance from MURR to consider off-site consequences for an Alert classification is some arbitrary distance from MURR (150 meters) within the MURR site boundary. RTM-93, pp. A-32 and A-33, clearly tie both classifications to off-site consequences (i.e., the site boundary).

Nevertheless, we are willing to incorporate the requirements of the above Memoranda & Orders, understanding that NRC response criteria for research reactors and materials licenses may vary slightly.

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CLI-95-11 requires a protective evacuation to beyond 150 meters for a fire involving TRUMP-S materials. This distance is beyond MURR's current EPZ which was based on the generic EPZ size (100 meters) prescribed in ANSI-ANS-15.16, <u>Emergency</u> <u>Planning for Research Reactors</u> and in NUREG-0849, <u>Standard Review Plan for</u> <u>Review and Evaluation of Emergency Plans for Research and Test Reactors</u>. This distance is also beyond the 100 meter protective action distance recommended in NUREG-1140, pp. 103 and 104, for an accident involving five times more material than evaluated in CLI-95-01. We are, however, changing our EPZ to 150 meters for additional conservatism and consistency between research reactor and materials license facility response criteria. We believe our emergency plan will be more effective with the same EPZ for reactor emergencies as the EPZ specified for the Materials License accident evaluated in CLI-95-01.

If you have any questions please contact me or J. Charles McKibben at (314) 882-4211.

Since: ely,

Walt A. Meyer, Jr. Reactor Manager

ENDORSEMENT: Reviewed and Approved

J. Charles McKibben Associate Director

enclosure

xc w/encl: Regional Administrator, U.S. NRC, Region III T. Reidinger, U.S. NRC, Region III

Curvetine M. Grante 12/21/95

CHRISTINE M. ERRANTE Notary Public - Notary Seal STATE OF MISSOURI Boone County My Commission Expires: April 14, 1999