



UNIVERSITY OF VIRGINIA
SCHOOL OF ENGINEERING AND APPLIED SCIENCE
CHARLOTTESVILLE, 22901

DEPARTMENT OF NUCLEAR ENGINEERING AND ENGINEERING PHYSICS
REACTOR FACILITY

TELEPHONE: 804-924-7136

December 11, 1978

Director of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Robert W. Reid, Chief
Operating Reactor Branch #4

Re: Docket No. 50-62 License No. R-66

Dear Sir:

This letter requests approval of an amendment for Facility Operating License R-66, Docket No. 50-62 to revise section 3.5 and 4.6 of the Technical Specifications which address the reactor confinement systems. Specifically, approval on amendment to allow operation of the reactor when the Emergency Exit Manhole Hatch is closed is requested to improve the reactor security.

Presently Technical Specification 3.5, includes a requirement that the reactor not be operated unless a switch which scrams the reactor upon closing of the Emergency Exit Manhole Hatch is operable. Section 4.6 includes a requirement that the switch be tested monthly to assure that it is operable.

It is recommended that these specific requirements be deleted. All other parts of Technical Specification sections 3.5 and 4.6 would remain as presently written.

The recommended amendment is considered warranted to increase the reactor security. As a result of the present requirements, the exit manhole hatch must be open at all times the reactor is operating. This allows easy access to the reactor room from outside the reactor building.

The stated objective of Technical Specification 3.5 is to prevent exposure to the public resulting from the release of airborne radioactivity in the reactor room from exceeding the limits of 10 CFR 20 for unrestricted areas. This objective is not affected by the requested change since the manhole hatch, which is a steel grate, does not serve as a part of the system for confining radioactivity. The water in the escape manhole acts as the confinement seal and is not affected by the recommended change.

The original purpose of the scram switch on the escape manhole hatch was to insure that a method of easy escape was available during a reactor emergency. This objective does not require that the grate actually be open. If the recommended amendment is approved the reactor procedures and startup

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list will be changed to ensure that the hatch is unlocked and therefore can be easily opened from the inside without the use of a key. A method of latching the hatch to preclude it from being opened from the outside will be used to ensure that the hatch is an effective security barrier.

The proposed amendment has been reviewed and approved by the University of Virginia Reactor Safety Committee.

Your early action on the amendment to the Technical Specification requested by this letter and to the amendment to change the frequency of inspections of control rods requested in our letter to the Division of Reactor Licensing dated July 14, 1978 is requested. These changes are considered necessary to support our plans for 24 hour per day reactor operation which is expected to start in December 1978.

In addition, we would like to withdraw our request for approval of an ammendment to the Technical Specifications for the UVAR and CAVALIER reactors concerning the release of fission products from fuel elements which was included in our letter to the Division of Reactor Licensing dated July 14, 1978. These items will be reviewed as a part of the revision to the UVAR Technical Specifications presently being performed and changes requested if necessary.

We are presently working on the response to the items concerning renewal of our Facility Operating License No. R-66 as requested in your letter of October 16, 1978. As agreed in a telephone discussion between Mr. Steve Ramos and Mr. Bryce Shriver on November 30, 1978 this response will be submitted by January 19, 1979. A partial response to specific items will be submitted before that date if possible.

The information contained in this letter is considered to be exempt from public disclosure since it relates to reactor security.

Sincerely,

TGW

T.G. Williamson, Director
Reactor Facility

TGW:vs

cc: Mr. Steve Ramos
Mr. J.P. Farrar
Mr. B.L. Shriver
Region II

T.G. Williamson

Signed and notarized 12/14/78

Sworn to and subscribed before me this 18th

day of December, 1978

Witness my hand and official seal.

Lena R. Thorne

Notary Public

Embossed Hereon is My
Albemarle County, Va., Notary Public Seal
My Commission Expires January 21, 1979
LENA R. THORNE