

# Georgia Institute of Technology

NEELY NUCLEAR RESEARCH CENTER 900 ATLANTIC DRIVE ATLANTA, GEORGIA 30332-0425

(404) 894-3600

October 3, 1988

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

ATTENTION: Joument Control Desk

Re: Docket No. 50-16 License No. R-97

Gentlamen:

On behalf of the Georgia Institute of Technology, I hereby apply to the Nuclear Regulatory Commission to amend Facility Operating License No. R-97 to include the following changes to the Technical Specifications contained in Appendix A.

#### 1. Table 3.1:

The set points for the period trip channels, as shown in Table 3.1, are specified as less than or equal to 10 sec. for negative or positive periods.

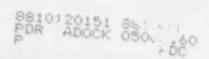
We would like to change this specification to read greater than or equal 10 sec.

b. The minimum number of required channels for low D2O level should be specified as 2

# Justification

We believe that the original intent for the period tr \ settings was, greater than or equal to, and no b lass than or equal to symbol used in Table 3 . priously the greater than or equal to set is more servative.

Trescation for the minimum no. of resident or low D20 Level was a simple of the control of the c





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2. Section 3.2, page 12 paragraph 8:

The statement ending with, "---- equipment or sheilding movements, etc." The word sheilding is misspelled; it should be shielding.

# Justification

We wish to correct typographical errors.

3. Section 3.4.e.2

The statement, "A temperature consevatively below ----." The word consevatively should be conservatively.

#### Justification

We wish to correct typographical errors.

4. Section 3.4.h

The abbreviation rem meaning "Roentgen Equivalent Man" is used four times in this paragraph: two times as rem and two times as Rem. The two places where Rem is used, should be changed to rem.

#### Justification

We wish to correct typographical errors.

5. Section 3.4 page 19

The fourth paragraph begins: "Specification 3.4.3 and 3.4.f.--." It should state: Specification 3.4.e and 3.4.f.

#### Justification

We wish to correct typographical errors.

6. Section 3.8 page 27

The first and second sentences, top of page, use the word "flask." It should be cask.

# Justification

We wish to correct typographical errors.

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# 7. Section 6.1 Figure 6.1

The organizational chart for the management and operation of the GTRR is being slightly modified. The modification involves the Office of Vice President for Research. The name of this office is being changed by the President of Georgia Tech to Vice President for Interdisciplinary Programs.

# Justification

The President of Georgia Tech is abolishing the Office of VPR. A new office of Vice President for Interdisciplinary Programs is created and that office is responsible for the twenty-two interdisciplinary centers which include the Neely Nuclear Research Center (NNRC). High level attention to NNRC affairs will increase.

#### 8. Section 6.4.a

Technical Specification 6.4.a states "All procedure and major changes thereto shall be reviewed and approved by the Nuclear Safeguard Committee prior to being effective. Changes which do not alter the original intent of a procedure may be approved by the reactor supervisor. We would like to change the last sentence to the following: Changes which do not alter the original intent of a procedure may be approved by the director of the facility.

# Justification

The director of the facility according to T.S. 6.1.a, has overall responsibility for direction and operation of the reactor facility including safeguarding the general public and facility personnel from radiation exposures and adhering to all requirements of the operating license and Technical Specifications. Furthermore, limiting approval of minor changes in procedures to facility director will insure independence in judgment with regard to safety because the reactor supervisor is normally heavily involved in procedure application.

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#### 9. Section 6.6.a

Technical Specifications 6.6.a states, "All reportable occurrences shall be promptly reported to the reactor supervisor or his designated alternate. We would like to change this sentence to the following: All reportable occurrences shall be promptly reported to the director of the facility.

# Justification

Same justification as in 8 above.

We appreciate in advance Nuclear Regulatory Commission's consideration of this request.

Sincerely yours,

R. A. Karam, Director

RAK: dwa

Many Sue Murray