



80M 50-123
University of Missouri-Rolla
Nuclear Reactor Facility

1870 Miner Circle
Rolla, MO 65409-0630
Phone: (573) 341-4236
FAX: (573) 341-4237

May 24, 1999

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Dear Sirs:

We respectfully request that Item 2.D of our operating license (License R-79) be revised with regard to the license expiration date. The current wording, which stems from the Amendment 7 license renewal (issued January 14, 1985), states that the license expires on November 20, 1999. We seek to have the wording revised such that the license expiration date is specified as being 20 years from the date of issuance. This would effectively make the expiration date January 14, 2005.

Specifically, we request that the wording of Item 2.D of our license be changed from:

This license is effective as of the date of issuance and shall expire November 20, 1999.

to read :

This license is effective as of the date of issuance. This license shall expire 20 years from January 14, 1985, the date of issuance of the Amendment 7 license renewal.

The original operating license expired on November 20, 1979. A license renewal application was submitted in October, 1979. The license went into a state of "timely renewal" until January 14, 1985 when Amendment 7 was issued renewing the license.

The requested change grants a 20 year license period from the date of issuance. We believe it was simply an unfortunate oversight that the expiration date was specifically worded to be November 20, 1999 instead of worded to be 20 years from the date of issuance.

We believe that the requested change is fair and reasonable. The proposed amendment simply grants us a 20 year license period from the date of issuance of the last license renewal which was issued on January 14, 1985. A review of the sixty-five NRC regulated non-power reactors shows that granting a license for 20 years from the date of issuance is common and had never led to a safety problem.

an equal opportunity institution

9905280234 990524
PDR ADDCK 05000123
P PDR

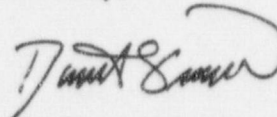
The requested change will remove a heavy and unnecessary burden from our facility. We believe it imposes an undue hardship on our facility to require us to go through the time consuming and labor intensive license renewal process only 14 years after the previous license renewal. Granting the request will save needless significant and excessive work for both us and the NRC.

There are no safety considerations dependent on the duration of operations at our facility. Because of the low licensed power (200kW) and operating history of the facility, there are no fuel burn up or material damage issues to be considered. The facility has operated less than 150 MW-hr since the last license renewal was issued. Granting the proposed license revision will not endanger the health and safety of the public and will have no environmental impact.

In the 1988 to 1992 time frame, new Technical Specifications, license amendment, and Safety Analysis Report were submitted to NRC, and were reviewed and approved as part of the HEU to LEU conversion process. Therefore, our documents have undergone recent and intense NRC review and approval.

We believe the requested revision is appropriate. We respectfully request that you respond with your decision on this matter to us as soon as possible as preparation of the license renewal submittal is a huge burden on our resources. Thank you for your consideration of this very important issue.

Sincerely,



Dr. David W. Freeman
UMR Reactor Director

DWF/mk

cc: Marvin Mendonca, Project Manager
U.S. Nuclear Regulatory Commission
PDNP
M.S. 11-B-20
Washington, D.C.

cc: NRC - Region III - Attention: Tom Burdick
801 Warrensville Road
Lisle, IL 60523-4351

Signed before me this 24th Day of May, 1999.

Sue Hufham
Notary Public

SUE HUFHAM
NOTARY PUBLIC STATE OF MISSOURI
PHELPS COUNTY
MY COMMISSION EXP. AUG. 30, 2000