



The Dow Chemical Company
Midland, Michigan 48667

January 29, 1998

Mr. Alexander Adams, Jr., Senior Project Manager
Non-Power Reactor and Decommissioning Project Directorate
Division of Project Support
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission

Dear Mr. Adams

Enclosed is a request to modify the Technical Specifications for Facility Operating License R-108. If you have any questions regarding this review, please contact me at (517) 636-6584.

Regards

Ward L. Rigot
Reactor Supervisor
Dow TRIGA Research Reactor
The Dow Chemical Company

SUBSCRIBED TO AND SWORN BEFORE ME

THIS 29th DAY OF January 19 98

Connie M. March

CONNIE M. MARCH
NOTARY PUBLIC, MIDLAND COUNTY, MICHIGAN
MY COMMISSION EXPIRES DECEMBER 23, 2000

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The requested change is shown below. The ~~strike-through~~ type is the requested deletion to the Technical Specifications and the **bold** type is the requested addition to the Technical Specifications.

Specifications

A Continuous Air Monitor (CAM) (with readout meter and audible alarm) to measure radioactive particulates in the reactor room must be operating during operation of the reactor.

The Area Monitor (AM) (with readout meter and audible alarm) in the reactor room must be operating during operation of the reactor or when work is being done on or around the reactor core or experimental facilities. During short periods of repair to this monitor, not to exceed ~~thirty~~ **sixty** days, reactor operations or work on or around the core or experimental facilities may continue while a portable gamma-sensitive ion chamber is utilized as a temporary substitute, provided that the substitute can be monitored by the reactor operator.

The requested change involves changing the period of time that a portable gamma-sensitive ion chamber is utilized as a temporary substitute, provided that the substitute can be monitored by the reactor operator. This provision in the Technical Specifications allows for continued operation while the area monitor is being serviced or repaired. The intent of specifying a fixed time is to assure that the intended equipment is returned to service in a reasonable length of time. Once the area monitor for our facility failed, we immediately took steps to repair the unit. During the inspection of the electronics, it was recommended by the instrument repair group that the device be replaced. Due to the fact that this unit has been in service for over twenty years, it was agreed to replace the unit with a newer version. With any large company such as Dow, the required paperwork limits the speed with approval can be made. Once the item was approved, the vendor was contacted and negotiations began. The new area monitor has been ordered and a verbal commitment of shipment has been made for February 13, 1998. This corresponds to the last day that operations will be allowed under our current Technical Specifications. Although delays are not expected, unforeseen circumstances could delay installation of the new area monitor. Therefore we request that the allowable time be changed to sixty days from thirty days. This should assure that there is sufficient time to ship, install, test and calibrate the new area monitor without disrupting operations.