



GPU Nuclear, Inc.  
Route 441 South  
Post Office Box 480  
Middletown, PA 17057-0480  
Tel 717-944-7621

6L20-98-20036

February 03, 1998

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Saxton Nuclear Experimental Corporation Facility  
Operating License No. DPR-4  
Docket No. 50-146  
SNEC Facility Response to the Fourth Request for Additional Information  
Regarding TSCR 59

Enclosed is the response to the Requests for Additional Information (RAI) dated January, 27, 1998. It also contains 1) additional information identifying changes to the GPU Nuclear organization reflecting the recent company reorganization, and 2) editorial changes. To maintain documentation consistency, it was necessary to change the Updated Safety Analysis Report, Quality Assurance Plan, and the PSDAR. The affected pages of those documents are included as attachments to this RAI response.

In accordance with 10 CFR 50.4(b)(1), also enclosed are revised pages to TSCR 59 which include revision to prior proposed wording based on the responses to the RAI and additional organizational and editorial changes identified. Revision of the proposed Technical Specification sections were reviewed and determined to have no effect on the evaluation and no significant hazards consideration provided with the submittal of TSCR 59 on November 25, 1996.

Pursuant to 10 CFR 50.91(a)(1) requirements, the previous analysis applying the standards of 10 CFR 50.92 in making no significant hazards consideration determination remains applicable without revision, since the proposed changes to the text involve administrative, non-technical issues. Also, enclosed is a Certificate of Service for the additional proposed revisions certifying service to the chief executives of Liberty Township and Bedford County, Pennsylvania, in which the facility is located, as well as the designated representative of the Commonwealth of Pennsylvania Bureau of Radiation Protection. It also includes an oath affirming the accuracy of the information provided.

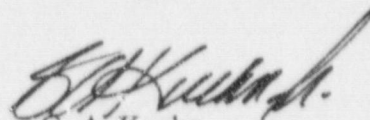
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For additional information regarding this submittal, contact William Heysek of the TMI Licensing Department at (717) 948-8191.

Sincerely,



G. A. Kuehn

Vice President SNEC

WGH

Attachments

- 1 Oath/Affirmation Page for the Fourth RAI for Technical Specification Change Request 59, 1 page
- 2 Certificate of Service for the Fourth RAI for Technical Specification Change Request 59, 1 page
- 3 Response to the Fourth RAI for Technical Specification Change Request 59, 5 pages
- 4 Proposed Revised Facility License- affected page
- 5 Proposed Revised Technical Specifications- complete document
- 6 Revised SNEC Facility Updated Safety Analysis Report- affected pages
- 7 Revised Saxton Nuclear Experimental Corporation Facility Decommissioning Quality Assurance Plan- complete document
- 8 Revised Post Shutdown Decommissioning Activities Report- affected pages

cc: NRC Project Manager, NRR- A. X. Adams Jr.  
NRC Project Scientist, NRR- T. F. Dragoun  
File 96516



SAXTON NUCLEAR EXPERIMENTAL CORPORATION

SAXTON NUCLEAR FACILITY

Operating License No. DPR-4

Docket No. 50-146

Response to the Fourth Request for Additional Information Regarding  
Technical Specification Change Request 59

COMMONWEALTH OF PENNSYLVANIA )

) SS:

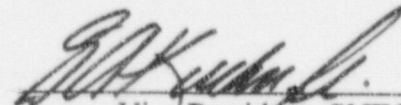
COUNTY OF DAUPHIN )

This information is being provided in regard to the fourth NRC Request for Additional Information for Technical Specification Change Request 59. As such it is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-4 for Saxton Nuclear Experimental facility.

I, G. A. Kuehn Jr., being duly sworn, state that I am the Vice President Saxton Nuclear Experimental Corporation (SNEC) and Program Director SNEC Facility; that on behalf of SNEC I am authorized by SNEC to sign, and file with the Nuclear Regulatory Commission, this Application to revise Appendix A and to amend the facility license; that I signed this Application as Vice President of SNEC and Program Director SNEC Facility; and that statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

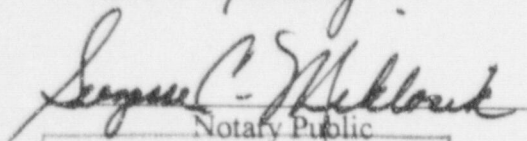
SAXTON NUCLEAR EXPERIMENTAL  
CORPORATION

BY:



Vice President, SNEC &  
Program Director, SNEC Facility

Sworn and Subscribed to before me  
this 3rd day of February 1998.



Notary Public

Notarial Seal  
Suzanne C. Miklosik, Notary Public  
Londonderry Twp., Dauphin County  
My Commission Expires Nov. 22, 1999

Member, Pennsylvania Association of Notaries

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
SAXTON NUCLEAR EXPERIMENTAL CORPORATION

LICENSE NO. DPR-4  
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

This is to certify that a copy of response to the fourth request for additional information regarding Technical Specification Change Request No. 59 to amend Appendix A to Operating License DPR-4 for the Saxton Nuclear Experimental Corporation facility as revised, have, on the date given below, been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Protection, by deposit in the United States mail addressed as follows:

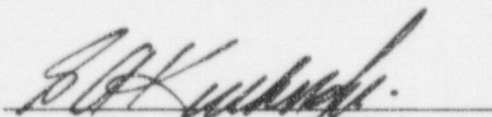
Mr. Donald Weaver, Chairman  
Liberty Township Supervisors  
R.D. #1  
Saxton, PA 16678

Mrs. Norma Ickes, Chairman  
Bedford County Commissioners  
County Courthouse  
203 South Juliana Street  
Bedford, PA 15522

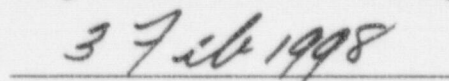
Director, Bureau of Radiation Protection  
PA Department of Environmental Protection  
Rachael Carson State Office Bldg., 13th Floor  
P.O. Box 8469  
Harrisburg, PA 17105-8469  
Attn: Kenneth Singh

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY:

  
Vice President, SNEC &  
Program Director, SNEC Facility

DATE:





Response to the Fourth RAI for Technical Specification Change Request 59

1. Section 2.C. of the license reads in part,

"... Section 50.54 of Part 50, 10 CFR Chapter 1, and to all applicable..."

In response to a request for additional information from NRC you replied to question 3 on May 30, 1997, changing your proposed wording to,

"...Sections 50.54, and 50.59 of 10 CFR Chapter 1, and to all applicable..."

It appears that you removed the words "of Part 50," from the license condition. Please clarify the wording of this license condition.

**Response:** The words "of Part 50," were inadvertently left out of the text during word processing activities. The words "of Part 50," have been reinserted in the license text.

2. In your letter of August 21, 1997, you submitted proposed revised technical specifications (TSs) as attachment 5. Figure 1 appears to be missing from the Proposed TSs. Please clarify.

**Response:** Figure 1 has been included in the attached TS accompanying this submittal.

3. In proposed TS 3.8, you discuss making reports to the Region I Administrator. Due to an internal reorganization of responsibility within NRC, the inspection program for the SNEF is the responsibility of the Non-Power Reactors and Decommissioning Project Directorate in Headquarters. Please update your proposed TSs to reflect this. You may also want to consider updating submitting reports by telegraph to submitting reports by facsimile to reflect advances in technology.

**Response:** The referenced section was revised to identify that more recent technology will be utilized to report any occurrence of a possible unsafe condition relating to the facility or to the public to the regulator and that written reports will be sent to the appropriate NRC office. The new proposed wording is as follows:

- 3.8.1 A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or facsimile, the Non-Power Reactors and Decommissioning Project Directorate Director, or designee, and the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk and the Non-Power Reactors and Decommissioning Project

Directorate Director within 30 days, which describes the circumstances and the corrective action taken. These reports shall include:

Section 3.8.2 was also changed to identify the proper location for submission of the annual report.

4. Section 1.3.2.15 of the SAR discusses the Decommissioning Support Facility (DSF) which appears to consist of the Decommissioning Support Building (DSB), Material Handling Bay (MHB) (Figure 1 refers to this as the Material Handling Building) and Personnel Access Facility (PAF). Your TSs only define and refer to the DSB. Should the definition be for the DSF or should the reference to DSB include all three structures? For example, TS 1.1.3.2 requires the DSB to have an intrusion alarm. Are there any entrances from the outside to the MHB or PAF that need to be alarmed? Section 2.1 of the TSs discusses CV/DSB activities and ventilation system. Should this reference be to the DSF? Please discuss.

**Response:** The DECOMMISSIONING SUPPORT FACILITY (DSF) is made up of the DECOMMISSIONING SUPPORT BUILDING (DSB), Material Handling Bay (MHB which is an external component with access to the DSB) and the Personnel Access Facility (PAF) as you noted.

There is an intended distinction between the use of the terms DSB and DSF. To eliminate confusion arising from the use of such similar acronyms, a definition of each term is provided in the TS. The definition of the DECOMMISSIONING SUPPORT FACILITY (DSF) has been incorporated within the definition of the DSB as identified below:

1.0.4 DECOMMISSIONING SUPPORT FACILITY (DSF) and  
DECOMMISSIONING SUPPORT BUILDING (DSB) -

The DECOMMISSIONING SUPPORT FACILITY (DSF) is the facility constructed southeast of the containment vessel (CV) and attached to the CV. The DSF consists of three structures, the DECOMMISSIONING SUPPORT BUILDING (DSB), the Material Handling Bay and the Personnel Access Facility. The DSB is used to facilitate the decommissioning process and allow the preparation and packaging of radioactive material for shipping.

The definitions were combined to eliminate section numbering problems. Identification of the non-interchangeability of the acronyms DSB and DSF resulted in a review of the meaning of each use in the TSs and a change of acronym where appropriate. Changes were made in the following sections and are identified by margin bars in the revised proposed TS: 1.0.4, 1.0.14, 1.1.3.2 and 1.1.3.3 Note: the MHB has no external entrances.



Any unauthorized attempt to gain access from the outside into the CV, DSB and PAF components of the DSF will activate the intrusion alarm system.

5. In your proposed TS 1.1.3 for exclusion area controls, it is possible to leave the DSB and CV unlocked when the site is not manned because the proposed TS requirement is for the intrusion alarms to be activated. Please address a requirement to the TSs to secure the CV and DSB whenever the site is not manned or justify why securing the CV and DSB need not be a TS requirement. If an alternate method is used to provide equivalent security, please include this in the proposed TSs or justify why it is not needed.

**Response:** A new subsection has been included to add a requirement to secure the access points to the CV and DSF

- 1.1.3.3 Access points to the CONTAINMENT VESSEL (CV) and the DECOMMISSIONING SUPPORT FACILITY (DSF) will be SECURED following an authorized entry, prior to activating the intrusion alarms.

6. In your reply dated May 30, 1997, to our request for additional information concerning the quality assurance program, you proposed several changes to the program that you would incorporate if the proposed changes were acceptable to NRC. To allow NRC to review a complete program please submit a revision to the program that incorporates your proposed changes.

**Response:** The Saxton Nuclear Experimental Corporation Decommissioning Quality Assurance Plan has been revised as identified in the May 30, 1997 responses to the April 24, 1997 Request for Additional Information. A copy of the QA Plan, as revised, as committed to in the RAI response and including the organizational changes described below, is included as Attachment 7 of this submittal.

### Additional Changes

#### A. Organizational Changes

A reorganization of GPU Nuclear has resulted in the elimination of the position of Vice President, Nuclear Safety and Technical Services. The responsibilities of the Vice President Nuclear Safety and Technical Services have been transferred to other vice presidents and directors of the company. As a result of that action, the responsibility for managing the decommissioning of the SNEC facility has been assigned to the Vice President Engineering.

The organization and organizational responsibilities describing the responsibility for the SNEC facility decommissioning in license basis documents must be revised to reflect the changes brought about by the reorganization of GPU Nuclear. The revised TS sections follow:

- 3.1.2 The Vice President Engineering Division assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).
- 3.5.5.1 The Radiation Safety Committee shall report to the Vice President Engineering. The Committee will consist of at least four members. Membership will be on the recommendation of the Vice President Engineering. Three members shall constitute a quorum.
- 3.5.5.4 Written minutes of all meetings shall be prepared and distributed to the Vice President Engineering within 30 days of the meeting date.

The changes identified are administrative in nature and are a reflection of the transfer of responsibilities within GPU Nuclear as a result of the company reorganization. There is no change in the independence of the oversight positions and the level of management attention within GPU Nuclear to the SNEC facility is not diminished.

B. Editorial changes

1. The listed TS sections were revised to correct the spelling of, case of, or a form of the word "operability"; 1.0.14, 1.1.3.2, 3.5.3.1.b, 3.6.2.1.1 and 3.6.2.1.6. Margin bars mark the changes in the revised TS at these sections.
2. The 8/21/97 proposed revised TS submittal did not incorporate words regarding "posting" in the EXCLUSION AREA as indicated in the response to question 3. The change was made in TS section 1.1.2. Based on the 8/21/97 response, the wording in TS 1.0.5 has been revised to address "posting" as shown below:

1.0.5 EXCLUSION AREA -

The term EXCLUSION AREA refers to the area shown on Figure 1 of the Technical Specifications and defines the area controlled for the purpose of security and access restrictions. The EXCLUSION AREA will be posted.

3. The term "containment building" in section 1.0.15 was changed to "containment vessel" to conform with the terminology used throughout the TS. A change bar annotates the change.
4. TS section 1.0.7 wording was revised between the 5/30/97 and 8/21/97 submittals as follows without being noted as a change in the 8/21/97 submittal. The wording was changed from "...that radioactive release..." to "...those potential radioactive releases..." so that the words did not present an expectation for a release but to identify the potential that one might occur.



5. TS section 1.0.12 wording was revised between the 5/30/97 and 8/21/97 submittals as follows without being noted as a change in the 8/21/97 submittal. The wording was changed from "...are physical activities..." to "...include all physical activities..." to expand the scope of applicability from only the specific activity to include those that support it.
6. TS section 2.1.2 was revised by replacing the term "SECURED" with "shutdown" to identify the operational status of the equipment. The section was further revised to permit operation of the exhaust monitoring instrumentation with the ventilation system shutdown which the prior proposed wording did not support.
  - 2.1.2 When the CV/DSB ventilation exhaust is in operation, the exhaust monitoring instrumentation will be operated simultaneously. The ventilation system will be shutdown if the exhaust monitoring instrumentation is inoperable.
7. Section 3.1 identified the document containing requirements for identifying and updating organizational relationships as the PSDAR. Those requirements are now located in the Updated Safety Analysis Report (USAR) and the TS section text was revised to indicate that change.
8. Section 3.3.2 was revised by eliminating the phrase "the SNEC PSDAR for" since the PSDAR is not a document which is considered to contain requirement statements.
9. Section 3.5.1.5 identified the document containing descriptions of the facility structures systems and components as the PSDAR. Those descriptions are now located in the Updated Safety Analysis Report (USAR) and the TS section text was revised to indicate that change.
  - 3.5.1.5 Proposed modifications to facility structures systems and components as described in the SNEC Facility USAR determined to be within the scope of the SNEC Facility Decommissioning QA Plan and QA program, shall be designed by an individual/ organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be technically reviewed by an individual/group other than the individual/group which designed the modification but may be from the same group as the individual who designed the modification.
10. TS section 3.6.2.3 was revised to change "solidified" to "solid" since the PCP as submitted does not allow for the solidification of SNEC facility wastes. If solidification should become an appropriate process, the PCP will be revised in accordance with TS 3.6.2.3.1.
11. TS section 3.6.3.1 was revised to show the title in upper case to identify it with the definition in TS section 1.0.9.

12. TS section 3.6.1.3.3 was revised to correct a reference as follows:

3.6.1.3.3 Facility inspections and access controls shall meet specific requirements of the sections 3.5.3 and 1.1.3, respectively, of these TS.

13. TS sections 3.9.9 and 3.9.12 to shift the location of the word "and" to the second last item of the listing.

The eleven changes proposed above are administrative in nature.



Attachment 4

Proposed Revised Facility License

1 Page

- 2) SNEC, pursuant to the Act and 10 CFR Part 50, is licensed to possess, but not to manage, use, maintain or operate, the Saxton facility at the designated location in Liberty Township, Bedford County, Pennsylvania, in accordance with the procedure and limitations set forth in the facility license; and
- 3) GPU Nuclear, pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material", is licensed to possess, but not to separate, such byproduct material as may have been produced by operation of the Saxton facility

C. This license shall be deemed to contain and be subject to the conditions specified in Part 20, Section 30.34 of Part 30, Sections 50.54, 50.59 of Part 50, 10 CFR Chapter I, and to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect, and to the additional conditions specified below:

- 1) GPU Nuclear shall not reactivate the facility without prior approval of the Commission.
- 2) The Technical Specifications contained in Appendix A as revised through Amendment No. 14 are hereby incorporated in the license. SNEC and GPU Nuclear shall possess the facility in accordance with the Technical Specifications.

3. This license is effective as of the date of issuance and shall expire at midnight on February 11, 2000. It will continue in effect until the Commission notifies the licensee of its termination.