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BERKELEY, CALIFORNIA 94720

October 10, 1988

Docket No. 50-224
License No. R-101

Mr. Alexander Adams
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Proposed Amendment #6 of the Berkeley Research Reactor Facility
Operating License

Dear Mr. Adams:

The University of California, Berkeley terminated operation of its TRIGA III Reactor on January 1, 1988.

This letter is intended to request a revision in the Berkeley Research Reactor, Technical Specifications as follows:

1. Delete item 1.2.c on page 1 of the Berkeley Research Reactor's Technical Specifications.
2. Add item 1.34 on page 5 of the Berkeley Research Reactor's Technical Specifications, as follows:

Fuel Handling

1.34 Fuel Handling

For the purpose of defueling the reactor, Fuel Handling is defined as in core loading or unloading of fuel elements including instrumented fuel elements, fuel followers and control rods. During Fuel Handling, the following conditions shall be followed:

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- a. A licensed operator or senior operator at the console to monitor the neutron population in the core environment through the Reactor start-up channel.
- b. The following monitors shall be operable:
 - Bridge area monitor and 2 other area monitors
 - Stackgas monitor
 - Air Particulate monitor
 - A portable survey meter
- c. Neutron, beta and gamma film badges shall be worn by all personnel directly involved
- d. Normal ventilation shall be maintained

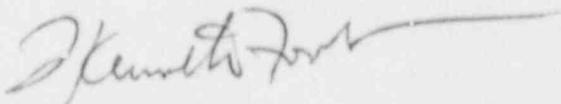
Prior to Fuel Handling, the reactor shutdown margin shall be calculated.

The proposed revision has been reviewed and approved by the Reactor Hazards Committee and the reactor staff. The revision is necessary, because we believe that the current specifications no longer serves its purpose.

A safety evaluation to justify the request for the revision is attached.

If you have further questions, please call me at 415-642-7071 or Dr. Tck H. Lim at 415-642-5213.

Sincerely yours,



T. Kenneth Fowler
Reactor Administrator

Attachment

TKF/jmh

cc: T. Budinger, Chairman, RHC
Andy Peterson, Radiation Safety Officer
T. Lim, Reactor Supervisor

Safety Evaluation

Oct 10, 1988

The request for changes of Item 1.2.c on page 1 and the addition of Item 1.34 on page 5 of the Berkeley Research Reactor Technical Specifications were reviewed by the Reactor Hazard Committee and the Reactor Staff. The following safety practices and past experience were the bases for the safety evaluation:

- a. Fuel handling has been performed safely since 1966.
- b. A Licenced Operator or Senior Operator shall monitor the neutron population in the core environment during fuel handling operation. Past experience indicated that the reactor start-up channel (a fission detector) can effectively serve this purpose. The start-up channel is connected in such a way that it funtions all the time regardless of the console "power on" switch; testing of the entire function of the console prior to fuel handling is thus meaningless.
- c. Unloading of fuel shall follow a patern of increasing shutdown margin.

These changes do not constitute an unreviewed safety question in that:

1. It does not increase the probability of occurance of an accident analyzed in the Safety Analysis Report
2. It does not increase the consequences of an accident analyzed in the Safety Analysis Report
3. It does not create the possibility of occurrence of nuclear accident not previously analyzed in the Safety Analysis Report.