

# TRTR

National Organization of Test,  
Research, and Training Reactors

Marcus H. Voth, Chairman  
Director Penn State Breazeale Reactor  
University Park, PA 16802  
(814) 865-6351

## Executive Committee

Donald M. Alger, University of Missouri  
Thomas L. Bauer, University of Texas  
Donald E. Feltz, Texas A&M University  
Arthur G. Johnson, Oregon State University  
George W. Nelson, University of Arizona, Chairman Elect  
Tawfik M. Raby, National Institute of Standards and Technology  
Wade J. Richards, McClellan Air Force Base  
Marcus H. Voth, Penn State, Chairman

May 18, 1989

Mr. Victor Stello  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stello:

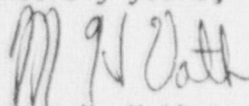
Thank you for your March 14, 1989 response regarding off-hour inspections at the Cintichem Reactor Facility. Upon discussing your response with members of the TRTR Executive Committee and with the Cintichem management, we have no further concerns on this matter, realizing that since the action taken at that facility was based on its fuel facility license and not its reactor license other non-power reactors will not be subject to similar inspection practices.

We would like to meet with you to discuss two other items that are of current concern to the non-power reactor community. The first issue deals with the severity of enforcement actions imposed on non-power reactors. In the recent past we have seen harsh enforcement actions, including the imposition of fines, which appear to be more severe than necessary to restore full compliance with regulatory requirements at the facility in question and to assure the pursuit of excellence in the operation of other facilities. We are not aware of a general lack of responsiveness on the part of licenses that warrants measures so severe.

The second issue involves the limitation of non-power reactor expertise and experience within the Commission. We find that our facilities are increasingly being evaluated against criteria applicable only to power reactors by personnel whose expertise is primarily that of power reactors. We would like to seek ways of increasing the sensitivity within the Commission to the unique aspects of non-power reactor operations.

Please schedule a one-hour meeting at your convenience when two or three TRTR representatives might meet with you to discuss these issues and other agenda items you may wish to add.

Sincerely yours,



Marcus H. Voth  
TRTR Chairman

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PDR DRG NE ED  
PNU

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555  
EDO Principal Correspondence Control

**ACTION**

FROM:

DUE: 06/06/89

EDO CONTROL: 0004497  
DOC DT: 05/18/89  
FINAL REPLY:

Marcus H. Voth  
National Organization of Test, Research, and  
Training Reactors (TRTR)

TO:

Victor Stello, Jr.

FOR SIGNATURE OF:

\*\* GRN \*\*

Executive Director

DESC:

REQUEST MEETING TO DISCUSS SEVERITY OF ENFORCEMENT  
ACTIONS IMPOSED ON NON-POWER REACTORS AND  
LIMITATION OF NON-POWER REACTOR EXPERTISE AND  
EXPERIENCE WITHIN THE COMMISSION

DATE: 05/22/89

ASSIGNED TO:

CONTACT:

NRR

Murley

SPECIAL INSTRUCTIONS OR REMARKS:

Ref. EDO 4280

NRR RECEIVED: MAY 22, 1989

ACTION: DRSP:HOLAHAN

NRR ROUTING: MURLEY/SNIEZEK

PARTLOW  
MIRAGLIA  
CRUTCHFIELD  
GILLESPIE  
MOSSBURG

CRC NO:

ROUTING:

Stello  
Taylor  
Thompson  
Blaha  
Tom Martin  
Lieberman, OE

*Due 4/2*  
*Stello*  
*Miller*  
*ae*  
*Belans*

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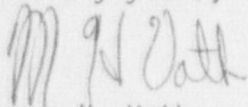
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Sincerely yours,



Marcus H. Voth  
TRTR Chairman



Penn State Breazale Reactor  
The Pennsylvania State University  
University Park, PA 16802

PENNSSTATE



PRESORTED  
FIRST CLASS



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Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555