



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 7, 2021

Dr. David M. Slaughter, President  
and Reactor Administrator  
Aerotest Operations, Inc.  
3455 Fostoria Way  
San Ramon, CA 94583

SUBJECT: AEROTEST OPERATIONS, INC. – REVIEW OF PHYSICAL SECURITY PLAN  
IN SUPPORT OF POSSESSION-ONLY LICENSE AMENDMENT REQUEST  
FOR THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR FACILITY  
OPERATING LICENSE NO. R-98 (EPID NO. L-2019-LLA-0065)

Dear Dr. Slaughter:

As part of its review of Aerotest Operations, Inc.'s (Aerotest's, the licensee's) license amendment request to modify Facility Operating License No. R-98 for the Aerotest Radiography and Research Reactor (ARRR) to a possession-only license in support of the licensee's decision to permanently cease operation of the ARRR, dated March 21, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19084A051), as supplemented, the U.S. Nuclear Regulatory Commission (NRC) staff performed a review of the Aerotest physical security plan (PSP), dated October 1, 2020, and submitted by letter dated September 28, 2020 (ADAMS Accession No. ML20276A247), which stated that the plan had been placed into service.

The NRC staff had reviewed the PSP revision previously submitted to NRC by letter dated March 26, 2020 (ADAMS Accession No. ML20134H946), revising the prior PSP revision which had been submitted to NRC by letter dated February 22, 2018 (ADAMS Accession No. ML18057A019), and determined that additional information was needed to complete its review of the PSP. Therefore, by letter dated June 18, 2020 (ADAMS Accession No. ML20164A225), the NRC staff issued a request for additional information (RAI) regarding the PSP. Aerotest responded to the NRC staff's RAI by letter dated July 28, 2020 (ADAMS Accession No. ML20220A422), and included a revised PSP in its response. The NRC staff reviewed this revised PSP and sent a clarification letter to Aerotest on September 17, 2020 (ADAMS Accession No. ML20234A631). Aerotest subsequently submitted the PSP, dated October 1, 2020, by its letter dated September 28, 2020.

The NRC staff has completed its review of the Aerotest PSP, dated October 1, 2020, and concludes that it is in compliance with the applicable regulations contained in Title 10 of the *Code of Federal Regulations* Part 73, "Physical Protection of Plants and Materials," and referenced in the NRC Regulatory Guide 5.59, "Standard Format and Content for a Licensee Physical Security Plan for the Protection of Special Nuclear Material of Moderate or Low Strategic Significance," Revision 1, issued February 1983 (ADAMS Accession No. ML100341301); and, that it incorporates the site-specific compensatory security measures discussed in confirmatory action letter No. NRR-04-003, dated February 17, 2004 (ADAMS

Accession No. ML033510264), which were put in place after the attacks of September 11, 2001, to enhance security at research reactors.

We request that Aerotest continue to implement its approved PSP. If you have any questions regarding the NRC staff's review, please contact me at 301-415-4067, or by electronic mail at [Edward.Helvenston@nrc.gov](mailto:Edward.Helvenston@nrc.gov).

Sincerely,



Signed by Helvenston, Edward  
on 01/07/21

Edward Helvenston, Project Manager  
Non-Power Production and Utilization  
Facility Licensing Branch  
Division of Advanced Reactors and Non-Power  
Production and Utilization Facilities  
Office of Nuclear Reactor Regulation

Docket No. 50-228  
License No. R-98

cc:

California Energy Commission  
1516 Ninth Street, MS-34  
Sacramento, CA 95814

Radiologic Health Branch  
P.O. Box 997414, MS 7610  
Sacramento, CA 95899-7414

Test, Research and Training  
Reactor Newsletter  
Attention: Ms. Amber Johnson  
Dept. of Materials Science and Engineering  
University of Maryland  
4418 Stadium Drive  
College Park, MD 20742-2115

SUBJECT: AEROTEST OPERATIONS, INC. – REVIEW OF PHYSICAL SECURITY PLAN  
 IN SUPPORT OF POSSESSION-ONLY LICENSE AMENDMENT REQUEST  
 FOR THE AEROTEST RADIOGRAPHY AND RESEARCH REACTOR FACILITY  
 OPERATING LICENSE NO. R-98 (EPID NO. L-2019-LLA-0065)  
 DATED: January 7, 2021

**DISTRIBUTION:**

PUBLIC  
 NParker, NRR  
 PTorres, NRR  
 JWachutka, OGC  
 ZCruz-Perez, NMSS  
 GWertz, NRR  
 EReed, NRR  
 BWatson, NMSS  
 KRoche, NRR  
 TTate, NRR  
 GCasto, NRR  
 EHelvenston, NRR  
 BSmith, NRR  
 MTakacs, NRR  
 CMontgomery, NRR  
 RidsOcfMailCenter Resource

**ADAMS Accession No.: ML21004A079****NRR-106**

OFFICE	NRR/DANU/PM	NRR/DANU/LA	NRR/DANU/BC	NRR/DANU/PM
NAME	EHelvenston	NParker	GCasto	EHelvenston
DATE	1/06//2021	1/07/2021	1/07/2021	1/07/2021

**OFFICIAL RECORD COPY**