



January 11, 2023

Document Control Desk
ATTN: Paulette Torres, Project Manager
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Reference: Washington State University Modified TRIGA Reactor
License No. R-76; Docket No. 50-027

Subject: Revised Responses to Request for Additional Information in Reference to LAR 2023-1: License Amendment Request – Section 5 of the Technical Specifications and Bases for the Washington State University Modified TRIGA Reactor and Facility License R-76, Proposed Amendment 22

Dear Ms. Torres:

The following responses are in reference to the U.S. NRC request for addition information dated September 20, 2023. These RAI responses and further proposed changes clarify sections in technical specifications that use certain descriptive language when referring to certain parts or a whole of either the WSU reactor, a licensed area, or the research reactor facility.

RAI 1: The TSs definition for Licensed Area in section 1 DEFINITIONS is not identical to how it is redefined in proposed TSs section 5.1(3) and has the potential to cause confusion. Submit a proposed change to TSs 5.1(3) reconciling the License Area definition differences (e.g., a single definition for Licensed Area) or provide a justification why reconciling the License Area definition difference are not needed.

WSU Response: The proposed change to TS 5.1(3) is attached. In summary, WSU proposes removal of the TS specification 5.1(3) as the term “licensed area” is already defined in section 1.

Justification: The removal of TS 5.1(3) is necessary because it redefines the research reactor facility to be a licensed area. The research reactor facility is a restricted area; only a part of the research reactor facility is a licensed area as defined in section 1.

RAI 2: “The facility” in TSs section 5.1(4) was not defined in TSs section 1 DEFINITIONS.

a) Clarify if the term “The facility” in TS 5.1(4) and the term “Research Reactor Facility” in TS section 1 DEFINITIONS are the same.

b) If the terms are not the same, explain why two different definitions are needed and provide a definition for “The facility” to avoid confusion from “Research Reactor Facility”

or provide a justification why a definition for “The facility” is not needed.

WSU Response: The proposed change to TS 5.1(4) is attached. In summary, WSU proposes to change instances “facility” to “research reactor facility” in TS specification 5.1(4) and in other locations throughout the TS where “the facility” or “the building” is used where “research reactor facility” should instead be used. Additionally, there are instances where “facility” or “facility area” used in reference to “BNC facility” as stated in the definitions in section 1. Finally, there are instances of “facility ventilation system” or “building ventilation system” used instead of the correct term “pool room ventilation system” as currently defined in section 1.

Justification: The terms “the facility,” “Dodgen Research Facility,” “the building,” and “research reactor facility” are synonymous. Throughout the technical specifications, these terms are used interchangeably. In some instances, “the facility,” “facility”, or “reactor building” is used incorrectly where “licensed area” should be used. In order to clarify and prevent redefinition of descriptive terms outside of those terms defined in TS section 1, new definitions must not be introduced in subsequent sections. Any instances of “building,” “reactor,” or “facility” ventilation system in the TS are referring to the pool room ventilation system as stated in section 1 of these TS and have been amended.

The terms “BNC facility,” “research reactor facility,” and “pool room ventilation system” are defined in section 1 of the Technical Specifications. Those terms, along with the applicability obtained from their definition in the Technical Specifications, should be used. No new terms or definitions are introduced as part of this LAR.

If you have any questions, please do not hesitate to contact me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/11/2024.

Best regards,



C. Corey Hines
Director

Attachment: Proposed Amendment 22 to the License, Technical Specifications, and Bases for the WSU Modified TRIGA Reactor pdf file. An editable Microsoft Word file has been transmitted to the U.S. NRC Project Manager via email.