



PennState

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April 21, 2025

US Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, DC 20555-0001

RE: License Amendment Request for Pennsylvania State University Breazeale Reactor, License R-2, Docket 50-005: Change in Organizational Structure.

To Whom It May Concern,

The Pennsylvania State University requests an amendment to the Breazeale Nuclear Reactor license (R-2) to be effective on July 1, 2025, in order to incorporate a proposed change to the organizational structure in the facility Technical Specifications (TS). Specifically, it is proposed that the Director of Environmental Health and Safety (EHS) shall report to the Associate Vice President of University Police and Public Safety (UPPS) instead of to the Vice President for the Office of the Physical Plant (OPP). Additionally, the title "Director of Environmental Health and Safety" is updated to "Senior Director of Environmental Health and Safety" in both the organizational chart and in the text of TS 6.1.1. All other aspects of the organizational chart remain the same as before.

An associated change is in the text of TS 6.1.1, in which the description of the organization is revised by removing the Assistant Vice President for Safety and Environmental Services, which is a secondary title held by the Senior Director of EHS and is therefore redundant, and including the Associate Vice President of University Police and Public Safety to reflect the aforementioned change in the organization chart. There is no mention of the VP of the Physical Plant in the current revision of TS 6.1.1, although this office is included in the organizational chart.

The intent of this change is to better align EHS functions with those of colleagues in UPPS, including the Emergency Management team, with whom EHS works closely on a regular basis. Since much of the work done by EHS and UPPS is complementary, the decision was made to organizationally align the teams to improve collaboration, efficiency, and innovation. This change

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is not driven by cost-cutting or budget savings, but by the desire to enhance organizational efficiency and overall capacity across EHS and UPPS.

This proposed change was reviewed and approved by the PSU Reactor Safeguards Committee by electronic vote on April 16, 2025.

PSU requests that the NRC expedite the review of this amendment so that it can issued by July 1, 2025, the planned date of the organizational realignment.

Summary of Proposed Changes

The following table describes the proposed changes from Version 40 to Version 41 of the reactor technical specifications:

Section 6.1.1	<p>The text of the “Structure” section is changed such that title of Associate Vice President of University Police and Public Safety was put in place of the Assistant Vice President for Safety and Environmental Services. The latter is a secondary title held by the Director of Environmental Health and Safety.</p> <p>The title “Director of Environmental Health and Safety” is updated to “Senior Director of Environmental Health and Safety.”</p>
Chapter 6 Organization Chart	<p>“Associate Vice President of University Police and Public Safety” was put in place of “Vice President for Physical Plant.”</p> <p>The title “Director of Environmental Health and Safety” is updated to “Senior Director of Environmental Health and Safety.”</p>

Conformance to pertinent standards and regulatory guidelines

The change in the organization structure maintains the overall structure in a way to follow the guidelines in NRC Reg Guide 1537 Ch. 12. Specifically:

- Persons performing review and audit functions report to a level above the reactor operational management to ensure independence of the review and audit function.
- The Level 1 management is still shown at the top of the organizational chart, with the reactor operators (Level 4) at the bottom.
- The requirements of 1537 Ch. 12.1.5 regarding the description of the organizational aspects of the radiation safety program are still met. Specifically, the Manager of Radiation Protection (the university Radiation Safety Officer) reports to a

university manager outside of the reactor organization, which eliminates concerns regarding reporting concerns to a level above reactor facility management.

ANSI/ANS-15.1-2007 (R. 2013) requires an organizational chart with radiation safety personnel reporting to Level 2 management or higher. In both the current revision (rev. 40) and the proposed amendment (rev. 41) of the PSU Tech Specs, the Manager of Radiation Protection reports through the Director of Environmental Health and Safety to the Senior Vice President for Finance and Business. This is not a subordinate position to the Level 1 administrator on the R-2 license. However, TS 6.2.1: Safeguards Committee Composition requires at least one member of the Reactor Safeguards Committee to have health physics expertise, which ensures that the oversight body which reports to the Level 1 administrator maintains the requisite expertise to review aspects of facility conduct related to radiation safety. The Reactor Safeguards Committee reports through the Dean of the College of Engineering to the Level 1 administrator.

Effect on Emergency Response

During the implementation of the Emergency Preparedness Plan, the reactor staff may notify the University Police and the Radiation Protection Office to request response. The Radiation Protection Office is notified directly by the reactor Emergency Director, and not through its supervisory organization, i.e., the Office of the Physical Plant. Therefore, the proposed change in the organizational structure above the Radiation Protection Office will not negatively affect the notification method or response time in the event of an emergency.

Conclusion

PSU requests a change in the organizational structure detailed in the technical specifications for the R-2 license by having the Director of Environmental Health and Safety report to the Associate VP of University Police and Public Safety instead of the VP of the Physical Plant. Additionally, it is requested that the title "Director of Environmental Health and Safety" be changed to "Senior Director of Environmental Health and Safety." The change in organizational structure will maintain the independence of the Radiation Protection Office in performing its audit and review functions. The structure will still conform to the requirements in NUREG-1537, and while it will deviate from ANS/ANSI-15.1, the way it deviates from this standard remains the same as before, i.e., there is no direct line of reporting from the Manager of Radiation Protection to the level 1 administrator in the license. Furthermore, the emergency response function of the Radiation Protection Office will not be negatively affected. Therefore, the proposed changes will not negatively impact reactor safety.

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

Executed on April 18

Sincerely,

Andrew F. Read

Andrew F. Read

Senior Vice President for Research

Enclosures: Proposed TS Revision 41, Clean Copy

Proposed TS Revision 41, Mark-Up Copy

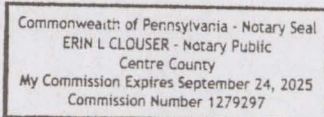
State of *Pennsylvania*

County of *Centre*

This record was acknowledged before me on 4/21/25 (date)
by Andrew F. Read (name(s) of individual(s)).

Signature of notarial officer *Erin L Clouser*

Stamp



Title of office *Notary Public*

My commission expires: *Sept. 24, 2025*



TECHNICAL SPECIFICATIONS: PENN STATE BREAZEALE REACTOR (PSBR)
FACILITY LICENSE NO. R-2

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

6.1.1 Structure

The University Senior Vice President for Research (level 1) has the responsibility for the reactor facility license. The management of the facility is the responsibility of the Director (level 2), who reports to the Senior Vice President for Research through the office of the Dean of the College of Engineering. Administrative and fiscal responsibility is within the office of the Dean.

The minimum qualifications for the position of Director of the PSBR are an advanced degree in science or engineering, and 2 years experience in reactor operation. Five years of experience directing reactor operations may be substituted for an advanced degree.

The Manager of Radiation Protection reports through the Senior Director of Environmental Health and Safety and the Associate Vice President of University Police and Public Safety, and to the Senior Vice President for Finance and Business/Treasurer. The qualifications for the Manager of Radiation Protection position are the equivalent of a graduate degree in radiation protection, 3 to 5 years experience with a broad byproduct material license, and certification by The American Board of Health Physics or eligibility for certification.

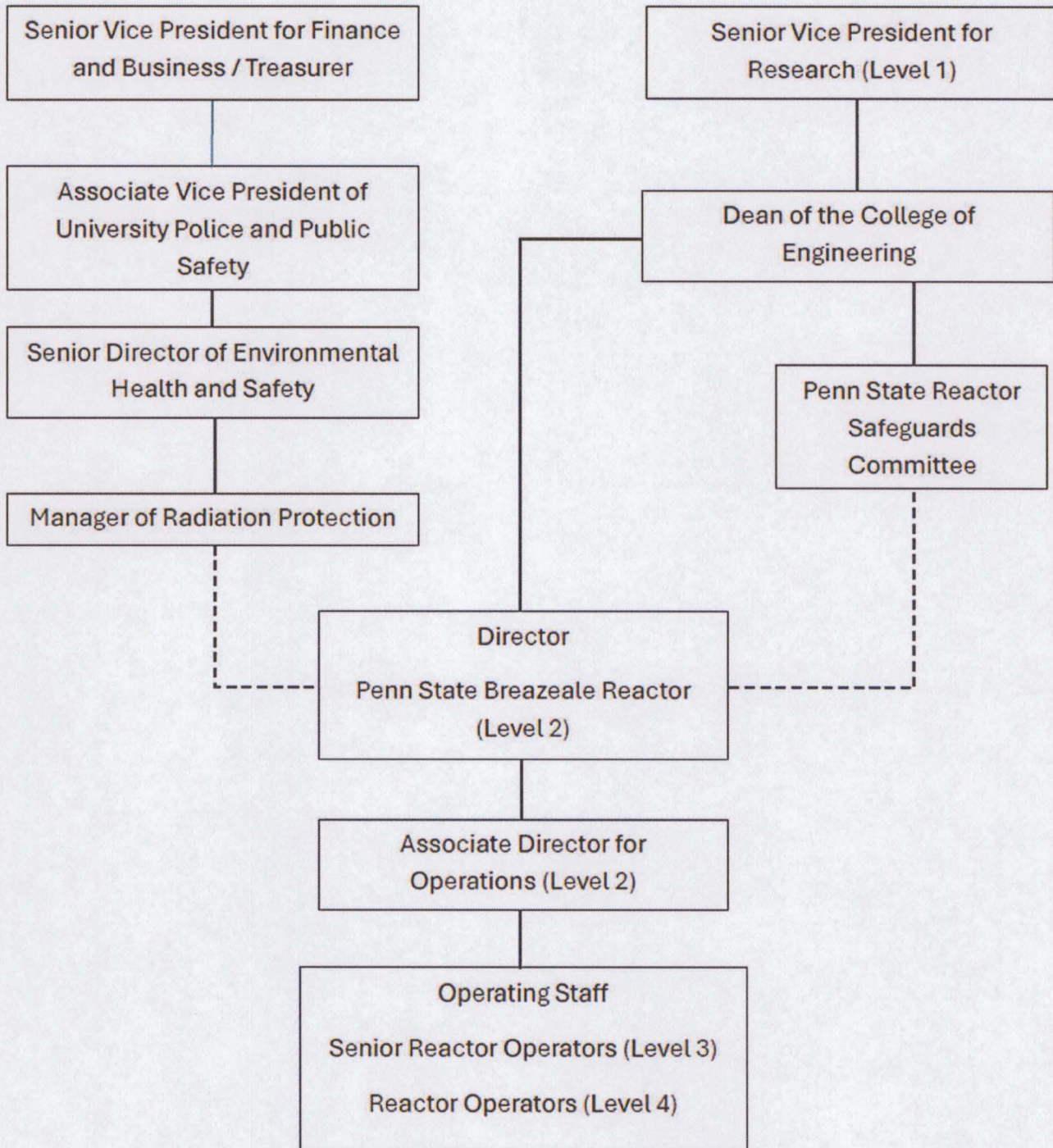
6.1.2 Responsibility

Responsibility for the safe operation of the reactor facility SHALL be within the chain of command shown in the organization chart. Individuals at the various management levels, in addition to having responsibility for the policies and operation of the reactor facility, SHALL be responsible for safeguarding the public and facility personnel from undue radiation exposures and for adhering to all requirements of the operating license and technical specifications.

In all instances, responsibilities of one level may be assumed by designated alternates or by higher levels, conditional upon appropriate qualifications.

TECHNICAL SPECIFICATIONS: PENN STATE BREAZEALE REACTOR (PSBR)
FACILITY LICENSE NO. R-2

ORGANIZATION CHART



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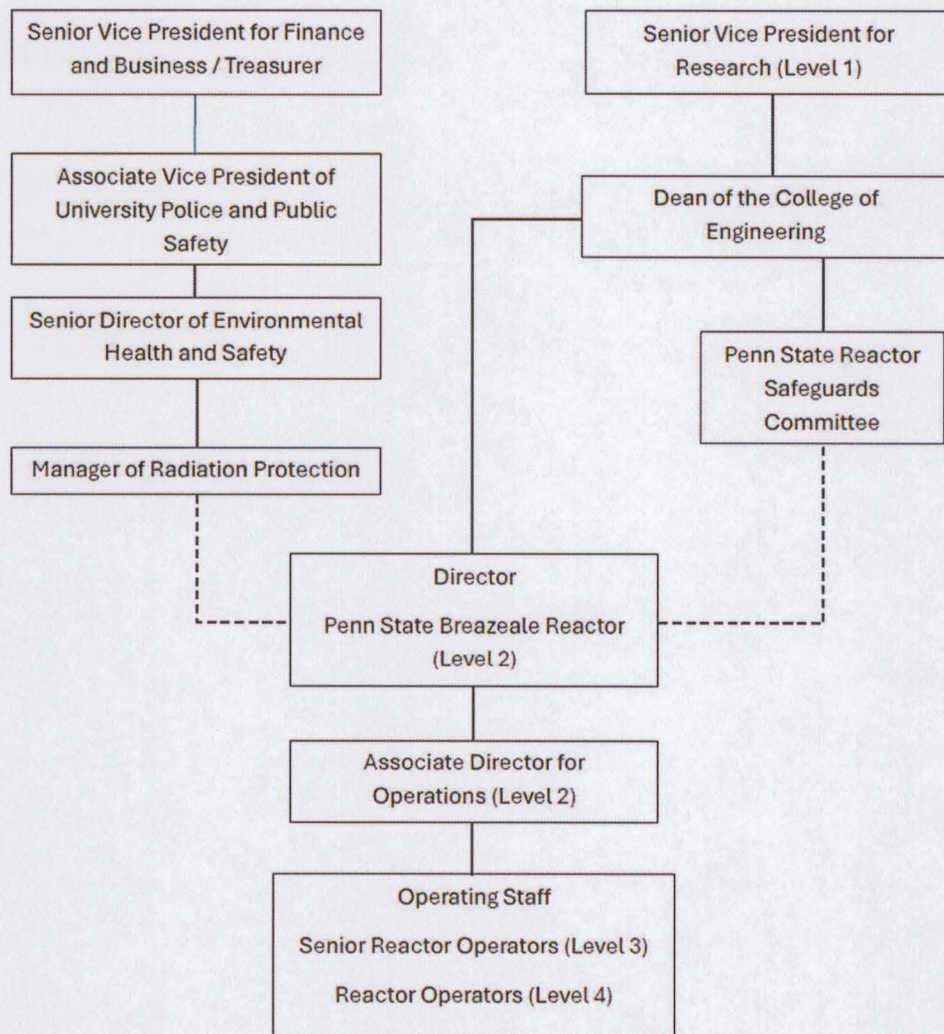
The Manager of Radiation Protection reports through the Senior Director of Environmental Health and Safety ~~and, the assistant Vice President for Safety and Environmental Services, and the Associate Vice President of University Police and Public Safety, and~~ to the Senior Vice President for Finance and Business/Treasurer. The qualifications for the Manager of Radiation Protection position are the equivalent of a graduate degree in radiation protection, 3 to 5 years experience with a broad byproduct material license, and certification by The American Board of Health Physics or eligibility for certification.

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ORGANIZATION CHART



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