



DEPARTMENT OF VETERANS AFFAIRS
4101 Woolworth Avenue
Omaha NE 68105

November 24, 1999

In Reply Refer To:

- Alexander Adams, Jr.
Senior Project Manager
US Nuclear Regulatory Commission
Mailstop 0-11-B-20
One White Flint North
11555 Rockville Pike
Rockville, Md 20852-2738

Re: Docket 50 - 131

Dear Al:

Enclosed you will find two copies of the addition information requested for the renewal of our Facility Operating License R-57. The original has been sent to the Document Control Desk.

It is my hope that I have adequately addressed the questions and comments outlined in your August 2, 1999 letter. The documents herein have also been revised based on telephone conversations during the fall of this year.

The Emergency Plan and Requalification Plan are enclosed as complete documents. There were numerous changes and additions to both. For purposes of clarity, I have included four attachments to this letter. Attachment #1 contains itemized answers to questions. Attachment #2 contains the Requalification Plan as a complete document. Attachment #3 contains the Emergency Plan as a complete document. In Attachment #4 we are providing an additional copy of the Emergency Plan that is formatted to denote corrections i.e. the deletions are strikethrough, additions are underlined and the changes are also noted with a vertical bar on the right side to the page. A detailed summary of justifications for each change will also be provided.

Sincerely,

A handwritten signature in cursive script, reading "John P. Claassen", is positioned below the word "Sincerely,".

John P. Claassen
Reactor Manager

Enclosures:

Reply to questions (Attachment #1)
Requalification Plan (Attachment #2)
Emergency Plan (Attachment #3)
Emergency Plan – edit formatted (Attachment #4)

Attachment #1

Emergency Plan Answers to Questions

1. The facility's schedule is based upon a standard work week e.g. Monday through Friday from 8am to 4:30pm. However, there may be occasional instances when it will be necessary to operate outside this scheme. This information has been provided in the Introduction section (page 3).
2. The figures have been renumbered and referenced appropriately. Figure 1 displays how the reactor is connected to the Medical Center. Additional detail has been added to Figures 1 and 2. A supplementary figure 4 has been added to indicate where the Emergency Support Center, operation rooms, decontamination room, and x-ray suite are located.
3. Currently the staff at our facility is composed of a Reactor Manager and a SRO trainee. Since our facility has a relatively small program some duties may need to be performed by one individual. This information has been provided in the Introduction section (page 3).
4. The event of "Fire" for the NOUE has been changed to "Fire within the operations boundary lasting longer than 10 minutes". Emergency action levels for damaged fuel are based on noble gas release and radiation dose levels that may occur as a result. Section 5.1.1.2 and 5.2.1.2 provide levels for declaration of NOUE and Alert level emergencies respectively. These values are based on effluent concentration and personal exposure. In addition, Section 5.1.4 will state that a NOUE will be declared for "Fuel damage that could release radionuclides to confinement or containment at levels specified in 5.1.1.2".
5. Emergency equipment is maintained in the Emergency Cart just outside exit S1 (refer to Figure 2). Section 8.5.1 states that an inventory of the emergency cart contents (items listed in Sections 8.5.2.(1-18) is conducted every six months. Section 8.5.4 states that "The portable health physics instruments and dosimeters in the emergency cart will be inspected and checked for operability quarterly and calibrated annually". Section 7.2.3.4 has been added to state that "All radiation area survey and Continuous air monitors will be calibrated on an annual basis".
6. The Emergency Plan is reviewed every two years via an audit instigated by the Reactor Safeguards Committee. Letters of support will be provided in Appendix B of the Emergency Plan. The letters of support will be updated every 2 years not to exceed 2.5 years. Section 10.1.2 has been modified to provide additional clarity toward this end.

Operator Requalification Plan Questions

7. Section 2.4 has been modified so that the written examinations are to be given on a two-year cycle.
8. Section 2.4 has been clarified to specifically mention an annual operating exam. Sections 2.4. (1-12) have been added to describe the applicable topics of the operating exam with reference made to 10 CFR 55.45(a)(2-13).
9. Reference to Reactor Supervisor (RS) exception has been incorporated into a single Section 2.6. The section has been revised to state that exception for RS will be allowed only when the RS gives the exam. It also specifies that the RS is required to take the examinations on alternate iterations of the exams.
10. The Requalification Program has been included as a complete document. All typos have been corrected.

Attachment #2