



Licensing Issues at Washington State University

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History

- March 9, 1961: First criticality as Materials Test Reactor
- 1967: Converted to TRIGA fuel
- 1976: Converted to HEU/LEU
- 2008: Reactor converted to entirely LEU fuel

WSU: HEU to LEU Conversion

- Conversion SAR submitted August, 2007
- RAI resolution conducted during 2008
- Conversion milestone met September, 2008

Conversion SAR

The following were updated as part of the HEU to LEU conversion:

- Reactor Description (Ch. 4)
- Accident Analysis (Ch. 13)
- Technical Specifications (Ch. 14)

The License Renewal Process

- WSU submitted Safety Analysis Report (SAR) consistent with NUREG-1537 on June 24, 2002
- WSU 2002 SAR was four years in preparation
- Essentially stalled since 2002

NUREG-1537

- NUREG-1537 Parts I & II is a *very* thorough guidance document
 - Part I = 521 pages
 - Part II = 348 pages
 - Total = 869 pages
- Treats license renewals as new applications: requires a complete rewrite of SAR

SECY-08-161

- Four issues contributing to license renewal backlog
 - Historic NRC staffing and emergent issues
 - Limited licensee resources
 - Poor existing license infrastructure
 - Regulatory requirements and broad scope of the license renewal process

SECY-09-0095

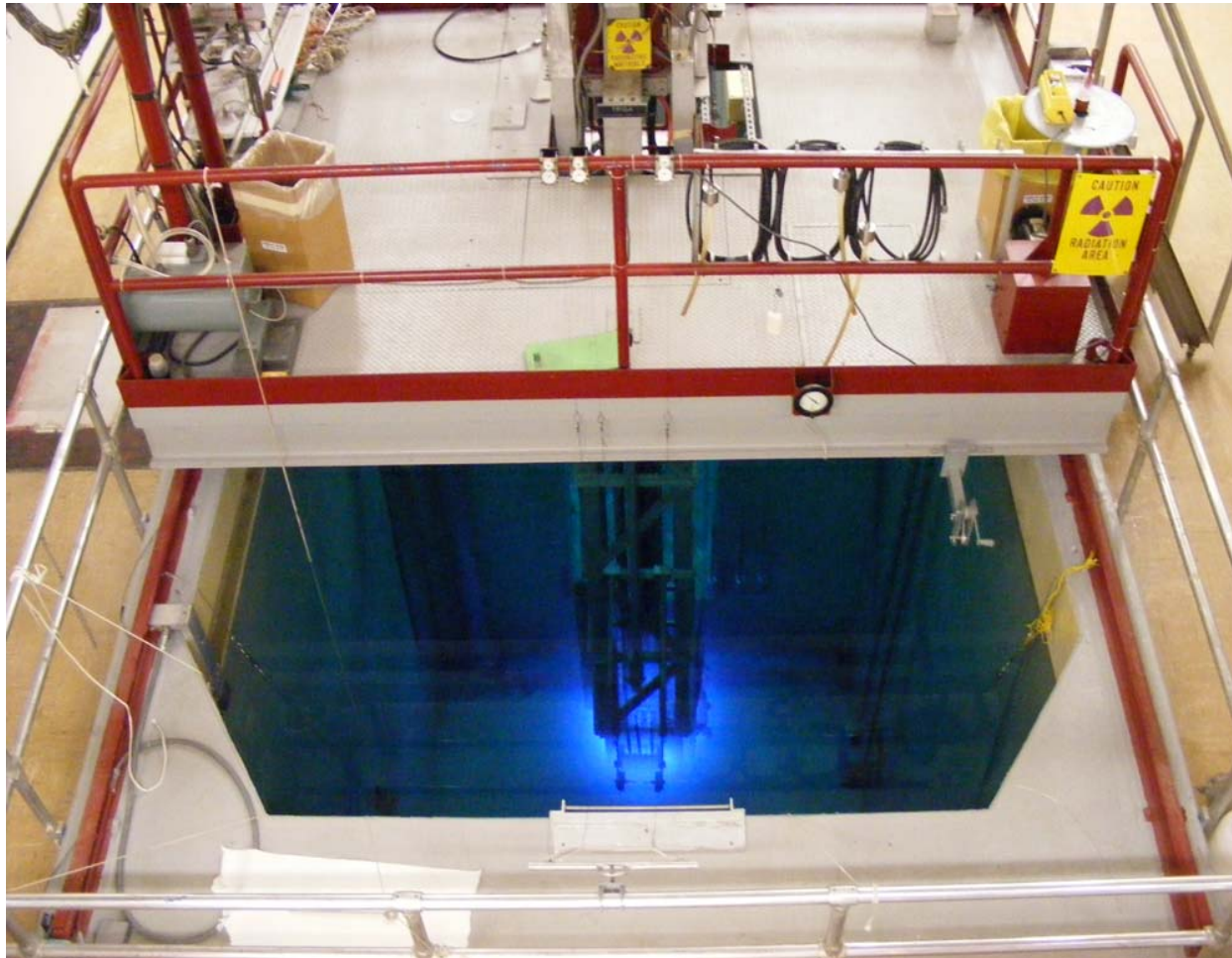
- Describes a graded approach with criterion level set at 2 MW(t)
- For less than 2 MW(t) Interim Staff Guidance (ISG) is focused on
 - Reactor design and operation
 - Accident analysis
 - Technical specifications

Focused Review

From WSU's perspective, the pertinent information has already been submitted and a Focused Review, in accordance with SECY-09-0095 should center on:

- Reactor Description
- Accident Analysis
- Technical Specifications

48 Years of Safe Operation



Conclusions

- 48 years of safe operation suggests that ISG in SECY-09-0095 is appropriate
- WSU supports:
 - Focused Review process for RTR less than 2 MW(t)
 - Decoupling NUREG-1537 formatted SAR from license renewal