

IOWA STATE UNIVERSITY
OF SCIENCE AND TECHNOLOGY

College of Engineering
Department of Mechanical Engineering
2025 H. M. Black Engineering Building
Ames, Iowa 50011-2161
515 294-1423
FAX 515 294-3261
<http://www.eng.iastate.edu/me>

Docket No. 50-116

January 31, 2000

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Request for License Amendment - Update of Technical Specifications for the
Iowa State University Reactor Facility

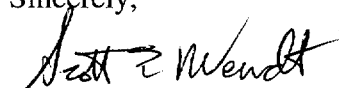
Dear Sir:

The technical specifications for the UTR-10 reactor facility are being updated to reflect the change in the facility's status resulting from the removal of the fuel from the site.

Enclosed please find an explanation for the updates and three copies of the modified text of the technical specifications.

Questions may be directed to me during normal working hours at (515) 294-0539.

Sincerely,



Scott E. Wendt
Reactor Manager

Enclosure

c: (without enclosures)

A.F. Rohach, Chm., Reactor Use Committee
A.D. Inyang, Dir., Environmental Health & Safety
D.B. Bullen, Facility Director, Chm., Radiation Safety Committee
W.R. DeVries, Chm., Mechanical Engineering Department

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CHANGES TO SECTIONS 3.6, 3.7, 4.6, 6.1, 6.2, & 6.3 OF THE TECHNICAL SPECIFICATIONS

General Background

The area radiation monitors and emergency power system were required during fuel transfer operations and to monitor the fuel storage area. The air particulate monitor was required to monitor for release of fission products during fuel transfer operations.

Now that all of the reactor fuel has been removed from the site, it is proposed that these requirements be deleted from the Technical Specifications.

The proposed changes will allow the reactor staff to stop maintaining these systems.

All special nuclear material remaining on the ISU campus has been transferred to the university's broad scope license administered by the State of Iowa. Therefore, it is requested that we no longer be responsible for maintaining an Operator Requalification Program, Emergency Plan and Security Plan.

PAGES EFFECTED BY AMENDMENT

Page 3-6

Emergency Power - Delete material and replace with the "not applicable" statement.

Page 3-7

Radiation Monitoring Systems and Effluents - Delete references to area monitors and air particulate monitor.

Move Table 3-3 from 3-8 to 3-7 and delete references to area monitors and air particulate monitor. Delete footnote (a).

Page 3-8

Radiation Monitoring Systems and Effluents (continued) - Delete page.

Page 4-6

Delete material and replace with the "not applicable" statement.

Pages 6-1 & 6-2

Delete references to fuel transfer operations in section 6.1.3. Delete the paragraph in section 6.1.4 and add "not applicable" statement.

Page 6-4

Delete items (2) and (4) in section 6.2.4.

Page 6-5

Delete items (1) and (5) and delete references to irradiation and experiments in item (4).

UTR-10 Technical Specifications

Affected Pages - **ONLY**

3.0 LIMITING CONDITIONS FOR OPERATIONS (Continued)

3.6 Emergency Power

3.6.1 Applicability

These specifications are not applicable.

The UTR-10 reactor has been permanently de-fueled, is in possession only license (POL) status and the fuel has been removed from the site.

Reactor operations are not authorized.

3.0 LIMITING CONDITIONS FOR OPERATIONS (Continued)

3.7 Radiation Monitoring Systems and Effluents

3.7.1 Applicability

These specifications apply to the radiation monitoring systems.

3.7.2 Objective

To specify the minimum number of acceptable components or the lowest acceptable level of performance for the radiation monitoring systems

3.7.3 Specifications

- A. The radiation monitoring channels and components shall be operable in accordance with Table 3-3, including the minimum number of channels or components, and their setpoints.

3.7.4 Bases

Specification A provides assurance that the required radiation monitors are operable.

- The doorway radiation monitor serves as a frisker to detect abnormal levels of radiation when a person passes the detector. The increasing aural signal alerts the reactor operator and the affected individual that further assessment must be initiated.
- The radiation film badge (or its equivalent) provides radiation dose information at the perimeter wall of the reactor room and serves as a control for the film badges used by personnel in the restricted area.

Table 3-3. Required Radiation Monitoring Channels or Components.

Channel	Setpoint	Min. Operable	Function
Doorway monitor	--	1	Warn of abnormal radiation level.
Environmental film	--	1	Integrated dose in restricted area.

4.0 SURVEILLANCE REQUIREMENTS (Continued)

4.6 Emergency Power

4.6.1 Applicability

These specifications are not applicable.

The UTR-10 reactor has been permanently de-fueled and the fuel has been removed from the site. The reactor is in possession only license (POL) status.

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

6.1.1 Structure

The organization for the management of the reactor facility shall be structured as indicated in Figure 6-1. Job titles are shown for illustration and may vary. Levels of authority indicated divide responsibility as follows:

- Level 1: Responsible for the facility license and site administration.
- Level 2: Responsible for the reactor facility operation and management.
- Level 3: Responsible for daily operations.

The Reactor Use Committee is appointed by, and shall report to the University Radiation Safety Committee. Radiation safety personnel shall report to Level 2 or higher through an independent organizational channel.

6.1.2 Responsibility

The Facility Director shall be responsible for the facility license and site administration. The dean, College of Engineering, shall appoint persons, qualified in accordance with paragraph 6.1.4, to the Facility Director and Reactor Manager positions.

Individuals at the various management levels shown in Figure 6-1, in addition to having responsibility for the policies and operation of the 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 the Technical Specifications.

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

6.1.3 Staffing

- (1) Events requiring the presence of a health physics-qualified individual:
 - a. Any activity that involves removal of a shield plug or closure.
 - b. Any activity that could cause an abnormal release of radioactive materials.

6.1.4 Selection and Training of Personnel

This section no longer applies since the reactor is permanently shutdown and the fuel has been removed from the site.

6.0 ADMINISTRATIVE CONTROLS (Continued)

6.2.3 Review Function

The following items shall be reviewed

- (1) Determinations that proposed changes in equipment, systems, tests, or procedures do not involve an unreviewed safety question.
- (2) All new procedures and major revisions thereto having safety significance and proposed changes in reactor facility equipment, or systems having safety significance.
- (3) Proposed changes in the Technical Specifications or the Operating License.
- (4) Violations of the Technical Specifications or the Operating License. Violations of internal procedures or instructions having safety significance.
- (5) Reportable occurrences listed in 6.6.2.
- (6) Audit reports.

6.2.4 Audit Function

The audit function shall include selective (but comprehensive) examination of operating records, logs, and other documents. Discussions with cognizant personnel and observation of operations should also be used as appropriate. In no case shall the individual immediately responsible for the area, audit in that area. Deficiencies uncovered that affect reactor safety shall be reported immediately to the University Radiation Safety Committee. A written report of the findings of the audit shall be submitted to the Reactor Use Committee within 30 days after completion of the audit. The following items shall be audited.

- (1) Facility operations for conformance to the Technical Specifications and applicable Operating License conditions, at least once per calendar year (interval between audits not to exceed 15 months).
- (2) The results of action taken to correct those deficiencies that may occur in the reactor facility equipment, systems, structures, or methods of operations that affect safety, at least once per calendar year (interval between audits not to exceed 15 months).

6.3 Procedures

Written procedures shall be prepared, reviewed and approved prior to initiating any of the activities listed in this section. The procedures shall be reviewed by the Reactor Use Committee (see 6.2.3) and approved by the Reactor Manager or a designated alternate. These reviews and approvals shall be documented in a timely manner. Substantive changes to the procedures shall be made effective only after documented review by the Reactor Use Committee and approval by the Reactor Manager or a designated alternate. Minor modifications to the original procedure which do not change their original intent may be made, but the modification must be approved by the Reactor Manager or a designated alternate within 14 days. Temporary deviations from the procedures may be made by the on-duty SRO in order to deal with special or unusual circumstances or conditions. Such deviations shall be documented and reported to the Reactor Manager or a designated alternate. Several of the following activities may be included in a single manual or set of procedures or divided among various manuals or procedures:

- (1) Surveillance tests and calibrations required by the Technical Specifications or those that may have an effect on safety.
- (2) Personnel radiation protection consistent with applicable regulations.
- (3) Administrative controls for operations and maintenance that could affect safety.