

August 19, 2003

Dr. Wade J. Richards, Chair
ANS 15 Subcommittee on Operation
of Research Reactors
UCD/MNRC
5335 Price Avenue
Building 258
McClellan, CA 95652

SUBJECT: REVIEW OF ANS-15.21, "FORMAT AND CONTENT FOR SAFETY ANALYSIS
REPORTS FOR RESEARCH REACTORS"

Dear Dr. Richards:

As requested by the ANS-15 Standards Committee, I have performed a maintenance review of ANSI/ANS-15.21-1996, "Format and Content for Safety Analysis Reports for Research Reactors." The results of the review is that it is not necessary at this time to revise the standard. I recommend that the standard be reaffirmed. Please find attached a list of comments for consideration in the future when the standard is revised.

If you have any questions concerning the review, please contact me at 301-415-1127.

Sincerely,

/RA/

Alexander Adams, Jr., Senior Project Manager
Research and Test Reactors Section
New, Research and Test Reactors Program (RNRP)
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

cc: Please see next page

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RESEARCH AND TEST REACTORS SECTION COMMENTS ON
ANSI/ANS-15.21.1996
FORMAT AND CONTENT FOR SAFETY ANALYSIS
REPORTS FOR RESEARCH REACTORS

The standard and appendixes with the exception of Appendix B were reviewed. Where a suggestion is made about adding information to the SAR, the same information should be added to the headings in Appendix A.

1. Section 1.3.9. Consider adding a statement that references should be available for reviewers.
2. Section 2.1. Consider adding to this Chapter of the SAR information on similar facilities. Also consider adding information on shared facilities between the reactor and other users.
3. Section 2.4, Thermal and Hydraulic Design. The last sentence states that "The descriptions can provide the technical basis for parameter limits in governance documents." This is true for almost every section of the SAR and is discussed in Section 1.3.13. It is not clear why it is repeated for this section.
4. Section 2.5, second paragraph. There is reference made to anticipated operational occurrences. Anticipated operational occurrences should be considered throughout the SAR and not just here. Consider adding a statement to the Introduction section of the standard.
5. Section 2.5, Primary Cooling. Consideration should also be given to embrittlement of the reactor vessel if the reactor has one (this could also be discussed in Chapter 4).
6. Section 2.5, Secondary Cooling. The impact of heat exchanger failure should be discussed.
7. Section 2.7. Consider adding information on the I&C aspects of the fixed radiation monitoring systems.
8. Section 2.9. Consider adding to this section of the SAR a discussion of laboratories and their uses if within the scope of the license or charter.
9. Section 2.10. Consider adding to this section of the SAR a discussion on the process for review and approval of experiments.
10. Section 2.11. Consider adding to this section for the SAR information on material possession limits.
11. Section 2.12, Operating Procedures. Consider adding to this section of the SAR information on revision of procedures and deviation from procedures.
12. Section 2.16. Consider adding information to the SAR on the cost of decommissioning.
13. Section 3. Review and update references as needed.
14. Appendix C, Section 6. Consider adding internal missiles and pipe whip to this section.