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E910-03-038
September 30, 2003

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

Gentlemen:

Subject: Saxton Nuclear Experimental Corporation Facility (SNEC)
Operating License No. DPR-4
Docket No. 50-146
Technical Specification Change Request No. 62, Rev. 2

Based on recent discussions with your staff GPU Nuclear believes it is necessary to clarify our intention with respect removal of the SNEC Facility Decommissioning Support Facility (DSF).

Technical Specification Change Request (TSCR) No. 62 was developed to reflect the site conditions that would exist following decontamination and NRC acceptance of the Final Status Survey of the SNEC Facility Containment Vessel (CV). At this point the NRC could issue a license amendment that would remove the term "exclusion area" and any associated specifications from the License. As discussed in TSCR 62 removal of some portions of the DSF may also be required to remove the upper CV dome.

During planning of CV upper dome removal it became obvious that it will be necessary to remove the DSF to provide access to the CV Dome for welding lifting attachments to the dome and for set up of the crane needed to lift the dome. Based on GPU Nuclear's review of the Technical Specifications we believe removal of the DSF can proceed prior to approval of the TSCR.

SNEC Technical Specifications require the establishment of an Exclusion Area. As discussed in Technical Specification Change Request No. 62 the reason behind the establishment of an Exclusion Area is to prevent members of the public from inadvertent exposure to radiation in excess of 0.002 rem per hour.

The Exclusion Area Boundary at the Saxton Nuclear Experimental Corporation (SNEC) Facility is defined in Technical Specification Figure 1 to consist as a minimum of the Reactor Containment Vessel and may extend to the SNEC outer security fence.

Technical Specification Section 1.0.5 defines the Exclusion Area as the area controlled for the purpose of security and access restrictions. Based on these requirements SNEC is given the flexibility to define which areas of the facility need to be controlled from an Exclusion Area standpoint.

Sections 1.1.3.2 and 1.1.3.3 specify Exclusion Area Controls for the Containment Vessel (CV) and the Decommissioning Support Facility (DSF).

This establishes an inherent conflict in that if the Exclusion Area is defined as the CV then there is no need for Exclusion Area Controls on the DSF except that specific Exclusion Area Controls are identified for the DSF in the Technical Specifications.

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It is SNEC's position that if the Exclusion Area is defined as the CV then the Exclusion Area Controls specified for the DSF are not required as the underlying purpose of this requirement, prevention of inadvertent exposure to radiation, is still being accomplished.

Similarly Sections 2.1.1 and 2.1.2 refer to a CV/DSB (i.e. Decommissioning Support Building, a portion of the DSF) Ventilation System. As described The SNEC Facility Updated Safety Analysis Report (USAR) this system ventilates the DSB via an opening to the CV. Removal of the DSF would not degrade the ability to ventilate the CV. However as committed in TSCR 62 the DSF would not be removed until activities involving the packaging of radioactive materials that could cause a measurable release as defined in the Technical Specifications have been completed.

Thus based on the above it is GPU Nuclear's intention to remove the DSF following completion of:

1. Any activities involving the packaging of radioactive materials in the DSF that could cause a measurable release as defined in the Technical Specifications, and
2. Moving the exclusion area alarm from the DSF to the door between the CV and the DSF.

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

Executed on

09/30/03

Sincerely,



G. A. Kuehn Jr.

Vice President, SNEC

cc: Administrator, NRC Region I - Hubert J. Miller
NRC Project Manager, NRR - Alexander X. Adams
NRC Project Scientist, Region I - Thomas F. Dragoun
Chairman, Board of Supervisors, Liberty Township
Chairman, Board of County Commissioners, Bedford County
Director, Bureau of Radiation Protection, PA Department of Environmental Protection