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

RE: University of Washington - Request for Additional Information #2, Docket No. 50-139 (TAC NO. MC5097)

Sirs:

This document is a response to a letter of request for additional information from Alexander Adams, dated September 12, 2005. This additional information relates to the University of Washington's (UW) request to use 10 CFR 50.59 type modifications in the decommissioning of the UW Research Reactor. Questions posed by Mr. Adams are italicized below, and our response follows each of the numbered questions:

Request for Additional Information
University of Washington Research Reactor
Docket No. 50-139

1. *In section (c)(1) of your proposed change process for the University of Washington (UW) Decommissioning Plan (DP), for changes in the facility and in procedures described in the DP, reference is made to the DP and not the DP (as updated). Please explain why an updated DP is not referenced for changes in the facility or in procedures or amend your proposed wording to reference the DP as amended.*

This was an oversight, and section (c)(1) of our proposed change should be corrected to read:

"(c)(1) The University may make changes in the facility as described in the Decommissioning Plan (as updated), make changes in the procedures as described in the Decommissioning Plan (as updated), and conduct tests or experiments not described in the Decommissioning Plan (as updated) without obtaining Commission approval only if:"

It was noted during our review of the proposed change request document, that our previous submittal also failed to include the words "as updated" in section (a)(4). That section should be corrected to read:

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"(a)(4) Decommissioning plan (as updated) means the Decommissioning Plan submitted and approved by the Commission as amended and supplemented, and as updated per the requirements of Sec. 50.71, as applicable."

2. *In section (c)(1)(ii) of your proposed change process you only refer to making changes and not tests or experiment. Please explain why (c)(1)(ii) only refers to changes when (c)(1) refers to changes, tests and experiments or amend your proposed wording to include tests and experiments.*

This was also an oversight, and section (c)(1)(ii) of our proposed change should be corrected to read:

"(c)(1)(ii) The change, test, or experiment does not meet any of the criteria in paragraph (c)(2) of this section."

3. *In section (2) there appears to be a typographical error in that the phrase "if the change" appears twice. Is this a typographical error? If so, please correct.*

This is a typographical error and section (c)(2) should be corrected to read:

"(c)(2) The University shall obtain Commission approval prior to implementing a proposed change, test, or experiment if the change, test, or experiment would:"

4. *When comparing section (2) of your proposed change process with the corresponding 10 CFR 50.59 section [50.59 (c)(2)] subsections (v), (vi), (vii), and (viii) do not appear in your proposed wording. Please explain why these subsections are not needed or propose corresponding subsections appropriately modified to be applicable to changes in your DP.*

The University of Washington would like to include an appropriately modified subsection (v) and subsection (viii) in the proposed change. However, subsections (vi) and (vii) are not needed for the reasons discussed below.

Section (c)(2)(v) should be added to read:

"(c)(2)(v) Create a possibility for an accident of a different type than any previously evaluated in the Decommissioning Plan (as updated)."

Section (c)(2)(viii) should be added to read:

"(c)(2)(viii) Result in a departure from a method of evaluation described in the Decommissioning Plan (as updated) used in establishing the design bases or in the safety analysis."

The reactor is permanently shut down. Section (c)(2)(vi) is not needed because the Decommissioning Plan (as updated) does not discuss or evaluate any SCC important to safety.

Since the reactor's fuel has been removed and transferred following permanent shut down of the reactor, fission products contained in reactor fuel are not an issue. Section (c)(2)(vii) is not needed because the Decommissioning Plan (as updated) does not discuss or evaluate the design basis limits for fission product barriers.

5. *You have proposed that certain sections of the DP not be subject to your proposed change process. Section 1.3.1 and 2.1 discuss the decommissioning alternative selected, DECON. The decommissioning alternative is one of the fundamental decisions made in facility decommissioning from which many other details of the DP are based. Please propose making these sections not subject to your proposed change process or explain why these two sections should be subject to the change process.*

The University proposes making these sections not subject to the proposed change process. Therefore, section 1.3.1 and 2.1 should be added to the list of exempt sections.

If you have any further questions, please contact me.

I declare under penalty of perjury that the forgoing is true and correct,



Stanley J. Addison
UW Radiation Safety Officer

cc:

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