



Nuclear Reactor Facility
1870 Miner Circle
Rolla, MO 65409-0630
Phone: 573.341.4236
Fax: 573.341.4237
reactor@umr.edu

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U.S. Nuclear Regulatory Commission
Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Response to TAC NO. MD 5976, University of Missouri – Rolla Reactor Facility, license 79, docket 50-123.

Mr. Marvin Mendonca:

The University of Missouri – Rolla Reactor (UMRR) Facility is responding to a request for additional information regarding changes to Technical Specification 6.3 “Operating Procedures”, TAC NO. MD5976. The Nuclear Regulatory Commission has asked UMRR to clarify whether the minor modifications need to be approved by Level 2 (Reactor Facility Director) and time to be approved after they are modified by the Facility Manager.

The proposed amendment to Technical Specification 6.3 “Operating Procedures” asked for a change from Facility Director to Facility Manager for approving minor changes in the UMRR Standard Operating Procedures. The last paragraph of Technical Specification 6.3 is “Substantive changes to the approved procedures shall be made only with the approval of the Radiation Safety Committee. Changes that do not change the original intent of the procedures may be made with the approval of the Facility Director.” UMRR would like to replace the last paragraph of Technical Specification 6.3 with the following paragraph:

“Substantive changes to the approved procedures shall be made only with the approval of the Radiation Safety Committee and approval by the Facility Director (Level 2) or designated alternates. Minor modifications to the original procedures which do not change their original intent may be made by the Facility Manager (Level 3) or higher but the modifications must be approved by the Facility Director (Level 2) or designated alternates within 14 days.”

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This paragraph clarifies the Facility Director (Level 2) or designated alternatives approve changes to procedures and a time limit of fourteen days for approval of modifications. The UMR Radiation Safety Committee, as required by Technical Specification 6.2.3(3), has reviewed and approved the proposed amendment to Technical Specification 6.3.

Technical Specification 6.3 "Operating Procedures" is listed as the following:

"The reactor staff shall prepare and utilize written procedures for at least the items listed below. These procedures shall be adequate to ensure the safe operation of the reactor, but should not preclude the use of independent judgment and action should the situation require such.

- (1) startup, operation, and shutdown of the reactor.
- (2) installation or removal of fuel elements, control rods, experiments, and experimental facilities.
- (3) actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected coolant system leaks, and abnormal reactivity changes.
- (4) emergency conditions involving potential or actual release of radioactivity, including provisions for evacuation, re-entry, recovery, and medical support.
- (5) preventive and corrective maintenance operations that could have an effect on reactor safety.
- (6) periodic surveillance (including testing and calibration) of reactor instrumentation and safety systems.
- (7) radiation control procedures which shall be maintained and made available to all operations personnel.
- (8) implantation of emergency and physical security plans.

Substantive changes to the approved procedures shall be made only with the approval of the Radiation Safety Committee. Changes that do not change the original intent of the procedures may be made with the approval of the Facility Director."

The proposed amendment modifies the last paragraph of Technical Specification 6.3 and is listed as the following:

"The reactor staff shall prepare and utilize written procedures for at least the items listed below. These procedures shall be adequate to ensure the safe operation of the reactor, but should not preclude the use of independent judgment and action should the situation require such.

- (1) startup, operation, and shutdown of the reactor.
- (2) installation or removal of fuel elements, control rods, experiments, and experimental facilities.

- (3) actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected coolant system leaks, and abnormal reactivity changes.
- (4) emergency conditions involving potential or actual release of radioactivity, including provisions for evacuation, re-entry, recovery, and medical support.
- (5) preventive and corrective maintenance operations that could have an effect on reactor safety.
- (6) periodic surveillance (including testing and calibration) of reactor instrumentation and safety systems.
- (7) radiation control procedures which shall be maintained and made available to all operations personnel.
- (8) implantation of emergency and physical security plans.

Substantive changes to the approved procedures shall be made only with the approval of the Radiation Safety Committee and approval by the Facility Director (Level 2) or designated alternates. Minor modifications to the original procedures which do not change their original intent may be made by the Facility Manager (Level 3) or higher but the modifications must be approved by the Facility Director (Level 2) or designated alternates within 14 days."

The UMRR Facility respectfully requests the Nuclear Regulatory Commission to review and approve the proposed amendment to Technical Specifications 6.3. Please contact me at 573-341-4384 or webonzer@umr.edu for further information or discussion regarding these proposed revisions.

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

William Bonzer

Executed on

August 23, 2007

Sincerely,

William E. Bonzer

William Bonzer
UMRR Manager

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Cc: Mr. Marvin Mendonca
Dr. Samuel Frimpong
Dr. Arvind Kumar
Dr. Mark Fitch
NRC region III