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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Docket: 50-288
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Enclosed is the response for the request for additional information dated June 25, 2015.

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

Executed on

7/10/15

Melinda Krahenbuhl, Ph.D.
Director, Reed Research Reactor

A020
NRK

Response to the request for additional information
Dated June 25, 2015

1. The requested TS amendment proposes to eliminate the position described in the current RRR TS 6.1.2, Specification b., of "Associate Director" as a Level 2, and adds a position of "Reactor Operations Manager" as a Level 3. The guidance in NUREG -1537, Guidelines for preparing and reviewing applications for the licensing of Non-Power Reactors, "Part 1, Appendix 14.1, Format and Content of Technical Specifications," states in part, that the organizational functions, assignments, and responsibilities should be stated. Provide an explanation, justification and/or basis for the elimination of Level 2 position and the creation of a Level 3 position, or justify why no response is necessary.

RRR response

Both the current and proposed administrative structures are consistent with the guidance in NUREG -1537, Guidelines for preparing and reviewing applications for the licensing of Non-Power Reactors, "Part 1, Appendix 14.1, Format and Content of Technical Specifications, and ANSI/ANS 15.4 2007.

During 2013, Reed College's Human Resources embarked on staff function review that included a questionnaire. The data from the questionnaire was used to update job descriptions, and evaluate the job for appropriate classification based duties and compensation. This data was compared to similar businesses and institutions. As a result of the review, Reed Colleges Human Resources identified that the title Associate Director was inconsistent with the duties and compensation of similar positions at peer institutions. The compensation and duties expected, specifically day-to-day operations were consistent with those of a Manager. Additionally, these duties were more aligned with Level 3 in NUREG-1537 and ANSI/ANS 15.4. Therefore, the position was renamed to convey the actual duties, responsibilities and compensation of the position.

2. The current RRR TS 6.1.2, Specification b, states in part, "The Associate Director Reports to the Director, and is responsible for guidance, oversight and technical support of reactor operations." The requested amendment removes the responsibility for guidance, oversight and technical support of reactor operations." The guidance in NUREG -1537, Guidelines for preparing and reviewing applications for the licensing of Non-Power Reactors, "Part 1, Appendix 14.1, Format and Content of Technical Specifications," states in part, that the organizational functions, assignments, and responsibilities should be stated. Explain why these responsibilities are being removed from the TSs, the basis for this change, if these responsibilities are maintained in RRR technical or administrative procedures, or justify why no response is necessary.

RRR response

The proposed language does not remove any responsibilities from the reactor operations manager. The proposed language is:

“Reactor Operations Manager and Supervisor(s) (Level 3): The Reactor Operations Manager reports to the Director and is responsible for directing the activities of the reactor staff and for the day-to-day operation and maintenance of the reactor. “ This language was chosen to clearly state an over-arching responsibility that implicitly includes guidance, technical support and oversight of the reactor.