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US Nuclear Regulatory Commission  
Document Control Desk  
Washington DC 20555-0001  
Attention: Michael Balazik, Senior Project Manager

**Re: Docket 50-326 R-116 License**

Dear Mr. Balazik:

The University of California Irvine hereby requests that a small revision be made to the proposed Technical Specifications for the referenced facility. This is proposed as a clarification and is a result of recent review and discussion with NRC personnel. Section 5.4 of our most recent version, dated 4-22-2016, currently reads as follows:

**5.4 Fuel Storage**

**Specification(s).**

- a. All fuel elements shall be stored in a geometrical array where the  $k_{eff}$  is less than 0.80 for all conditions of moderation and reflection.
- b. Irradiated fuel elements and fueled devices shall be stored in an array which will permit sufficient natural convection cooling by water or air such that the fuel element or fueled device temperature will not exceed 80°C.
- c. Fuel showing evidence of damage (see Technical Specification 3.1.6) shall be stored separately from fuel not suspected to be damaged, and shall be checked for fission product leakage.

**Basis.** These specifications establish a sufficient reactivity margin to guard against accidental criticality of elements in storage, and that heat dissipation does not create excess corrosion or other problems. Damaged fuel is more likely to have or develop fission product leakage and so must be monitored and kept separately.

The new proposal is to read as follows and constitutes the only revision in an updated version dated 5-13-2016.

AD2D  
NRR

#### 5.4 Fuel Storage

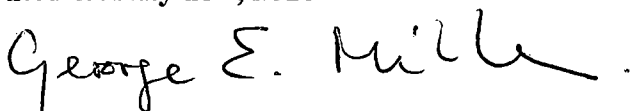
Specification(s).

- a. All fuel elements and fueled devices shall be stored in a geometrical array where the  $k_{\text{eff}}$  is less than 0.80 for all conditions of moderation and reflection.
- b. Irradiated fuel elements and fueled devices shall be stored in an array which will permit sufficient natural convection cooling by water or air such that the fuel element or fueled device temperature will not exceed design limits.
- c. Fuel elements or fueled devices showing evidence of damage (see Technical Specification 3.1.6) shall be stored separately from fueled items not suspected to be damaged, and shall be checked for fission product leakage.

Basis. These specifications establish a sufficient reactivity margin to guard against accidental criticality of fuel elements or fueled devices in storage, and that heat dissipation does not create excess corrosion or other problems. Damaged items containing fuel are more likely to have or develop fission product leakage and so must be monitored and kept separately.

**I declare under penalty of perjury that the foregoing and the attached are true and correct to my knowledge.**

**Executed on May 13<sup>th</sup>, 2016**

A handwritten signature in black ink that reads "George E. Miller". The signature is written in a cursive, flowing style.

Dr. George E. Miller