



AEROTEST OPERATIONS, INC.

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November 1, 2016

Mr. Spyros Traiforos
Program Manager
Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket 50-228

Dear Mr. Traiforos:

The following is in response to the NRC Generic Letter 2016-01, regarding monitoring of neutron-absorbing materials in spent fuel pools. The NRC requested answers from non-power reactor facilities to three questions.

Question 1: Are neutron-absorbing materials used in a reactor pool, fuel storage pool, or other wet locations designed for the storage of reactor or spent fuel?

Answer 1: No neutron-absorbing materials are currently used in the ARRR reactor pool. We have no separate fuel storage pool or other wet location designed for the storage of reactor or spent fuel. All fuel has been removed from the reactor core assembly and placed in subcritical storage racks (designed to be less than $0.9 k_{eff}$) which do not use any neutron-absorbing material. The TRIGA fuel rods in each rack are made subcritical by the spacing as directed by General Atomics. The boron carbide control rods which were present in the core are not in use but suspended in the pool outside of the core frame assembly. The control rod drives are detached from the control rods and have been removed from the pool.

Question 2: If neutron-absorbing materials are used, is their use credited in the licensing or design basis (i.e., criticality safety analysis) for the storage of reactor fuel or spent fuel in a reactor pool, fuel storage pool, or other wet locations, as applicable?

Answer 2: No neutron absorbing materials are being used.

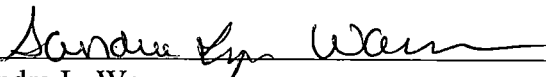
Question 3: If neutron-absorbing materials are credited in the facility licensing or design basis for the storage of reactor or spent fuel in a reactor pool, fuel storage pool, or other wet locations, as applicable, then provide a description of, and technical basis for, any surveillance or monitoring programs used to confirm continued acceptable performance of the neutron-absorbing materials over time.

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NAR

Answer 3: No neutron-absorbing materials are used for storage of fuel, only for in-core use when the core was still assembled. We did not have a surveillance program for the control rods. We removed them individually on 5-1-13 and inspected each one in turn. There was a minor amount of corrosion on the aluminum cladding but they were in very good condition for their 48th year in the pool. We did take photographs at the time for future reference.

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

Executed on November 1, 2016.



Sandra L. Warren
General Manager
Aerotest Operations, Inc.