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Lynchburg Research Center

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September 10, 1981

Mr. James R. Miller, Chief
Standardization & Special Projects Branch
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: License R-47, docket 50-99

Dear Mr. Miller:

The Federal Register of August 19, 1980 announced the implementation of §50.54(r) of 10 CFR Part 50. This regulation requires licensees authorized to possess and operate research reactors of 500Kw or greater to submit emergency plans that assures that adequate action can and will be taken in the event of a radiological emergency. The due date for the plans is November 3, 1981.

My letter to you dated July 23, 1981 requested authority to dismantle the Lynchburg Pool Reactor (LPR) for the purpose of terminating the referenced license. The letter forwarded the plan to be used in carrying out the dismantling operation. Section 5 of the plan states, in part, that it is planned to ship the facility's fuel for reprocessing during December, 1981. The schedule has been revised so that fuel shipment will be completed during November, 1981.

Postulated radiological emergencies at the LPR that are in any way unique to that facility are based on the reactor being fueled. With the fuel removed, such emergencies can be managed in accordance with the emergency plan incorporated in license SNM-778, which covers operations utilizing licensed material at the Lynchburg Research Center. This latter plan was submitted for approval by NRR in connection with the LPR renewal application before our decision was made to seek authority to dismantle. In addition, I do not anticipate the need for operation of the LPR after September, 1981.



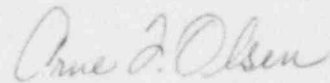
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In consideration of the foregoing, I request that the Lynchburg Research Center be granted an exemption in accordance with 10 CFR 50.12 (a) from the requirements for submittal of a revised emergency plan pursuant to 10 CFR 50.47. Granting this exemption would obviate the need for the Lynchburg Research Center to devote a substantial effort to develop a plan that for all practical purposes will not be implemented until after the facility fuel has been removed.

If you have need for additional information in this regard, please contact me.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Arne F. Olsen".

Arne F. Olsen
Senior License Administrator

AFO:ccf