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Missouri's Technological University

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Nuclear Reactor Facility

Nuclear Reactor
Rolla, MO 65401-0249
Telephone (314) 341-4236

May 31, 1994

Document Control Room
U.S. Nuclear Regulatory Commission
MS 10-D-21
Washington, D.C. 20555

Dear Sirs:

The management of the UMR Reactor Facility respectfully requests a second one-year waiver of our Technical Specifications requirement to perform annual visual control rod inspections (Tech. Spec. 4.2.1(5)). Due to the LEU fuel conversion, our fuel storage pit is now holding the entire inventory (28 elements) of HEU fuel elements. By procedure, we are required to offload several fuel elements from the core prior to disassembling and removing control rods from the core for visual inspection. As our fuel pit is nearly full with the old HEU fuel, we currently have no place to offload our core.

This situation will be remedied when the old HEU fuel is shipped offsite. We plan to complete the HEU offsite shipment within the next year.

Last year, we requested (June 4, 1993) and received a one year extension for the same reason. Control rod visual inspections were last performed on July 16, 1992.

The present control rods have been visually inspected every year for "pitting and cracking" as required by Technical Specifications. No pitting or cracking has ever been detected, and we have every reason to believe that this trend will continue. Furthermore, our reactor typically

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runs about 10 megawatt-hours per year. Consequently, the neutron fluence to the control rods is relatively low - most certainly below that required to produce significant neutron damage to the rods.

The control rod visual inspections will be late as of October 17, 1994; therefore, we ask for resolution of this issue before that date.

Sincerely,



David W. Freeman
UMR Reactor Manager

DWF/lp

copy to: Dr. Albert E. Bolon, UMR Reactor Director
Dr. Lee W. Saperstein, Dean, School of Mines & Metallurgy
Marvin Mendonca, Project Manager, USNRC
Robert Martin, Regional Administrator, Region III, USNRC

Signed before me this 1st day of June, 1994.



Notary Public

SUE HUFHAM
NOTARY PUBLIC STATE OF MISSOURI
PHELPS COUNTY
MY COMMISSION EXP. AUG. 30, 1996