



Rensselaer

Department of Nuclear Engineering & Engineering Physics

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U.S. Nuclear Regulatory Commission
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SUBJECT: REQUEST TO TEMPORARILY CHANGE THE TECHNICAL
SPECIFICATIONS IN OPERATING LICENSE NO. CX-22 -
RENSSELAER POLYTECHNIC INSTITUTE, DOCKET NO. 50-225

1. In order to expedite resolving the current staffing problems at Rensselaer Polytechnic Institute's Reactor Critical Facility (RCF), it will be necessary to operate the RCF reactor with only one licensed operator on duty and none on call. Prior to operating the reactor, several surveillance items must be completed which require the reactor to be in a condition which is not shutdown as defined in the RCF Technical Specification 1.0.0. This will also have to be accomplished with only one licensed operator on duty and none on call. Both of these operations will result in a violation of the current staffing requirements, Technical Specification 6.1.3.a.
2. In order to avoid violating the Technical Specifications, it is proposed that the following temporary changes be made to Technical Specification 6.1.3.a:
 - (1) Delete the following:

6.1.3 Staffing

 - a) The minimal staffing when the reactor is not shutdown as described in these specifications shall be:
 - 1) An operator or senior operator licensed pursuant to 10 CFR 55 be present at the controls.
 - 2) A licensed senior operator shall be present or readily available on call.
 - 3) The identity of and method for rapidly contacting the licensed senior operator on duty shall be known to the operator.

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- (2) Replace the deleted sections with:

6.1.3 Staffing

- a) ² The minimal staffing when the reactor is not shutdown as described in these specifications shall be:
- 1) An operator or senior operator licensed pursuant to 10 CFR 55 be present at the controls.
 - 2) One other person in the control room certified by the Reactor Supervisor as qualified to activate manual scram and initiate emergency procedures. (This requirement will expire on March 2, 1995.)
 - 3) A licensed senior operator shall be present or readily available on call. (Not required prior to March 1, 1995).

Note, these changes will be revoked and the Technical Specifications will revert to their original wording (as of Amendment 9) on March 1, 1995.

3. Justification for this proposed Technical Specification change is as follows:

- (1) *Safety basis for request:*

The second person present in the control room (specified in revised Technical Specification 6.1.3.a.2) shall be an individual who has been determined to be capable of independently identifying an emergency situation and is adequately trained and qualified to initiate a manual scram and carry out emergency procedures. These persons shall include those individuals scheduled to take the SRO examination on Dec. 5, 1994, or the former RCF supervisor, Sean Bucher. Mr. Bucher has had extensive operating experience on the RPI RCF in the last year. However, his license is currently inactive because he has not operated the RCF reactor since May, 1994.

- (2) *Additional compensatory measure:*

Dr. D.R. Harris will be present in the control room while the reactor is operating.

(3) *Duration of the temporary change:*

The duration of this temporary Technical Specification change (until March 1, 1995) will allow continued training and re-examination in the event none of the SRO candidates passes the SRO examination on December 5, 1994.

(4) *Assurance of public and environmental safety:*

With the exception of the Technical Specification changes proposed in this letter, the RCF reactor will be operated in accordance with the currently existing Technical Specifications and SAR. This, in addition to having a second, competent individual in the RCF control room, will ensure that no hazards to the safety of the public or to the environment not addressed in the SAR are present.

(5) This proposal has the approval of the Rensselaer Polytechnic Institute Nuclear Safety Review Board (NSRB).

Sincerely,



Dr. D.R. Harris, Director,
RPI Reactor Critical Facility

cc: Dr. M.Z. Podowski, Chair, NEEP and NSRB
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