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UNITED STATES OF AMERICA

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USMRC

NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before Administrative Judges:

Charles Bechhoefer, Chairman  
Dr. Jerry R. Kline  
Dr. Peter S. Lam

Docket No. 50-160-Ren

In the Matter of

ASLBP No. 95-704-01-Ren

GEORGIA INSTITUTE OF TECHNOLOGY  
RESEARCH REACTOR  
Atlanta, Georgia  
Facility License No. R-97

GEORGIANS AGAINST NUCLEAR ENERGY  
AMENDED PETITION FOR LEAVE TO INTERVENE  
IN CONSIDERATION OF APPLICATION FOR FACILITY LICENSE  
CONVERSION FROM HIGH-ENRICHED URANIUM TO LOW-ENRICHED URANIUM FUEL

Georgians Against Nuclear Energy (GANE) respectfully petitions the Nuclear Regulatory Commission for intervenor status and to hold a public hearing on the issue of Georgia Tech's conversion of the Georgia Tech Research Reactor from the use of high-enriched uranium fuel to the use of low-enriched uranium fuel.

GANE agrees with the regulators' premise that removing weapons-grade high-enriched uranium from various and sundry locations around the country will improve national security and the common defense. GANE acknowledges the wisdom shown by the Commission in establishing the same Atomic Safety and Licensing Board to consider this operational change that is overseeing at least one other current case concerning the Georgia Tech Research Reactor.

GANE represents in this proceeding, Robert Johnson, employed by Greenpeace at 20 13th Street NE, Atlanta, Georgia - less than 1/2 mile

from the Georgia Tech Research Reactor. His standing has been established in the License Renewal proceeding on this docket which GANE has maintained since October 1994.

GANE acknowledges that we consider it responsible on the part of Georgia Tech to follow through on its mandate to convert from high-enriched uranium to low-enriched uranium as a fuel in an effort to make the reactor less of a security risk to Georgia Tech, Home Park residents and Atlanta (population 2.5 million). Further, we are deeply impressed by Georgia Tech's decision to remove all high-enriched fuel elements from the site prior to the Olympics and to begin bringing the low-enriched fuel on-site after the Olympics.

Attached is a copy of the State Attorney General of Georgia's letter dated July 25, 1995. May the record reflect that this supersedes the passage in Safety Evaluation by the Office of Nuclear Reactor Regulation Supporting the Order Modifying Facility Operating License No. R-97 to Convert from High-Enriched to Low-Enriched Uranium Fuel which reads: (2.4 Fuel Storage, p. 4) "The licensee anticipates the possible need to safely possess but not use the HEU fuel after conversion, and has requested the necessary license conditions to permit possession of the irradiated HEU and LEU fuel."

GANE agrees, in general, with the statement on page 4 of the Order Modifying Facility Operating License No. R-97: ". . . the public health and safety and the common defense and security support a conversion of the facility from the use of HEU to LEU fuel."

GANE contends that Georgia Tech is risking the public health and safety in its conversion plan. The optimum method for Georgia Tech to convert its reactor from high-enriched fuel to low-enriched fuel requires a core reconfiguration which costs several million dollars. In lieu of a straight-forward, albeit expensive, approach to conversion, Georgia Tech has submitted various theories and paper proofs that the reactor as currently configured will operate, and operate safely, by inserting extra LEU into the reactor.

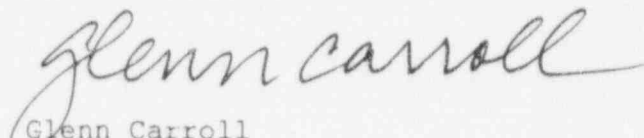
GANE refers you to section 2.15 Reactor Startup Testing on p. 11 of the aforementioned Safety Evaluation which states, "The licensee is to submit a startup report to the NRC on the results of this startup testing. This startup testing will provide verification of key LEU reactor functions, and, therefore, is acceptable."

GANE finds it unacceptable to operate a reactor in the middle of a large population center. To experiment with the reactor's function in the middle of downtown Atlanta is definitely unacceptable. Until the last fuel rod is inserted, how the reactor will operate remains

theory. In that telling moment, there is the possibility of a criticality accident. To impose upon Atlanta an experiment with a critical mass in a 30-year old reactor is unsafe and an unnecessary risk. At the minimum we call on Georgia Tech configure its reactor properly to receive and use the low-enriched uranium fuel.

In our effort to see that the 1996 Olympic Games are not threatened by radiological sabotage, GANE has learned some of the complexities of fuel transportation. GANE encourages Georgia Tech to reconsider its premise of continuing to operate an aged reactor on its campus in downtown Atlanta. As the United States' reactors age (along with the rest of Earth's reactors) nuclear waste handling is going to become more and more of an issue. The reactor at Georgia Tech has clocked only 150 hours of use each year for the past five years. GANE feels that to go through the elaborate and extensive effort to bring the reactor on-line with low-enriched fuel is out of step with the times and current industry needs. We encourage Georgia Tech to document its fuel removal effort and distribute the documentation to other educators. In this way, Georgia Tech can provide much-needed leadership in a long-neglected area of research, nuclear waste. We beg Georgia Tech to reorient its nuclear focus following fuel removal on dry-cask development and other nuclear waste needs that are immediate and pressing.

Respectfully submitted,

A handwritten signature in cursive script that reads "Glenn Carroll".

Glenn Carroll

Representative for GANE

Dated and signed August 21, 1995  
in Decatur, Georgia



MICHAEL J. BOWERS  
ATTORNEY GENERAL

Department of Law  
State of Georgia

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July 25, 1995

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The Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Georgia Institute of Technology  
Georgia Tech Research Reactor

Dear Ms. Cater:

This is to advise the Commission that Georgia Institute of Technology will remove the HEU fuel from its reactor before the start of the Olympics in July 1996 and will not bring LEU fuel to its facility until after the conclusion of the Olympics. The estimated date for removal of the HEU fuel is late January/early February 1996. In any event, there will be no nuclear fuel at the Georgia Tech site during the Olympics.

Should you have any questions concerning the above, please let me know.

Sincerely,

*Patricia Guilday*

PATRICIA GUILDAY  
Assistant Attorney General

PG/me

cc: Randy Nordin  
Sherwin Turk

CERTIFICATE OF SERVICE - Docket No.(s) 50-160-REN

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Secretary  
U.S. Nuclear Regulatory Commission  
Docketing and Service Branch  
Washington, DC 20555

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Office of Commission Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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U.S. Nuclear Regulatory Commission  
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