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October 29, 1996

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-37  
Washington, DC 20555

REFERENCE: Docket 50-186  
University of Missouri Research Reactor  
License R-103

SUBJECT: Technical Specification changes requested pursuant to 10CFR50.59(c) and 10CFR 50.90.

The University of Missouri Research Reactor (MURR) requests approval to revise Figure 6.0 of Technical Specification 6.1 and Technical Specification 6.1.d. as described and evaluated below:

**A) Proposed Changes to Figure 6.0:**

Figure 6.0 of Technical Specification 6.1 is the administrative structure showing the line of authority for the management and operation of the University of Missouri Research Reactor (MURR).

The University of Missouri requests three revisions to the administrative structure. The first revision request is to delete the specific person (Vice Provost or Associate Provost) within the Provost's Office to whom the Reactor Director reports. Currently the Director reports to the Vice Provost for Research. The University would like to change this reporting line to the Associate Provost in the Provost's office. The University would like the administrative structure to reflect the Director reporting to the Office of the Provost rather than a specific person in the Office of the Provost, allowing the University the flexibility to delegate the responsibility and authority for MURR to the appropriate person in the Office of the Provost. The Provost will assure the assignment of responsibility will not decrease the effectiveness of management oversight of MURR. This is consistent with ANSI/ANS-15.1, "The Development of Technical Specifications for Research Reactors," Section 6.1.2 where it states "responsibilities of one level may be assumed by designated alternates or by higher levels, conditional upon appropriate qualifications." NUREG-1537, "Guidelines for Preparing and Review of Applications for Licensing of Non-Power Reactors," Section 14, Technical Specifications, states the NRC accepts the responsibility guidance provided in ANSI/ANS- 15.1.

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The second revision request is to have the Reactor Advisory Committee be appointed by and report to the Office of the Provost, instead of the Chancellor. This request is consistent with the guidance in ANSI/ANS 15.1, under organization structure regarding the reporting and communications lines for the reactor review group designated to advise reactor management (in our case, the Reactor Advisory Committee).

The third revision request does not involve a change to the direct line of authority, but substitutes a new communications/consultation link from the MURR Health Physics Manager to University of Missouri upper administration in place of the communications/consultation link from the Facility Director via the Radiation Safety Officer (RSO) for the University of Missouri System materials license (#24-00513-32) to the Vice President for Academic Affairs. Before July 1993, the University of Missouri System materials license provided oversight for authorized activities involving licensed radioactive materials at the UM-Columbia campus, including at the MURR. At that time, in a shift from central oversight and management, the University was granted five individual broadscope materials licenses, one for each campus and one for MURR.

Now that MURR has its own broadscope materials license, the UM-Columbia materials license RSO has no direct responsibility for radiation protection for broadscope materials use at the MURR. The consultation/communications link therefore serves little purpose.

We feel that the Technical Specification administrative organizational chart for the R-103 license should be revised to include a different consultation/communications link from the Health Physics Manager to upper administration. This link would formalize a line of communication for the Reactor Health Physics Manager to use if there were unaddressed radiation protection concerns at MURR.

#### **B) Proposed Change to Technical Specification 6.1.d.:**

The last two sentences of Technical Specification 6.1.d. state:

"The Reactor Advisory Committee shall meet at least once during each calendar quarter. A meeting of a subcommittee shall not be deemed to satisfy the requirement of the parent committee meeting quarterly."

We would like the second sentence to be revised to be consistent with the preceding sentence regarding the schedule for Reactor Advisory Committee meetings. We request the second sentence be revised to read:

"A meeting of a subcommittee shall not be deemed to satisfy the requirement of the parent committee meeting **at least once during each calendar quarter.**"

The inconsistency between the two existing sentences results from the difference between "meeting at least once each calendar quarter" and the Technical Specification definition of quarterly implied by T.S. 1.2 regarding interpretation of time intervals. Quarterly implies meetings will be held within four months of each other. Meeting each calendar quarter implies meetings will occur within four distinct three month periods with no specified interval between meetings.

The University finds that meeting each calendar quarter is conducive to long term planning and scheduling of meetings for the non-MURR Reactor Advisory Committee members.

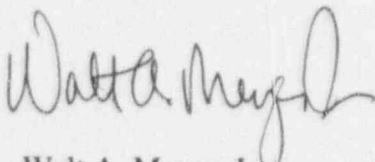
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Attached are the Technical Specification pages that will implement the proposed changes described in this letter. The administrative change proposed for Figure 6.0 continues to meet the administrative needs of a Class 104 license as outlined in Section 6.0 of ANSI/ANS-15.1 (1990) "Development of Technical Specifications for Research Reactors."

These requested changes have no affect on the safety of reaction operations, no reduction in management oversight, involve no changes to the reactor safety systems; and are requested pursuant to 10CFR50.59(c) and 10CFR50.90.

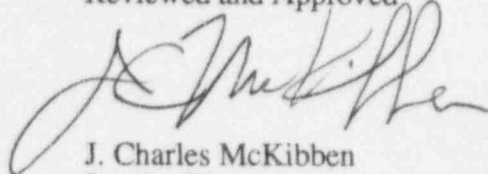
If you have any questions, please call me or J. Charles McKibben at (314) 882-4211.

Sincerely,



Walt A. Meyer, Jr.  
Reactor Manager

ENDORSEMENT:  
Reviewed and Approved



J. Charles McKibben  
Interim Director

attachments

xc: Reactor Advisory Committee  
RAC Safety Subcommittee  
Dr. Elaine Charlson, Associate Provost  
Mr. Tim Reidinger, U.S. NRC, Region III  
Mr. Al Adams, U.S. NRC, Washington, D.C.

*Christine M. Errante 10/29/96*

