



# MIT NUCLEAR REACTOR LABORATORY

AN MIT INTERDEPARTMENTAL CENTER

Edward Lau  
Assistant Director  
Reactor Operations

Mail Stop: NW12-122  
138 Albany Street  
Cambridge, MA 02139

Phone: 617 253-4211  
Fax: 617 324-0042  
Email: [eslau@mit.edu](mailto:eslau@mit.edu)

30 June 2020

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn.: Document Control Desk

Subject: Supplemental Information for License Amendment Request for Position Title Change  
in Technical Specifications for Level 1 Staff, Docket No. 50-20, License R-37

The Massachusetts Institute of Technology (MIT) hereby submits supplemental information for its Facility Operating License No. R-37 License Amendment Request (LAR) originally submitted to NRC on 12 March 2020, requesting a position title change in reactor Technical Specifications for Level 1 staff. The proposed title change requires revision to several sections in the Technical Specifications, including page 6-33, which is part of the Quality Management Program for Section 6.5 Generation of Medical Therapy Facility Beams for Human Therapy. Item numberings on page 6-33 were identified as having unintended changes from the original Technical Specifications authority document. The supplemental information consists of the enclosed corrected markup and final versions of page 6-33 of the Technical Specifications. These supersede the markup and final versions of page 6-33 from the 12 March 2020 LAR.

Again, MIT considers the proposed position title change along with the new management structure an improvement to the MIT Nuclear Reactor Laboratory, maintaining the safe and reliable operation of the MIT Reactor, while improving research and utilization.

Sincerely,

Edward S. Lau, NE  
Assistant Director of Reactor Operations  
MIT Research Reactor

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 07/01/2020  
Date

  
Signature

EL/t

Enclosures: As stated

cc: USNRC – Senior Project Manager  
Research and Test Reactors Licensing Branch  
Division of Licensing Projects  
Office of Nuclear Reactor Regulation

USNRC – Senior Reactor Inspector  
Research and Test Reactors Oversight Branch  
Division of Licensing Projects  
Office of Nuclear Reactor Regulation

A020

NRR

- (i) The review shall be performed by the Director of the MIT Radiation Protection Program or his designate.
  - (ii) The review shall be performed annually.
  - (iii) Patient administrations selected for review shall be audited to determine compliance with each of the requirements listed in paragraph (3) above.
  - (iv) The review shall be written and any items that require further action shall be so designated. Copies of the review shall be provided to the NRL **Managing Director for Operations** and to the MIT Reactor Safeguards Committee who will evaluate each review and, if required, recommend modifications in this quality management program to meet the requirements of paragraph (3) above. A copy of these reviews will also be provided to each medical use licensee.
- c) Records of each review, including the evaluations and findings of the review, shall be retained in an auditable form for three years.
- d) The licensee (MIT) shall reevaluate the Quality Management Program's policies and procedures after each annual review to determine whether the program is still effective or to identify actions required to make the program more effective.
5. Response to Recordable Event: Within thirty days after the discovery of a recordable event, the event shall be evaluated and a response made that includes:
- a) Assembling the relevant facts, including the cause;
  - b) Identifying what, if any, corrective action is required to prevent recurrence; and
  - c) Retaining a record, in an auditable form, for three years, of the relevant facts and what corrective action, if any, was taken.
- A copy of any recordable event shall be provided to the affected medical use licensee.
6. Records Retention: The following records shall be retained:
- a) Each written directive for three years; and
  - b) A record of each administered radiation therapy where a written directive is required in paragraph (3(a)) above, in an auditable form, for three years after the date of administration.
7. Program Modification: Modifications may be made to this quality management program to increase the program's efficiency provided that the program's effectiveness is not decreased. All medical use licensees shall be notified of any modifications and provided with a copy of the revised program. The licensee (MIT) shall furnish the modification to the NRC (Region I) within 30 days after the modification has been made.

- (i) The review shall be performed by the Director of the MIT Radiation Protection Program or his designate.
  - (ii) The review shall be performed annually.
  - (iii) Patient administrations selected for review shall be audited to determine compliance with each of the requirements listed in paragraph (3) above.
  - (iv) The review shall be written and any items that require further action shall be so designated. Copies of the review shall be provided to the NRL Managing Director for Operations and to the MIT Reactor Safeguards Committee who will evaluate each review and, if required, recommend modifications in this quality management program to meet the requirements of paragraph (3) above. A copy of these reviews will also be provided to each medical use licensee.
- c) Records of each review, including the evaluations and findings of the review, shall be retained in an auditable form for three years.
- d) The licensee (MIT) shall reevaluate the Quality Management Program's policies and procedures after each annual review to determine whether the program is still effective or to identify actions required to make the program more effective.
5. Response to Recordable Event: Within thirty days after the discovery of a recordable event, the event shall be evaluated and a response made that includes:
- a) Assembling the relevant facts, including the cause;
  - b) Identifying what, if any, corrective action is required to prevent recurrence; and
  - c) Retaining a record, in an auditable form, for three years, of the relevant facts and what corrective action, if any, was taken.
- A copy of any recordable event shall be provided to the affected medical use licensee.
6. Records Retention: The following records shall be retained:
- a) Each written directive for three years; and
  - b) A record of each administered radiation therapy where a written directive is required in paragraph (3(a)) above, in an auditable form, for three years after the date of administration.
7. Program Modification: Modifications may be made to this quality management program to increase the program's efficiency provided that the program's effectiveness is not decreased. All medical use licensees shall be notified of any modifications and provided with a copy of the revised program. The licensee (MIT) shall furnish the modification to the NRC (Region I) within 30 days after the modification has been made.