The Petitioner has asserted that substantial management deficiencies persist, including concerns on the problems related to the 1987/1988 time frame. This concern on the persistence of substantial management deficiencies may be addressed in the pending license renewal proceeding. As previously outlined in the Introduction to this Partial Director's Decision, the Final Director's Decision will take into account any relevant findings from this license renewal proceeding at an appropriate time after completion of the NRC staff review.

The NRC staff finds no reason at this time to conclude that the Georgia Tech Research Reactor is not continuing to conduct research and development activities in accordance with the Atomic Energy Act and NRC regulations. The Petitioner provided no facts to conclude otherwise. Therefore, the NRC staff concludes that no information has been provided on this issue to conclude that a substantial health or safety issue exists warranting the action requested by the Petitioner.

(9) Security at the Georgia Tech Research Reactor is extremely lax. The concerns on security issues, as previously outlined in the Introduction to this Partial Director's Decision, may be addressed in a pending license renewal proceeding. These issues will be addressed in a Final Director's Decision at an appropriate time after taking into account any relevant findings from this license renewal proceeding and after completion of the NRC staff reviews.

(10) In case of an accident or terrorist attack, evacuation of the campus and downtown Atlanta would be impossible both now and during the Olympics.³⁷ With respect to potential accident conditions for the Georgia Tech Research Reactor, the Emergency Planning Zone (EPZ), the area within which predetermined protective actions are established, is a 100 meters radius from the facility. This EPZ is in accordance with NRC emergency preparedness guidance applicable to research reactors.³⁸ The Georgia Tech

Research Reactor accident analyses 39 demonstrates that this 100 meter EPZ is conservative for the Georgia Tech Research Reactor. These analyses have been found acceptable most recently in the safety evaluation for the Order to convert from HEU fuel.⁴⁰ These analyses demonstrate that the potential need for protective actions outside the EPZ is highly unlikely. The specification of emergency classifications (e.g., no general emergency classification) for the Georgia Tech Research Reactor has also been reviewed by the NRC staff and found to be consistent with the NUREG-0849 guidance. The Georgia Tech Research Reactor emergency plan has been previously verified by the NRC staff to be acceptable in accordance with this regulatory guidance and applicable regulations.

The Georgia Tech Research Reactor has conducted emergency response drills in accordance with its emergency plan (the last three drills were on October 19, 1994, November 4, 1993, and November 9, 1992). The drills have included involvement of onsite or offsite agencies, such as the Georgia Tech Police Department, the Atlanta Fire Department, the Atlanta/Fulton **County Emergency Management** Agency, the Georgia Emergency Management Agency, the Georgia Environmental Protection Division, and the Grady Memorial Hospital. Training, equipment, and contingency planning for onsite and offsite personnel have been acceptably in accordance with emergency plan requirements, as verified most recently in NRC staff Inspection Reports 50-160/94-04, 50-160/93-03, and 50-160/92-04. Police, fire, and medical personnel have been observed by NRC staff to acceptably perform their responsibilities. Other recent discussions with these emergency response organizations demonstrate that they acceptably understand and feel capable of discharging their responsibilities under emergency conditions at the Georgia Tech Research Reactor.

With regard to emergency preparedness during the Olympics,⁴¹ the

NRC staff and the licensee have been discussing the necessary steps to take for reactor safety during this event for some time before this Petition was raised. The licensee has decided to not operate the research reactor during the 1996 Olympics and to remove the spent fuel from the facility prior to the Olympics.⁴² This would eliminate the potential for radiological releases during the Olympics related to the presence of such fuel onsite, and would reduce the potential for any emergency response to be taken due to radiological conditions for the Georgia Tech Research Reactor during the Olympics.

Georgia Tech has indicated that there are no events or additional resident population that are planned to be within the EPZ, and that the entire campus is to be controlled for access such that increased transient population through the EPZ is not expected. Further, supplemental emergency provisions for the Olympics are being planned by Georgia Tech in coordination with the Atlanta Committee for the Olympic Games, the U.S. Department of Defense, the Federal Bureau of Investigation, the Georgia State Patrol, Georgia Department of Transportation, City of Atlanta Police, and City of Atlanta Fire Department.

Ådditionally, the Petitioner in her July 18, 1995 letter, raised a concern on emergency preparedness for power reactor licenses, including emergency preparedness during the Olympics. NRC regulations require the development of emergency preparedness plans for all reactor licenses. The Petitioner presented no information and the NRC staff does not know of any information which would suggest that reactor emergency preparedness is not acceptable, including emergency preparedness during the Olympics.

The Petitioner also raised an issue addressing the location of the emergency command center within the Georgia Tech Research Reactor building. However, the emergency command center is outside the containment structure in which the Georgia Tech Research Reactor is housed. The emergency command center is isolated from the containment structure, which, as previously discussed on issue (6), is capable of withstanding pressures greater than would result from any analyzed accident. The discussions on

current license and other NRC regulatory requirements. In order to perform medical therapy at the Georgia Tech Research Reactor, an associated license under the provisions of 10 CFR 50.21(a) would be required, as well as associated modifications to the Technical Specifications from the NRC.

³⁷ That portion of the issue that deals with potential terrorist attacks will be included in issue (9) on security.

³⁸ "Standard Review Plan for Review and Evaluation of Emergency Plans for Research and Test Reactors," NUREG–0849, Appendix II.

³⁹ SAR, Section 5.10 *Accident Analyses*, pages 139–144 and Section 8, *Reactor Hazards Evaluation*, and Appendices A, B, and C, pages 176–214.

⁴⁰ Letter from Marvin M. Mendonca, NRC, to Dr. Ratib A. Karam, Georgia Institute of Technology, Enclosure 3 Safety Evaluation, Section 2.14 *Potential Accident Scenarios.*

⁴¹ As previously noted, the implications of terrorist acts during the Olympics relative to emergency preparedness may be addressed in a pending license renewal proceeding. These issues will be addressed in a Final Director's Decision at an appropriate time after taking into account any relevant findings from this license renewal

proceeding and after completion of the NRC staff reviews.

⁴² Georgia Institute of Technology's Response to Commission's Order Issuing Housekeeping Stay, dated June 21, 1995, and letter from Patricia Guilday, Assistant Attorney General, State of Georgia, Department of Law, to the Secretary of the NRC dated July 25, 1995.