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October 23rd, 1999

US Nuclear Regulatory Commission Director, Division of Nuclear Reactor Regulation One White Flint North Building 11555 Rockville Pike, Rockville, Maryland 20852-2738

Attention: DOCUMENT CONTROL DESK

RE: LICENSE R-116, DOCKET 50-326 UC IRVINE NON-POWER REACTOR LICENSE RENEWAL REQUEST

Gentlemen:

We admit to being uncertain how many copies of our revised Safety Analysis Report (SAR) to submit in support of our request (mailed recently under separate cover) to renew the referenced Class 104c operating license. 10 CFR 50.4 (2) (i) implies a single copy is sufficient, whereas 10 CFR 50.4 (6) implies that for an updated FSAR, 10 copies are required, but only if pursuant to 50.71(e) which only applies to nuclear power reactors.

Thus we are sending a single copy, while retaining many more in accordance with 10 CFR 50.30(a)(2) and awaiting further instructions.

Sincerely,

George E. Miller

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