

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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In the Matter of  
THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA  
(UCLA Research Reactor)

Docket No. 50-142

(Proposed Renewal of  
Facility License  
Number R-71)

April 20, 1981

APPLICANT'S FIRST SET OF INTERROGATORIES TO  
NUCLEAR REGULATORY COMMISSION STAFF

PROPOUNDING PARTY:

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA

RESPONDING PARTY:

NUCLEAR REGULATORY COMMISSION STAFF

SET NUMBER:

ONE



DONALD L. REIDHAAR  
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1 Applicant, The Regents of the University of California requests  
2 the Nuclear Regulatory Commission Staff (NRC Staff) to answer the following  
3 interrogatories under oath within thirty days in accordance with 10 Code  
4 of Federal Regulations Section 2.740 and the schedule contained in the order  
5 issued March 20, 1981 by the Atomic Safety and Licensing Board in the  
6 instant action.

7  
8 In answering these interrogatories, please furnish all information  
9 as is known or available to you regardless of whether this information is  
10 possessed directly by you, or by agents, employees, representatives,  
11 investigators, consultants, or your attorneys.

12  
13 If any of these interrogatories cannot be answered in full,  
14 answer to the extent possible, specifying the reasons for your inability  
15 to answer the remainder, and stating whatever information, knowledge,  
16 opinion, or belief you do have concerning the unanswered portion.

17  
18 As used herein from time to time, "NEL" refers to the Nuclear  
19 Energy Laboratories; "Contention I," "Contention II," etc., refers to  
20 specific contentions (and, where indicated, their subparts) contained in  
21 the proposed Stipulation of November 28, 1980, as amended by the order  
22 issued March 20, 1981 by the Atomic Safety and Licensing Board in this  
23 action, which amendment effectively integrates the three attachments to the  
24 Stipulation but with the same numbering sequence as appears in the Stipulation,  
25 and "staff" refers to the Nuclear Regulatory Commission staff.

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1 INTERROGATORY NO. 1 (Contention I):

2           At the time applicant was preparing to renew its facility license  
3 did you provide applicant with written instructions relating to the  
4 information to be submitted as part of applicant's research reactor license  
5 renewal application?

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7 INTERROGATORY NO. 2 (Contention I):

8           Has applicant responded to all supplemental questions you have  
9 asked of applicant relating to applicant's license renewal application?

10  
11 INTERROGATORY NO. 3 (Contention I):

12           Was the staff misled by the reference in the application to the  
13 C. B. Smith article on experimental vibration of the reactor? If yes,  
14 please explain.

15  
16 INTERROGATORY NO. 4 (Contention I):

17           Does the staff contend that the application contains any materially  
18 false statements? If yes, please explain.

19  
20 INTERROGATORY NO. 5 (Contention II):

21           Are any research reactor training facilities which are operated  
22 by educational institutions licensed as "class 103" facilities? If yes,  
23 please identify the facilities.

24  
25 INTERROGATORY NO. 6 (Contention III):

26           Based upon the operating experience of the applicant during the  
27 immediately preceding five-year period beginning January 1, 1976, does the  
28

1 staff contend that applicant's managerial and administrative controls  
2 have not been adequate in protecting the public health and safety? If yes,  
3 please explain.

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5 INTERROGATORY NO. 7 (Contention IV):

6           Based upon the operating experience of the applicant during the  
7 immediately preceding five-year period beginning January 1, 1976, does  
8 the staff contend that applicant has exhibited a consistent pattern of  
9 regulatory non-compliance? If yes, please explain.

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11 INTERROGATORY NO. 8 (Contention V):

12           Based upon the operating experience of the applicant since the  
13 establishment of applicant's current reactor excess reactivity limits  
14 ("Change No. 1" to the technical specifications, dated September 20, 1966),  
15 does the staff contend that the amount of excess reactivity permitted by  
16 the technical specifications could bring about melting of the fuel cladding  
17 and thereby endanger the public health and safety? If yes, please explain.

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19 INTERROGATORY NO. 9 (Contention VII):

20           Based upon the number of unscheduled shutdowns and abnormal  
21 occurrences at applicant's facility during the immediately preceding five-  
22 year period beginning January 1, 1976, does the staff contend that the  
23 reactor is unreliable and, thereby, a danger to the public health and  
24 safety? If yes, please explain.

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1 INTERROGATORY NO. 10 (Contention XII):

2           Are the safety features of applicant's Argonant-type reactor,  
3 as described in the application, generally the same as those found on  
4 other Argonant-type reactors? If no, please explain.

5  
6 INTERROGATORY NO. 11 (Contention XIV):

7           Are you aware of any problems of safety significance common  
8 to Argonant-type reactor facilities? If yes, please explain.

9  
10 INTERROGATORY NO. 12 (Contention XVIII):

11           Is the information provided by the applicant in the application  
12 sufficient to demonstrate to you that the applicant possesses the funds  
13 necessary to cover estimated operating costs or that the applicant has  
14 reasonable assurance of obtaining the necessary funds, or a combination  
15 of the two? If no, please explain.

16  
17 INTERROGATORY NO. 13 (Contention XIX):

18           Is sabotage an accident scenario that a research reactor operating  
19 license applicant is generally required to consider as part of that  
20 applicant's safety analysis? If yes, please explain.

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1 INTERROGATORY NO. 14 (Contention XIX):

2           Absent a demonstration that the approach flight paths of large  
3 commercial airliners are in close proximity to applicant's facility, are  
4 research reactor operating license applicants generally required to consider  
5 airplane crash scenarios as part of applicant's safety analysis? If yes,  
6 please explain.

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8  
9 Dated: April 20, 1981

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11  
12 DONALD L. REIDHAAR  
13 GLENN R. WOODS  
14 CHRISTINE HELWICK

15 By Glenn R. Woods  
16 GLENN WOODS

17 Attorney for Applicant  
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1 (DECLARATION OF SERVICE BY MAIL (CODE CIV. PROC. §§1013a & 2015.5))

2 I, the undersigned, say: I am a citizen of the United States,  
3 over 18 years of age, employed in Los Angeles County, California, in  
4 which county the within-mentioned mailing occurred, and not a party  
5 to the subject cause. My business address is 2214 Murphy Hall,  
6 405 Hilgard Avenue, Los Angeles, California 90024. I served  
7 the attached: APPLICANT'S FIRST SET OF INTERROGATORIES TO

8 NUCLEAR REGULATORY COMMISSION STAFF

9

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11 by placing a copy thereof in a separate envelope for each addressee  
12 named hereafter, addressed to each such addressee respectively  
13 as follows:

14

SEE ATTACHED

15

16

17

18 Each envelope was then sealed and with the postage thereon  
19 fully prepaid deposited in the United States mail by me at  
20 Los Angeles, California, on April 20, 1981.

21

22 There is delivery service by U.S. mail at each place so  
23 addressed or regular communication by U.S. mail between the place  
of mailing and each place so addressed.

24

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

26

Executed on April 20, 1981 at Los Angeles, California.

Darlene Otten  
DARLENE OTTEN

1 Elizabeth Bowers, Esq.  
2 U.S. Nuclear Regulatory Commission  
3 Atomic Safety & Licensing Board  
4 Washington, DC 20555

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Chief, Docketing and Service Section  
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Washington, DC 20555

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