RELATED CORRESPONDENCE

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10 In the Matter of

OF CALIFORNIA

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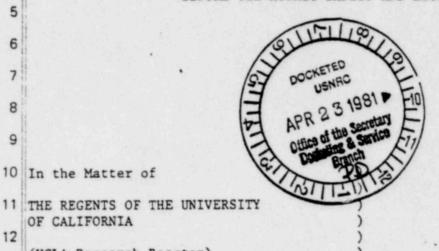
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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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:

(UCLA Research Reactor)

RESPONDING PARTY:

SET NUMBER:

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

NUCLEAR REGULATORY COMMISSION STAFF

ONE

DONALD L. REIDHAAR GLENN R. WOODS CHRISTINE HELWICK 590 University Hall 2200 University Avenue Berkeley, California 94720 Telephone: (415) 642-2822

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.

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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.

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

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

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1 INTERROGATORY NO. 1 (Contention I): 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? 6 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, 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 by educational institutions licensed as "class 103" facilities? If yes, 23 please identify the facilities. 24 25 INTFLAOGATORY 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):

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

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11 INTERROGATORY NO. 8 (Contention V):

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 the technical specifications could bring about melting of the fuel cladding and thereby endanger the public health and safety? If yes, please explain.

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INTERROGATORY NO. 9 (Contention VII):

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

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1 INTERROGATORY NO. 10 (Contention XII):
             Are the safety features of applicant's Argonant-type reactor,
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 3 as described in the application, generally the same as those found on
 4 other Argonant-type reactors? If no, please explain.
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 6 INTERROGATORY NO. 11 (Contention XIV):
             Are you aware of any problems of safety significance common
 8 to Argonant-type reactor facilities? If ves, please explain.
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10 INTERROGATORY NO. 12 (Contention XVIII):
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             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.
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17 INTERROGATORY NO. 13 (Contention XIX):
             Is sabotage an accident scenario that a research reactor operating
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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): 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, please explain. Dated: April 20, 1981 DONALD L. REIDHAAR GLENN R. WOODS CHRISTINE HELWICK Attorney for Applicant

(DECLARATION OF SERVICE BY MAIL (CODE CIV. PROC. §§1013a & 2015.5) I, the undersigned, say: I am a citizen of the United States, 2 over 18 years of age, employed in Los Angeles County, California, in 3 which county the within-mentioned mailing occurred, and not a party to the subject cause. My business address is 2214 Murphy Hall, 405 Hilgard Avenue, Los Angeles, California 90024. I served the attached: APPLICANT'S FIRST SET OF INTERROGATORIES TO 7 NUCLEAR REGULATORY COMMISSION STAFF 8 9 10 by placing a copy thereof in a separate envelope for each addressee 11 named hereafter, addressed to each such addressee respectively 12 as follows: 13 14 SEE ATTACHED 15 16 17 Each enevlope was then sealed amd with the postage thereon 18 fully prepaid deposited in the United States mail by me at 19 Los Angeles, California, on April 20, 1981 20 There is delivery service by U.S. mail at each place so 21 addressed or regular communication by U.S. mail between the place 22

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

Exer and on April 20, 1981

of mailing and each place so addressed.

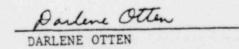
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at Los Angeles, California.



Elizabeth Bowers, Esq. U.S. Nuclear Regulatory Commission Atomic Safety & Licensing Board Washington, DC 20555 3 Dr. Emmeth A. Luebke U.S. Nuclear Regulatory Commission Atomic Safety & Licensing Board Washington, DC 20555 5 Dr. Oscar H. Paris U.S. Nuclear Regulatory Commission Atomic Safety & Licensing Board 7 Washington, DC 20555 8 Counsel for NRC Staff Office of Executive Legal Director U.S. Nuclear Regulatory Commission Maryland National Bank Building 10 7735 Old Georgetown Road Bethesda, Maryland 20015 11 Daniel Hirsch 12 Committee to Bridge the Gap 1637 Butler Avenue, #230 13 Los Angeles, CA 90025 14 Mr. Mark Pollock Mr. John Bay 15 1633 Franklin Street Santa Monica, CA 90404 16 Chief, Docketing and Service Section 17 Office of the Secretary U.S. Nuclear Regulatory Commission . 18 Washington, DC 20555 19 20 21

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