

06/10/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)

THE REGENTS OF THE UNIVERSITY OF)
CALIFORNIA)

(UCLA Research Reactor))

) Docket No. 50-142
) (Proposed Renewal of Facility
) License)

NRC STAFF SECOND ROUND INTERROGATORIES
TO INTERVENOR CBG

The NRC Staff hereby requests the Intervenor, Committee to Bridge the Gap (CBG) pursuant to 10 CFR § 2.740b to answer separately and fully in writing and under oath or affirmation the following second round interrogatories which refer to first round responses of CBG. The letters "SR" are added to the numbers of first round interrogatories to distinguish the two sets of discovery.

The Staff points out that the purpose of discovery is to avoid surprise at hearing concerning the evidence which each party must be prepared to address. To this end Staff directed its first round interrogatories and seeks clarification by the following second round questions.

The Intervenor's attention is again directed to 10 CFR § 2.740(e)(1)-(3) which sets forth a duty to supplement certain responses to interrogatories upon acquisition of further knowledge.

8106110 302

General Matters

Question A-SR

- (a) The original interrogatory asked for names, addresses and professional qualifications of the person or persons upon whose views Intervenor relies to substantiate each contention as well as the persons whom Intervenor will present as expert witnesses at hearing.

Your response to this question:

"No arrangements have yet been made by Intervenor regarding expert witnesses."

By this response do you mean that Intervenor has no evidence (documentary or expert testimony) to present at hearing in support of any of Intervenor's contentions other than the references made in Intervenor's responses to Staff's first round interrogatories? (b) Since your first-round response merely referenced A-(a), is it correct that you have no documentary evidence to support your contentions other than the following references cited in your first-round responses?

1. Material already on the UCLA docket, such as the UCLA application; CBG Supplemental Contentions, all I&E Reports and UCLA annual reports, correspondence, etc.
2. UCLA reactor operating logs and financial records.
3. WASH-740 and the ANL-5647 report mentioned in response 50(b).

(b-1) If not, please explain.

- (d) In light of your responses to A(a), (b), and (c), is it correct that the views and calculations contained in your first-round responses are solely those of Mr. Hirsch or Mr. Pollock?

POOR ORIGINAL

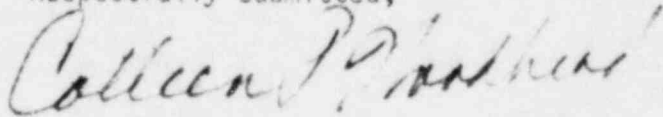
Question 52-SR

(a) Please clarify your response stating you do not contend (in Contention VIII.1.b.) that

"the SAR assumption that reactor operation has been long enough to attain equilibrium concentrations of short-lived fission products is invalid"

since question 52 quoted from your contention, omitting only the power level.

Respectfully submitted,

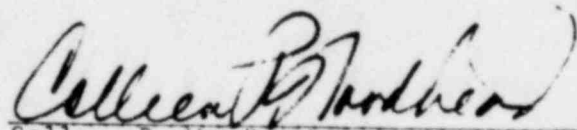


Colleen P. Woodhead
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 10th day of June, 1981

Atomic Safety and Licensing Appeal
Panel (5)*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section (7)*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Colleen P. Woodhead
Counsel for NRC Staff

POOR ORIGINAL