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COMMITTEE TO BRIDGE THE GAP

9/11/81

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 No. R-71) INTERVENOR'S FORMAL REQUEST, AS PER 10 CFR 2.741(a)(2), TO BE PERMITTED ENTRY UPON APPLICANT'S PROPERTY FOR PURPOSES OF INSPECTION, MEASURING, PHOTOGRAPHING, AND TESTING; REQUEST TWO

PROPOUNDING PARTY: COMMITTEE TO BRIDGE THE GAP

RESPONDING PARTY: REGENTS OF THE UNIVERSITY OF CALIFORNIA

Intervenor, the Committee to Bridge the Gap, hereby requests that Applicant, the Regents of the University of California, permit representatives of and investigators for Intervenor to enter upon certain land and other property, designated herein, for the purpose of inspecting and measuring, photographing, and testing the property and certain designated objects thereon, pursuant to 10 CFR 2.741(a)(2).

On September 3, 1981, Intervenor requested permission to inspect certain portions of Applicant's facility as to certain contentions dealing with ventilation, airflow, and dispersion matters. Intervenor herewith requests permission to inspect certain portions of Applicant's facility as to the other matters in controversy, specifically, Contentions I.3.a,b,d,e,f,g, II, III, IV, V, VI, VII, VIII, IX, X, XII, XIII, XIV, XVI, XVII, XIX, and XXI.

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Intervenor respectfully requests permission to inspect, measure, photograph, and test certain objects and processes identified below related to the above contentions and found within the Nuclear Energy Laboratory facility. It proposes to do so on a day mutually agreeable to the parties. It additionally requests that on another mutually agreeable date it be permitted to inspect and photograph the location of past and present film badges and TLDs outside the NEL facility used in monitoring possible exposures related to the facility.

Intervenor hereby requests permission for the purposes above to enter and inspect the following property: the Nuclear Energy Facility at UCLA, including but not limited to rooms 1000, 1000A,1000B, 1003, 1004, 1005, 1567, 1561, 1549, 1541, 1540, the area between 1561 and 1549, and rooms 2000A, 2000B, 2000, 2001, 2567B, 2567A, 2567, 2567C, and 2549, and the room between 2000B and 2001, the area between 2567C and 2549, plus all hallways, corridors, stairwells, and doorways leading thereto and therefrom. The above room identifications are based upon Figures III/4-3 and 4-4 of the Application; should in any instance that chart be an inaccurate representation of the actual NEL facility, Intervenor requests the rooms intended by the above request be made available for inspection even should the identification, based on the Application, be at variance with the actual structure. In particular, Intervenor requests entry into the following areas, whether they are identified above or not: reception room, control room, reactor room, NEL machine room, Tokomak room, health physicist's lab, and room (not reactor room) where pneumatic tube ends. Furthermore, Intervenor requests entry into 3rd floor area and machine room.

For purposes of specificity the enclosed list is rather detailed; however the entire inspection within NEL is anticipated to take no more than a few hours.

Intervenor hereby requests permission to inspect the following objects, equipment and processes in the areas listed above:

1. film badge and TLD, past and present, locations, within and outside NEL, including site of control film badges, whether at NEL or in Center for Health Sciences (if NEL control badges are kept at CHS)

2. all non-portable radiation monitors at NEL, including but not limited to hand-and-foot counters, secondary effluent monitor, the two GM gamma detectors mounted on the walls of the reactor room, the continuous particulate air monitoring system sampling the exhaust stack, the Argon-41 monitor, high level GM radiation stack and area monitor identified at III/4-7 of Application.

3. the alarms, annunciators, readouts, warning lights, and other recording or warning devices attached to the monitors identified in 2 above.

4. all portable radiation monitors at NEL, including but not limited to GM counters, neutron devices including the PNR-4 REM Meter and the NEMOSPHERE, and devices for integrating counts from said monitors.

5. health physics instrumentation for determining the radioactive content of airfilters, swipes, liquid and gaseous samples; i.e. the health physics laboratory equipment

6. all evacuation and emergency alarms, both triggering devices and warning devices, such as flashing lights, audible alarms, intercoms, smoke detectors, automatic sprinkler systems.

7. mock-up of fuel bundles, mock-up or sample of fuel box, deflector plate, graphite rupture disk, control blade

8. lead bricks used in recent TLD experiments to determine concrete radiation affect.

9. pneumatic tube system

10. sample containers of various varieties used in pneumatic tube and irradiation ports.

11. place where calibration methods, requirements, and records kept.

12. place where maintenance log kept

13. place in control room where operating procedures are kept

14. location of all emergency procedures (where posted)

15. location of all copies of 10 CFR within NEL.

16. all specific locations where Cobalt-60 leaking sources have been stored.

17. all specific locations where Ra-Be leaking sources have been stored.

18. sump pump case where fire occurred referred to in Scram Report 66-8

19. spare or back-up control blade motors

20. high radiation areas identified at page 125 of Second Set responses

21. interlock, inhibit and scram systems currently in use at the NEL reactor, and means for by-pass, as per response #30 at page 127 of Second Set Response, including but not limited to 3rd floor void area interlock system

22. the control panel

23. the reactor itself

24. the process pit

25. the dump valve, and airpressure system for the dump valve

26. Argon dilution airflow system

27. ceiling above control panel

28. safety amplifier

29. log N and period amplifier

30. dual linear amplifier

31. the repair and testing equipment available for maintenance purposes

32. fuel storage holes

33. demineralizers

34. portions of corroded pipe replaced or bypassed after 1971 earthquake

35. shield tank

36. graphite thermal column

37. areas in reactor room and upon reactor shielding where duct work has been placed

38. graphite stringers

39. beam ports and plugs

40. reactor shielding; in particular, 39" paraffin referred to in Application III/6-5

41. health physics suitcase referred to at IV/1-2 of Application

42. control blade drive mechanisms

43. control blade logic system

44. "poor man's hot cell" referred to in '68 minutes of Campus Radiation Safety Committee, or newer hot cell if one exists

45. fuel handling cask

46. lead pigs used for storage of radioactive materials (such as leaking sources)

47. Firefighting equipment within or near NEL (fire extinguishers, as well as wall-hoses and water mains for firefighting).

48. boron injection system

49. air filters in pneumatic tube system or rabbit room

50. HEPA filters

51. high level radiation monitor system which activates the scram system.

52. radioactivity removal system for emergency situations

53. emergency liquid and gaseous emissions holding tanks

54. normal operation liquid and gaseous emissions holding or delay tanks

55. emergency core cooling system

56. all missile shields, particularly for control blade drives

57. mechanism and procedure by which stuck control blade could be torqued down with a pipe wrench, as per UC response #13 to NRC 2nd set questions

58. stock of spare parts for the reactor

59. location of specifications for orginal parts for the reactor

60. all places where the ALARA requirement is posted or otherwise placed in settings to remind staff and students

61. testing equipment for vacuum tubes

62. reactor top

63. film badge storage place in reception room

64. radwaste storage area(s) within NEL

65. emergency power (i.e. backup power)

66. crane, and mountings for crane, in reactor high bay

67. magnet drive V5, fuse F-3, resister R74 referred to in Scram report 76-7

68. regulated power supply for Log N and period amplifier

69. rabbit containment types identified in scram report for July 30, 1979

70. mechanism for bypassing secondary radiation monitor circuitry (as in scram report 3-80.)

71. fluorescent light in log N recorder, as mentioned in 4-80 scram report

72. automatic power level controller

73. mechanism for clearing inhibit

74. mechanism in inhibit which causes reg-rod drive-down response

75. shield closures connected to scram system (and mechanism for bypassing)

76. linear power, log power, ventilation effluent activity, and secondary effluent water activity recording mechanisms and strip charts

77. thermocouple recording device (i.e. 24 point recorder)

78. control rod position displays and console meters

79. the processes conducted by students at NEL working for Dr. Kalil on commercial or "extramural" activities that Applicant has asserted have educational value; the sample loading, unloading, preparation work, and data reduction and recording from such runs. It would be preferable to observe students actually performing such work; simulation or detailed description at the location of each such task would be acceptable.

Conditions for said inspection to be properly undertaken:

Intervenor requests that the inspection (at least the first three hours of the inspection) within NEL take place while the reactor is not running and while it has not run previously that day. The inspection should commence with the reactor room first, followed by the rabbit room, and control room; the reactor can run, if so desired by Applicant, after first three hours of inspection are over. For purposes of the inspection of certain of the above objects and processes, however, it is essential that the reactor be off and not have run earlier in the day. Intervenor stands ready to discuss and clarify and where necessary modify the requests above so as to avoid unnecessary burden to the parties.

In summary, Intervenor requests opportunity for inspection of Applicant's property and objects and processes thereon on two days for two different purposes: one to inspect items within the NEL facility itself, and the other to inspect film badge and TLD locations outside NEL. The former, with cooperation from Applicant's staff, should take roughly four hours, certainly no more than six. The latter should take roughly two hours, including inspection of location of control film badges. It is requested that a staffperson familiar with NEL be responsible for production of the objects for inspection on the first day and someone familiar with the locations of past and present film badges and TLDs be responsible for the second. Intervenor is available to meet and confer with Applicant to attempt to "iron out" any confusion or dispute arising out of this inspection request. Intervenor suggests as dates for the two inspections October 28 (beginning at 10 a.m.) for the site visit within NEL and any afternoon during the week of October 19 or the following week for the inspection of TLD and film badge locations. Intervenor is available to conduct such inspection on a weekend if that is more convenient to Applicant. Intervenor is prepared to discuss other possible dates mutually convenient to the parties.

Respectfully submitted,

Dated: September 11, 1981

Mark Pollock
Attorney for Intervenor
COMMITTEE TO BRIDGE THE GAP

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)

DECLARATION OF SERVICE

I hereby declare that copies of "INTERVENOR'S FORMAL REQUEST, AS PER 10 CFR 2.741(a)(2), TO BE PERMITTED ENTRY UPON APPLICANT'S PROPERTY FOR PURPOSES OF INSPECTION, MEASURING, PHOTOGRAPHING, AND TESTING; REQUEST TWO" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 12th day of September, 1981.

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Washington, D.C. 20555

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