

COMMITTEE TO BRIDGE THE GAP

1637 BUTLER AVENUE #203
LOS ANGELES, CALIFORNIA 90025
(213) 478-0829

March 26, 1982

Ms. Colleen P. Woodhead
Counsel for NRC Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKETED
11:10

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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)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

RE: AGREEMENTS AS TO CERTAIN SCHEDULING AND DISCOVERY MATTERS

Dear Ms. Woodhead:

This letter is to confirm certain agreements recently made between Staff and Intervenor as to certain scheduling and discovery matters.

We have agreed to await submission by Staff of answers by its Battelle consultants to certain of Intervenor's interrogatories before discussing further the dispute as to Contentions C16-24. Discussion of the Court and Staff answers of March 17 will likewise await the submission of the Battelle answers. Intervenor will review the Battelle responses and shortly thereafter Intervenor and Staff will confer as to any matters related to any of the interrogatory answers as to which concerns may remain. Intervenor and Staff will confer as to these matters prior to any motions to the Board, should disputes remain.

Additionally, when Intervenor and Staff confer as to these matters, the matter of whether and what discovery may be necessary regarding the recently-released Brookhaven analysis will be discussed. Deferral of these matters until the Battelle responses are served in no way waives either party's rights to request relief from the Board should agreement not be possible between the parties.

Finally, Staff some time ago agreed to an extension in time for Intervenor to respond to summary disposition motions, when filed, due to expected very extensive motions by Staff. I have contacted Mr. Cormier in an attempt to ascertain how extensive Applicant anticipates its motions, if any, to be. He indicates Applicant is not decided at this time, and although he has no objection to a reasonable extension, a more precise estimate of the additional time reasonably required to respond to any summary disposition motions by Applicant cannot be made at this time. I indicated I would await moving the Board for an extension until Applicant is more sure of its plans.

Applicant and Intervenor have likewise agreed to await attempting to determine certain scheduling matters, primarily related to the conclusion of discovery and beginning of summary disposition, until Applicant has served its Amendments to its Application and Intervenor had a chance to review those Amendments and conferred with Applicant as to any discovery that may be necessary thereto. You indicated by phone you had no objection to these scheduling matters awaiting service and review of the Amendments and the Battelle responses and conferring among the parties on these matters.

If the above description is not in agreement with your recollection of our discussions, please let me know. May I also suggest that we attempt to discuss similar matters that may arise by phone in order to attempt to smooth out minor scheduling matters and not unduly burden the Board? I have made the same suggestion to Mr. Cormier in response to the "requests" he made of the Board in his March 15 discovery report.

In summary, we will be in touch shortly after we have had an opportunity to review the Battelle responses and will attempt to resolve the few remaining matters. I understand you expect those responses in the next few weeks. Likewise, Mr. Cormier expects the Application Amendments in roughly the same time frame, after which he and I will confer as to remaining issues and implications of the new material.

Cordially,



Daniel Hirsch
President

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cc: service list