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Attorneys for
CITY OF SANTA MONICA

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket No. 50-142
)	
THE REGENTS OF THE UNIVERSITY)	(Proposed Renewal of
OF CALIFORNIA)	License No. R-71)
)	
(UCLA Research Reactor))	
_____)	

IDENTIFICATION OF SUBJECTS
UPON WHICH THE CITY OF SANTA
MONICA INTENDS TO PARTICIPATE

On May 6, 1982, the City of Santa Monica (hereinafter "City") filed with the Atomic Safety and Licensing Board its "Notice of Intent to Participate as An Interested Municipality" in the above-captioned proceedings. By Memorandum and Order dated June 4, 1982, the Board admitted the City as an Interested Municipality pursuant to 10 C.F.R. §2.715(c), and directed the City to state with specificity the subjects upon which it intends to participate herein.

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SUBJECT MATTERS TO BE ADDRESSED

In its Notice of Intent, the City indicated that it wished to participate with respect to the matters which had been placed in controversy by Intervenor Committee to Bridge the Gap (hereinafter "CBG"), to wit, the CBG Contentions. Pursuant to the Board's Order, those matters are specified hereinbelow. The City has not restated the bases for the CBG Contentions since, as an Interested Municipality, it is not required to do so with respect to the subject matters it intends to address. The City will, however, deal with the matters raised in the CBG contention bases as part of its overall treatment of each issue.

Pursuant to the provisions of 10 C.F.R. §2.715(c), the City does not at this time take any position with respect to the following. The City does, however, state its intent to participate on the following subject matters:^{1/}

SUBJECT I: SUFFICIENCY OF APPLICATION

Whether the application and ancillary documents submitted by Applicant in this proceeding meet the requisite standards for such submissions; specifically: (1) whether statements included therein are misleading and/or materially inaccurate, and (2) whether Applicant has adequately demonstrated the validity of and nexus to its current reactor of the information and analyses that was not prepared by Applicant

^{1/} The enumeration of the subject matters intended to be addressed by the City parallels that of the CBG Contentions.

itself, but which was included in said submissions.

SUBJECT II: APPROPRIATE CLASS OF LICENSE

Whether Applicant has applied for the wrong class of license; specifically, whether the reactor is primarily operated for commercial enterprises and functions, with minimal research and educational usage.

SUBJECT III: ADMINISTRATIVE AND MANAGERIAL CONTROLS

Whether Applicant has in the past, and can provide sufficient assurance that it will in the future, competently administer and manage the licensed activities to responsibly protect public health and safety.

SUBJECT IV: COMPLIANCE WITH REGULATIONS

Whether Applicant has in the past and, if granted the requested license, can provide sufficient assurance that it will in the future comply with NRC regulations and its own Technical Specifications through the license period.

SUBJECT V: EXCESS REACTIVITY

Whether the margin of safety regarding possible insertions of excess reactivity is sufficient to assure prevention of a destructive power excursion.

SUBJECT VI: RADIATION EMISSIONS AND MONITORING

Whether Applicant has in the past, is at present, and can provide sufficient assurance that will in the future, keep the radiation emissions sufficiently low so that public health and safety will not be unduly threatened.

SUBJECT VII: OPERATIONAL RELIABILITY

Whether the reactor under license to Applicant has been and/or will be sufficiently operationally reliable through the license period to provide sufficient assurance that the reactor will be operated without endangering public health and safety.

SUBJECT VIII: POTENTIAL CONSEQUENCES OF ACCIDENTS

Whether there has been an adequate analysis of potential consequences of serious accidents at the facility, and whether such accidents could cause unacceptably high radiation exposures.

SUBJECT IX: ADEQUACY OF MAINTENANCE AND CALIBRATION

Whether Applicant has in the past, and can provide sufficient assurance that it will in the future, adequately maintain its equipment and calibrate its instruments, in such manner that equipment failures and erroneous instrument readings are sufficiently unlikely.

SUBJECT X: NEED FOR AN EIS: SUITABLE ALTERNATIVES TO PROPOSED ACTION

Whether the relicensing of the UCLA nuclear reactor is a major Federal action which will significantly affect the quality of the human environment and for which an EIS must be prepared, and whether there are suitable alternatives to the proposed action.

SUBJECT XII: ADEQUACY OF SAFETY FEATURES

Whether the reactor's safety features are adequate to protect public health and safety.

SUBJECT XIII: SPECIAL NUCLEAR MATERIALS LICENSE

Whether the quantity requested and enrichment level are excessive, and whether Applicant has provided the information in its SNM license application required by 10 C.F.R. §70.22(a) (7) and (8) and §70.24(a) (1), (2), and (3).

SUBJECT XIV: PROBLEMS COMMON TO SIMILAR REACTORS

Whether adequate review has been and will continue to be conducted of problems common to similar reactors and whether such problems have been resolved.

SUBJECT XV: SITING CHARACTERISTICS

Whether the siting characteristics for the UCLA reactor result in significant adverse consequences.

SUBJECT XVI: AGE

Whether the age of the reactor and its components render it too old to provide adequate assurance of safe operation through the requested license period; whether there is difficulty obtaining spare parts; whether key safety features found in newer facilities are lacking; whether equipment is unreliable, difficult to repair and/or replace; whether it is significant that the reactor vendor is no longer in the business; and whether Applicant has and will in the future devote the funds necessary to update and maintain the equipment so as to prevent deterioration.

SUBJECT XVII: SEISMIC VULNERABILITY

Whether the reactor is vulnerable at its current site to an earthquake that could result in a release of radioactivity which might endanger public health and safety.

SUBJECT XVIII: FINANCIAL QUALIFICATIONS

Whether Applicant can give sufficient assurance of obtaining the funds necessary to cover the costs of safely operating the facility.

SUBJECT XIX: ANALYSIS OF MAXIMUM CREDIBLE ACCIDENT(S)

Whether the maximum credible accident or accidents for this particular reactor have been adequately analyzed.

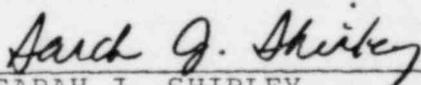
SUBJECT XX: PHYSICAL SECURITY

Whether Applicant's physical security plan and the implementation thereof provide sufficient assurance of being capable of protecting against radiological sabotage as well as theft or diversion of SNM pursuant to 10 C.F.R. §73.60 and §73.67.

SUBJECT XXI: EMERGENCY RESPONSE PLAN

Whether the Emergency Response Plan is sufficient to provide adequate assurance that appropriate measures can and will be taken in the event of various kinds of emergencies to protect public health and safety and prevent damage to property.

Dated: June 22, 1982



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DECLARATION OF SERVICE

I hereby declare that copies of the attached:

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MONICA INTENDS TO PARTICIPATE

in the above-captioned proceeding have been served upon the service list attached hereto as Exhibit A by deposit in the United States mail, first class, postage prepaid, addressed as indicated, on this the 22nd day of June, 1982.



SARAH SHIRLEY
Deputy City Attorney

EXHIBIT "A"
SERVICE LIST

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