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SANTA BARBARA · SANTA CRUZ

COMMUNITY SAFETY DEPARTMENT OFFICE OF RESEARCH & OCCUPATIONAL SAFETY LOS ANCELES, CALIFORNIA 90024

June 23, 1982

Mr. Hal Bernard, Acting Branch Chief Standardization and Special Projects Branch Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Bernard:

The enclosed pages represent major amendments to UCLA's License Renewal Application of February 1980. The organization of the application is unchanged, and the amendments are in the form of pages which replace the original pages or augment existing portions of the Application. All pages of this amendment bear the date 4-30-82.

The body of Appendix I has been rewritten to include recent financial data and to improve the clarity of presentation. Appendix II is supplemented with an updated analysis of the environmental effects of reactor operations.

Appendix III is amended to update, clarify, and expand the discussion relating to reactor usage (chapter 1), and to rectify some typographical errors in the Comparison Tables (chapter 6). Chapter 8 has been entirely rewritten and greatly expanded to incorporate (by reference) the considerable advances in Argonaut accident analyses (NUREG/CR-2079 and NUREG/CR-2198) that have occurred subsequent to the filing of the February 1980 application. This chapter also adapts those generic analyses to UCLA parameters and circumstances, in order to provide a design basis for emergency response planning.

Appendix IV is hereby withdrawn, the section is reserved for an Emergency Response Plan that is not yet written, pending further guidance from the Commission. The analysis of the design basis accident of Appendix III, Chapter 8, concludes that the threshold radiological limits for the lowest emergency action level as defined in ANSI/ANS 15.16, Table 1, "Notifications of Unusual Events" are not reached anywhere either inside or outside of the reactor building. Therefore, UCLA does not know how to proceed with an emergency response plan without commission guidelines.

Appendix V is entirely replaced by the Technical Specifications written by the Commission staff, a table of contents for that document has been added, several typographical errors corrected, and minor modifications have been made.

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The corrections and modifications are shown by vertical bars in the right margin and indicate changes from the commission version, <u>not</u> changes from the February 1980 filing of UCLA.

All of the enclosed amendment material has been reviewed by campus legal council, by the Director of Research and Occupational Safety, and by the manager of the Nuclear Energy Laboratory. The content of Charter 8, Appendix III has also been reviewed by several members of the NEL staff, by the UCLA Radiation Use Committee, and by the Chairman of the campus Radiation Safety Committee.

If you have any questions about the enclosed material, please contact Mr. Neill Ostrander at the UCLA Nuclear Energy Laboratory (213-825-2040).

Very Truly Yours,

Watt F. Wegst

Walter F. Wegst Director, Research & Occupational Safety

WFW/gr Encl.