



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

Item 2 (b)

JUL 30 1979

University of California  
ATTN: Mr. Harold B. Brown  
Environmental Health & Safety  
Officer  
Los Angeles, California 90024

Gentlemen:

Background

Your reactor facility license authorizes you to possess special nuclear material (SNM) of types and amounts that exceed the "threshold" quantity defined by 10 CFR Part 73, §73.1(b). Authorization limits will establish physical protection requirements under 10 CFR §73.47 and the Safeguards Upgrade Rule. The maximum possession limit will mandate that you comply with the requirements of the proposed safeguards upgrade rule (see enclosure A) which will be issued in the Federal Register within the next few days and will be implemented 120 days from its effective date. All nonpower reactor facilities have been deferred from the implementation of the upgrade rule for 120 days. During this 120 day period the staff has been directed to determine for the affected facilities (1) the status of physical protection at each, (2) the impact of closure of some or all as applicable, (3) what plans are being taken to implement the upgrade rule. After acquisition of this data the staff must report to the Commission with appropriate recommendations.

Requirements

The purpose of this notice is to inform you of our program to comply with the Commission's directive (see enclosure B) and to request certain information from you.

Program

- July 27, 1979 Issue this Notice
- August 15, 1979 Licensees to provide requested data
- August 27, 1979 Meeting of all affected nonpower licensees with NRC staff representatives at NRC Region III headquarters. Agenda will be provided separately.
- August -
- September 1979 Visit facilities not previously visited
- October 5, 1979 First draft of Report

Information Required

Information is required that only you can provide to develop the aforementioned report. Therefore, provide the following as a minimum. This list is by no

means complete and additional data from you is solicited.

1. What additional features will be constructed walls, vaults, CAS, protected area and costs associated with these.
2. What is the expected total cost to upgrade hardware? - one time cost - alarms, CCTV, guns, uniforms, badges, detectors.
3. What is the expected cost annually - guards, material, screening, two man rule - for an upgraded physical security plan - manpower and hardware?
4. What is the cost of shutting down the facility?
5. What is the annual cost of maintaining possession only status?
6. Effect of loss of program on US industry - (i.e.) engineers and operators for U.S. Nuclear Power Plants.
7. Effect of loss on medical research, medical treatment.
8. Cost of new plans - security, contingency, guard training.
9. Considering the impact of implementing the Safeguards Upgrade Rule will you continue to operate your facility?
10. Describe the impact of closing the facility on the educational program at your facility (school) - Loss of program and courses.
11. What is the size of the facility staff? - Will it be cut?
12. How many students are in the classes? - Will they finish their degrees?
13. How many graduate students are in facility - related programs? - Will they be able to finish?
14. What is the typical annual operating budget?
15. With 100 r/hr at 3 feet exemption criteria, can you meet and maintain the SNM at such a level continuously? What would the impact be on current financial and operating resources? How would it maintain the self-protection criteria affect fuel replacement and costs therefore?
16. How many courses utilize the facility - will they be cut?

Sincerely,

  
James R. Miller, Acting Assistant Director  
for Site and Safeguards

Enclosures:

1. Proposed Upgrade Rule
2. Transcript of Public Meeting  
July 24, 1979