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SANTA BARBARA • SANTA CRUZ

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TIMELY OR ACCURATE. THEY SHOULD BE CONSIDERED ONLY
IN A HISTORICAL CONTEXT.

OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY
THE CENTER FOR THE HEALTH SCIENCES
LOS ANGELES, CALIFORNIA 90024

August 15, 1979
EHS: C1251

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James R. Miller
Acting Assistant Director for
Site and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Miller:

Due to the sensitive nature of the contents of this letter, we
request that this document be withheld from public disclosure pursuant
to Section 2.790 of 10 CFR Part 2. This letter is our response to your
letter dated July 30, 1979.

It is not our intention to possess greater than a formula quantity
of non-exempt SSNM because greater amounts would entail financial costs,
manpower requirements, and restrictions which could not be met at this
facility. Our Argonaut Reactor contains approximately 3.6 Kgs of SSNM.
We also have 0.7 Kg of irradiated SSNM in the process of being shipped
to the Idaho Chemical Reprocessing Plant and another 4.6 Kg of non-
irradiated fuel in storage. We have three alternatives.

- a. Ask for a variance on the 3.6 Kgs of SSNM in the core of the reactor due to the difficulty in retrieving it from the reactor.
- b. Store the 4.6 Kgs of non-irradiated SSNM elsewhere off-site.
- c. Remove all the irradiated fuel from the reactor and send it to ICRP for reprocessing and place the non-irradiated fuel in the reactor.

With the above comments in mind, the following are our responses to your sixteen questions answered in the same order as submitted in your letter:

- 1. None planned.
- 2. None except change of locks, keys, and combinations in the near future.
- 3. Uncertain, depends upon alternatives.
- 4. Approximately \$500,000 to \$1,000,000.
- 5. Approximately \$25,000 to \$35,000.

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6. Uncertain, but would result in a reduction in the number of graduate nuclear engineers entering industry. Our reactor also supports uranium assay work related to the search for uranium resources.
7. None.
8. None planned.
9. Yes, conditionally.
10. The reactor serves as a major part of five laboratory courses offered by the School of Engineering and Applied Science. Closing the facility will cost UCLA at least three job openings, five classes, and several research programs here and at other Universities. Closure would diminish not only our total educational program, but would diminish educational programs at other schools because our reactor is a part of the Reactor Sharing Program of DOE.
11. Seven. Yes. We will have to cut approximately three people.
12. Approximately 30 per quarter. Yes.
13. Approximately a dozen. Reactor shutdown would not directly affect them.
14. \$120,000.
15. It does not seem possible to meet the 100 r/m at 3' at all times for the reactor fuel. The impact of the upgrade rule would result in prohibitive costs if unfavorably interpreted in our case.
16. There are five courses which utilize the reactor, and two courses on reactor licensing (on a one-time-only basis) are beginning this fall.

We hope that the answers to these questions meet with your approval.

Sincerely,

Harold V. Brown
Harold V. Brown, Dr. P.H.
Environmental Health and
Safety Officer

HVB/jao

cc: Charles E. Ashbaugh
Ivan Catton
John Evraets

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