

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of
THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA
(UCLA Research Reactor)

Docket No. 50-142

(Proposed Renewal of
Facility License)

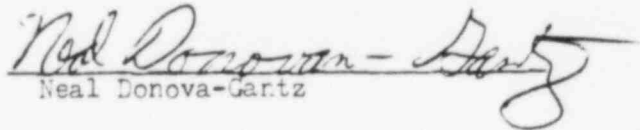
DECLARATION OF NEAL DONOVAN-GANTZ

I, Neal Donovan-Gantz, do declare as follows:

1. Since September 1979 I have been a student at the University of California at Santa Cruz, majoring in Environmental Studies. I have completed all of my course work and am currently completing my senior thesis.
2. In the spring of 1980 I was an Environmental Intern, placed through the UCSC Environmental Studies Field Program, working with the Committee to Bridge the Gap in Los Angeles. My research project was an assessment of potential impacts of a radioactive waste dumpsite located on Veterans Administration property approximately one mile from UCLA. My study focused on potential impacts of the disposal site on nearby water wells.
3. As part of my review, I contacted officials of the relevant agencies to ascertain the location of water wells in the vicinity. These agencies contacted included: the State Department of Water Resources, the State Health Department, the Water Quality Control Board, EPA, the VA, the LA Department of Water and Power, the LA County Flood Control District, and the Santa Monica Water Division. I furthermore reviewed the available records provided by these agencies.
4. The available records indicate wells within a half mile to a mile of UCLA, with numerous additional wells within two miles, including wells which provide water for the City of Santa Monica.

5. My review of the records available as of spring 1980 indicates the presence of water wells in the vicinity of UCLA.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


Neal Donovan-Gartz

Executed at Ben Lomond, California, this 7th day of January, 1983

CONTENTION II

RESPONSE TO STAFF'S ASSERTED MATERIAL FACTS

1. "Less than 2% of the costs of owning and operating the UCLA reactor was incurred from non-academic activities during 1977-1981."

DISPUTED

(Bayevsky declaration for II, P4-17; Aftergood declaration for I, P2-14, plus attachments).

2. "The direct costs to UCLA for use of the research reactor for the fiscal year 1980-1981 were \$224,000."

NOT DISPUTED

3. "The 1980-1981 total direct and indirect costs for operating the UCLA reactor were \$337,958."

NOT DISPUTED

4. "The costs to UCLA for commercial uses of the research reactor for the fiscal year 1980-1981 were \$3,000."

DISPUTED

(Bayevsky declaration for II, P4-17; Aftergood declaration for I, P2-14, plus attachments.)

RESPONSE TO UCLA'S ASSERTED MATERIAL FACT

4. "Less than 50 percent of the annual cost of operating the UCLA reactor facility is devoted to the sale of services, other than research and development or education or training."

DISPUTED

(Bayevsky declaration for II, P4-17; Aftergood declaration for I, P2-14, plus attachments).

