

COMMITTEE TO BRIDGE THE GAP

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Administrative Judge
Chairman
Atomic Safety and Licensing Board
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Administrative Judge
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
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Washington, D.C. 20555

In the Matter of
The Regents of the University of California
(UCLA Research Reactor)
Docket No. 50-142
(Proposed Renewal of Facility License)

RE: AGREEMENT REACHED ON CBG MOTION FOR SUMMARY DISPOSITION OF SEISMIC
CONTENTION; REQUEST FOR IMMEDIATE RULING

Dear Administrative Judges:

By Motion dated September 7, 1982, CBG moved for summary disposition of Contention XVII (Seismic) or, in the alternative, partial summary disposition thereof. To the motion was affixed, as required, a short, concise statement of the material facts asserted by CBG to not be in dispute.

By letter dated October 29, 1982, the Staff informed the Board "that it does not dispute any statement attached to the CBG motion for partial summary disposition of Contention XVII."

By letter dated January 7, 1983, the Applicant notified the Board that it disputed none of CBG's facts on the seismic contention except facts 2,3,6, and 8.

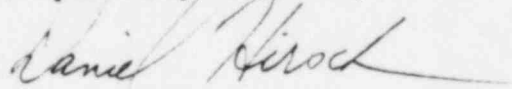
At the February 23, 1983, prehearing conference the Board directed CBG and the Applicant to confer as to possible resolution of the disputes as to those four facts. We have done so and reached agreement by making minor language modifications to the statements to resolve semantic difficulties perceived by the Applicant in those statements. The modifications are attached.

Thus, none of the material facts affixed to CBG's motion as to Contention XVII on the seismic matter are now disputed by any party.

The seismicity of the site, the ability of a major earthquake to damage the reactor fuel and release fission products to the environment, and ensuing consequences of at least 10 Rem to the thyroid to members of the public are admitted by all parties. The only remaining dispute for hearing on this matter is how much greater than 10 Rem to the thyroid those doses might be.

CBG thus respectfully requests, in light of this new development, that the Board rule now on CBG's motion for partial summary disposition of Contention XVII. CBG is entitled to such a ruling now, as there are no longer material facts in dispute and because such a ruling would greatly facilitate preparation by all parties for the summer evidentiary hearings on the inherent safety issues. As seismically-induced fission product release is one of the key hazard scenarios to be reviewed at that hearing (it is, in fact, the hazard sequences Staff has proposed as the maximum credible), a prompt ruling at this time would greatly facilitate scoping hearing preparation on this particular accident sequence.

Respectfully submitted,



Daniel Hirsch
President
COMMITTEE TO BRIDGE THE GAP

cc w/ enclosure: service list

STATEMENT OF MATERIAL FACTS AS TO WHICH NO GENUINE DISPUTE EXISTS AS TO CONTENTION XVII

1. The reactor is is a seismically active area.
- ** 2. The UCLA reactor may be in the path of at least one active earthquake fault.
- ** 3. The Newport-Inglewood fault is about two miles from the UCLA reactor, and may extend closer.
4. The Newport-Inglewood Fault was responsible for the Long Beach earthquake of 1933.
5. The Newport-Inglewood Fault is capable of an earthquake of a magnitude 7.5 on the Richter Scale.
- ** 6. The current probability of occurrence of a 7.5 magnitude earthquake along the Newport-Inglewood Fault is approximately .1% annually, or a one in fifty chance during the proposed twenty-year license period.
7. The Santa Monica Fault Zone is within one mile of the reactor.
- ** 8. The Santa Monica Fault Zone is variously estimated as being capable of an earthquake of magnitude 6.7 to 7.5 on the Richter Scale.
9. The reactor could also be affected by a quake along the southern San Andreas Fault, which has a capacity of 8.3 magnitude with a probability of occurrence of between 2 and 5% annually, or greater than 50% over the next thirty years.
10. A major earthquake could bring down the several-story structure built atop the reactor building and crush the reactor core.
11. Mechanical damage to the fuel (i.e. breaks in the cladding and fuel meat) could result from core-crushing.
12. Core-crushing could result from lateral accelerations in an earthquake, with or without the above structures collapsing.
13. Mechanical damage to the fuel resulting from an earthquake could result in fission products escaping to the environment.
14. It is conceivable that subsequent flooding of the reactor room could occur as the result of earthquake-induced failure of the Stone Canyon Reservoir which is positioned in the hills to the north of the UCLA campus.
15. Subsequent flooding of the reactor could result in the dispersion of fission product releases in the flood water.
16. Neither Staff nor Applicant has done a detailed seismic analysis of the reactor site nor a detailed structural analysis of the reactor structure and related buildings as to how they would respond to potential earthquakes (i.e., ability to withstand various response spectra without suffering displacement).
17. Earthquake-induced fission product release could cause doses in unrestricted areas of at least 10 Rem to the thyroid.
18. The Uniform Building Code according to which the reactor structure and the building above it were built had no provisions for reactors and has since been substantially strengthened; and builds built to UBC standards have failed in relatively moderate earthquakes.

NOTES

- * Facts 2,3,6, and 8 underwent minor language modifications to accomodate semantic objections raised by UCLA. The previous language is identified below.

- ** 2. The UCLA reactor is in the path of at least one active earthquake fault.

- ** 3. The UCLA reactor is within two miles of the Newport-Inglewood fault.

- ** 6. The current probability of occurrence of a 7.5 magnitude earthquake along the Newport-Inglewood Fault is at least .1% annually, or a one in fifty chance during the proposed twenty-year license period.

- ** 8. The Santa Monica Fault Zone is capable of a 7.5 magnitude earthquake.