

CBG's argument is fatally flawed. CBG's basic assumption, that a credible accident could result in significant fission product releases, is incorrect and controverted by the considerable weight of technically competent evidence of record in this proceeding.

University will demonstrate below by affidavit and discussion that because of the inherent, self-limiting characteristics of UCLA's 100 kw Argonaut research reactor, the UCLA reactor poses no credible threat to public health and safety. The conclusions as to the safety of the reactor rest on general engineering principles and on several generic accident analyses of Argonaut reactors published by the NRC. Additional support for these basic conclusions can be found in the history of safe operations at the UCLA facility and other Argonaut reactor facilities. All of CBG's allegations on safety issues must be examined in light of that evidence, which is substantial, reliable and uncontroverted.

CBG has well disguised its case against the reactor in an elaborate statement of contentions. However, examined properly, CBG's entire case is dependent on a single, critical assumption: that a credible accident could result in significant fission product releases at the UCLA facility. CBG has not understood or simply ignored the basic engineering principles

CORRECTIONS TO UNIVERSITY'S MOTION FOR SUMMARY DISPOSITION

Corrections to the Motion

On page 78, a clause has been omitted from the first line. As corrected, this line should read: "found that the University had not complied with proper calibration procedures and that there were inaccuracies in certain calibrations that University performed. . . ."

On page 92, the reference on the 3rd line should be to Appendix "C".

Corrections to the Affidavit of Ostrander

On page 2, the first subheading should read: "Basic Premises of Accident Analyses."

On page 6, the symbol for "beta", " β ", should be inserted at the end of the 16th line.

On page 12, 27th line should read: "fast flux in the UCLA reactor is approximately 2×10^{10} . . ."

On page 13, 4th line from the bottom, delete ". . . and Sec. 21.1(c)."

On page 17, 3rd line from bottom, the reference should be to "subpart 2.c."

Corrections to the Affidavit of Wegst

On page 2, 5th line from the bottom, the symbol for "less than", "<", should be inserted before "100%".

UCLA
September 20, 1982