

# COMMITTEE TO BRIDGE THE GAP

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April 20, 1983

John H. Frye, III, Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Emmeth A. Luebke  
Administrative Judge  
Atomic Safety and Licensing Board  
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Dr. Glenn O. Bright  
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)

Dear Administrative Judges:

CBG's witness list for the inherent safety hearings is as follows: Boyd Norton, Michio Kaku, David duPont, Steven Aftergood, Miguel Pulido, Roger Kohn, Daniel Hirsch, Sheldon Plotkin, Nabil El Gabalawi, Lowell Wayne, and James Warf.

Uncertainty remains at this date about the availability of Professor Warf, as we have not yet received word from Malaysia, where he is on sabbatical. Should we subsequently learn that he will not be available, replacement will be sought to address points raised in his November 1982 declaration.

The above list is premised on the assumption that accident consequences (e.g. dispersion and dose assessment

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matters), as well as certain portions of Contention I (e.g. matters related to the SPERT and BORAX tests, excess reactivity, and the basic safety studies) remain deferred. (CBG's request that these matters be considered during the summer safety hearings is pending at this time.)

The parties have statements of professional qualifications for all but two of the above witnesses. CBG stands prepared to exchange with the other parties statements of professional qualifications for witnesses for whom that has not already been done.

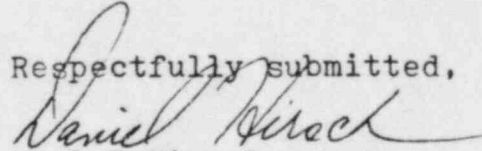
The scope of CBG's direct testimony will essentially cover the inherent safety matters addressed in detail in CBG's summary disposition responses of January 12, 1983, although editorial and sponsorship alterations may be necessary to convert summary disposition declarations to hearing testimony. The opposing parties already have in hand--through a process much objected to by CBG--what amounts to the detailed substance of CBG's direct testimony, prefiled many months before the opposing parties will prefile theirs.

CBG indicated in its April 7 pleading that witness availability necessitated a hearing starting date of July 25 if the Board continued to intend to hear CBG's case after that of Applicant and Staff. Unfortunately, CBG's April 7 pleading crossed in the mail with the Board's Memorandum and Order of the same date which indicate a starting date of July 18. On April 14 CBG indicated that it would attempt to contact its witnesses to see if it might be possible to rearrange their schedule so as to accommodate a July 18 hearing date.

Such rearrangement does not appear possible. Upon rechecking with the witnesses, it is clear that scheduling difficulties do indeed necessitate the CBG basic case beginning Monday morning, August 8, with preliminary matters such as voir dire of witnesses available earlier being conducted on August 5 or over the intervening weekend. This would require hearing commence on July 25.

The "window of availability" for a number of CBG's key witnesses is very narrow. Their presence requires the "dates certain" indicated above.

Respectfully submitted,



Daniel Hirsch  
President

Committee to Bridge the Gap

cc: service list