

COMMITTEE TO BRIDGE THE GAP  
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11/12/82  
USNR

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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 No. R-71)

REQUEST FOR PRODUCTION OF CERTAIN DOCUMENTS AS TO CONTENTION XXI

PROPOUNDING PARTY: COMMITTEE TO BRIDGE THE GAP

RESPONDING PARTY: THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

Pursuant to 10 CFR 2.741, the Committee to Bridge the Gap hereby formally requests Applicant, the Regents of the University of California, to produce for inspection and/or copying, as CBG chooses, certain documents identified herein.

Should any of the documents herein not exist, or not be in the possession of the Applicant, Applicant should so specify and provide what documents are in its possession. Should Applicant object to any part of this request for production, Applicant should make its objection known substantially before the date set by the Board for said production, November 26, 1982.

The documents to be produced are as follows:

1. The campus emergency plan, as identified at page IV/3-2 of the revised emergency plan included in the Application.
2. Written emergency response procedures associated with the plan identified in 1 above.
3. The procedures and lists, including draft procedures and lists, identified at page IV/11-1 of the revised emergency plan.
4. All written procedures for responding to emergencies at NEL, other than those included in response to item 3 above.
5. Campus-wide evacuation drill records, including critiques thereof.
6. Evacuation drill records for Boelter Hall, including critiques thereof.
7. Evacuation drill records for NEL, including critiques thereof.
8. Documents regarding reactor room smoke alarm/detector and fire alarm/detector, including capabilities and calibration of said device(s).
9. NEL training curricula materials and exam questions thereon as to emergency response procedures and techniques.
10. Campus police department nuclear emergency response procedures.
11. Campus fire marshal NEL fire response procedures.
12. Copies of emergency procedures as currently posted at NEL.
13. Emergency call and notification list and Emergency Directors call and notification list, as currently posted or possessed at NEL.
14. Previous versions of items 12 and 13.
15. Records of fires, explosions, toxic releases, water damage from flooding or pipe breaks, contamination incidents, and other emergencies that have occurred in Boelter Hall.
16. Reviews of Boelter Hall for compliance with local, state and federal fire-safety regulations.
17. Reviews and inspections by insurance company representatives for fire protection or other safety protection deficiencies at Boelter Hall
18. Records of inspections conducted at UCLA by local, state, or federal fire safety officials as to fire safety precautions at UCLA.
19. Records of fires at UCLA, including identification of causation, detail of damage created, and description of fire suppression response.

20. The NEL procedures handbook
21. Radiation Use Committee minutes, January 1982 to date
22. Campus Radiation Safety Committee minutes, January 1982 to date
23. 1981 NEL Annual Report
24. Fire Extinguisher check records for NEL, and other operability test records for other fire response equipment designed for use at NEL
25. All records of the July 28, 1982 Young Hall fire, including any inspection records and warnings or citations by inspecting authorities of the area involved in the fire prior to the event, and any investigation records as to cause of fire and possible UCLA responsibility for the injuries suffered by the firefighters due to improper warning signs at the site.
26. Documents identifying the 8 violations of fire safety standards referred to by Acting Chemistry Chairperson Foote in the 8/5/82 Daily Bruin.
27. Documents detailing the investigation of other chemical storage areas at UCLA which the Daily Bruin of 8/5/82 indicated Dr. Wegst was planning to undertake.
28. All procedures and plans for fighting a fire involving the UCLA reactor, including methods to be employed.
29. All procedures and plans for responding to an emergency at the reactor at night or on weekends or during vacations, when NEL staff is not at facility.
30. Procedures and plans for emergency response at reactor if NEL Staff is not at facility and cannot be reached by phone or otherwise.
31. Documents identifying which NEL personnel are assigned "beepers" for emergency response when away from NEL and range (i.e. distance) of said devices.
32. 1982 operating log
33. NEL Emergency Response Log
34. Radiation monitor and portable survey calibration records, January 1982 to present
35. Maintenance log or records, January 1982 to present, and ECOs, for the same period
36. internal audit for 1981, as required by Tech Specs
37. records of emergencies and emergency responses at NEL

38. Any correspondence by the LA Fire Department to the Regents, and vice versa, as to the 7/28/82 Young Hall Fire, and any such correspondence as to NEL fire response procedures and agreements, other than "Attachment A" of emergency plan.

39. All documents identifying fire response procedures by LA Fire Department and LA County Department of Health Services in case of fire at UCLA reactor.

40. All agreements with LA County Department of Health Services as to offsite emergency services to be provided in case of radiological emergency at NEL, including but not limited to fire.

41. Records of drills with Radiological Defense Officers of the LA County Department of Health Services as to response procedures at NEL.

42. Records identifying location of standpipes and hydrants for fire fighting use in case of fire at NEL and nature and specifications of fire hoses and other fire response equipment at those locations.

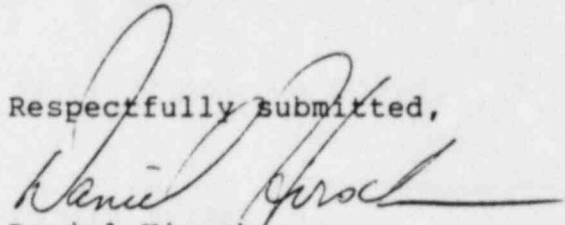
43. Records of the training received by campus fire officials in fighting a fire involving a reactor or radioactive materials.

44. Procedures and analyses detailing how fire involving a Pu-Be source is to be responded to at NEL.

45. Procedures and analyses detailing how fire involving radioactive materials other than the reactor fuel or the Pu-Be source is to be responded to at NEL.

Unless otherwise identified above, records to be produced are for the period 1960 to the present. Records are to be produced for inspection beginning at 9:00 a.m. and continuing until 5:00 p.m. on November 26, 1982. CBG will contact Applicant early in the week of November 22, 1982 to confirm the inspection and to indicate to Applicant the location at which the documents shall be produced.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Daniel Hirsch", written over a horizontal line.

Daniel Hirsch  
President  
Committee to Bridge the Gap

dated at Los Angeles, CA  
November 12, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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DECLARATION OF SERVICE

I hereby declare that copies of "REQUEST FOR PRODUCTION OF CERTAIN DOCUMENTS AS TO CONTENTION XXI" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 12th day of November, 1982:

John E. Frye, III, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Emmeth A. Luebke  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Oscar H. Paris  
Administrative Judge  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Chief, Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Counsel for NRC Staff  
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Washington, D.C. 20555  
Attention: Ms. Colleen Woodhead

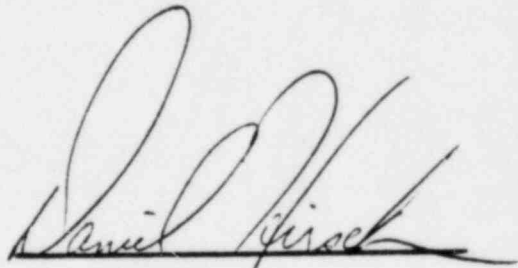
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Daniel Hirsch  
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COMMITTEE TO BRIDGE THE GAP