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COMMITTEE TO BRIDGE THE GAP



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 No. R-71)

MOTION REQUESTING PERMISSION
FOR EXAMINATION BY EXPERT,
PURSUANT TO 10 CFR § 2.733

At the special pre-hearing conference on February 5, 1981, Judge Bowers informed Intervenor of the regulations permitting an individual to qualify as an "expert interrogator" to participate in examination or cross-examination of expert witnesses, and suggested that Intervenor consider whether it wished "to go that route or not" regarding Mr. Daniel Hirsch. TR. 328.

Pursuant to 10 CFR 2.733, Intervenor hereby requests that the presiding officer permit Daniel Hirsch to engage in examination or cross-examination of expert witnesses, consonant with the Board's rules regarding "double-teaming" and such other rules as the Board may impose. Permission for Mr. Hirsch's participation is sought for all Contentions admitted to date in the proceedings, with the exception of Contention XX ("Inadequate Security"), for which no request is currently made, pending Board's determination of in camera procedures and protective order requests. This action is requested at this time because depositions may be taken in the near future for which Mr. Hirsch's expertise would be useful in

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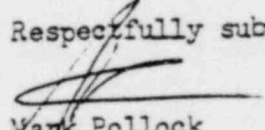
attempting to obtain a comprehensive record. Mr. Hirsch will be under the direction of Mr. Mark Pollock, counsel for Intervenor, who will be responsible for his conduct.

Intervenor asserts: (a) That Mr. Hirsch is qualified, by virtue of his scientific and technical experience, to contribute to the development of an adequate decisional record in the proceeding by the conduct of examination or cross-examination, (b) that he has committed to read any written testimony on which he intends to examine or cross-examine and any documents to be used or referred to in the course of examination or cross-examination, and (c) that he has committed to prepare himself to conduct a meaningful and expeditious examination or cross-examination.

An affidavit from Mr. Hirsch is attached detailing his relevant qualifications.

As Intervenor anticipates no objections from the other parties to this request--Staff having indicated by phone conversation with Intervenor's counsel that they anticipated no objection from Staff, and the Applicant in another setting having approved Mr. Hirsch's competence in the general area by his academic appointment by the UCLA Academic Senate to teach nuclear and other energy matters as a Visiting Lecturer--no letters of recommendation nor affidavits of support are included herein. Should the Board desire, or should unanticipated objections arise, numerous such letters and/or affidavits from nuclear physicists, engineers, radiation biologists and others can be provided upon request.

Respectfully submitted,


Mark Pollock
Attorney for Intervenor
COMMITTEE TO BRIDGE THE GAP

Dated at Los Angeles, CA
this 3rd day of June, 1981