

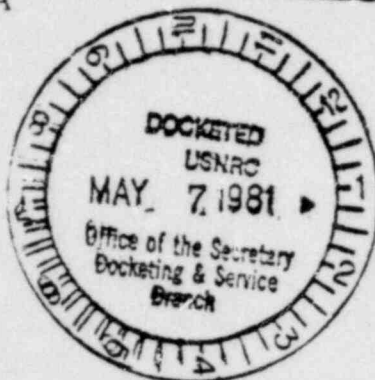
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May 1, 1981

Mr. Mark Pollock
POLLOCK & WILLIS
1724 North La Brea Avenue
Los Angeles, CA 90046

Re: NRC Docket No. 50142 (UCLA Research Reactor)

Dear Mr. Pollock:

This is written in response to your letter of April 24, 1981, regarding the Atomic Safety and Licensing Board's "Order Relative to Intervenor's Supplemental Motion To Compel", dated March 10, 1981.

Basically, the Board's Order found the University at fault for not having responded to CBG's first set of interrogatories by providing to CBG a copy of its letter of May 13, 1980 to the staff. The Board went on to state as follows:

"Once again, we direct UCLA to be open and candid as to the details of all existing records. At the same time, we again advise CBG that the Applicant is not required to create new information or engage in a work effort to reshape its records to the Intervenor's categories. Put more bluntly, UCLA shall not hold back any information it possesses which is relevant to the

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Intervenor's interrogatories, and the Intervenor shall take advantage of the opportunities provided it by UCLA to inspect and copy relevant documents."

". . . Failure of the parties to fully cooperate in responding to discovery requests in the future may well result in the imposition of sanctions by the Board under 10 CFR § 2.707."

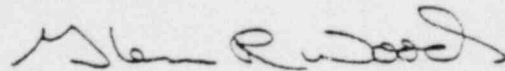
The Order of the Board stated as follows:

"That UCLA shall respond to CBG interrogatories with a complete disclosure of all relevant information."

If you read the Board's Order carefully you will see that, unlike its previous Order (December 22, 1980) which stated that "The Motion to Compel is . . . GRANTED," there is no such directive here. We believe that The Board was admonishing the University for what the Board considered "less than frank" past interrogatory responses and directing the University to be fully responsive to future discovery requests. We intend, of course, to comply with the Board's direction.

It is therefore clear that you are simply incorrect in stating that the "Board granted [your] Motion to Compel further answers . . . regarding interrogatories on Contention II." If you are really serious about bringing this matter to the Board at this late date, you should reread the Board's Order of March 10, 1981 and the present order. I think that once you do this you will agree that the Board's Order of March 10, 1981 did not contemplate further answers to your past interrogatories dealing with Contention II.

Sincerely,



Glenn R. Woods

cc: service list