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OFFICE OF THE CHANCELLOR  
LOS ANGELES, CALIFORNIA 90024

July 16, 1981

Elizabeth S. Bowers, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
Washington, DC 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 Judge Bowers:

In response to two matters pending before the Board,  
the University's position is as follows.

Intervenor's Request to Qualify Mr. Hirsch as "Expert Interrogator"

We have had an opportunity to examine the additional information provided by Mr. Hirsch regarding his qualifications.

In regard to Intervenor's request to qualify Mr. Hirsch as an expert interrogator we would like to point out that although we understood that Mr. Hirsch did not possess an advanced academic degree nor any degree at all in a science or field of engineering, we were unaware of the extent of Mr. Hirsch's technical and scientific training and experience. The June 30 statement of Mr. Hirsch suggests that his technical and scientific training and experience is at best very limited. Mr. Hirsch is vague about what science and engineering courses, if any, were part of his "Special Studies" program and he has not mentioned the subject matter of his "Special Studies" thesis. Mr. Hirsch states that his competency to address public policy questions requires "a deep immersion in the scientific and technical aspects of the policy questions (he addresses)." Mr. Hirsch also states that the course he teaches is "interdisciplinary in attempting to create an interface between the technical

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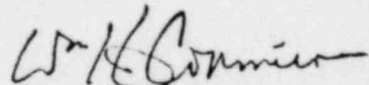
and scientific information and skills necessary for making informed judgements about complex issues and the understanding of social theory as to how complex decisions are actually made in a society such as ours." Such statements are vague and insufficient in demonstrating that Mr. Hirsch is qualified to function as an expert respecting any single contention in this proceeding and certainly not all twenty contentions that have been admitted.

Schedule for Summary Disposition Motions

In Mr. Pollock's memorandum of June 30, 1981 regarding "Response to Applicant's 'Request for Change in Discovery Schedule'", it is stated "As Applicant's request for discovery schedule change does not address summary disposition, Intervenor assumes that the stipulated agreement . . . remains in place. To wit: that summary disposition motions will be filed thirty days after answers are submitted to the second round of questions."

However, the Board ruled on June 9, 1981, that "motions for summary disposition are not to be filed prior to July 30, 1981." Applicant understands that ruling as meaning that such motions may be filed on or after July 30, 1981. We oppose Intervenor's implied request to further delay beyond the above date the beginning day of the period for filing motions for summary disposition.

Respectfully submitted,



William H. Cormier  
UCLA Representative

THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA

cc: Service List