UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

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OFFICE OF THE CHANCELLOR
LOS ANGELES, CALIFORNIA 90024

November 8, 1982

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
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
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:

As directed by your Order of October 22, 1982, I am forwarding to you and the parties copies of the statement of material facts attached to University's motion for summary disposition dated September 1, 1982 with the citations requested by the Board.

Sincerely,

William H. Cormier
UCLA Representative

Enclosure

cc: Service List

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V. STATEMENT OF MATERIAL FACTS AS TO WHICH NO DISPUTE EXISTS

University submits the following statement of material facts as to which no genuine issue is in dispute.

Contention I

1. University's license renewal application for its UCLA research reactor contains all the information requested by the NRC staff. (Application.)

2. There are no material false statements in University's license renewal application. (Ostrander Aff., pp. 13-14; O'Neill Aff., para. 4.)

3. The proposed Technical Specifications of the application contains only minor changes from the current ones. (Ostrander Aff., pp. 13-14; Exhibit B (current Tech. Specs.) and Application, Appendix V (proposed Tech. Specs.).)

Contention II

4. Less than 50 percent of the annual cost of operating the UCLA reactor facility is devoted to the sale of services, other than research and development or education or training. (Ostrander Aff.) p. 15; O'Neill Aff.; Rebok Aff.; Exhibit C and D.)

5. The UCLA research reactor has operated safely for the past 22 years. [This material fact statement should be deleted as out of place and duplicative of material fact statement #37, hereof]

Contention XVIII

6. The current fund expenditure for the fiscal year ending June 30, 1981 of the University of California was in excess of 3 billion dollars. (Rebok Aff., para. 9.)

7. Operating expenses for the Nuclear Energy Laboratory for the fiscal year ending June 30, 1981 were $280,000. (Attachment B of Exhibit C.)

8. The University of California can obtain sufficient funds from the State to operate the UCLA research reactor safely during the license renewal period. (Rebok Aff., para. 9)

Contention VIII

9. The "Appendix C" study of the 1960 Hazards Analysis Report included in the 1980 Safety Analysis Report of the application is based on a core melting assumption that is expressly stated to be "implausible." (Ostrander Aff., p. 16; Exhibit E, p.1, 4th para.)

10. The "Appendix C" study assumption of fission product releases is expressly stated to be an "arbitrary" assumption. (Ostrander Aff., p. 16; Exhibit E, p.1, 2nd para.)

11. The "Appendix C" study was not based on any accident deemed credible. (Ostrander Aff., p. 16; Exhibit E, p.1.)

Contention V

12. The stepwise insertion of 2.6% delta k/k excess reactivity in Argonaut reactors will not cause melting of the fuel. (Ostrander Aff., p. 10; NUREG/CR-2079, p. 21; SER, pp. 14-4.)

13. The stepwise insertion of $3.00 excess reactivity in Argonaut reactors will not cause melting of the fuel. (Ostrander Aff., p. 11; NUREG/CR-2198.)

14. The graphite temperature coefficient does not operate quickly enough in Argonaut reactors to be of any consequence in the analysis of fast transients. (Ostrander Aff., pp. 12, 17 and 21.)

15. "Appendix B" of the 1960 Hazards Analysis Report does not state that melting of the fuel will occur at 2.3% k-eff. (Ostrander Aff., p. 18; Exhibit F, p. III/A-5.)

16. The maximum reactivity changes that can be induced by the "rabbit" system at the UCLA reactor are less than 50¢. (Ostrander Aff., p. 18.)

Contention XIX

17. Credible accidents at the UCLA reactor facility pose no threat to the public. (Ostrander Aff., pp. 2-12 and 20; Application, pp. III/8-1 to 8-13; SER, secs. 1,7,14 and 17; NUREG/CR-2198; NUREG/CR-2079.)

Contention XIV

18. There are no known significant safety problems common to Argonaut reactors. (Ostrander Aff., p. 21; SER, secs. 3-9; NUREG/CR-2079; NUREG/CR-2198.)

Contention XII

19. Contamination of the secondary effluent by primary water is prevented by the natural static head differential which drives any hypothetical leakage into, and not out of, the primary loop. (Ostrander Aff., p.22.)

20. The UCLA reactor facility has HEPA filters, liquid holdup tanks, an extra control blade motor, and a radioactivity removal system. (Ostrander Aff., p.22.)

21. No member of the public has been endangered by the bypassing of interlock systems at the UCLA facility. (Ostrander Aff., p.22.)

22. No credible accident at the UCLA facility can create missiles. (Ostrander Aff., p.22.)

23. The time required to generate a fast neutron fluence of consequence in UCLA's 100 kw reactor operated 5% of the time on average is in excess of 100 years. (Ostrander Aff., p. 22.)

24. Since replacement of the fuel tie-bolts which occurred in the 1960's there have been no tie-bolt failures. (Ostrander Aff., pp. 22-23.)

25. Control blade scrams are backed by the independent dump water scram in the UCLA reactor. (Ostrander Aff., p. 23; SER, pp. 5-1, 6-2.)

Contention XVII

26. Decay heat build-up in a crushed core would not be sufficient to cause core melting. (Ostrander Aff., p. 24; NUREG/CR-2198; SER, sec. 14.)

Contention VI

27. Based on conservative assumptions the maximum argon-41 concentration seen in the past five years at the Mathematical Sciences Air intake is 2.6×10^{-9} $\mu Ci/cm^3$. (Wegst Aff., p. 5; Exhibits G and H.)

28. The highest radiation level on the unrestricted rooftop areas adjacent to the reactor building exhaust stack does not exceed 22 mrem per year above background. (Wegst Aff., p. 6; Application pp. II/A-7 to A-10.)

29. The radioactive emissions from the UCLA reactor have been reduced to a level that is as low as reasonably achievable. (Wegst Aff., p. 8.)

Contention VII

30. The UCLA reactor facility has experienced no accidents which have harmed any member of the public. (Ashbaugh Aff., p. 3; SER, p. 1-3; NRC Docket No. 50-142.)

31. None of the unscheduled shutdowns or abnormal occurrences which have occurred at the UCLA reactor facility are of safety significance. (Ashbaugh Aff., p.3; SER, p. 1-3.)

Contention IX

32. None of the calibration errors or equipment malfunctions which have occurred at the UCLA reactor facility are of safety significance. (Ashbaugh Aff., p. 4; Wegst Aff., pp. 2-7; Exhibit H, pp. 6-11.)

Contention XVI

33. The UCLA reactor operates an average of 8.5 hours per week at a maximum power level of 100 kw. (SER, p. 1-3 and sec. 17.)

34. The level of operations at the UCLA reactor does not produce significant component or equipment wear. (Ashbaugh Aff., p. 5; SER, pp. 17-1, 17-2.)

Contention IV

35. None of the notices of violation issued for the UCLA reactor facility since 1976 have raised any questions of safety significance. (Exhibits H through T.)

Applicable to Contentions VIII, V, XIX, XII, XIV, XVII and X

36. The worst accident deemed credible for the UCLA reactor facility does not endanger public health and safety. (Ostrander Aff., pp. 2-12; Application, pp. III/8-7 to 8-13; SER, pp. 1-3, 1-4 and sec. 14; NUREG/CR-2079; NUREG/CR-2198.)

Applicable to Contentions VI, VII, IX, XVI, III, IV, XIII and XV

37. UCLA reactor facility operations during the past 22 years have not resulted in any harm to members of the public or to property. (NRC Docket No. 50-142; SER, p. 1-3 and secs. 3, 4, 5, 6, 9, 11, 12 and 17.)