

7/20/82

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Committee To Bridge The Gap

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USNRC

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF	)	
	)	Doc. No. 50-142
THE REGENTS OF THE UNIVERSITY	)	
OF CALIFORNIA	)	
	)	(Proposed Renewal
(UCLA Research Reactor)	)	of Facility
	)	License No. R-71)

REQUEST FOR PRODUCTION OF DOCUMENTS  
RE SECURITY REGULATIONS PURSUANT TO  
COURT ORDER

TO: APPLICANT, THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, AND  
ITS ATTORNEYS OF RECORD:

Intervenor Committee to Bridge the Gap, hereby requests, pursuant to Title 10 of the Code of Federal Regulations Section 2.741, that Applicant the Regents of the University of California, shall serve its written response to these requests no later than August 9, 1982, and produce the documents described below at 1:00 p.m. on August 12, 1982, at the applicant's offices, UCLA campus, Los Angeles, California and permit intervenor and its attorneys to inspect and copy said documents, or any of them. This request is made pursuant to the Board order made at the Pre-Hearing conference held on Wednesday June 30, 1982.

## SPECIFICATION OF DOCUMENTS TO BE PRODUCED

### I.

#### INSTRUCTIONS

1. In responding to this request for production of documents you must produce all requested documents in your possession, custody, or control, or in the possession, custody or control of your agents, employees, representatives, investigators or attorneys.

### II.

#### DEFINITION OF TERMS

1. The term "document" as used herein means and includes:

- a. The original; or
- b. If the original is not in your custody or under your control, then a copy thereof; and in any event
- c. Includes any nonidentical copy or copies which differ from the original for any reason, including, but not limited to, the making of notes thereon; of any writing, as that term is defined in Rule 1001(1) of the Federal Rules of Evidence, paper, book, or record of whatever kind or description, which is not privileged, whether inscribed in hand or by mechanical, electronic, photographic, or other means, which shall include any recorded, taped or graphic matter in any phonic, (e.g., a tape recording) or a visual reproduction or record of any statement, conversation or event.

2. The term "UCLA/NEL" shall mean the Regents of the University of California, the University of California Los Angeles, the Nuclear Energy Lab at UCLA, their agents, employees

and representatives.

3. The terms "you" and "your" shall refer to UCLA/NEL.

4. The term "reactor" shall refer to the Argonaut type nuclear reactor which is located in Boelter Hall on the UCLA campus.

5. The term "reactor facility" shall mean the building, rooms and structures containing and surrounding the reactor which are used in or related to the operation of the reactor or storage of fuel therefor and the operation of the Nuclear Energy Lab.

6. The term "SNM" shall mean special nuclear materials as that term is defined in 10 CFR Section 73.2(x).

### III.

#### DOCUMENTS REQUESTED

1. All documents constituting, referring or relating to commitments to the NRC by the UCLA/NEL to maintain an external radiation dose rate in excess of 100 Rem per hour at 3 feet unshielded, for U-235 in the core of the reactor.

2. All documents constituting, referring or relating to commitments made by UCLA to the NRC to keep its SNM inventory at levels below those requiring compliance with 10 CFR 73.60.

3. All documents constituting, referring or relating to calculations regarding the operating conditions necessary to maintain an external radiation dose rate of greater than 100 Rem per hour at 3 feet unshielded for the U-235 in the reactor core.

4. All documents constituting, referring or relating to rules and procedures for maintaining the U-235 in the reactor at an external radiation dose rate in excess of 100 Rem per hour

at 3 feet unshielded.

5. All documents constituting, referring or relating to short term and long term plans for insuring that the SNM there is at all times less than 5000 grams at U-235 enriched more than 20%, with a total external radiation dose rate of less than 100 rems per hour at a distance of three feet unshielded at the reactor facility.

6. All documents constituting, referring or relating to plans or procedures for keeping the U-235 in the reactor core in a state of having an external radiation dose rate in excess of 100 Rem per hour at three feet unshielded in each of the following situations:

- a. Long weekends;
- b. Final examination periods;
- c. Holidays or vacations;
- d. Quarter breaks;
- e. Refueling;
- f. In-core maintenance;
- g. Experiments requiring in-core placements;
- h. Experiments requiring reactor shutdown several days prior to or after the experiment;
- i. Maintenance or calibration requiring a reactor shutdown of several days;
- j. Unintentional SCRAMS or other malfunctions, the cause or repair of which cannot be determined or accomplished within several days;
- k. Lack of business or other reason to operate the reactor other than for the purpose of maintaining the radia-

tion level of the fuel.

7. All documents referring or relating to NRC requirements for procedures, structures and other measures designed to minimize the potential for radiological sabotage at the reactor facility. If any of the documents requested in this Request No. 7 contain protected information please identify each such document and produce those portions which do not contain protected information.

8. All documents sent or received from the NRC, including but not limited to notices of violation, responses thereto, and inspection reports referring or relating to the need for UCLA/NEL to either reduce its SNM inventory levels or to increase its security consistent with higher levels of SNM.

9. All written communications between NRC and UCLA, or internal UCLA documents, for the period 1960 through the present, referring to or relating to:

a. The need to reduce SNM inventories at the reactor facility;

b. The applicability of 10 CFR 73.60 or 73.67 to the UCLA/NEL reactor operation;

c. The radiation level of irradiated fuel at the reactor facility.

10. All documents referring or relating to the quantity of U-235 at the reactor facility and its radiation level.

11. All documents referring or relating to the radiation level of the U-235 in the reactor core including the raw data from which such radiation level is computed.

12. The letter of December 12, 1974, from UCLA/NEL to

NRC regarding SNM inventory.

13. The letter of October 28, 1974, from UCLA/NEL to NRC regarding SNM inventory.

14. All documents referring or relating to the site visit and review described in Jim Miller's 1/12/81 letter to UCLA/NEL's Dr. Wegst.


15. All written communications between NRC and UCLA/NEL as to the need to transfer the irradiated fuel in storage at the reactor facility in order to comply with the Upgrade Rule to 10 CFR 73, from January 1, 1977 to January 1, 1981.

16. The following documents from January 1, 1981, through the most current entries:

- a. Operating Log;
- b. Maintenance Log and Records;
- c. Calibration Log and Records;
- d. Reactor Supervisor's Notebook/Log--reactor use schedule;
- e. Engineering Change Order;
- f. Minutes of the Radiation Use Committee and Campus Radiation Safety Committee.

DATED: July 20, 1982.

By

  
\_\_\_\_\_  
John H. Bay  
Attorneys For Intervenor  
(Contention XX)

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 OL  
(Proposed Renewal of  
Facility License)

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached: Request For Production  
Of Documents Pursuant to Board Order

in the above-captioned proceeding have been served on the following by deposit  
in the United States mail, first class, postage prepaid, addressed as indicated,  
on this date: July 20, 1982

John H. Frye, III,  
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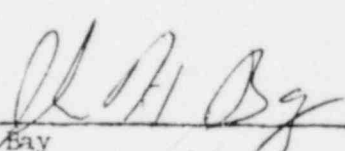
Chief, Docketing and Service Section (3)  
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