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COMMUNITY SAFETY DEPARTMENT
OFFICE OF RESEARCH & OCCUPATIONAL SAFETY
LOS ANGELES, CALIFORNIA 90024

6 August 1982

Mr. Hal Bernard, Acting Branch Chief
Standardization and Special Projects Branch
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket 50-142

Dear Mr. Bernard:

This is to advise you that UCLA recently transferred off-site a quantity of unirradiated U-235 reactor fuel sufficient to reduce the total inventory of U-235 at the UCLA facility to 4.92 kilograms - 3.53 kilograms irradiated, and 1.39 kilograms unirradiated. The off-site transfer was completed on July 21, 1982. I have enclosed copies of the fuel transfer forms for this shipment.

As you know, UCLA had been planning for some time to make this fuel transfer in order to remove an unnecessary constraint on future facility operations. In connection with this, in January 1981, the Commission informed UCLA that in order for UCLA to remain exempt from the Commission's upgraded safeguards regulations which became effective in November 1979, UCLA would either have to maintain the self-protecting conditions for the "in-core" fuel (100 Rem/hr at 3 feet, unshielded) or reduce its inventory of "fresh" fuel in storage [J. R. Miller letter to W. F. Wegst, January 12, 1981]. In response, UCLA informed the Commission that reactor operations were being scheduled to maintain the self-protecting conditions for the in-core fuel but that UCLA was also planning to reduce its unirradiated fuel inventory [W. F. Wegst letter to J. R. Miller, January 29, 1981].

UCLA has determined that under normal reactor operating conditions the self-protection criteria are generally satisfied. However, now that the total inventory of reactor fuel at the facility has been reduced to below 5 kilograms, UCLA need not maintain the self-protecting conditions to remain exempt from the safeguards requirements contained in 10 CFR 73.60. As a result UCLA need not be concerned with the possibility that the reactor may have to be shut down for an extended period of time at some time in the future.

Sincerely,

Walter F. Wegst

Walter F. Wegst, Director
Office of Research & Occupational
Safety

WFW/jb

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