

RESPONSE TO UCLA's ASSERTED MATERIAL FACT

35. "None of the notices of violation issued for the UCLA reactor facility since 1976 have raised any questions of safety significance."

DISPUTED. (same citations as for Staff "fact" 1 for Contention III)

23. DISPUTED. (Dupont full declaration, in particular P13-14,22,24-5; Warf, P23-27)

24. DISPUTED. (Plotkin as to XII, P23)

25. NOT DISPUTED THAT THE REACTOR HAS BOTH SCRAM SYSTEMS; (adequacy is disputed)