

OFFICE OF THE CHANCELLOR
LOS ANGELES, CALIFORNIA 90024

JULY 26, 1982

John H. Frye, III, Chairman
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

Dr. Emmeth A. Luebke
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:

University wishes to inform the Board with respect to the following two (2) matters.

City's Proposed Order and Affidavit

University received City of Santa Monica's proposed Protective Order and Affidavit of Non-Disclosure, dated July 12, 1982, for use in connection with the discovery of physical security information in the above-captioned proceeding. City's proposed order and affidavit appear to be identical to the order and affidavit proposed by CBG, except that part of paragraph 8 of CBG's proposed order has been deleted in City's proposed order.

University objects to City's proposed order and affidavit. University has previously responded with its objections to CBG's proposed order and affidavit in a July 12, 1982 pleading, "University's Proposed Protective Order and Affidavit of Non-Disclosure for Discovery of Physical Security Information." Since the versions proposed by City and CBG are nearly identical, the objections and reasons explained in University's July 12th pleading should be considered fully applicable to the order and affidavit proposed by City.

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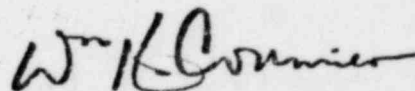
University does not intend to make any further response to City's proposed order and affidavit.

CBG's Modifications to Contentions Language

University wishes to make only a brief response to the "modifications to contention language" submitted by CBG July 12, 1982.

Most of the modifications are editorial in nature and unexceptionable. However, the re-writing of Contention VIII retains reference to the 1960 Hazards Analysis, confusing certain assumptions allegedly made in that Analysis with what is or may be contained in the 1980 Safety Analysis Report, presumably, as recently amended. In the amendments to the application submitted this past June (as noted by University, the "4-30-82" amendments) the 1960 Hazards Analysis was withdrawn from the application and replaced by an amended Safety Analysis Report (to avoid confusion, the "1982 Safety Analysis Report"), which incorporated by reference NUREG/CR-2079 and NUREG/CR-2198, the Argonaut accident analyses published in 1981. As modified, Contention VIII is ambiguous and imprecise in specifying the assumptions, if any, that are being challenged in the 1982 Safety Analysis Report.

Respectfully submitted,



William H. Cormier
UCLA Representative

cc: Service List