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(Contention XX)
Committee to Bridge the Gap

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)
	) Doc. No. 50-142 OL
THE REGENTS OF THE UNIVERSITY OF CALIFORNIA	)
	) (Proposed Renewal of Facility
	) License No. R-71)
(UCLA Research Reactor)	)
	)
	)

INTERVENOR COMMITTEE TO BRIDGE THE GAP'S FINAL SUPPLEMENTAL RESPONSE TO NRC STAFF'S MOTION FOR SUMMARY DISPOSITION AS TO THE ISSUE OF THE APPLICABILITY OF 10 CFR 73.60 AND THE NEED TO PROTECT AGAINST SABOTAGE

Pursuant to Board Order, Committee to Bridge the Gap (CBG) hereby submits its response to Applicant's March 16, 1983 reply and the NRC Staff's March 23, 1983 response and March 29, 1983 fuel shipment documentation relating to the issue of the quantity of Special Nuclear Material currently possessed by Applicant.

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I.

INTRODUCTION

In its March 4, 1983 memorandum and order the Licensing Board directed Staff and Applicant to respond to CBG's allegations that Applicant currently possesses more than a "formula quantity" of Special Nuclear Material (SNM) and granted CBG an opportunity to respond thereto. These submissions are the latest step in the Board's consideration of the Staff's motion for summary disposition on Contention XX and are the direct result of CBG's allegations that despite Applicant's July 21, 1982 shipment of a quantity of unirradiated fuel off-site, that Applicant currently possesses a formula quantity of Special Nuclear Material. A review of the evidence currently before the Board, demonstrates clearly that neither the Applicant nor the Staff have provided the Board with accurate and reliable information as to the quantity of SNM possessed by Applicant and that their own documents indicate that Applicant possesses more than 5,000 grams of SNM. In light of this fact, a brief review of the standards for summary disposition of a contention is in order.

Summary disposition may only be granted when the record shows that there is no genuine issue as to any material fact and that the movant is entitled to a decision as a matter of law. 10 C.F.R. § 2.749(d). The burden of proof lies upon the movant, who must demonstrate the absence of any genuine issue of material fact. Adickes v. Kress & Co., 398 U.S. 144, 157 (1970); 10 C.F.R. § 2.732. Furthermore, the record must be viewed in the light most favorable to the party opposing the motion. Poller v. Columbia Broadcasting System, Inc., 368 U.S. 464, 467 (1962).

Applying these standards to the instant controversy over the applicability of 10 C.F.R. § 73.60 and the quantity of SNM possessed by Applicant, the Staff cannot prevail on its overall summary disposition motion as to Contention XX unless the record viewed in a light favorable to CBG demonstrates that there is no genuine issue or question as to the exact amount of SNM possessed by Applicant. As will be shown below, the record does not and cannot support such a conclusion.

II.

APPLICANT AND STAFF HAVE NOT DEMONSTRATED THROUGH COMPETENT AND RELIABLE EVIDENCE THAT APPLICANT POSSESSES LESS THAN 5,000 GRAMS OF SNM

Other than taking an actual physical inventory of Applicant's SNM, a measure CBG is unable to undertake and one which neither the Applicant nor Staff have undertaken, in order to determine the amount of SNM on site it is necessary to establish some reliable baseline quantity in the past from which to calculate the current inventory. In its February 8, 1983 submission, CBG uses as a baseline the NRC inspection reports from 1974, 1975, 1978 and 1979. As CBG stated therein, these reports indicate that on October 31, 1978 and October 10, 1979, the NRC inspectors determined that Applicant possessed 9,000 grams U-235 plus two Pu-Be startup sources. In its March 16, 1983 submission, the Applicant accuses CBG of attempting to deliberately mislead the Board by using these baseline quantities. Applicant states on page 4:

> In fact, as is clear in reading the first sentence on page three of the 1978 inspection report (CBG's Exhibit I), that the 9.0 kilograms of SNM estimated by the NRC inspector included the two 32 gm Pu-Be neutron sources . . .

The following is the relevant portion of the 1978 inspection report:

> The inspector determined through interview of licensee employees that the licensee presently has in its possession 9.0 kg. of special nuclear material in the form of 93% enriched uranium (fuel plates, fuel scraps and uranyl nitrate) and two 32 gm Pu-Be neutron sources. The U-235 is located as follows: 3.6 kgs. U-235 is in _____ and 0.7 kg. is in the radioactive storage pits, and 4.7 kgs. is non-irradiated fuel stored in _____. (Blanks in the censored copy provided to CBG.)

Simple addition of 3.6 plus 0.7 plus 4.7 kgs. equals 9.0 kg. of Special Nuclear Material without the neutron source. The inspector's estimate of Applicant's SNM did not include the two 32 gram Pu-Be neutron sources. We submit that either Applicant's counsel cannot add or it is the Applicant which is attempting to deliberately mislead the Board. The baseline inventory on January 1, 1979 should be 9,000 grams, not the 8,866 grams that the Staff uses as its baseline, or the 8,870 grams which Applicant uses.

Having established that the baseline should be 9,000 grams, let us examine the off-site transfers of SNM after January 1, 1979. Staff's March 29, 1983 letter enclosing certain nuclear material transaction reports indicates off-site transfers after January 1, 1979 in the amount of 3,938 grams. Several facts regarding these transfers must be noted. First, the nuclear material transaction reports are documents prepared by Applicant

and apparently not subject to any independent verification. Second, the transaction reports for the July 21, 1982 shipment of fuel plates themselves raise several discrepancies and questions. The three transactions reports for this shipment which are attached hereto as Exhibit "A" each indicate a shipment of 55 alloy fuel plates. The isotope weight noted on the three transaction reports are 778 grams, 781 grams and 796 grams, for a total of 2,355 grams. If one divides 2,355 grams by 165, the number of alloy fuel plates, one finds that each fuel plate has an isotope weight of some 14.27 grams. Interestingly, on page III/5-4 of Applicant's Application for License Renewal, each fuel plate is listed as containing approximately 13.0 grams of U-235. Thus, according to the specifications listed in the Application, 165 fuel plates should contain 2,145 grams of U-235. It would appear that either the Application is wrong, in which case it is very likely that there is a greater amount of fuel in the core than heretofore accounted for, or that Applicant and Staff have overcounted the fuel shipped off site by as much as 210 grams. A genuine issue of fact exists as to precisely how much fuel has been shipped off site.

The fuel transaction reports also omit a notation as to the limit of error, or error bars despite the fact that a space is provided for such a notation. Given the quantities of fuel involved, an error of even one or two percent could be very significant in terms of the regulatory threshhold. Particularly given the unverified unattested to nature of the figures in the reports, some error should be assumed.

In light of the foregoing, a genuine issue of material fact exists as to the precise quantity of SNM possessed by Applicant. Based on the foregoing discussion, the following is one likely calculation of Applicant's SNM inventory.

UCLA Inventory of SNM on 1/1/79:	9,000 grams
Off-site transfers of SNM after 1/1/79:	3,728 grams
Burnup loss of SNM reported:	4 grams
Present inventory of SNM:	5,268 grams

Since the "formula quantity" of SNM is 5,000 grams (10 C.F.R. § 73.2(b)), the present inventory of SNM possessed by Applicant is greater than the "formula quantity" without even considering the two 32 gram Pu-Be sources.

As CBG has briefed extensively in its earlier submission, the Pu-Be sources must be included in the determination of the total inventory of SNM possessed by Applicant for safeguard purposes. As Applicant has admitted, 10 C.F.R. 73.60 does not include an exemption for Pu-Be sealed sources. Furthermore, Applicant has once more misled the Board regarding the existence and location of the Pu-Be sources. The Affidavit of Neill C. Ostrander attached to Applicant's March 16, 1983 submission states that on July 22, 1982 a single 32 gram Pu-Be sealed source was physically transferred from the reactor facility to a calibration building remote from the reactor site. In fact, CBG is informed and believes that the calibration building alleged to be remote from the reactor site is, in fact, within several hundred feet of the reactor.

In sum, if one includes the 32 gram Pu-Be sources, one finds that Applicant could have as much as 5428 grams SNM on site.

III.

CONCLUSION

The issue before the Board is whether or not a genuine issue of material fact exists and whether the Staff is entitled to judgment on Contention XX as a matter of law. The sub-issue which the parties have focused on in this series of submissions is the applicability of 10 C.F.R. 73.60 to Applicant's facility. Within this issue, the critical determining factor is the quantity of SNM possessed by Applicant. As the quantity of SNM possessed is a critical material fact in reaching a decision as to the applicability of 73.60 and as to reaching a decision on the entire summary disposition motion, if a genuine dispute exists as to the amount of SNM on site, Staff has failed to uphold its burden and summary disposition cannot be granted.

The Board does not have before it a current direct physical inventory of the SNM possessed by Applicant. Not having that, it can only rely on the record that has been created before it by the parties. In determining whether or not there is a dispute as to the amount of SNM on site, the reliability of the evidence on the record and the credibility of its proponents must be considered by the Board. In light of this, let us review Applicant and Staff's course of conduct concerning Contention XX throughout this proceeding.

Shortly after CBG submitted its initial petition for Leave to Intervene on May 22, 1980, Staff requested an opportunity to meet with CBG and discuss CBG's concerns about the reactor. The meeting took place on July 9, 1980, and included both legal

and technical members of the Staff. During the discussion, Mr. James Miller, Branch Chief in Licensing, and in charge of NRC review of UCLA's security, told CBG that it would be permitted to litigate any matter related to security "over my dead body." This obstructionist attitude has continued throughout.

At the first prehearing conference, September 25, 1980, when CBG was admitted to the proceedings, the Board directed that Staff and CBG confer about the nature of NRC security regulations in an effort to assist CBG in drafting an acceptable contention. The Staff failed to follow through: information was not forthcoming, phone calls were not returned, the little information which was provided turned out to be inaccurate. (See Complaint by M. Pollock, February 4, 1981; Prehearing Conference TR 84, 85.)

At that prehearing conference Staff argued that Applicant need only comply with 10 C.F.R. § 73.67, and that it did not have nor was it licensed to have more than a "formula quantity" of SNM (TR 388-89) In fact, at that very moment Applicant possessed more than a "formula quantity" of SNM and Staff had so informed Applicant a few weeks earlier. (Miller to Wegst, January 12, 1981). Interestingly, the January 12 letter was not provided to CBG or the Board until many months later, after repeated protests by CBG that the Staff was withholding documents.

On April 13, 1981 Staff moved for summary disposition of Contention XX premising its case, not on assertion that Applicant's security was adequate, rather by arguing that Applicant did not need to protect against theft or sabotage. This summary disposition motion violated the stipulated discovery schedule and

was stricken as untimely.

In July of 1982 when the Board directed CBG to respond to the summary disposition, it did so demonstrating that despite Staff's assertion to the contrary in its motion, the NRC Staff itself had informed Applicant and other non-power reactor operators of the sabotage protection requirements (CBG 2/8/83 Brief, p. 3) and that they were not in compliance with the security regulations. In fact, for a period of several years prior to the filing of Staff's summary disposition motion, the NRC Staff consistently stated in numerous documents that UCLA/NEL could not operate in such a manner as to assure self protecting levels of radiation (100 rem/hour) in the core fuel and that as early as August 15, 1979, Applicant informed the NRC Staff in the person of James R. Miller that it could not meet the self protection criteria of 100 rem/hour at all times. (Harold V. Brown (UCLA) to James R. Miller (NRC) letter 8/15/79.) On August 28, 1979, in a letter from I. Catton, Director NEL to Robert W. Reid, Chief of Operating Resources Branch #4, Catton told Reid that none of the SNM at UCLA/NEL could be exempted by the 100 rem/hour at 3 feet criterion. In SECY-79-187c dated December 19, 1979, UCLA was listed as one of seven non-power reactors which cannot meet the 100 rem/hour exemption criterion. (SECY-79-187c, p. 3). On January 12, 1981, James R. Miller wrote ot Dr. Walter F. Wegst at UCLA informing him that UCLA/NEL's operating and SNM sites are contiguous and as such UCLA/NEL must meet the requirements of 73.67(a)(b)(c)(d) and 73.60. On February 4, 1981, NRC Staff counsel argued before the Board that Applicant did not have

sufficient quantities of SNM to be subject to 10 C.F.R. § 73.60. (2/4/81 Transcript, p. 388:22-23.) On April 8, 1981, James R. Miller signed an affidavit in support of Staff's summary disposition motion which stated:

> I have verified that the irradiated fuel in the UCLA reactor core emits radiation such that the dose at three feet will be in excess of 100 rems per hour . . . In addition, UCLA has committed to schedule reactor operations to maintain the self-protection of the fuel in the reactor core.
> (Miller Affidavit, p. 2, ¶ 7.)

CBG's September 9, 1982 submission demonstrates, using Applicant's own formulas, that the reactor fuel loses its inherent self-protection capability within eight hours of reactor shutdown. (CBG's Response Brief, p. 16-17). Thus, from 1979 to 1981, despite Staff's assertions in its moving papers, Applicant and Staff agreed that the UCLA/NEL reactor fuel could not meet the 73.60 exemption criterion at all times. Their record in terms of providing a credible inventory is no better.

We have no current and physical inventory of the SNM. The reports provided by Staff in an effort to verify its assertions are merely shipping documents filled out by Applicant. Even these reports omit the error bars, although the forms, themselves, have a place for such error limitations.

Applicant has a long history of MUF (Material Unaccounted For) and their interpretation of the inventory records is by their own admission uncertain at best. (See 8/25/82 Ostrander to Cormier Memorandum, Exhibit K to CBG's February 8, 1983 submission).

Finally, we have assertions such as that made by Applicant in its latest submission accusing CBG of double counting the Pu-Be sources in the 1978 inspection report when simple arithmetic demonstrates that the Pu-Be sources were not counted.

Thus, there is no basis for the Board to conclude that Staff and Applicant's estimates of SNM possessed by Applicant are credible and accurate. In fact, there is every reason to believe that Applicant currently possesses greater than the formula quantity of SNM. Consequently, unless evidentary hearings are held, the Board cannot determine accurately how much SNM is on site, and thus cannot determine whether Applicant is subject to the requirements of 73.60.

Respectfully submitted,

JOHN H. BAY
DOROTHY THOMPSON
NUCLEAR LAW CENTER

By _____
Attorneys for Intervenor (Contention XX)
Committee to Bridge the Gap

E/NRC FORM 741
(01) Previous editions are obsolete
MANDATORY DATA COLLECTION
(AUTHORIZED BY 10 CFR 30, 40, 50, 70,
150, Public Laws 83-703, 93-438, 95-91)

U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION

NUCLEAR MATERIAL TRANSACTION REPORT

BUSINESS MAIL JUL 27 1982
10 CFR 20

Approved by OMB
038 R0478
Approved by GAO
B-180225 (R0040)
Expires 6-30-83

1 SHIPPER'S M B/S	2 RECEIVER'S M B/S	3 TRANSACTION NO.	4 CORRECTION NO.	5 PROCESSING CODE	6 RESERVED	7 ACTION CODE	8 DATA CODE	9 CLASSIFICATION (When Completed)
YEU	F2B	2	0	SHIPPER A / RECEIVER		SHIPPER A / RECEIVER		SECRET

PAGE 1 OF PAGES COPY 5 OF 7 COPIES SERIES

10A. NAME AND ADDRESS OF SHIPPER
University of California (SEAS/NEL
405 Hilgard Ave
Los Angeles, CA, 90024
C. ATTENTION Neill C. Ostrander
D. TELEPHONE (213) 825-2040

B. LICENSE NO. R-71

10B. NAME AND ADDRESS OF RECEIVER
Union Carbide Corporation, Nuclear
Division, Y-12 Plant, Bldg 9720-5
Oak Ridge, TN, 37830
C. ATTENTION Edward Owings
D. TELEPHONE (615) 574-2580 Russ pullen

B. LICENSE NO. exempt

11. NO. OF DATA LINES: 01
12. NATURE OF TRANSACTION: D
13. A. SHIPPED FOR ACCOUNT OF: B. M.B. YEU
14. A. SHIPPED TO ACCOUNT OF: same; B. M.B.

15. TRANSFER AUTHORITY: CONTRACT, NRC DRAFT, OR ORDER NUMBER: DE-AS03-76SF00034, PA DE-AT03-76SF80120. See Box 21.

16. EXPORT OR IMPORT TRANSFERS: A. LICENSE NO.; B. U.S. PORT OF ENTRY/EXIT

17. MATERIAL TYPE AND DESCRIPTION: Irradiated Fuel Plates of 93% enriched U-235 alloyed with aluminum and clad with aluminum
Copy to Ralph 9-8-82 AA

17A. MISCELLANEOUS
Telcon: DOE (McIntosh - S.F. Op) to UCLA (Ostrander - NEL) on 6-21-82.

B. Control Note Attached Yes ☐ No ☐
C. Control Note Attached Yes ☐ No ☐

18. TRANSPORTATION PROFILE: exempt
19. PACKAGE IDENTIFICATION

	A. CARRIER IDENTIFICATION	C. TRANSFER POINT	A. MODEL ID	B. NUMBER
1	GOU2		6M	1
2				
3				
4				
5				

20. ACTION DATE: A. SHIPMENT 7 21 82; B. SHIPPER'S CORRECTION; C. RECEIPT; D. RECEIVER'S MEASUREMENT; E. RECEIVER'S CORRECTION

22. TOTAL GROSS WEIGHT: 460
23. TOTAL VOLUME

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LINE NO.	TYPE OF PACKAGE	IDENTIFICATION (BATCH NAME)	NO. OF ITEMS	PROJECT NUMBER	WASTE DISPOSAL TYPE	COMPONENT FACILITY CODE	TYPE DATA	VOID CODE	COUNTRY CONTROL NUMBER	KEY MEAS. POINT	MEAS. IDENT 1	MEAS. IDENT 2	MEAS. IDENT 3	MEAS. IDENT METHOD	GROSS WEIGHT	NET WEIGHT	ELEMENT WEIGHT	ELEMENT LIMIT OF ERROR	WEIGHT % ISOTOPE	ISOTOPE WEIGHT	ISOTOPE LIMIT OF ERROR
1		alloy Fuel Plates	55		20	391	A		USUS0000							13135	93500		93.1300	77800	

TJ2 AA
7-30-82
8-5-82
All change per OSTRANDER

24. SHIPPER'S CERTIFICATION: SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED: 7/21/82

25. RECEIVER'S DATA: 1. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

G

EXHIBIT A

NRC FORM 741
(1) Previous editions are obsolete.
MANDATORY DATA COLLECTION
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U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION

NUCLEAR MATERIAL TRANSACTION REPORT

BUSINESS MONTH ____
TO ORO ADP ____
DATA TO CTC ____

Approved by OMB 038 R0478
Approved by GAO B 180225 (R0040)
Expires 6-30-83

1. Shipper's RIS	2. Receiver's RIS	3. Transaction No.	4. Correction No.	5. Processing Code	6. Reserved	7. Action Code	8. Data Code	Documentation
YEU	F2B	3	0	Shipper A		Shipper A		Page __ of __ Pages; Copy 5 of 7 copies series

9a. Name and Address of Shipper — b. License No. R-71
University of California (SEAS/NEL)
405 Hilgard Ave
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c. Attention: Neill C. Ostrander
d. Telephone: (213) 825-2040

10a. Name and Address of Receiver — b. License No. exempt
Union Carbide Corporation, Nuclear Division, Y-12 Plant, 9720-5
Oak Ridge, TN, 37830
c. Attention: Edward Owings
d. Telephone: (615) 574-2580

11. No. of Data Lines: 01
12. Nature of Transaction: D
13. a. Shipped for Account of: YEU — Same
14. a. Shipped to Account of: —

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4. F2B - LAA
5. ~~LAA~~ QFA
6. XAG
7. YEU

15. Transfer Authority, Contract, NM Draft, or Order Number: DE-AS03-76SF00034, PA: DE-AT03-76SF80120, See Box 21.

16. Export or Import Transfers — a. License No.
b. U.S. Port Exit/Entry

Material Type and Description: Unirradiated Fuel Plates of 93% enriched U-235 alloyed with aluminum and clad with aluminum.

18. Transportation Profile: exempt
a. Certification: GOVZ

19. Package Identification — a. Model ID: 6M — b. Number: 1

20. Action Date — A. Shipment: Month 7, Day 21, Year 82

21. A. Miscellaneous
Telcon: DOE (McIntosh - S.F. Op.) to UCLA (Ostrander - NEL) on 6-21
Copy to Ralph 9-8-82

B. Concise Note Attached: Yes ☐ No ☐
C. Concise Note Attached: Yes ☐ No ☐

22. Total Gross Weight: 460
23. Total Volume

Line No.	Identification (Batch Name)	No. of Items	Project Number	Mat. Type	Comp. Facility Code	Free Code	Owner Code	Country Control Number	Key Meas. Point	Meas. Ident.	Gross Weight	Net Weight	Element Weight	Element Limit of Error	Weight % Isotope	Isotope Weight	Isotope Limit of Error
1	Alloy Fuel Plates	55		20	391	A		USUS0000				13138	839.00		93.1200	781.00	

All changes per Ostrander
Ok, 8-5-82
TJZ

24. Shipper's Data — Signature of Authorized Official and Date Signed: [signature] 7/21/82

25. Receiver's Data — 1. Signature of Authorized Official and Date Signed:

NRC FORM 741

(3) Previous editions are obsolete

MANDATORY DATA COLLECTION

AUTHORIZED BY 10 CFR 30, 40, 50, 70

P.L. Public Laws 83-703, 93-438, 95-91

U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION

NUCLEAR MATERIAL TRANSACTION REPORT

JUL 29 1982

Approved by GAO
B-180225 (R0040)
Expires 6-30-83

1 SHIPPER'S RIS	2 RECEIVER'S RIS	3 TRANSACTION NO.	4 CORRECTION NO.	5 PROCESSING CODE	6 RESERVED	7 ACTION CODE	8 DATA CODE	9 DOCUMENTATION (CONTINUATION SHEETS)
YEU	Z6F	1	0	SHIPPER A / RECEIVER		SHIPPER A / RECEIVER		PAGE 1 OF 1 PAGES COPY 5 OF 7 COPIES SERIES

8A. NAME AND ADDRESS OF SHIPPER
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405 Hilgard Ave
Los Angeles, CA 90024
C. ATTENTION Neill C Ostrander
D. TELEPHONE (213) 825-2040

B. LICENSE NO. R-71

10A. NAME AND ADDRESS OF RECEIVER
University of Florida, Bldg 557
Department of Nuclear Engineering
Gainesville, Florida, 32611
C. ATTENTION Donald Monroe
D. TELEPHONE (904) 392-1594

B. LICENSE NO. R-56

11. NO. OF DATA LINES: 01
12. NATURE OF TRANSACTION: B

13. A. SHIPPED FOR ACCOUNT OF: YEU
Same
PROF WILLIAM VERNETSON

14. A. SHIPPED TO ACCOUNT OF: Z6F
Same

15. EXPORT OR IMPORT TRANSFERS
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B. U.S. PORT (EXIT/ENTRY)

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16. TRANSPORTATION — Exempt
17. PACKAGE IDENTIFICATION
18. ACTION DATE

LINE	A. IDENTIFICATION OF CONTAINER	B. TRANSFER POINT	A. MODEL NO.	B. NUMBER	A. SHIPMENT	B. SHIPPER'S CORRECTION	C. RECEIPT	D. RECEIVER'S MEASUREMENT	E. RECEIVER'S CORRECTION
1	GOVZ		6M	1					
2									
3									
4									
5									
6									

A. MONTH 7 | B. DAY 21 | C. YR 82

19. TOTAL GROSS WEIGHT: 460
20. TOTAL VOLUME

MATERIAL TYPE AND DESCRIPTION
Unirradiated Fuel Plates of 93% enriched U-235 alloyed with aluminum and clad with aluminum
McIntosh 536-4152 Copy to Foley 7-8-82

21. A. MISCELLANEOUS
Telecon: DOE (McIntosh - SF Op) to UCLA (Ostrander - NEL) on 6-21-82. We have [illegible]

B. Certain Nuclear Material: Yes ☐ No ☐
C. Certain Nuclear Material Attached: Yes ☐ No ☐ AA

TRANSFER AUTHORITY, CONTRACT, NRC DRAFT, OR ORDER NUMBER
DE-AS03-76SF00034, PA: DE-AT03-76SF80120. See Box 21.

LINE	IDENTIFICATION (BATCH NAME)	NO. OF ITEMS	PROJECT NUMBER	MATERIAL TYPE	COMP. FACILITY CODE	PRODUCT CODE	FAMILY CODE	COUNTRY CONTROL NUMBER	KEY MEASUREMENT POINT	MEASUREMENT	GROSS WEIGHT	NET WEIGHT	ELEMENT WEIGHT	ELEMENT LIMIT OF ERROR	MATERIAL TYPE	MATERIAL QUANTITY	LIMIT OF ERROR
1	Alloy Fuel Plates	55		20	391	A		US115000			13152		855.00			93.100	796.00

all charges per Ostrander
Alt 8-5-82
TSZ

24. SHIPPER'S DATA Neill C. Ostrander for James McLaughlin RSO 7/21/82
SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

25. RECEIVER'S DATA
A. SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED

A

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 INTERVENOR COMMITTEE TO BRIDGE THE GAP'S FINAL SUPPLEMENTAL RESPONSE TO NRC STAFF'S MOTION FOR SUMMARY DISPOSITION AS TO THE ISSUE OF THE APPLICABILITY OF 10 CFR 73.60 AND THE NEED TO PROTECT AGAINST SABOTAGE 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: April 13, 1983

John H. Frye, III, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Administrative Judge
Atomic Safety & 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

Chief, Docketing & Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Washington, D.C. 20555
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