

DOCKETED
USNRC

'84 JAN -3 P4:07

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

| | | |
|-------------------------------|---|-------------------------------|
| In the Matter of |) | |
| |) | Docket No. 50-142 |
| THE REGENTS OF THE UNIVERSITY |) | (Proposed Renewal of Facility |
| OF CALIFORNIA |) | License Number R-71) |
| |) | |
| (UCLA Research Reactor) |) | December 30, 1983 |
| |) | |

UNIVERSITY'S RESPONSE TO CBG'S
MOTION FOR CURTAILMENT OF ACTIVITIES

DONALD L. REIDHAAR
GLENN R. WOODS
CHRISTINE HELWICK
590 University Hall
2200 University Avenue
Berkeley, California 94720
Telephone: (415) 642-2822

Attorneys for Applicant

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA

8401050233 831230
PDR ADOCK 05000142
G PDR

D503

In its motion CBG seeks "curtailment" of activities at the UCLA facility on the asserted grounds that there is no "sabotage protection plan" for the UCLA facility and that the Board has determined that such a plan is required.


CBG's arguments are based on misrepresentation of the factual record and a misunderstanding of the effects of the Board's rulings concerning Staff's motion for summary disposition of Contention XX. At best, CBG's motion is premature. It is sufficient to point out here that the remedy CBG appears to be seeking is in the nature of an enforcement action which is properly a matter for the NRC Staff and not the Licensing Board.

University respectfully requests that the motion be denied.

Dated: December 30, 1983.

DONALD L REIDHAAR
GLENN R. WOODS
CHRISTINE HELWICK

By



WILLIAM H. CORMIER
Representing UCLA

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached: UNIVERSITY'S RESPONSE TO CBG'S MOTION FOR CURTAILMENT OF ACTIVITIES.

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: December 30, 1983.

John H. Frye, III, Chairman
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

Mr. Glenn O. Bright
Administrative Judge
ATOMIC SAFETY AND LICENSING BOARD
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Counsel for the NRC Staff
OFFICE OF THE EXECUTIVE LEGAL DIRECTOR
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Ms. Colleen P. Woodhead

Chief, Docketing and Service Section (3)
OFFICE OF THE SECRETARY
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555


Mr. Daniel Hirsch
Cte. to Bridge the Gap
1637 Butler Avenue, #203
Los Angeles, CA 90025

Mr. John H. Bay, Esq.
Chickering & Gregory
Three Embarcadero Center
Suite 2300
San Francisco, CA 94111

Mr. Daniel Hirsch
Box 1186
Ben Lomond, CA 95005

Nuclear Law Center
c/o Dorothy Thompson
6300 Wilshire Blvd., #1200
Los Angeles, CA 90048

Ms. Lynn G. Naliboff
Deputy City Attorney
City Hall
1685 Main Street
Santa Monica, CA 90401


WILLIAM H. CORMIER
Representing UCLA

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA