

RELATED CORRESPONDENCE

Roger L. Kohn, c/o
Committee to Bridge the Gap
DOUGLAS BUTLER
Butler Avenue, Suite 203
Los Angeles, CA 90025
(213) 379-3956, (213) 478-0829

*84 MAY -7 P2:21

William H. Cormier, Esq.
Office of the Administrative Vice Chancellor
University of California at Los Angeles
405 Hilgard Avenue
Los Angeles, California 90024

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

Dear Mr. Cormier:

This is to confirm our telephone conversations of April 28 and May 2, 1984 concerning (1) the facility site tour per Board Order of April 20, 1984, (2) the deposition of CBG expert security witnesses, and (3) my appearance for CBG.

(1) Our witnesses can make themselves available with CBG attorneys for the site tour on your suggested date of Monday, May 7, 1984, at 7:00 am, at NEL. We will expect that we will be permitted to direct the tour and pace, where our witnesses so desire, that the whole day until 4:30 pm be available for the tour and document inspection, and that the tour include the following:

- reactor room;
- fresh-fuel (storage) room and subcritical facility;
- equipment room;
- third and eighth floors;
- key cabinet;
- phone lines and phone-line tunnels and communication lines to University police;
- power lines and backup power sources;
- doors, access ports, openings, crawl spaces, fences, and barriers, through or attached to the above;
- alarms, wiring and conduits, control panels and boxes, on-off and arming and testing controls and control stations where alarms are received or monitored,

DS03

related or affixed to the above;

and any other security items and NEL features which we are entitled to inspect but which we may not have specified in detail above as we tried to so do for your convenience.

We have also requested to inspect security documents, including but not limited to the following which, for your convenience, we are attempting to specify in some detail:

1. Security plan: (a) current;
(b) previous (all);
(c) amendments (all); and
(d) all correspondence related thereto, sender and recipient;
2. Inspection reports:
(a) by NRC;
(b) by any other entities (regarding security);
(c) all correspondence related thereto;
3. Notifications by the University to the NRC regarding security developments, occurrences, and problems;
4. Security audits;
5. Security logs, and records of all reviews and incidents;
6. All correspondence in the security files and that related to response and detection;
7. Minutes of the Radiation Use Committee, security committee, and other committees on security matters;
8. Records of alarm installation, maintenance, repair, verification and testing, and any problems related to these;
9. Records and logs of keys, including issuance and return, and locks, including installation, maintenance, repair, verification and testing, rekeying, and any problems related to these, and including locksmiths' records;
10. Wiring diagrams, mechanical plans, specifications, and records of installation, maintenance, repair, verification and testing, and problems, regarding
 - intrusion alarms,
 - detection systems,
 - communication systems and lines,
 - power sources and lines,
 - doors, barriers, locks,

- and interlocks;
11. Records and logs of watchmen, guards, police, and other security personnel and response forces, related to routine NEL security and non-routine incidents, whether logged by NEL personnel or others; and
 12. All special documents related to Olympic security measures for or by NEL.

These requested items are to include all those for the duration of the past license period, present, and future.

We view items 3. through 12. above as within our approved request for the security file and security log. We reiterate that we are entitled to inspect the University's security files concerning NEL, and not merely Mr. Ashbaugh's security files. Thus, insofar as, e.g., locksmith personnel, or the Facility Division, or the University police, or the Chancellor's Office maintain files related to security and locatable or filed or indexed to NEL activities, we view these as part of the security files. That is, CBG regards it as irrelevant that Applicant, the Regents of the University of California, may have chosen to maintain some security files at locations other than NEL. We hope that, as attorney for Applicant, you will locate and make available any such files not in fact located in Mr. Ashbaugh's files. If you still object to giving us access to any such documents developed, received or maintained by the University, or to any of the items on the above site or document list, please notify me at least one working day before the tour date so that we can place the matter before Judge Frye to resolve.

We will expect that you will supply us with copies of the above documents that we so designate, or that you give us continuing access to all the above security information, at a minimum during all working hours, subsequent to the tour and document inspection.

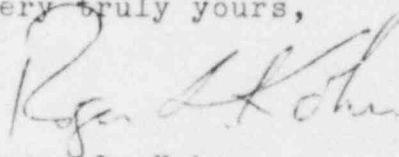
(2) We have scheduled our expert witnesses to be available for depositions on your suggested date of Thursday, May 10, 1984-- Dr. Plotkin at 9:00 am, and Mr. Cornwell at 1:00 pm. As we discussed, our witnesses expect to be paid, in advance of the depositions, their usual and customary fees as experts. Mr. Cornwell's rate is \$50/hour with a minimum of eight hours (\$400). Dr. Plotkin's fee is \$150 each of the first three hours, \$100 for each additional hour of travel or work, with a minimum of \$600. We would expect that, within 48 hours of receipt of this letter, you will inform me of your intent to depose or not. Further,

Mr. Cormier
Page four
May 2, 1984

if you do not notify me at least 48 hours before the scheduled depositions, Dr. Plotkin and Mr. Cornwell will expect to be paid their minimum fees for the time they have set aside.

(3) I have been accepted as associate counsel for CBG on Contention XX under the protective order, per verbal order of Judge Frye on Friday, April 27, 1984. If you have not received written confirmation of that order, please verify it to your satisfaction with Judge Frye or John Bay in time for the site tour on Monday, May 7.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Roger L. Kohn".

Roger L. Kohn
Attorney for Intervenor
Committee to Bridge the Gap
and Associate Counsel on
Contention XX

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 MAY -7 P2:21

In the Matter of)
)
THE REGENTS OF THE)
UNIVERSITY OF CALIFORNIA)
)
(UCLA Research Reactor))
_____)

Docket No. 50-142

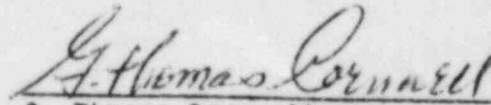
(Proposed Renewal of
Facility License)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

DECLARATION OF G. THOMAS CORNWELL

I, G. Thomas Cornwell, do declare as follows. I
have been given a copy of the Protective Order issued by the
Atomic Safety and Licensing Board dated January 18, 1984, and
revised April 20, 1984. I have read it and I agree to abide by
its terms.

I declare under penalty of perjury that the foregoing
is true and correct.


G. Thomas Cornwell

Executed at Los Angeles, CA on this 30th day of Apr, 1984

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'84 MAY -7 P2:21

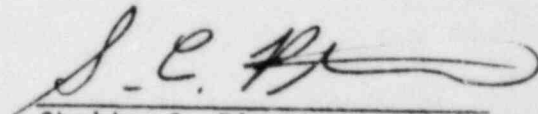
In the Matter of)
)
THE REGENTS OF THE)
UNIVERSITY OF CALIFORNIA)
)
(UCLA Research Reactor))
_____)

Docket No. 50-142
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
(Proposed Renewal of
Facility License)

DECLARATION OF DR. SHELDON C. PLOTKIN

I, Sheldon C. Plotkin, do declare as follows. I
have been given a copy of the Protective Order issued by the
Atomic Safety and Licensing Board dated January 18, 1984, and
revised April 20, 1984. I have read it and I agree to abide by
its terms.

I declare under penalty of perjury that the foregoing
is true and correct.


Sheldon C. Plotkin

Executed at Los Angeles, CA on this 30th day of April, 1984