

RELATED CORRESPONDENCEDOCKETED
USNRC

'84 MAY 29 P12:25

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA

(UCLA Research Reactor)

Docket No. 50-142
(Proposed Renewal of Facility
License Number R-71)

May 25, 1984

UNIVERSITY'S INTERROGATORIES TO CBG CONCERNING SECURITY CONTENTION

PROPOUNDING PARTY:

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA

RESPONDING PARTY:

COMMITTEE TO BRIDGE THE GAP

SET NUMBER:

ONE

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 CALIFORNIA8405300255 840525
PDR ADOCK 05000142
G PDR

D503

University hereby requests the Committee to Bridge the Gap, pursuant to 10 CFR §2.740 and particularly §2.740(e)(1)-(3), to answer separately and fully in writing and under oath or affirmation the following interrogatories.

In answering these interrogatories, you must furnish all information as is known or available to you regardless of whether this information is possessed directly by you, your officers, members, agents, representatives, consultants, witnesses, or attorneys. Your answers should be numbered corresponding to the number of the interrogatory and, where applicable, its subparts. If any of these interrogatories cannot be answered in full, answer to the extent possible, specifying the reasons for your inability to answer the remainder, and stating whatever information, knowledge, opinion, or belief you do have concerning the unanswered portion.

As used herein, "document" or "documents" refers to papers, photographs, tapes, and all other tangible things on which any handwriting, typing, printing, photostatic copy, magnetic or electrical impulse, or other form of communication is recorded or reproduced, including, but not limited to, letters, notes, diaries, correspondence, contracts, agreements, files, records, reports, telegrams, bulletins, memoranda, orders, invoices, brochures, maps, diagrams, agendas, minutes, studies, analyses, manuals, transcriptions, pictures, photographs, and recordings, all notations on the foregoing, and all summaries thereof.

As used herein, "identify the document(s)" means provide for each document, the name and address of the person who presently has custody or control of the document and each copy thereof; the nature and substance of the document with sufficient particularity to enable the same to be identified; the form of the document; the date of the document; and the name and address of each person who drafted it or participated in its drafting. If the document to be identified is a document in the custody of the UCLA staff that has been made available to CBG, its witnesses or attorneys, during document examination sessions conducted in connection with this security contention proceeding, the document may be identified by describing it as a "UCLA" document and indicating with sufficient particularity the nature of the document and the page or portion of the document that contains the information requested (for example, UCLA Security Plan, page 12-8; UCLA Security Log, entry of May 30, 1984).

As used herein, "depositions" refers to the May 10, 1984 depositions taken of CBG's witnesses Dr. Sheldon C. Plotkin and Mr. G. Thomas Cornwell. To the extent that the opinion or conclusion of a witness, or the basis for such an opinion or conclusion, or other information requested in an interrogatory has not changed from the information provided at the time of the depositions, the interrogatory may be answered by so stating.

Question 1

Has Dr. Sheldon Plotkin changed any of the opinions expressed in his deposition? If so:

- (a) state each such opinion that has been changed;
- (b) explain the substance of the change made in the opinion;
- (c) identify each document on which the change in the opinion is based;
- (d) specify the particular information in each such document on which the change in the opinion is based; and
- (e) explain how the information provides a basis for the change in the opinion.

Question 2

Has Dr. Sheldon Plotkin formed new opinions to be offered as part of his testimony which were not expressed in his deposition? If so:

- (a) state each such opinion;
- (b) explain the facts on which the opinion is based;
- (c) identify each document which supports the opinion;
- (d) specify the particular information in each such document on which the opinion is based; and
- (e) explain how the information provides a basis for the opinion.

Question 3

Has Mr. G. Thomas Cornwell changed any of the opinions expressed in his deposition? If so:

- (a) state each such opinion that has been changed;
- (b) explain the substance of the change made in the opinion;

(c) identify each document on which the change in the opinion is based;

(d) specify the particular information in each such document on which the change in the opinion is based; and

(e) explain how the information provides a basis for the change in the opinion.

Question 4

Has Mr. G. Thomas Cornwell formed new opinions to be offered as part of his testimony which were not expressed in his deposition? If so:

(a) state each such opinion;

(b) explain the facts on which the opinion is based;

(c) identify each document which supports the opinion;

(d) specify the particular information in each such document on which the opinion is based; and

(e) explain how the information provides a basis for the opinion.

Question 5

With respect to your Contention XX, do you contend that any of the UCLA response procedures are inadequate? If so:

(a) identify each such response procedure you claim is inadequate;

(b) describe the inadequacy;

(c) specify the basis for the claim that the procedure is inadequate; and

(d) identify each document on which you intend to rely in support of the claim that the procedure is inadequate.

Question 6

Do you intend to offer any documents as evidence at the security contention hearing? If so:

(a) identify each such document and if the document is a UCLA document so state;

(b) specify the particular information in the document on which you intend to rely; and

(c) explain how you are relying on the information.

Question 7

Aside from Dr. Plotkin and Mr. Cornwell, identify each other witness who will testify on behalf of CBG at the security contention hearing. As to each such witness provide the following information:

(a) name;

(b) address;

(c) statement of professional qualifications (if previously provided so state);

(d) the substance of the testimony to be provided by the witness;

(e) identify each document on which the witness intends to rely; and

(f) specify the particular information in each such document on which the witness intends to rely.

Dated: May 25, 1984.

DONALD L. REIDHAAR
GLENN R. WOODS
CHRISTINE HELWICK

By 
WILLIAM H. CORMIER

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 MAY 29 P12:25

In the Matter of

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA

(UCLA Research Reactor)

Docket No. 50-142
(Proposed Renewal of Facility
License Number R-71)

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached: UNIVERSITY'S
INTERROGATORIES TO CBG CONCERNING SECURITY CONTENTION.

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: May 25, 1984.

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

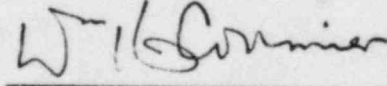
* Mr. John H. Bay, Esq.
Chickering & Gregory
Three Embarcadero Center
Suite 2300
San Francisco, CA 94111

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. Naliboiff
Deputy City Attorney
City Hall
1685 Main Street
Santa Monica, CA 90401

* Express Mail


WILLIAM H. CORMIER
Representing UCLA

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA