

RELATED CORRESPONDENCE

DOCKETED
USNRC

'84 JUN -4 A11:12

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHBEFORE 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 30, 1984

NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTIONDONALD 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

DS03

NOTICE IS HEREBY GIVEN, pursuant to 10 C.F.R. §2.740a, to intervenor Committee to Bridge the Gap (CBG) and its attorneys John Bay, Roger Kohn, Dean Hansell, and Dorothy Thompson, that University requests the appearance of CBG witnesses DR. THEODORE TAYLOR and DR. DAVID HAFEMEISTER at depositions to be taken on June 4-5, 1984. The deposition of Dr. Taylor will begin at 8:30 a.m. on June 4, in room 3125B Murphy Hall on the UCLA campus. The deposition of Dr. Hafemeister will begin at 8:30 a.m. on June 5, in room 2211 Murphy Hall on the UCLA campus. The deposition will concern matters relating to the physical security of the UCLA research reactor facility, threats directed against the UCLA research reactor facility, matters relating to claims in CBG's Contention XX of the above-entitled proceeding, and matters relating to any information upon which said witnesses will rely or may be expected to rely in providing testimony at the hearing to consider Contention XX in the above-entitled proceeding.

University further requests that each of the above-named witnesses produce and bring with him at the time of the deposition the following documents:

1. All documents relating to the physical security of the UCLA research reactor facility which he has considered or upon which he intends to rely in providing testimony on Contention XX of the above-entitled proceeding.
2. All documents containing information concerning threats of damage directed against the UCLA research reactor, or the reactor

facility, which he has considered or upon which he intends to rely in providing testimony on Contention XX of the above-entitled proceeding.

3. All documents caused to be created by said witness, or in the creation of which said witness participated, that contain information relating to the physical security of the UCLA research reactor facility, or threats directed against the facility, including any information sent to CBG or to any of its officers or representatives or sent to any other CBG witnesses.

As used herein above, "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.

University will arrange for a court reporter to take the deposition and will insure that the court reporter is advised that the deposition will contain "Protected Information" which is to be protected in accordance with the Board's protective order requirements. The court reporter will be asked to sign an affidavit of non-disclosure consistent with those requirements.

Mr. William Cormier will conduct the examination for the University and will be assisted by Mr. Charles Ashbaugh, the security officer at the UCLA facility. University requests that it be notified if there is any objection to Mr. Ashbaugh's conducting part of the examination.

Dated: May 30, 1984.

DONALD L. REIDHAAR
GLENN R. WOODS
CHRISTINE HELWICK

By W H Cormier
WILLIAM H. CORMIER

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached: NOTICE OF
DEPOSITION AND REQUEST FOR PRODUCTION

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 30, 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

* EXPRESS MAIL

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

W H Cormier
WILLIAM H. CORMIER
Representing UCLA

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA