

Associated Students of the University of California

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STUDENT BODY PRESIDENTS' COUNCIL

926 J St. Room 522  
Sacramento, Ca. 95814

October 29, 1984

Att: Docketing and Service Branch  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: HEU Conversion Rule (49 Federal Register 27769)

Dear Sir:

On September 25, 1984 the Energy Development and Applications Subcommittee and the Energy Research and Production Subcommittee of the House Committee on Science and Technology held a public hearing on the NRC's proposed rule to require conversion of all nuclear research reactors from highly enriched uranium to low enriched uranium. The University of California Student Body President's Council, which represents the 141,000 students of the nine-campus University of California system, has expressed strong support of the proposed requirement of conversion to the NRC. The students of the University of California were appalled at the undemocratic public hearing held by these two Congressional subcommittees. For the oral testimony only those organizations and individuals, who were opposed to the rule, were allowed to testify. Even upon request, supporters of the rule were denied permission to speak.

The chairpeople of the two subcommittees may submit a recommendation to the NRC on the proposed conversion rule based on their hearing. It is our belief that these subcommittee chairpeople are not prepared to make a sufficiently informed recommendation to the NRC based on the one sided presentations.

I have enclosed a copy of the written testimony which the Student Body President's Council submitted to the two subcommittees. As student leaders, we do not believe weapons-grade uranium belongs on university campuses, where it can not be adequately protected from theft. Considering the budgetary constraints facing universities today, we do not believe educational money should be used to provide the expensive security or to fight expensive and lengthy litigation over continued presence of HEU, which will certainly follow if the NRC does not require the removal of this bomb-grade uranium from research reactors.

The idea of exemption for any of the HEU research reactors seems to contradict the purpose of the rule which is to decrease the unnecessarily large quantity of sensitive nuclear material,

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which exist in the United States. The failure to require conversion of domestic research reactors and Department of Energy reactors would result in the refusal of foreign reactor operators to convert from weapons-grade uranium. The NRC has a possibility to make a decisive commitment to the reduction of nuclear proliferation. Any exemptions regardless of reasons such as uniqueness of purpose or the lifetime of the reactor's core will not be well received on university campuses throughout the country.

As the NRC may be aware, the students of American universities believe very strongly in the necessity to reduce nuclear proliferation. The Student Body President's Council has been in communication with student governments across the nation, who would be affected by a rule requiring conversion. If the NRC does not support a comprehensive, national regulation requiring conversion, we will encourage other student governments to work with their university's board of trustees and their state legislatures to require the conversion of the dangerous nuclear reactors within their state.

Thank you for your careful consideration and support of this important decision.

Sincerely,

*Kevin Gillis*

Kevin Gillis

Chair

Social Responsibility Committee  
U.C. Student Body President's  
Council

enclosed: cover letter to House Committee on Science and Technology subcommittees; testimony to the subcommittees and a resolution by the University of California Student Body President's Council supporting the proposed regulation requiring conversion from HEU to LEU.

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Representative Don Fuqua  
Chairman  
Subcommittee on Energy Development  
and Applications  
Committee on Science and Technology  
U.S. House of Representatives  
Washington, D.C. 20515

Representative Marilyn Lloyd  
Chairman  
Subcommittee on Energy Research and  
Production  
Committee on Science and Technology  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Representatives Fuqua and Lloyd:

The University of California's Student Body Presidents' Council, which represents the 141,000 students of the nine-campus University of California system, is appalled that your two subcommittees would conduct such an undemocratic public hearing as you did on September 25, 1984. Your two subcommittees held on that date a joint public hearing to consider the proposed regulation by the Nuclear Regulatory Commission on the Conversion of all research reactors which presently use highly enriched uranium (HEU) to the use of low enriched uranium (LEU). HEU is weapons-grade uranium and can with only slight modification and minimal technological expertise be used to build a nuclear bomb. LEU, with under 20% enrichment, cannot be readily used in the construction of a nuclear weapon. The Student Body Presidents' Council has unanimously endorsed the rule proposed by the NRC to require immediate and complete conversion. See the attached resolution.

SBPC has registered our official support for the conversion rule with the NRC. We were therefore outraged that your two subcommittees held a public hearing on the rule and allowed only public opponents of the rule such as nuclear reactor operators to present oral testimony. After reading their testimony, it does not seem possible for your two subcommittees to make a sufficiently informed recommendation to the NRC on the conversion rule, since you have heard only one side of that complex issue.

We are informed by your staff that, although we would not be permitted to provide oral testimony, we could submit written testimony after the hearing, which is attached. We request that you include this letter and the attached written statement and resolution in the official hearing record. We hope that in the future your subcommittees will be more conscious of including all points of view in your oral public hearings.

Sincerely,

*Kevin Gillis*

Kevin Gillis

Chair, Social Responsibility Committee

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STATEMENT OF  
KEVIN GILLIS  
STUDENT BODY PRESIDENTS' COUNCIL  
UNIVERSITY OF CALIFORNIA

BEFORE THE  
COMMITTEE ON SCIENCE AND TECHNOLOGY  
ENERGY DEVELOPMENT AND APPLICATIONS SUBCOMMITTEE  
AND  
ENERGY RESEARCH AND PRODUCTION SUBCOMMITTEE  
U.S. HOUSE OF REPRESENTATIVES

October 10, 1984

My name is Kevin Gillis. I am the Chair of the Social Responsibility Committee of the University of California Student Body Presidents' Council, which represents the 141,000 students of the nine-campus University of California system. SBPC, because of its concern about the security and proliferation risks associated with the presence of weapons-grade uranium at university campuses, has unanimously endorsed the NRC proposal to replace highly enriched uranium (HEU) at these research reactors with low enriched uranium (LEU) from which atomic weapons could not be made if the material were stolen. We believe this is a very important positive step, and any attempt to reverse the proposed conversion of these reactors could have very serious results.

The potential security threat involved with having weapons-grade nuclear materials on university campuses is grave. As students who live and work on university campuses, we know that this highly sensitive material cannot be adequately protected by the small, untrained security "forces" on such campuses. The security which does exist at these facilities is often more extensive than the security found at the campus bookstore. Unlike nuclear power reactors,

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STUDENT BODY PRESIDENT: [REDACTED]

which are located in sparsely populated areas with extensive security, such as large exclusion zones, security perimeters and containment structures, these nuclear research reactors are located on densely populated college campuses, often surrounded by large urban centers. Reactors sit on these campuses without any security of the security precautions found associated with power reactors. Students and visitors move freely around the normal classroom buildings in which the reactors are housed. Since the reactors are used for instruction and students on work-study are employed in the reactor facilities, any registered student can gain access and even possession of the keys to the facilities in which weapon-grade uranium is stored. As students ourselves, know that these student employees do not always realize or understand the sensitivity of the material with which they are working.

This low level security is unacceptable for material which, if stolen, could result in a major national or international crisis. This lax security must be improved if HEU is to remain on college campuses. However, the cost of improving security to an adequate level could be far too expensive for the Universities. It appears as if the reactor operators have claimed that conversion is too expensive and if required to convert, they will have to close down their facilities. However, considering the cost of technological alarms and security systems, and the employment of armed guards at the site, the cost of providing sufficient security could well be far more expensive than the actual conversion to non-weapon grade material, which is the most comprehensive security fix. The Department of Energy has agreed to help with the cost of conversion. No government agency will subsidize security. Therefore,

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it simply makes no sense to channel funding from educational programs to expensive security, considering its already tight budget.

Many of the operators have argued against the conversion rule and have said that no terrorist attacks have as of yet been reported against the research reactors. However, no one can deny that terrorism is an unfortunate reality in our modern world. In the past no bombs ever exploded at American embassies or at our nations capitol. However, today this type of terrorism occurs and we students do not want the terrorist target to remain on our college campuses in the future. Must we await a successful theft of HEU from a campus before action is taken. As Turinsky indicated in his testimony to your subcommittees, there has been a rapid decline in student enrollment in the nuclear engineering programs nationwide. For instance, in the University of California system, there are four nuclear research reactors; two of which are fueled by HEU, UCLA and UCSanta Barbara. A systemwide engineering review committee in 1982 reported that the four nuclear engineering departments should be consolidated due to the very low student enrollment. There can be no justification for continuing to permit weapons grade uranium to remain in use at reactors which have such diminished educational benefit when replacement fuel is available. The topic before these two subcommittees is the proposed rule of conversion from HEU to LEU fuel. The only academic question is whether such a conversion will interfere with the research potential of the reactors. According to our investigations with our faculty, the research potential will not be hampered to any significant degree. Very few experiments would have to be altered in the least and those exceptions would

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be altered only slightly. The important consideration is the actual health and safety problems passed by the HEU.

The dangers of having weapons grade uranium on college campuses is being seen by both campus student organizations and governments and community citizen organizations. Their combined public outcry has helped promote the NRC to propose the HEU conversion rule. Some of the individuals who have testified before the subcommittees orally said that public interventions will follow the passage of the HEU conversion rule, by the exact organizations who have supported its conception. This is a completely false representation of the students position. There has never been public action against action which was intended to improve the safety of nuclear reactors, which this conversion rule is clearly an example. There have been several interventions when public safety was endangered. The Universities need not fear intervention if they comply with the HEU conversion. However, there will almost assuredly be a rash of interventions and lengthy litigation if the NRC does not pass this regulation and if individual universities do not comply in removing weapons materials from campuses.

Again the students of the University of California which has two HEU fueled reactors are appalled at the dangerous and negligent security at these sensitive facilities. Due to the cost of improving security the universities should take steps to decrease the potentiality of a terrorist theft by converting to non-weapons grade uranium. This conversion will not effect the academic potential of the education and the research at these facilities. Lastly, the universities need not fear intervention or litigation if they improve the safety of the reactors by conversion. However, inter-

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vention and litigation of public opposition is sure to follow if the reactors do not convert. The presence of weapons-grade uranium at open universities would be a continuing source of public controversy and concern, as well as a major security risk, that can best be alleviated by the proposed NRC rule. Were weapons-grade uranium ever stolen from a university reactor, the consequences could be devastating. Conversion to non-bomb grade fuel is the best protection available against that catastrophic potentiality.