



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

September 6, 1984

NOTE TO: C. Kammerer, OCA
FROM: T. A. Rehm, EDO
SUBJECT: BOUQUARD TESTIMONY

Attached is draft testimony for the Bouquard Hearing. I am sending it a little early as Commissioner Roberts may want some time to consider it. The text can be reduced in length or complexity if the Commission desires.

While the Commission/Commissioner is reviewing, IP will confirm Department of State's position to assure it is stated correctly.

Attached also are some Q&As on the issue. IP will develop some additional ones over the next 10 days and we will provide them separately.

A handwritten signature in dark ink, appearing to be "T. A. Rehm", written over a horizontal line.

T. A. Rehm
Assistant for Operations, EDO

Attachments:
As stated

sent to Secy

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Date

7/24/84

TO: (Name, office symbol, room number,
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REMARKS

The docketing people
down at SECY received this.
They are holding the original
in a pending folder. I thought
you might like to see this
letter.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
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Sarah Wiggish

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* GPO: 1983 O - 381-529 (232)

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Department of Nuclear Engineering
Box 7909 Zip 27695-7909

Dear Joe, As you would guess, I fully
North Carolina State University support Ray's
School of Engineering

DOCKETED
USNRC

letter. Best wishes

June 19, 1984

and good luck!

Dr. Philip N. Powers (EMERITUS PROFESSOR)
School of Nuclear Engineering
Purdue University
West Lafayette, IN 47906

DOCKETING & SERVICE
BRANCH

Phil Powers

200 E 64 St.

New York, N.Y.

1002,

Dear Dr. Powers:

Phil

As you may have heard, UCLA has decided to permanently shut down their research reactor. The university has been in a protracted ASLB hearing on the renewal of their reactor's license. Apparently the cost and time to counter the intervenors, mainly the Committee to Bridge the Gap, has forced this decision by UCLA's administration.

Currently the NRC Commissioners are considering issuing proposed rules requiring non-power reactors to convert from HEU to LEU fuel and to implement augmented security. The commissioners and ACRS have had public meetings on the proposed rules. Both the Nuclear Engineering Department Heads Organization (NEDHO) and the Test, Research and Teaching Reactor (TRTR) Organization have testified opposing the HEU to LEU conversion rule and urged a more careful evaluation before implementing augmented security requirements. The augmented security requirements are being pushed toward implementation in an expedited manner in spite of the NRC staff's position that current security requirements are adequate. The Committee to Bridge the Gap and Nuclear Control Institute have urged prompt adoption of both proposed rules.

NEDHO and TRTR are concerned that the conversion rule will result in many university reactors permanently shutting down. This cost is judged to be much greater than the benefit of reduced diversion risk. A recent analysis by Dr. Zebrowski of EPRI indicates both the small amount of total HEU that is located at NRC licensed non-power reactors (note DOE reactors are exempt from conversion) and the difficulty of simultaneous diversion and weapon manufacture without low enforcement intervention.

The concern that some university reactors will permanently shut down originates because of both licensing and financial concerns. A lengthy and costly licensing process driven by intervenors cannot be afforded financially or in terms of staff at many universities. The proposed rule indicates generic licensing, but past experience with this approach has not proven successful. The proposed rule also indicates that the availability of federal funds will be considered during rule implementation. It is unclear what costs such funds would cover, e.g., legal fees, and what will happen if adequate funds are not available. Some funding currently exists in pending Senate legislation but has been removed during markup in House legislation.

Dr. Philip N. Powers

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Departments of Nuclear Engineering have been under considerable pressure from university administrators due to a declining share of engineering enrollment and high cost per degree. Several academic programs have already closed down or been merged with other programs. Within this environment the proposed conversion rule if adopted may be enough to force university administrators to close down reactors and academic programs. The real cost of this rule will be the lost educational experience for our future nuclear leaders and research associated with university reactors. We also should be concerned that additional success on the part of the intervening groups in shutting down university reactors may provide momentum for a more ambitious objective of stopping nuclear power.

I urge you to contact the President, Presidential Science Advisor George Keyworth and NRC Commissioners to express your opinion on this matter. Time is of the essence since the NRC Commissioners are due to vote shortly on issuing the proposed rules. I would appreciate you sending me copies of any correspondence and advising me of what actions you have taken. If university nuclear engineering programs are severely damaged, one cannot be optimistic about the future of nuclear power in this country.

With thanks and best regards.

Sincerely,



Raymond L. Murray
Professor Emeritus

RLM:dcr

NOTATION VOTE

RESPONSE SHEET.

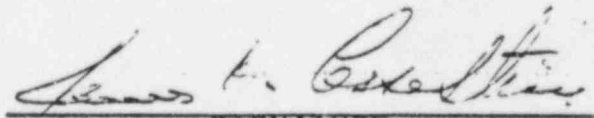
TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER ASSELSTINE

SUBJECT: SECY-84-336 - FUNDING FOR DOE'S REDUCED ENRICHMENT FOR
RESEARCH AND TEST REACTORS PROGRAM

APPROVED ✓ DISAPPROVED _____ ABSTAIN _____
NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:



SIGNATURE
9-7-84

DATE

SECRETARIAT NOTE: PLEASE ALSO RESPOND TO AND/OR COMMENT ON OGC/OPE
MEMORANDUM IF ONE HAS BEEN ISSUED ON THIS PAPER.