



System Energy Resources, Inc.  
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CNRO-2005-00037

July 4, 2005

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Document Control Desk

DOCKET: 52-009

SUBJECT: Grand Gulf Early Site Permit Application Revision 1 (TAC NO. MC 1378)

REFERENCE: 1. System Energy Resources, Inc. (SERI) letter to USNRC – Early Site Permit Application (CNRO-2003-00054), dated October 16, 2003.  
2. See Attachment 2

CONTACT:

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DOCUMENT COMPONENTS:

One (1) CD-ROM is included in this submittal. The CD-ROM contains the following forty (40) files:

001\_Cover\_and\_Part\_1\_R1.pdf, 266 KB, publicly available  
002\_Part\_2\_TOC\_R1.pdf, 196 KB, publicly available  
003\_Part\_2\_Chapter\_1\_R1.pdf, 659 KB, publicly available  
004\_Part\_2\_Chapter\_2\_Text\_Tbls\_R1.pdf, 1770 KB, publicly available  
005\_Part\_2\_Chapter\_2\_Fig\_S1\_2\_3\_R1.pdf, 4827 KB, publicly available  
006\_Part\_2\_Chapter\_2\_S4\_Fig\_1-30\_R1.pdf, 4531 KB, publicly available  
007\_Part\_2\_Chapter\_2\_S4\_Fig\_31-55\_R1.pdf, 3944 KB, publicly available  
008\_Pt2\_Chapter\_2\_S5\_Fig\_1-3\_R1.pdf, 4930 KB, publicly available  
009\_Pt2\_Chapter\_2\_S5\_Fig\_4a\_R1.pdf, 4706 KB, publicly available  
010\_Part\_2\_Chapter\_2\_S5\_Fig\_4b-8\_R1.pdf, 3932 KB, publicly available  
011\_Pt2\_Chapter\_2\_S5\_Fig\_9a\_R1.pdf, 1346 KB, publicly available  
012\_Pt2\_Chapter\_2\_S5\_Fig\_9b-14\_R1.pdf, 2597 KB, publicly available  
013\_Pt2\_Chapter\_2\_S5\_Fig\_15\_R1.pdf, 830 KB, publicly available  
014\_Pt2\_Chapter\_2\_S5\_Fig\_16a-25\_R1.pdf, 1451 KB, publicly available  
015\_Pt2\_Chapter\_2\_S5\_Fig\_26-28\_R1.pdf, 2673 KB, publicly available  
016\_Pt2\_Chapter\_2\_S5\_Fig\_29\_R1.pdf, 501 KB, publicly available

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017\_Pt2\_Chp2\_S5\_Fig\_30-37\_R1.pdf, 2951 KB, publicly available  
018\_Pt2\_Chp2\_S5\_Fig\_38-68\_R1.pdf, 4017 KB, publicly available  
019\_Part\_2\_Chp2\_S5\_Fig\_69-80\_R1.pdf, 4363 KB, publicly available  
020\_Part\_2\_Chp2\_S5\_Fig\_81-100\_R1.pdf, 1628 KB, publicly available  
021\_Part\_2\_Chapter\_3\_R1.pdf, 1029 KB, publicly available  
022\_Part\_3\_TOC\_R1.pdf, 106 KB, publicly available  
023\_Part\_3\_Chapter\_1\_R1.pdf, 262 KB, publicly available  
024\_Part\_3\_Chapter\_2\_Text\_R1.pdf, 1755 KB, publicly available  
025\_Part\_3\_Chapter\_2\_Tables\_R1.pdf, 1870 KB, publicly available  
026\_Part\_3\_Chp2\_Fig\_S1\_S2\_R1.pdf, 2255 KB, publicly available  
027\_Part\_3\_Chp2\_S3\_Fig\_1-22\_R1.pdf, 4311 KB, publicly available  
028\_Part\_3\_Chp2\_S3\_Fig\_23-29\_R1.pdf, 2349 KB, publicly available  
029\_Part\_3\_Chp2\_S4\_Fig\_1-4\_R1.pdf, 1142 KB, publicly available  
030\_Pt3\_Chp2\_Figures\_S5-S8\_R1.pdf, 2186 KB, publicly available  
031\_Part\_3\_Chapter\_3\_R1.pdf, 654 KB, publicly available  
032\_Part\_3\_Chapter\_4\_R1.pdf, 1007 KB, publicly available  
033\_Part\_3\_Chapter\_5\_R1.pdf, 1453 KB, publicly available  
034\_Part\_3\_Chapter\_6\_R1.pdf, 469 KB, publicly available  
035\_Part\_3\_Chapter\_7\_R1.pdf, 572 KB, publicly available  
036\_Part\_3\_Chapter\_8\_R1.pdf, 63 KB, publicly available  
037\_Part\_3\_Chapter\_9\_R1.pdf, 417 KB, publicly available  
038\_Part\_3\_Chapter\_10\_R1.pdf, 121 KB, publicly available  
039\_Part\_4\_R1.pdf, 5342 KB, publicly available  
040\_Part\_5\_R1.pdf, 69 KB, publicly available

Enclosed is Revision 1 to the Grand Gulf Early Site Permit (ESP) application. Revision 1 updates the application to incorporate SERI's responses to NRC's requests for additional information, our responses to the NRC's Draft Safety Evaluation Report open items, changes made in response to informal NRC comments made during site visits, meetings, or conference calls, and self-identified changes including those editorial in nature, as outlined in Attachment 1. For convenience, letters submitted to the NRC with proposed changes to the application are tabulated in Attachment 2.

The original intent was to submit this revision to the NRC on June 27, 2005. However, the submittal was delayed due to final administrative preparation and review required to support the revision. Except for several minor revisions, the changes included in Revision 1 to the application have been previously submitted to the NRC (see Attachment 1). This delay, therefore, would not be expected to impact the schedule for NRC review of the application.

Should you have any questions, please contact me.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 4, 2005.

Sincerely,



George A. Zinke  
Project Manager  
System Energy Resources Inc.

Attachment 1: GGNS ESP Application Revision 1 Change Summary  
Attachment 2: References

Enclosure: one CD-ROM

cc: Mr. R. K. Anand, USNRC/NRR/DRIP/RNRP  
Mr. C. Brandt, PNL  
Ms. D. Curran, Harmon, Curran, Spielberg, & Eisenberg, L.L.P.  
Mr. W. A. Eaton (ECH) (w/o enclosure)  
Mr. B. S. Mallett, Administrator, USNRC/RIV  
Mr. J. H. Wilson, USNRC/NRR/DRIP/RLEP

Resident Inspectors' Office: GGNS

## GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY PART 1, ADMINISTRATIVE INFORMATION

This change summary indicates the revision status for each text section of Administrative Information revised. Revision 0 indicates no change to a text section other than the footer revision level. The SERI letter to the NRC associated with the changes (RAI responses, etc.) is included in the revision summary listing below (see Attachment 2 for a complete list of letter responses).

<u>SECTION</u>	<u>REVISION</u>	<u>REFERENCE LETTER</u>
1.1	1	CNRO-2005-00033
2.1	0	
2.2	1	Revised to show overall revision as "1" in section 2.2.7.
3.1	0	
3.2	0	
3.3	0	
3.4	0	
3.5	1	Revised SERI board and Principal Officers listings in section 3.5.1.
3.6	0	

## GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY PART 2, SITE SAFETY ANALYSIS REPORT

This change summary indicates the revision status for each SSAR text section and includes a list of tables and figures revised. Revision 0 indicates no change to a text section other than the footer revision level. The SERI letter to the NRC associated with the changes (RAI responses, etc.) is included in the revision summary listing below (see Attachment 2 for a complete list of letter responses).

<u>SECTION</u>	<u>REVISION</u>	<u>REFERENCE LETTER</u>
TOC/LOT/LOF	1	Various
1.1	0	
1.2	1	CNRO-2005-00033
1.3	0	
1.4	0	
2.1	1	CNRO-2005-00033 (See also Note 2)
2.2	1	CNRO-2004-00041, -00062 (See also Note 1)
2.3	1	CNRO-2004-00041, -00045, -00067 CNRO-2005-00033 (See also Note 7)
2.4	1	CNRO-2005-00033 (See also Notes 6 and 8)
2.5	1	CNRO-2004-00049, -00077 CNRO-2005-00009, -00015, -00033 (See also Note 3)
3.1	1	CNRO-2004-00049, -00077 CNRO-2005-00033 (See also Note 6)
3.2	1	CNRO-2005-00008
3.3	1	CNRO-2004-00053, -00067
3.4	1	CNRO-2004-00049

<u>SSAR TABLE</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
1.3-1	8/16	CNRO-2004-00053
1.3-3	8/16	CNRO-2004-00053
2.1-5	6/21/05	CNRO-2005-00033
2.1-6	6/21/05	CNRO-2005-00033
2.2-3	NA	See Note 1
2.3-1	6/26 7/16	CNRO-2004-00041 CNRO-2004-00045
2.3-2	7/16	CNRO-2004-00045
2.3-3	6/26	CNRO-2004-00041
2.3-5	6/26	CNRO-2004-00041
2.3-15	6/21/05	CNRO-2005-00033
2.3-16	6/26	CNRO-2004-00041
2.3-17	6/26	CNRO-2004-00041
2.3-18	6/26	CNRO-2004-00041
2.3-32	6/26	CNRO-2004-00041

<u>SSAR FIGURE</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
2.1-1	6/21/05	CNRO-2005-00033
2.1-2	6/21/05	CNRO-2005-00033
2.1-5	8/16	CNRO-2004-00053
2.2-4	6/21/05	CNRO-2005-00033
2.2-5	9/4	CNRO-2004-00062
2.3-1	6/26	CNRO-2004-00041
2.3-2	6/26	CNRO-2004-00041
2.3-3	6/26	CNRO-2004-00041
2.3-4	6/26	CNRO-2004-00041
2.3-5	6/26	CNRO-2004-00041
2.3-6	6/26	CNRO-2004-00041
2.3-7	6/26	CNRO-2004-00041
2.3-18	6/26	CNRO-2004-00041
2.4-1	6/21/05	CNRO-2005-00033





GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY  
PART 2, SITE SAFETY ANALYSIS REPORT

SSAR TABLE	LETTER DATE	REF. LETTER
3.3-11	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-13	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-14	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-16	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-18	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-20	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-22	8/16 10/1	CNRO-2004-00053 CNRO-2004-00067
3.3-23	8/16	CNRO-2004-00053
3.3-24	8/16	CNRO-2004-00053
3.3-25	8/16	CNRO-2004-00053
3.3-26	8/16	CNRO-2004-00053
3.3-27	8/16	CNRO-2004-00053
3.3-28	8/16	CNRO-2004-00053

SSAR FIGURE	LETTER DATE	REF. LETTER

NOTES:

- 1) SSAR Table 2.2-3 is deleted, and associated text in SSAR Sections 2.2.2, 2.2.3 is revised accordingly. During the June 30, 2004 NRC visit to the GGNS site, an NRC Staff reviewer offered an informal comment that SSAR Table 2.2-3, dealing with truck-borne hazardous materials on the closest major highway, did not appear to provide clear or meaningful information, relevant to the safety analyses of offsite hazards. The subject table and related SSAR 2.2 text were reviewed, and it was concluded that the table and related text are not essential to the safety analyses of offsite hazards. Therefore, the table and related references in SSAR Section 2.2 are removed.
- 2) An editorial change is made to Section 2.1.2 to correct a table number cross-reference.
- 3) Section 2.5 changes to remove citations to Reference 15 in various places in the text are restored. Reference 15 had been removed in the CNRO-2004-00049 submittal, but was restored in the CNRO-2004-00077 submittal. However, all text citations to Reference 15 were not restored in the CNRO-2004-00077 submittal.
- 4) A text reference section number in Table 3.2-1 is revised to correct a typo error.
- 5) CNRO-2005-00008 indicated the distance to the nearest garden given in Table 3.2-3A would be revised from 0.63 miles to 0.67 miles. 0.63 miles is correct for the evaluations done for the ESP site; distances reported for GGNS Unit 1 to receptor locations were adjusted for the approximate difference between the GGNS Unit 1 location and the ESP site location, or based on the most conservative D/Q values. Therefore, the table is annotated to reflect this change from the RAI response.



## GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY PART 2, SITE SAFETY ANALYSIS REPORT

- 6) SSAR Sections 2.4.13 and 3.1.4.4 were revised to correct the distance from the ESP site to the Mississippi River from 3,200 ft to 5,400 ft.
- 7) RAI 2.3.1-4 response (CNRO-2004-00041, July 1, 2004) indicated that the terminology probable maximum winter precipitation would not be used in SSAR Section 2.3.1.2.5, to preclude confusing it with PMP discussions in SSAR 2.4.2.3.1. The SSAR has been revised to restore the use of probable maximum winter precipitation as it relates to maximum frozen precipitation to be used in roof loadings for extreme conditions.
- 8) The first paragraph of 2.4.11.2 is revised to correct the date of the minimum daily streamflow from 1940 to 1939 as pointed out in the DSER.
- 9) The "Mean" value had been inadvertently left out of these tables in Revision 0. It has been added to the listed tables in Revision 1 (Tables 2.3-100, -101, -102, -104, -106, -107, and -108).
- 10) SSAR figures and tables not listed were not changed for Revision 1, other than to change the revision level on the figure title block or table page(s) or for minor editorial corrections.
- 11) Other minor editorial, format and spelling changes are made; these are not always identified with revision bars in the Revision 1 files.

## GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY PART 3, ENVIRONMENTAL REPORT

This change summary indicates the revision status for each ER text section and includes a list of tables and figures revised. Revision 0 indicates no change to a text section other than the footer revision level. The SERI letter to the NRC associated with the changes (RAI responses, etc.) is included in the revision summary listing below (see Attachment 2 for a complete list of letter responses).

<u>SECTION</u>	<u>REVISION</u>	<u>REFERENCE LETTER</u>
TOC/LOT/LOF	1	Various
1.0	1	CNRO-2005-00033
2.1	1	CNRO-2005-00033
2.2	0	
2.3	1	CNRO-2004-00045;CNRO-2005-00033
2.4	0	
2.5	1	CNRO-2004-00045
2.6	0	
2.7	1	CNRO-2004-00045, -00067 CNRO-2005-00033
2.8	0	
2.9	0	
3.0	0	
4.1	0	
4.2	0	
4.3	0	
4.4	0	
4.5	1	CNRO-2004-00045;CNRO-2005-00033
4.6	0	
5.1	0	
5.2	0	
5.3	0	
5.4	1	CNRO-2004-00045;CNRO-2005-00008
5.5	0	
5.6	0	
5.7	0	
5.8	0	
5.9	0	
5.10	0	
6.0	0	
7.1	1	CNRO-2004-00045, -00047, -00055
7.2	0	
7.3	0	
7.4	0	
8.0	0	
9.0	0	
10.0	0	
APPENDIX 2.4A	0	





**GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY  
PART 3, ENVIRONMENTAL REPORT**

ER TABLES	LETTER DATE	REF. LETTER

ER FIGURES	LETTER DATE	REF. LETTER

**NOTES:**

- 1) Figure 2.5-10 is revised to correct the title of the figure.
- 2) CNRO-2005-00008 indicated the distance to the nearest garden given in Table 5.4-11A would be revised from 0.63 miles to 0.67 miles. The distance of 0.63 miles is correct for the evaluations done for the ESP site; distances reported for GGNS Unit 1 to receptor locations were adjusted for the approximate difference between the GGNS Unit 1 location and the ESP site location, or based on the most conservative D/Q values. Therefore, the table is annotated to reflect this change from the RAI response.
- 3) The location of meteorological input data called out in Table 5.4-3 was corrected.
- 4) Table 2.7-13 Notes are revised to correct the reference number citation for the document NWS HYDRO-35.
- 5) ER Figure 2.3-8 is revised to clearly indicate the ESP power block area.
- 6) Changes to these tables similar to changes to SSAR Tables 1.3-1 and 1.3-3 as documented in CNRO-2004-00053.
- 7) Revised the total hectares for new construction areas to equal sum of the individual areas in Table 2.2-1.
- 8) Changed "District 7" to "District 3" in Table 2.2-6 for the rice data.
- 9) ER figures and tables not listed were not changed for Revision 1, other than to change the revision level on the figure title block or table page(s) or for minor editorial corrections.

## GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY PART 4, EMERGENCY PLANNING INFORMATION

This change summary indicates the revision status for each Emergency Planning Information text section and includes a list of tables and figures revised. Revision 0 indicates no change to a text section other than the footer revision level. The SERI letter to the NRC associated with the changes (RAI responses, etc.) is included in the revision summary listing below (see Attachment 2 for a complete list of letter responses).

<u>SECTION</u>	<u>REVISION</u>	<u>REFERENCE LETTER</u>
TOC/LOT/LOF	1	CNRO-2005-00003 (See also Note 2)
1.0	1	CNRO-2005-00003 (See also Note 2)
2.0	1	CNRO-2005-00003 (See also Note 2), -00033
3.0	1	CNRO-2005-00003 (See also Note 2)
4.0	1	CNRO-2005-00003 (See also Note 2)
APPENDIX A	0	

<u>EPI TABLES</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
2-1	1/24/05	CNRO-2005-00003
2-2	1/24/05	CNRO-2005-00003

<u>EPI FIGURES</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
2-1	1/24/05 6/21/05	CNRO-2005-00003 CNRO-2005-00033
2-3	1/24/05 6/21/05	CNRO-2005-00003 CNRO-2005-00033
2-6	1/24/05	CNRO-2005-00003
3-2	1/24/05	CNRO-2005-00003
3-3	1/24/05	CNRO-2005-00003

**NOTES:**

- 1) EPI figures and tables not listed were not changed for Revision 1, other than to change the revision level on the figure or table page(s).
- 2) The EPI changes shown in the Revision 1 files of this submittal were submitted to NRC by the reference letter CNRO-2005-00003 as "Draft Rev-2\_1-24-05" version of the text, tables and figures. These "draft Revision 2" EPI changes have been included in Revision 1 of the application.

**GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY  
PART 5, PROGRAMS AND PLANS**

Part 5 of the application had no changes for Revision 1.

REFERENCES

Continued from cover letter page 1:

- 2) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information Letter No. 1, CNRO-2004-00041, dated July 1, 2004
- 3) SERI letter to USNRC – Response to Request for Additional Environmental Information Related to Early Site Permit Application (Partial Response No. 1), CNRO-2004-00043, dated July 2, 2004 [no application change pages included with this letter]
- 4) SERI letter to USNRC – Response to Request for Additional Environmental Information Related to Early Site Permit Application (Partial Response No. 2), CNRO-2004-00045, dated July 19, 2004
- 5) SERI letter to USNRC – Response to Request for Additional Environmental Information Related to Early Site Permit Application (Partial Response No. 3), CNRO-2004-00047, dated July 22, 2004
- 6) SERI letter to USNRC – SERI ESP Application – EQHAZARD PSHA Calculation Corrections, CNRO-2004-00049, dated August 10, 2004
- 7) SERI letter to USNRC – Response to Request for Additional Environmental Information Related to Early Site Permit Application (Partial Response No. 4), CNRO-2004-00050, dated August 10, 2004 [no application change pages included with this letter]
- 8) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Environmental Information Letter No. 2 (Partial Response No. 1) (CNRO-2004-00053), dated August 16, 2004
- 9) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Environmental Information Related to Early Site Permit Application, CNRO-2004-00055, dated August 16, 2004
- 10) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Environmental Information Letter No. 3, CNRO-2004-00062, dated September 14, 2004
- 11) SERI letter to USNRC – Early Site Permit - Response to Supplemental Request for Additional Information (RAI) Regarding the Environmental Portion of the Early Site Permit Application for the Grand Gulf ESP Site, CNRO-2004-00065, dated September 30, 2004 [no application change pages included with this letter]
- 12) SERI letter to USNRC – Response to Request for Additional Information Letter No. 7, Early Site Permit Application for the Grand Gulf ESP Site (TAC NO. MC 1378), CNRO-2004-00067, dated September 30, 2004
- 13) SERI letter to USNRC – Response to Request for Additional Information Letter No. 4 - Early Site Permit Application for the Grand Gulf ESP Site (TAC NO. MC 1378), CNRO-2004-00069, dated October 19, 2004 [no application change pages included with this letter]



- 14) SERI letter to USNRC – Response to Request for Additional Information Letter No. 5, Early Site Permit Application for the Grand Gulf ESP Site (TAC NO. MC 1378), CNRO-2004-00077, dated December 10, 2004
- 15) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information Letter No. 6 - Early Site Permit Application for the Grand Gulf ESP Site, CNRO-2005-00003, dated January 25, 2005
- 16) SERI letter to USNRC – Early Site Permit - Response to Second Supplemental Request for Additional Information (RAI) Regarding the Environmental Portion of the Early Site Permit Application for the Grand Gulf ESP Site, CNRO-2005-00006, dated February 3, 2005 [no application change pages included with this letter]
- 17) SERI letter to USNRC - Early Site Permit - Response to Request for Additional Information (RAI) Regarding the Environmental Portion of the Early Site Permit Application for the Grand Gulf ESP Site, CNRO-2005-00008, dated February 14, 2005 [no application change pages included with this letter]
- 18) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information, Early Site Permit Application for the Grand Gulf ESP Site (Seismic Review) (TAC NO. MC 1378) CNRO-2005-00009, dated February 14, 2005
- 19) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information, Early Site Permit Application for the Grand Gulf ESP Site (Office of General Counsel Review) (TAC NO. MC 1378), CNRO-2005-00010, dated February 17, 2005
- 20) SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information, Early Site Permit Application for the Grand Gulf ESP Site (Seismic Review) (TAC NO. MC 1378) CNRO-2005-00015, dated March 12, 2005 [no application change pages included with this letter]
- 21) SERI letter to USNRC – Early Site Permit – Response to Request for Additional Information to Resolve the Grand Gulf Early Site Permit draft Safety Evaluation Report Open Items, CNRO-2005-00033, dated June 21, 2005

bcc: Mr. R. J. Bell (NEI)  
Mr. M. Bourgeois (ECH) (w/o enclosure)  
Mr. R. N. Buckley (ECH) (w/o enclosure)  
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Corporate File [18]