7/12/73

BEFORE THE

UNITED STATES OF AMERICA

ATOMIC ENERGY COMMISSION

FRIENDS OF THE EARTH,		
Petitioner		
v.		
JERSEY CENTRAL P&L COMPANY	Docket Nos.	50-219
COMMONWEALTH EDISON COMPANY		50-237, 249, 254, 265
NIAGRA MOHAWK POWER COMPANY		50-220
MILLSTONE POINT COMPANY		50-245
NORTHERN STATES POWER COMPANY		50-263
BOSTON EDISON COMPANY,		50-293
Respondents		

PETITION FOR IMMEDIATE DERATING OF CERTAIN BOILING WATER REACTORS AND FOR ISSUANCE OF A SHOW CAUSE ORDER WHY THE AUTHORIZATION TO OPERATE THESE PLANTS SHOULD NOT BE SUSPENDED

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Counsel for Petitioner

Ms. Jan Trenholm
Law Student

BEFORE THE
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

FRIENDS OF THE EARTH, Petitioner	)	
v.	)	
JERSEY CENTRAL P&L COMPANY	)	Docket Nos. 50-219
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BE SUSPENDED *

Attached to this Petition are two affidavits prepared by Victor Stello, the Assistant Director for Reactor Safety of the Director of Licensing of the United States Atomic Energy Commission. (Also attached are Mr. Stello's Professional Qualifications.) In these affidavits Mr. Stello states:

1. I am responsible for directing and supervising the review by the AEC Regulatory Staff of the information, data and analyses submitted by licensees and applicants regarding the fuel densification phenomenon as it relates to all light-water nuclear facilities.

*/ Attachment B contains a list of the plants involved.

2. The effects of fuel densification are not taken into account in the analytical techniques described in NEDO-10329 or its supplement which are referred to in Appendix A Part 2 (General Electric Evaluation Model) of the Interim Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Power Reactors (IAC).

3. In its "Technical Report on Densification of Light-Water Reactor Fuels" dated November 14, 1972 (Staff Report) the regulatory staff concluded (p. 71) that the effects of fuel densification should be considered "in safety evaluations of nuclear facilities for normal operation, operation during various transient conditions, and postulated accident situations" and that "the effects of densification should be included in calculating the behaviour of the fuel rods during postulated loss-of-coolant accidents."

4. ...the review to date...has included consideration of a report prepared by General Electric Company (which supplied the fuel for the station's initial core loading) entitled "Densification Consideration in BWR Fuel Design and Performance", designated NEDM-10735 and dated December, 1972 (hereinafter referred to as the "GE Report") and supplements 1 and 2 thereto , dated April, 1973, and May, 1973, respectively.

5. The regulatory staff's fuel densification review for the (Station) has not yet progressed to thepoint where it can be said with confidence whether the calculated maximum fuel element cladding temperature in the unlikely event of a loss-of-coolant accident at the Station will or will not exceed 2,300°F if the effects of fuel densification are accounted for. At or before the completion of its review, now expected to be completed about September 4, 1973, the staff will be able to say, with confidence, what the calculated maximum temperature will be.

It is clear that at this point the Staff is unable to conclude that BWRs which rely upon NEDM-10735 and its supplements to demonstrate compliance with the Interim Acceptance Criteria are in

compliance with the requirements of the Interim Acceptance Criteria. It is a pre-requisite to licensing plants that it be established that the plant is in compliance with the Interim Acceptance Criteria. Interim Acceptance Criteria for Emergency Core Cooling System for Light-Water Reactor. It is the obligation of the Staff to shut down any plants if the Staff receives information which if available at the time the plant was licensed would have warranted a denial of the license. Section 186a of the Atomic Energy Act; 10 CFR Part 50, Section 50.100; Vermont Yankee Nuclear Power Corporation, RAI-73-5 (ALAB-124) 358,362; Duke Power Company (McGuire) RAI-73-6 (ALAB-128) Op. p. 35; H. Rep. No. 92-1027, 92d Cong., 2d Sess. (accompanying H.R. 14655) April 27, 1972, p. 7.

Compliance with the Interim Acceptance Criteria is the only evidence that the Commission now considers reliable that these plants have a workable ECCS as required by Criterion No. 35. The failure of an Emergency Core Cooling System to function when called upon can have catastrophic consequences as fully detailed in WASH-740 and subsequent updates of that document. Thus the safety implications of allowing operation of power plants at power levels where, in the event of a LOCA, calculated peak

clad temperatures will exceed Interim Acceptance Criteria, can not be over stated.*/ It is truly the heart of plant safety which is involved. The safety importance of the Interim Acceptance Criteria is underscored by the fact that they were adopted by the Commission on an emergency basis without prior opportunity for public comment.

In the two Stello Affidavits reference is made to the low probability of a LOCA as the bais for Mr. Stello's conclusion that continued operation without compliance with the Interim Acceptance Criteria does not endanger the public health and safety. But compliance with the Interim Acceptance Criteria is not conditional but absolute. The Staff is not entitled to allow the Applicant to operate with less than full compliance with the Interim Acceptance Criteria no matter how sincerely it may believe that the plants are safe. The Interim Acceptance Criteria have provided a definite standard which has excluded exploration of the adequacy of the Interim Acceptance Criteria in any licensing proceeding. The Staff has often reaped the benefit of this situation by excluding from individual licensing proceedings lengthy exploration of the bases for the Interim Acceptance Criteria

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*/ The failure to show compliance with IAC temperature limits is all the more serious in light of the present Staff view that those temperature limits are at least 100° too high. Final Environmental Statement with respect to Criteria for Emergency Core Cooling System.

or consideration of whether they are sufficiently stringent. It can not now decide that when the shoe is on the other foot and it feels that the Interim Acceptance Criteria are too stringent, compliance with the Interim Acceptance Criteria can be excused. */

RELIEF

1. Emergency Derating

The Commission regulations provide for emergency action when the public health safety or interest so requires. In his affidavit dated June 23, 1973, Mr. Stello indicates that at a reduced power level, even in the event of a LOCA and taking account of fuel densification affects peak clad temperatures will not exceed Interim Acceptance Criteria limits. The only possible basis for this conclusion is that the Staff has bounded the potential temperature affects of fuel densification on BWR fuel. Thus, at this time the Staff can quickly factor into the LOCA calculations for each BWR involved here the temperature penalty (conservatively set at the outer boundary and disregarding temperature benefits, if any, which might come as a result of fuel densification)

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*/ There is a very specific procedure any party, including the Staff, must follow if it believes that the Interim Acceptance Criteria, as applied to a particular plant, are too stringent. 10 CFR Part, Section 2.758. It is to this procedure that the Appeal Board appeared to direct the Staff in Duke Power, supra, when it required the Staff to provide the authority and the basis for anything less than unequivocal proof that the Applicant there was in compliance with 10 CFR Part 50, Appendix B.

expected from fuel densification. Each BWR involved in this petition submitted its Interim Acceptance Criteria calculations on or about October 1, 1971. Of course, if sufficient safety margins were built into plant operations at that time (i.e. if peak clad temperatures were well below IAC maximum limits) it may be that no derating will be required. Clearly the calculations of the temperature penalty and necessary derating must be undertaken on an emergency basis in order for the Commission to be able to definitively find that if any of these plants experience a LOCA, the Emergency Core Cooling System will work. That assurance, according to the Commission, can only be achieved when/with use of the calculational methods approved in the Interim Acceptance Criteria and with due consideration for the affects of fuel densification, peak clad temperatures are less than Interim Acceptance Criteria limits.

We therefore specifically request that on or before July 31, 1973, the Commission on an emergency basis and as authorized by 10 CFR Part 2, § 2.202(f) take the following actions with respect to each of the plants which are the subject of this petition:

1. Indicate publicly the maximum credible, conservatively calculated increase in the peak clad temperature of fuel rods as a result of fuel densification.

2. Order the immediate derating of each plant for which the maximum peak clad temperature in the event of a LOCA is calculated to exceed 2300°F when the temperature increase in 1. is added to peak clad temperatures previously computed pursuant to the Interim Acceptance Criteria. The level of derating shall be such that peak clad temperatures are not calculated to exceed 2300°F when the temperature increase in 1. is added to peak clad temperatures previously computed pursuant to the Interim Acceptance Criteria.

2. Order to Show Cause

Even after ordering an emergency derating of the plants the Commission will need to be able to definitively determine whether in light of the fuel densification affects on peak clad temperatures the BWRs involved here are in compliance with the Interim Acceptance Criteria. If such a finding cannot be made and if instead the only reasonable finding is that more research must be done to say definitely what the effects of fuel densification will be, then the plants must be shut down because they cannot establish compliance with Commission regulations. (Criterion No. 35) Thus in the face of the Stello Affidavit the licensees should be required to show cause why their plants should not be shut down until there is an unequivocal finding that the plants are in compliance with the Interim Acceptance Criteria and thus in compliance with Criterion No. 35.

The order to show cause should initiate a subsequent hearing, which could be a consolidated hearing for all of these plants, at which there would be ultimate resolution of the fuel densification issue with respect to these plants. The hearing(s) should commence at a time following the Staff report on BWR fuel densification affects to allow discovery by all interested parties and proper identification of issues in contention.*/

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*/ The hearing on the show cause order should, of course, utilize the procedures in 10 CFR Part 2 including where appropriate motions for summary disposal of any or all issues where no genuine issue of fact remains. It would be an adjudicatory hearing.

CONCLUSION

As the Commission is fully aware there is now pending in the United States Court of Appeals for the District of Columbia Circuit a case in which Friends of the Earth contends that compliance with the Interim Acceptance Criteria does not establish that the ECCS will be effective as requied by Design Criterion No. 35. In this Petition FOE does not waive or diminish in anyway its position on that issue. This Petition merely claims if the Commission believes what it has stated in defense to that litigation, i.e. that compliance with the Interim Acceptance Criteria does provide reasonable assurance for the public health and safety, then it cannot allow these plants to operate when it does not know if the plants do comply with the Interim Acceptance Criteria when the affects of fuel densification are taken into account. Thus while it is our judgment that these plants, among others, should be shut down because there is no definitive and unequivocal finding of compliance with Design Criterion No. 35 we nonetheless also urge the action sought here as an additional basis for emergency derating and eventual shut down of these plants.*/

Respectfully submitted,

Jan Trenholm
Law Student

Anthony Z. Roisman
Counsel for Petitioner

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*/ Because the Commission does allow a party to challenge whether a plant complies with the IAC and the effect of fuel densification on that compliance, FOE did not feel that exhaustion of administrative remedies here would be futile. However, here, as in the court case the violation alleged is a clear violation of law.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Petition For Immediate Derating Of Certain Boiling Water Reactors And For Issuance Of A Show Cause Order Why The Authorization To Operate These Plants Should Not Be Suspended"was mailed, postage prepaid this 12th day of July, 1973 to the following, all of whom are shown to be counsel of record for the Regulatory Staff or licensee in one or more of the proceedings involved here.

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Anthony Z. Roisman

ATTACHMENT A

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
VERMONT YANKEE NUCLEAR POWER CORPORATION	)	Docket No. 50-271
	)	
	)	
(Vermont Yankee Nuclear Power Station))		

AFFIDAVIT OF VICTOR STELLO

I, Victor Stello, being on oath, depose and say as follows:

1. I am Victor Stello, Assitant Director for Reactor Safety, Directorate of Licensing, U. S. Atomic Energy Commission, Washington, D. C.. My duties and responsibilities are the planning, directing and supervising of the program activities of the Reactor Systems Branch, Core Performance Branch, Electrical Instrumentation and Control Branch, and Operational Safety Branch. Formerly, as Chief of the Reactor Systems Branch, my duties and responsibilities included the review and evaluation of reactor thermal hydraulic design, reactor coolant system design and auxiliary system design, and emergency core cooling system design. Attached hereto is a statement of my professional qualifications and experience.

2. I am responsible for directing and supervising the review by the AEC Regulatory Staff of the information, data and analyses submitted by

licensees and applicants regarding the fuel densification phenomenon as it relates to all light-water nuclear facilities, including the Vermont Yankee Nuclear Power Station (station).

3. That phenomenon and its effect on reactor operations are described in a report of the AEC regulatory staff, in the preparation of which I participated, entitled "Technical Report on Densification of Light Water Reactor Fuels" and dated November 14, 1972, hereinafter referred to as the "Staff Report".

4. The regulatory staff's fuel densification review for the station will be completed within the next few months. However, the review to date -- which has included consideration of a report prepared by General Electric Company (which supplied the fuel for the station's initial core loading) entitled "Densification Consideration in BWR Fuel Design and Performance", designated NEDM-10735 and dated December, 1972 (hereinafter referred to as the "GE Report") and supplements 1 and 2 thereto, dated April 1973, and May 1973, respectively, as well as of the Staff Report -- is sufficiently advanced to warrant the drawing of conclusions with respect to the potentials at the station for the only possible results of fuel densification which could have significant safety implications, viz., the potentials for (1) a collapse

of the fuel rod cladding and (2) an increase in stored energy within the fuel pellets due to power spikes or decreased gap conductance. The review also makes clear that fuel densification was not the cause of the unusually high gaseous release activity levels from the station.

5. With respect to the potential for a collapse of the fuel rod cladding, it is my opinion that a fuel cladding collapse will not occur within the station's core during the present first fuel cycle. This conclusion is supported not only by the Staff Report and the GE Report and supplements, but also by boiling water reactor fuel rod inspection data gathered from several thousand boiling water reactor fuel rods used at other stations, some of which have operated for up to three fuel cycles. No boiling water reactor fuel rods inspected so far have shown any indication of fuel cladding collapse.

6. With respect to the potential for an increase in stored energy within the fuel pellets due to power spikes or decreased gap conductance, it is my opinion that potential increases in stored energy are, indeed, possible. Increased stored energy could affect the calculated peak cladding temperature for a design basis loss-of-coolant accident. However, in light of the extremely small probability of a loss-of-coolant accident during the next several months (the time required to complete our review), I do not believe that concern for the public's health and safety requires any action to modify or restrict the operation of the applicant's reactor. If, upon completion of the regulatory

staff's review, any modifications or restrictions appear to be necessary, they will, of course, be imposed.

7. A copy of the Staff Report was served on the parties and the Board in this proceeding under cover of a letter from the regulatory staff to the Board dated December 12, 1972. A copy of the GE Report is attached to the affidavit of John W. Beck sworn to June 1, 1973 which has been filed by the applicant in response to the order of May 24, 1973 of the Atomic Safety and Licensing Board in this proceeding. Copies of the supplements 1 and 2 to the GE Report have not been submitted herewith because they consist of proprietary information.

Victor Stello

Then appeared before me the above-subscribed Victor Stello and made oath that he was the author of the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Subscribed and sworn to before me
this 7 day of June 1973

Notary Public

My Commission expires: July 1, 1974

VICTOR STELLO, JR.

PROFESSIONAL QUALIFICATIONS

My name is Victor Stello, Jr. I am the Assistant Director for Reactor Safety within the Directorate of Licensing. As the Assistant Director for Reactor Safety, I have the responsibility for managing the Electrical, Instrumentation and Control Systems Branch, the Operational Safety Branch, the Core Performance Branch, and the Reactor Systems Branch. These branches have the responsibility of evaluating certain safety aspects of light water cooled power reactors for Construction Permits and Operating Licenses.

My formal education was obtained from Bucknell University where I received a BS degree in Mechanical Engineering in 1958. I received the MS degree in Mechanical Engineering from Bucknell University in 1960. Subsequently, I enrolled in Rensselaer Polytechnic Institute in pursuit of a Doctorate of Engineering Science Degree and have completed 42 hours of graduate work credited toward that degree. My course work included, in addition to a standard undergraduate Mechanical Engineering curriculum, courses in Nuclear Engineering, Heat Transfer, Thermodynamics, and Mathematics. My major field of study in the graduate program was Heat Transfer.

From 1960 to 1965 I was employed at the CANEL office of Pratt and Whitney Aircraft Company which was located in Middletown, Connecticut. I participated in analyses of the high temperature liquid metal reactor systems proposed for use in aircraft and space applications. My responsibilities included preparation of the safety evaluation and development of operating procedures for various systems. I was also responsible for establishing requirements for various experimental programs to support proposed systems arrangements.

From 1965 to 1966 I was employed at the East Hartford, Connecticut, Office of Pratt and Whitney Aircraft Company. I participated in the study of advanced jet engine concepts for military and commercial applications. I was responsible for establishing jet engine performance parameters that would optimize the engine configuration for a particular application.

I accepted an appointment with the technical staff of the AEC Regulatory Organization in 1966 and presently have had the primary responsibility for safety reviews of various reactor plants including Oyster Creek, Nine Mile Point, Millstone Units 1 & 2, Peach Bottom Units 2 & 3, Hanford Unit 2 and Wm. H. Zimmer. I have also participated in the reviews of various boiling and pressurized water reactors including Palisades, Diablo Canyon, Dresden Units 2 & 3, Pilgrim, and Browns Ferry Unit 3.

In July 1971, I was promoted to Branch Chief of Boiling Water Reactors Branch No. 4. In this position I was responsible for coordinating and supervising the safety evaluations for reactor plants under review for either construction permits or operating licenses assigned to the branch.

I was promoted to Chief of the Reactor Systems Branch in March 1972. In this position I was responsible for the review and evaluation of reactor thermal hydraulic design, reactor coolant system design and auxiliary system design, and emergency core coolant system design.

I was named as Assistant Director for Reactor Safety in March 1973.

I am a member of the American Society for Mechanical Engineers.

ATTACHMENT B

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of	)	
	)	
VERMONT YANKEE NUCLEAR POWER CORPORATION	)	Docket No. 50-271
	)	
	)	
(Vermont Yankee Nuclear Power Station)	)	

AFFIDAVIT OF VICTOR STELLO IN OPPOSITION TO MOTION OF NEW ENGLAND COALITION ON NUCLEAR POLLUTION (NECNP) FOR IMMEDIATE SUSPENSION OF AUTHORIZATION TO OPERATE

Victor Stello, being duly sworn, deposes and says:

1. I am the same Victor Stello whose affidavit, sworn to June 7, 1973, was submitted by the regulatory staff in response to the order of the Licensing Board herein dated May 24, 1973.

2. In March 1971, following five years of experience in the technical evaluation of the performance of Emergency Core Cooling Systems, I was assigned to the Task Force of senior regulatory management personnel organized in February, 1971 to reappraise Emergency Core Cooling Systems. My activity with the Task Force included study of analyses of Emergency Core Cooling Systems performed and reported by various applicants and vendors and of the results of experiments associated with the performance of Emergency Core Cooling Systems. I appeared as an expert witness in the pending rulemaking proceeding on Emergency Core Cooling Systems. (Docket RM 50-1)

3. The effects of fuel densification are not taken into account in the analytical techniques described in NEDO-10329 or its supplement which

are referred to in Appendix A Part 2 (General Electric Evaluation Model) of the Interim Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Power Reactors (IAC). Use of that Model, which is applicable to the Vermont Yankee Nuclear Power Station (Station) because it incorporates a General Electric boiling water reactor, demonstrated that the calculated maxium fuel element cladding temperature does not exceed 2300° F. and that the Station's Emergency Core Cooling System (ECCS) otherwise meets the requirements of the IAC.

4. In its "Technical Report on Densification of Light-Water Reactor Fuels" dated November 14, 1972 (Staff Report) the regulatory staff concluded (p.71) that the effects of fuel densification should be considered "in safety evaluations of nuclear facilities for normal operation, operation during various transient conditions, and postulated accident situations" and that "the effects of densification should be included in calculating the behaviour of the fuel rods during postualted loss-of-coolant accidents."

5. The regulatory staff's fuel densification review for the (Station) has not yet progressed to the point where it can be said with confidence whether the calculated maximum fuel element cladding temperature in the unlikely event of a loss-of-coolant accident at the Station will or will not exceed 2,300°F if the effects of fuel densification are accounted for. At or before the completion of its review, now expected to be completed about September 4, 1973, the staff will be able to say, with confidence, what the calculated maximum temperature will be. However,

the review has progressed to the point that enables me to form the opinion, which I hold without reservation, that there will not be any undue risk to the health and safety of the public if the Station is authorized to operate at full rated power until the staff's review is completed. My opinion is based on (a) the known effects of the fuel densification phenomenon, (b) the likely range of the parameters of those effects at the Station which are evident thus far from the staff's review, (c) my study of the performance capability of the Station's ECCS; and (d) the extremely low probability of a loss-of-coolant accident during the period before the completion of the regulatory staff's review, as indicated in the accompanying affidavit of Raymond Maccary, sworn to June 22, 1973.

6. If, despite the low probability of occurrence of a loss-of-coolant accident between now and the completion of the regulatory staff's review, it is assumed that one will occur, and all consideration of the margins inherent in the Station's ECCS capability are excluded, I am of the opinion that, nevertheless, appropriate regard for the health and safety of the public would not require restricting operations of the station to less than 75% of full rated power. Operation at this power level would conservatively account for the anticipated effects of fuel densification, during normal operation and during operation under anticipated transient conditions and postulated situations, including a loss of coolant accident.

Then appeared before me the above-subscribed Victor Stello and made oath that he was the author of the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Subscribed and sworn to before me

This 13 day of June 1973

Notary Public

Montgomery County, Md.

My commission expires July 1, 1974

Attachment C

STATEMENT OF PETITIONER'S INTEREST

Petitioner Friends of the Earth ("FOE") is a non-profit membership corporation organized pursuant to the laws of the State of New York. It has a home office in San Francisco, California and regional and principal offices throughout the United States, including the District of Columbia. FOE is devoted to the enhancement and preservation of environmental values throughout the United States and the world and to that end carries out research, publishes reports and engages in litigation, among other organizational activities. FOE asserts in this Petition both its organizational interests and the rights and interests of its members in the preservation of environmental values in general and in the public health and safety in particular.

As alleged in the Petition, in the event of an uncontrolled loss-of-coolant accident, massive amounts of contaminating radioactivity would be released into the environment. The released radioactivity would have a direct lethal effect upon many exposed persons, would contribute to an increased incidence of cancer, especially leukemia, among other exposed persons, and would contaminate vast amounts of land and property. The size of the

area surrounding a nuclear power plant that would be so affected would depend upon a number of factors, such as weather conditions at the time of the accident. Studies by the Commission have established that under not uncommon weather conditions the range of lethal injury could extend up to dozens of miles from the site of the accident.

In connection with its devotion to the enhancement and preservation of environmental values, FOE has for some time maintained an organizational interest in the protection of the public health and safety from the dangers inherent in nuclear power plants. Pursuant to that interest, FOE has monitored the development of nuclear power plants and the adequacy of safeguards to protect life and property against the consequences of nuclear accidents. FOE has members in every state of the United States. In addition, FOE has members who reside or work in each of the cities in which the nuclear power plants identified in Attachment D are situated or who reside or work within the geographic area adjacent to such plants in jeopardy in the event of an uncontrolled loss-of-coolant accident at any of such plants. FOE thus files this Petition on behalf of and to protect the rights of its affected members, as well as to assert its own organizational interest in the enhancement and preservation of environmental values and the protection of the public health and safety from the dangers presented by nuclear power plants.

ATTACHMENT D

Name	Utility	Docket	License Number	Date Issued	Location	Staff Fuel Densification Letter Response	Response Date	Compliance with IAC Filed
Pilgrim	Boston Edison Co.	50-293	DPR-35 OL	6/8/72	Plymouth Co., Mass.	NEDM-10735	1/4/73	7/22/71
Dresden 2	Commonwealth Edison Co.	50-237	DPR-19 POL	12/22/69	Grundy Co., Ill.	NEDM-10735	1/3/73	9/13/71
Dresden 3	Commonwealth Edison Co.	50-249	DPR-25 OL	1/12/71	Grundy Co., Ill.	NEDM-10735	1/3/73	9/13/71
Quad-Cities 1	Commonwealth Edison Co.	50-254	DPR-29 OL	10/1/71	Rock Island Co., Ill.	NEDM-10735	1/3/73	7/19/71
Quad-Cities 2	Commonwealth Edison Co.	50-265	DPR-30 OL	3/31/72	Rock Island Co., Ill.	NEDM-10735	1/3/73	7/19/71
Oyster Creek 1	Jersey Central Power & Light Co.	50-219	DPR-16 POL	4/9/69	Ocean Co.,N.J.	NEDM-10735*		9/7/71
Millstone 1	Millstone Point Co.	50-245	DPR-21 POL	10/7/70	New London Co., Conn.	NEDM-10735	12/29/72	9/20/71
Nine Mile Point 1	Niagra Mohawk Power Corp.	50-220	DPR-17 POL	8/22/69	Oswego Co.,N.Y.	NEDM-10735	1/3/73	8/20/71 (visual inspection no collapse)
Monticello	Northern States Power Co.	50-263	DPR-22 POL	9/8/70	Wright Co., Minn.	NEDM-10735	12/29/72	9/21/71

*Oyster Creek's responses were on 1/18/73 & 2/22/73. It determined that its position is stated in NEDM-10735.