UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
FLORIDA POWER & LIGHT COMPANY	)	Docket No. 50-389
	)	
(St. Lucie Nuclear Power Plant, Unit 2)	)	

REPLY OF APPLICANT TO PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

In accordance with 10 CFR § 2.754(b)(3) and this Board's direction (Tr. 3377), the Applicant, Florida Power & Light Company (FPL), hereby submits this reply to the proposed findings of fact and conclusions of law filed by the other parties to this proceeding.

Both Applicant's and the AEC Regulatory Staff's proposed findings of fact and conclusions of law have been filed in accordance with 10 CFR § 2.754 and the Board's directions of November 19, 1974 (Tr. 3369-3370, 3376-3377). The proposed findings and conclusions of the Applicant and the Staff are in basic agreement. To the extent that they do differ, Applicant requests that the Board adopt Applicant's proposed findings of fact and conclusions of law. With one exception, the Applicant does not believe those differences are sufficiently significant to make it necessary to burden the Board with a discussion of them.

Paragraph 28 of the Staff's Proposed Findings contains language which implies that cooling water can be discharged solely through one discharge line while Unit 1 and Unit 2 are both in operation. That implication is incorrect. Tr. 2298-2300; Applicant's Proposed Findings, para. 158, p. 76; Staff's Proposed Findings, paras. 42 and 43, pp. 20-21. In fact, para. 28 is part of Section IIB of the Staff's Proposed Findings, entitled "Impacts of Construction," and is intended to be in effect only before Unit 2 goes into operation. Accordingly, the paragraph should be clarified. Such clarification can be effected if the next-to-last sentence of the paragraph is modified by (i) adding the words "Before Unit 2 becomes operational" at the beginning of the sentence; and (ii) substituting the words "would allow discharges" for the words "allow operation" in the third line. As so amended, the sentence would read: "Before Unit 2 becomes operational, the Staff requires shutting off one of the two discharge lines (preferably the Unit 1 Y-type discharge line) once the Unit 2 multiport line becomes available and would allow discharges with both discharge lines only when Unit 1 is shut down or full dilution flow from the Unit 2 circulating pumps is available."

The remainder of this reply is devoted to a discussion of the "Intervenors Proposed Findings of Law."

At the outset we note that the document wholly fails to address Contentions 1.1, 1.2, 1.2.1, 1.6(c), 2.3 and 3.2. This failure has occurred in the face of the Board's express direction that proposed findings of fact and conclusions of law "will be filed by each party in accordance with the rules of practice . . . ." Tr. 3369. The issues included in Contentions 1.1, 1.2, 1.2.1, 1.6(c), 2.3 and 3.2 were the subject of extensive consideration by the Board in this proceeding. "At least as to those issues the failure to file proposed findings represents a clear default." Consumers Power Company (Midland Plant, Units 1 and 2), ALAB-123, RAI-73-5, 331, 333-334 (1973). Accordingly and pursuant to 10 CFR § 2.754(a), Applicant requests the Board to declare the Intervenors to be in default with respect to those issues. Such default could ". . . be taken into account in any challenge on appeal to the findings of the Licensing Board." Northern States Power Company (Prairie Island Nuclear Generating Plant, Units 1 and 2), ALAB-244, Slip Op., p. 17 (November 21, 1974).

Intervenors' Proposed Findings purport to address only Contention 2.2, relating to population; Contention 2.1(b) concerning hurricanes and site suitability; Contention 1.3, relating to need for power; and LWA activities. We discuss each of these matters below.

I.

The evidence presented in this proceeding overwhelmingly supports the conclusion[1/] that "the proposed site meets the requirements of 10 CFR Part 100 as to population density and use characteristics." In consequence on this record Contention 2.2(a) must be decided favorably to the Applicant's position. Perhaps in recognition of this, Intervenors do not request the Board to conclude that the requirements of 10 CFR Part 100 relating to population have not been met. They merely request that the Board direct that "fuller consideration be given to present population and its future projections . . ." (Intervenors Proposed Findings, p. 4)[2/] and that more intensive consideration be given to possible alternative sites (pp. 2, 8). However, as we show below, the alleged bases for the suggestion that this Board should direct "fuller consideration" are wholly without merit.

Intervenors cite the initial decision in Public Service Electric and Gas Company and Atlantic City Electric Company (Hope Creek Generating Station Units 1 and 2), LPB-74-79, RAI-74-10, 745, to support their argument that the population levels projected to occur around the St. Lucie site require additional investigation of alternative sites. Apparently in further support of this position, at page 6 Intervenors quote Dr. Bernard as stating that:

> "If the population were projected to increase to the hypothetical level of 134,000 persons within a 5 mile radius of the St. Lucie site, the Staff would require the Applicant to investigate alternative sites." (Emphasis added)

1/ That evidence is summarized in the Staff's Proposed Findings at paras. 128-153, pp. 59-65, and in the Applicant's Proposed Findings at paras. 92-144, pp. 45-69.

2/ Hereinafter, page references are to Intervenors Proposed Findings of Law unless the context otherwise indicates.

Intervenors ignore the fact that, in the very next sentence of his testimony, Dr. Bernard said:

> "However, since the Staff does not project a population of this magnitude at St. Lucie, the investigation of alternative sites for this purpose has not been required." (Supplemental Testimony of AEC Regulatory Staff on Board Questions Related to Demography, p. 2; follows Tr. 2722)

It is clear that no one, including Intervenors' witness,[3/] projects "a population of this magnitude at St. Lucie." Indeed, the entire passage quoted by Intervenors is in response to a question by Dr. Hooper in which he hypothetically doubled the highest projection made by any witness for the area within 5 miles of the plant. See, Applicant's Proposed Findings, paras. 139, 142, pp. 67, 69.

There is no support for the argument that, because of the population projections in this case, some investigation of alternative sites was required, different or more intensive than what took place. Intervenors' citation to the Hope Creek case is entirely inapposite. To the contrary, Intervenors have raised no genuine issue of material fact in this proceeding with respect to alternative sites. Contention 1.6(b) was, therefore, dismissed summarily. "Order on Motion for Summary Disposition," para. 8, September 25, 1974. The comparison of the site with the best available alternatives, as analyzed in the FES, is a proper analysis of alternative sites. Northern Indiana Public Service Company

---

3/ The highest projection, 67,000, was made by Intervenors' witness Schmidt. See Schmidt testimony, p. 10; follows Tr. 1096.

(Bailly Generating Station, Nuclear-1), ALAB-224, RAI-74-8, 244 at 268-269 (August 29, 1974).

Neither do Intervenors' questions concerning the admissibility and weight to be accorded to those parts of the Preliminary Safety Analysis Report and the Environmental Report which relate to population raise any issue of significance. Contrary to Intervenors' assertion at pp. 2-3, there is no doubt that Applicant's witnesses Kent and O'Neal are qualified to testify to the authenticity of the ER and PSAR. They supervised the preparation of these documents. Joint Testimony of Ellis O'Neal and Clifford S. Kent, Jr., follows Tr. 344. As stated by the Atomic Safety and Licensing Appeal Board:

> "The admissibility of the [PSAR] into the hearing record need be tested only by its identification as the document prepared pursuant to Commission regulations and submitted to the Commission as a part of the application. So long as the [PSAR] meets such an identification test it is admissible."

Boston Edison Company (Pilgrim Nuclear Power Station), ALAB-83, WASH-1218 (Supp.), p. 552, 567 (December 4, 1972).

So far as weight is concerned, Philip W. Moore, Applicant's demography witness, testified that his firm had prepared all of the material submitted by Applicant to the AEC with the exception of certain updated figures prepared by Applicant. Tr. 767-768; 813-814. Moreover, Mr. Moore stated that he was in general agreement with the updated figures with exceptions noted in his testimony. Tr. 768.

Mr. Moore, who was cross-examined at length by Intervenors' counsel, was familiar with all of the data in the ER and PSAR. Tr. 768, 813-814. Moreover, the Staff made its own independent study of population on which it relied. Testimony of Calvin W. Moon, p. 2, follows Tr. 3340; Tr. 2321. In this proceeding as in the Pilgrim case:

> "The weight which should be given to the contents of the [PSAR] is another matter which depends on the evidentiary record which is developed in connection with specific matters in controversy. The Joint Intervenors were given every reasonable opportunity from the outset of this proceeding to challenge the probative value of any specific information in the [PSAR] which concerns matters in controversy in this proceeding."

ALAB-83, supra, WASH-1218 (Supp.), p. 567. Accordingly, the PSAR and ER have been properly authenticated and have probative value.[4/]

Intervenors' efforts to discredit Mr. Moore fail. Their pejorative references (p. 2) to a bankrupt corporation in the context of population projections are wholly irrelevant; and, in fact, there is nothing in the record which indicates that population projections were made by any corporation which is now,

---

4/ The factual context of this case is strikingly similar to that in the Pilgrim case. The PSAR was introduced in evidence through the testimony of witnesses under whose supervision the documents were prepared. Intervenors' blanket objection to admission of the PSAR was denied. Intervenors' motion to strike certain portions of the PSAR not within the expertise or competence of the sponsoring witnesses was denied. See, WASH-1218 (Supp.), p. 567.

or ever has been, in bankruptcy. Tr. 736-737, 741, 750, 752. In fact the record discloses that Mr. Moore based his evaluation on 25 years' experience and data, including data specific to the St. Lucie area. Testimony of Philip W. Moore Relating to Contention 2.2(c), p. 2, follows Tr. 764; Tr. 827. The past studies of Mr. Moore's firm have proved to be reliable. Tr. 887. The fact that in March, 1974, his firm was requested to re-evaluate information in the PSAR to prepare for hearings in this proceeding, is of no significance insofar as the weight or credibility of his testimony is concerned. (p. 3).

As noted in paragraph 140 of Applicant's findings, Mr. Moore, based on his long experience, projected what he considered to be realistic population figures. In large part Intervenors' efforts to discredit him depend upon distortions of the record. For example, Mr. Moore did not consider Mr. Shinn's count (p. 3) because he had no way to evaluate its reliability. Tr. 886. He did not consider timesharing ownership (p. 4) to be significant. Tr. 823. Although he testified that "plans existed" to construct a town in connection with a proposed oil refinery about 20 miles from the site (p. 4), he stated, based on a firsthand knowledge of the situation, that the likelihood that the refinery or the town would ever be built is very small. Tr. 844-845. Mr. Moore did not testify (p. 4) that "he failed to research" the point of origin of camper condominium owners at Tr. 839, 841; he stated that he did not "conduct a survey" of such owners on Hutchinson Island and that his analysis was based

on experience in Florida with respect to such camper condominium owners. Tr. 840-841. At Tr. 748, Mr. Moore did not testify that he studied the Stuart, Martin County, Hutchinson Island area in 1974 "for the first time." (p. 4) Not only did he study the area prior to 1974, he identified the study specifically, contrary to Intervenors' assertion at p. 5. Tr. 2996. Although he testified, at Tr. 849, that he knew of no zoning density changes "in effect," (p. 4) he also testified "that zoning changes are being contemplated . . . . ." Tr. 849.

Nor does Mr. Moore's testimony constitute a "refutation" (p. 5) of the PSAR and ER. Moore did not testify at Tr. 2992 that a population of 22,266 could occur on Hutchinson Island. That figure is contained in his prepared testimony which follows Tr. 2967, on Table 2.1-4, page 2.1-20 of that testimony. The table itself, and the page of text two pages before the table, clearly indicate that the estimate was of potential population and was a conservative estimate pending completion of formal demographic studies. The realistic evaluation prepared by Mr. Moore shows a lower expected population, but it is not inconsistent with the conservative estimate in the testimony cited by Intervenors. Applicant's Findings, paras. 139-140, pp. 67-69.

The arguments made by Intervenors with respect to Dr. Bernard's qualifications (p. 5) have been answered in the Board's Order of November 29, 1974. They are also addressed in para. 114, pp. 55-

56, of the Applicant's Proposed Findings and para. 137, p. 60, of the Staff's Proposed Findings. Nevertheless, two additional points may be made. First, the citation to Tr. 272 at p. 5 has no weight as evidence. It is a citation to the opening statement of Applicant's counsel. It also has nothing to do with population projections. Second, Richard Schmidt's testimony does not find fault with reliance upon State of Florida population statistics, as asserted by Intervenors on page 6 of Intervenors' Findings. Quite the contrary, Mr. Schmidt relies on the very same statistics. Testimony of Richard Schmidt, pp. 3-5 and Tables 1 and 2, (notes), follows Tr. 1096.

At the bottom of page 7 and continuing to page 8, Intervenors refer to projections of possible accelerated growth beyond 1990 by Mr. Schmidt. However, they neglect to note that Mr. Schmidt admitted these to be "speculation on some of the assumptions" which he made in his testimony. Tr. 1148. The nature of the assumptions and their lack of validity are discussed in paras. 128-130, pp. 63-64,of Applicant's Proposed Findings.

Finally, the calculations with respect to the population center distance on page 8 ignore one crucial fact -- the population center distance can be reduced to 1 1/3 miles if future population growth warrants it. Testimony of Dr. Bernard, p. 2, follows Tr. 2722; Applicant's Findings, para. 148. Using the same technique as Intervenors use on page 8, the population at 1 1/3 miles from the plant would be 1950 X 1 1/3 or approximately 2600 people, nearly ten times lower than the 10 CFR Part 100 criterion of 25,000.

For all of the reasons stated above, the record does not support any of Intervenors' proposed findings with respect to population, and they should be rejected.

II.

As with respect to Contention 2.2, Intervenors do not now argue that Contention 2.1(b) be decided in their favor. They merely suggest (pp. 9-10) that "more complete analysis," "more accurate testimony" and "more stringent precautionary investigation" be provided or undertaken. The request for further evidence or proceedings is wholly lacking in justification.

Intervenors' present position appears to be that "in view of the vulnerability of Hutchinson Island during a hurricane" (i.e., the likelihood that Hutchinson Island will be cut; see Tr. 1933, 1697-1699 and testimony of Arnold L. Sugg, p. 2, following Tr. 2000B -- all cited in the Intervenors' Proposed Findings) and the fact that the site is located on a sand island below the 35th parallel, more facts than are now known should be determined. However, Contention 2.1(b) relates to the possible impact of hurricanes on the proposed site and the safe operation of the plant. As demonstrated in paras. 24-53, pp. 12-26, of the Applicant's Proposed Findings and in paras. 185-186, pp. 82-83, of the Staff's Proposed Findings, the only qualified expert witnesses concluded that while it is possible that a PMH could breach Hutchinson Island, the integrity of the plant island

would be maintained and all features essential for safety would be protected.

Nor do any differences among the witnesses concerning the characteristics of stalled hurricanes (p. 9), throw doubt on the validity of these conclusions concerning the security of the plant site. The potential effects of stalled hurricanes were taken into account in considering the effects of PMH caused erosion and in reading those conclusions. Tr. 1733-1734. See Staff's Proposed Findings, para. 187, p. 84; Applicant's Proposed Findings, para. 41, p. 20.

III.

Intervenors' Proposed Findings as they relate to Contention 1.3 distort the record concerning the need for power. Thus, Intervenors appear to suggest (p. 11) that because FPL calculates reserve margins on a 15 minute peak load rather than a 60 minute peak, somehow the need for reserves has not been established. However, they ignore the facts that the 15 minute peak must be met (Tr. 616, 617), that use of the 15 minute margin is appropriate because of considerations unique to FPL's system (Tr. 661-662, 665), and that reserve margins calculated on the 15 minute peak basis correspond to 60 minute peaks well within the reserve margins recommended for the Applicant. See Applicant's Proposed Findings, para. 167, p. 82; Staff's Proposed Findings, para. 107, p. 48.

Intervenors also suggest (pp. 12, 13) that the only reason for the construction of the St. Lucie No. 2 facility is to substitute nuclear fueled facilities for fossil-fueled capacity. In fact, however, the record clearly reflects FPL's need for base load capacity, including St. Lucie Unit 2, to meet projected increased demand on its system. Applicant's Proposed Findings, paras. 169, 170, pp. 84-85. Recognizing current uncertainties associated with forecasting, FPL's generation plans were developed to accommodate a band of growth rates ranging from 7% to 11%, and all studies based on growth rates within that band support the need for St. Lucie Unit 2. Testimony of Ernest L. Bivans Relating to Contention 1.3, p. 6, Table B-1; follows Tr. 383; paras. 169, 170, supra. Even if the growth rate declines to 7%, the bottom of the band, FPL would not, because of the uncertainties involved in estimating both load and construction schedules six years in advance, defer commencement of construction of St. Lucie Unit 2. App. Exh. 7, Attachment B, p. 3.

If for no other reason, these considerations make the Intervenors' reference (p. 14) to the dissenting opinions in the initial decision in Niagara Mohawk Power Corporation (Nine Mile Point, Unit 2), LBP-74-43, RAI-74-6, 1046 at 1090 (1974), inapposite. Unlike the situation in Nine Mile Point,[5/] here substitution of nuclear for fossil fuel is far from the only justification for St. Lucie Unit No. 2. The plant is needed to generate electricity.

5/ RAI-74-6 at 1067.

Applicant has made load growth projections, based on the best state-of-the-art methods, which projections predict a need for St. Lucie No. 2 in 1980. Applicant's Proposed Findings, paras. 170, 193-196, pp. 83, 95-97. These projections take into account energy conservation and the recent economic downturn. Applicant's Findings, paras. 171-182, 183-187, pp. 85-90. Consequently this case provides even more reasons for a finding favorable to the Applicant on need for power than did the majority opinion in the Nine Mile Point case, and there is no reason to follow the dissenting opinion in that case.

Finally, with respect to Contention 1.3 a few miscellaneous distortions of the record by the Intervenors should be noted. They cite (p. 13) Tr. 533 for the proposition that "additional reserve power through Florida Power Corporations [sic] interties with the Southern Companies . . ." is available to Applicant. That transcript reference supports only the existence of such interties. The evidence was uncontradicted that the Southern Companies have no firm power for sale. Tr. 538, 540; Applicant's Proposed Findings, para. 188, p. 94. Intervenors also state (p. 14) that "uranium fuel may well be as scarce as fossil fuel . . . in the coming decade." There is no support in the record for such a proposition. On the other hand, Intervenors' reference to Tr. 713 indicates that the Applicant analyzed "concerns" with respect to the supply of coal, oil and nuclear fuel, and that concerns with respect to nuclear fuel

are "considerably less" than with respect to coal or oil. And at the bottom of page 14 Intervenors make some calculations concerning the costs of delay as to which there is no record support. In addition, those calculations omit elements of expense involved in delaying St. Lucie Unit 2 for one year, such as costs of alternative capacity and fuel costs. Such a delay may also jeopardize the reliability of the system. Tr. 579-581.

IV.

Intervenors' assertion (p. 15), that the question of an LWA-1 is moot, is incorrect. Additional work which requires an LWA-1 has been requested by Applicant. Applicant's Proposed Findings, para. 268, pp. 135-136; see also Staff's Proposed Findings, paras. 194-197, pp. 88-89. Accordingly, the Board should make findings of fact and conclusions of law with respect to NEPA matters and site suitability. 10 CFR § 50.10(e)(2).

10 CFR § 50.10(e)(3)(ii) provides that an LWA-2 may only be issued after the licensing board, in addition to making the findings and determinations required by 10 CFR § 50.10(e)(2), has

> "determined that there are no unresolved safety issues relating to the additional activities that may be authorized pursuant to this paragraph <u>that would constitute good cause for withholding authorization</u>". (Emphasis added)

Intervenors point out (p. 15) that there exist unresolved safety issues with respect to some of the activities for which the Applicant seeks an LWA-2. However, Intervenors point to no such unresolved issue which "would constitute good cause for

withholding authorization." To be sure they characterize (p. 15) as "unresolved safety issues" undefined "problems" concerning meteorology, population, and evacuation in an emergency. However, they do not specify how these "problems" either constitute "good cause for withholding authorization" or even how, if at all, they relate "to the additional activities which may be authorized." In addition, evacuation in an emergency is an issue covered by Contention 3.2 as to which Intervenors have defaulted. Their objections to the issuance of an LWA-2 are therefore wholly without merit.

For all of the foregoing reasons, Applicant requests the Board to reject all of "Intervenors Proposed Findings of Law."

Respectfully submitted,

STEEL HECTOR & DAVIS
Co-counsel for Applicant
14th Floor Southeast First
National Bank Building
Miami, Florida 33131

LOWENSTEIN, NEWMAN, REIS & AXELRAD
Co-counsel for Applicant
1025 Connecticut Avenue, N.W.
Washington, D. C. 20036

By: Harold F. Reis
Harold F. Reis

Dated: December 27, 1974

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
FLORIDA POWER & LIGHT COMPANY	)	Docket No. 50-389
	)	
(St. Lucie Plant, Unit No. 2	)	

ERRATA TO "APPLICANT'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW IN THE FORM OF A PARTIAL INITIAL DECISION"

Applicant requests that its proposed findings of fact and conclusions of law, filed in this proceeding on December 9, 1974, be corrected as follows:

PAGE	LINE	CHANGE	TO
2	6	2560	2570
3	2 of second footnote	"IV.E"	"IV.B"
7	18	"2181"	"2281"
21	5	"surge would"	"surge plus wave runup would"
32	2	"(g)"	"(f)"
33	21	"15"	"115"
53	20	"Fort Pierce."	"Fort Pierce,"
56	5	"date"	"data"
65	9	"he"	"Mr. Schmidt"
67	16	"10,760"	"8693"
67	16	Change cite to read:	"Schmidt, p. 3 as corrected at TR. 1092."
69	25	"frivilous"	"frivolous"
77	24	"does"	"dose"
78	3	"does"	"dose"

PAGE	LINE	CHANGE	TO
80	3	"Applicant. Bivans, pp. 2-9."	"Applicant. Testimony of Ernest L. Bivans Relating to Contention 1.3, pp. 2-9, follows Tr. 383, hereinafter "Bivans."
83	25	"associate with a"	"associated with an"
100	18	2111."	2111.
105	24	"decised"	"decided"
108	1	"genetical"	"genetically"
129	11	Strike the word	"However"
132	14	"488"	"536"
132	15	"App. Exh. 7, Attachment A, p. 1, follows Tr. 530."	"SER, p. 20-1"
135	8	"May"	"June"
136	23	"LWA-1,"	"LWA-1."
138	21	"LAWA."	"LWA."
142	1	"Indded"	"Indeed"

Respectfully submitted,

STEEL HECTOR & DAVIS
Co-counsel for Applicant
14th Floor Southeast First
National Bank Building
Miami, Florida 33131

LOWENSTEIN, NEWMAN, REIS & AXELRAD
Co-counsel for Applicant
1025 Connecticut Avenue, N.W.
Washington, D. C. 20036

By: Harold F. Reis
Harold F. Reis

Dated: December 27, 1974

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Reply of Applicant to Proposed Findings of Fact and Conclusions of Law" and "Errata to 'Applicant's Proposed Findings of Fact and Conclusions of Law in the Form of a Partial Initial Decision'", both dated December 27, 1974, have been served on the following by deposit in the United States mail, first class or air mail, this 27th day of December, 1974.

John B. Farmakides, Esq.
Chairman, Atomic Safety & Licensing Board Panel
U.S. Atomic Energy Commission
Washington, D. C. 20545

Michael Glaser, Esq.
Alternate Chairman
Atomic Safety & Licensing Board Panel
1150 17th Street, N.W.
Washington, D. C. 20036

Dr. Marvin M. Mann
Technical Advisor
Atomic Safety & Licensing Board Panel
U.S. Atomic Energy Commission
Washington, D. C. 20545

Dr. David L. Hetrick
Professor, Nuclear Engineering
University of Arizona
Tucson, Arizona 85721

Dr. Frank F. Hooper, Chairman
Resource Ecology Program
School of Natural Resources
University of Michigan
Ann Arbor, Michigan 48104

Mr. C. R. Stephens, Supervisor
Docketing and Service Section
Office of the Secretary of the Commission
U.S. Atomic Energy Commission
Washington, D. C. 20545

Mr. Angelo Giambusso
Deputy Director for Reactor Projects
U.S. Atomic Energy Commission
Washington, D. C. 20545

Alan S. Rosenthal, Esq.
Chairman, Atomic Safety & Licensing Appeal Panel
U.S. Atomic Energy Commission
Washington, D. C. 20545

Perry B. Seiffert, Esq.
Counsel for AEC Regulatory Staff
U.S. Atomic Energy Commission
Washington, D. C. 20545

Martin Harold Hodder, Esq.
1130 NE. 86 Street
Miami, Florida 33138

Norman A. Coll, Esq.
Co-Counsel for Applicant
Steel, Hector & Davis
1400 Southeast First National Bank Bldg.
Miami, Florida 33131

Local Public Document Room
Indian River Junior College Library
3209 Virginia Avenue
Ft. Pierce, Florida 33450

LOWENSTEIN, NEWMAN, REIS & AXELRAD
Co-Counsel for Applicant
1025 Connecticut Avenue, N.W.
Washington, D. C. 20036

By Harold F. Reis
Harold F. Reis