



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
PUGET SOUND POWER & LIGHT	)	Docket Nos. 50-522
COMPANY, et al.	)	50-523
	)	
(Skagit Nuclear Power Project,	)	November 30, 1979
<u>Units 1 and 2)</u>	)	

APPLICANTS' REPLY  
TO  
FOB/CFSP PROPOSED FINDINGS

This is Applicants' reply to Intervenor FOB/CFSP's proposed findings of fact dated October 12, 1979 (FOB/CFSP Proposed Findings).

The FOB/CFSP Proposed Findings are confined to two subjects: (1) alternative sites and (2) environmental effects of postulated accidents. Both of these subjects are beyond the scope of FOB/CFSP's contentions. Board order dated May 26, 1976. Both of these subjects also lie outside the scope of the interest represented by FOB/CFSP, which is the interest of rate payers of Portland General Electric Company and Pacific Power & Light Company. Id., pp. 2-3. The interest of a rate payer would encompass certain economic issues whereas the issues relating to alternative sites and the environmental effects of

1595 089

7912170 020  
ECLIFORE  
G

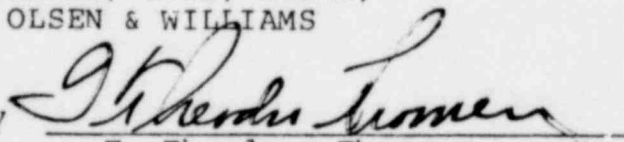
accidents now sought to be addressed by FOB/CFSP are environmental issues. Accordingly, the FOB/CFSP proposed findings should be rejected. Northern States Power Co. (Prairie Island Nuclear Generating Plant, Units 1 and 2) 8 AEC 857, 867 (1974).

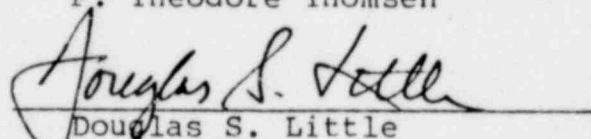
With respect to the merits of the FOB/CFSP Proposed Findings, they are without merit, for the reasons stated in the relevant sections of Applicants' reply dated November 30, 1979 to the SCANP Proposed Findings. With respect to alternative sites, see Section H, Alternative Sites, of that reply, pp. 86 et seq. With respect to the effects of postulated accidents, see Section L, Effects of Postulated Accidents, of that reply, pp. 79 et seq.

DATED: November 30, 1979.

Respectfully submitted,

PERKINS, COIE, STONE,  
OLSEN & WILLIAMS

By   
F. Theodore Thomsen

By   
Douglas S. Little  
Attorneys for Applicant  
1900 Washington Building  
Seattle, Washington 98101  
Phone (206) 682-8770

Of Counsel:

Lowenstein, Newman, Reis,  
Axelrad & Toll  
1025 Connecticut Avenue, N.W.  
Washington, D. C. 20036

1595 090