UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket Nos. 50-295, 50-304
COMMONWEALTH EDISON COMPANY	)	Proposed Issuance of Amendments
	)	to Facility Operating License
(Zion Station, UNits 1 and 2)	)	Nos. DPR-39, DPR-48

TESTIMONY OF ARGIL L. TOALSTON
ON CONTENTION 2(c)

I am Chief, Power Supply Analysis Section, Antitrust and Indemnity Group, Nuclear Reactor Regulation.

As a part of my duties, I aided in the preparation of Sections 7.5 and 7.6 of the NRC Staff Environmental Impact Appraisal (EIA) issued in connection with the proposed modification of the spent fuel pool at the Zion Station, Units 1 and 2 and adopt them as part of my direct testimony on Contention 2(c).

Contention 2(c) states:

> Should it be necessary to shut down the Zion facility, pending the development of an alternate, away from reactor facility, the Applicant has not shown that the community currently being served by Zion would be adversely affected economically or by experiencing loss of electricity.
>
> (1) The Applicant has not explored the possibility of meeting current demand by increased use of underutilized fossil-fueled plants serving the Edison system.
>
> (2) The Applicant has not considered curtailing the output from Zion in conjunction with a conservation program and coordinated rate structure which would reduce the demand for electricity in the area served by Zion.

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With regard to Contention 2(c)(1), the Staff found that, without additional spent fuel storage capacity, the Zion Station would be forced to shutdown in 1983. The Staff further found that independent spent fuel storage facilities (under Government-sponsorship) are not expected to be available until 1983 or 1984 at the earliest. See EIA, §7.3. If the Zion Station were shutdown, pending development of away from reactor storage, replacement energy would cost at least $7.2 million per month. See EIA, §7.5.

With regard to Contention 2(c)(2), conservation measures are not predictably available as an alternative to the proposed action. See EIA, §7.6.

In conclusion, reactor shutdown would remove the unit from service. This, in turn, could adversely effect the licensee's ability to meet electrical energy needs or force the operation of other plants which are less economical to operate.

PROFESSIONAL QUALIFICATIONS

OF

ARGIL L. TOALSTON

My name is Argil L. Toalston. I am currently employed by the Nuclear Regulatory Commission as Chief, Power Supply Analysis Section, Antitrust and Indemnity Group, Nuclear Reactor Regulation. The Power Supply Analysis Section is responsible for investigating and providing engineering assistance with respect to the activities of nuclear plant applicants as they relate to the antitrust laws. Toward this function, the group has special expertise in the operation of electrical utility systems and the bulk power supply relationships among electrical utilities.

I am a graduate of the Ohio State University with a bachelor of science degree in electrical engineering, power option. I am registered as a professional engineer in Ohio and Michigan, and a member of Eta Kappa Knu and the Institute of Electrical and Electronic Engineers.

My professional experience consists of employment with Commonwealth Associates, Inc., an engineering consulting firm located in Jackson, Michigan from 1951 to 1971; with the Federal Power Commission, now the Federal Energy Regulatory Commission, from 1971 to 1972; and with the Nuclear Regulatory Commission, formerly the Atomic Energy Commission, from 1972 to the present time.

With Commonwealth Associates, Inc., I worked in the steam power plant design section for about two years, in the substation design section for about four years, in the electrical technical section for about one year, and the consulting and system study section for the remaining thirteen years. My work in the system study section involved production costing studies and economic dispatch studies for various electric utilities.

While with the Federal Power Commission from 1971 to 1972, I worked in the Division of Coordination and Reliability, Bureau of Power. My principal duties involved analysis of the power supply plans of the various regional reliability councils in the United States.