



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:)	
)	
PUGET SOUND POWER AND)	Docket Nos. 50-522
LIGHT COMPANY, et al.,)	50-523
)	
(Skagit Nuclear Power Project,)	
Units 1 and 2))	
-----)	

MOTION FOR ORDER DIRECTING
REVIEW OF STAFF POSITION REGARDING
RELEVANCE OF CLASS 9 ACCIDENTS
AND RENEWING MOTION TO CONSIDER
CLASS 9 ACCIDENTS

Although intervenor SCANP has, since the outset, contended that Class 9 accidents are an appropriate and necessary issue in this proceeding (Intervenor's Contention J9), the staff has heretofore taken the position that such incidents should be disregarded in connection with site safety and environmental impact analysis.

In view of the recent incident at the Three Mile Island plant in Pennsylvania, the basis for staff's refusal to consider the Class 9 accident in connection with safety analysis, and environmental impact statement preparation, has disappeared. The Three Mile Island incident was an actual or potential Class 9 accident.

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EPS 0055

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The staff has prepared an environmental impact statement, and a supplement, to support the action of the Commission in connection with this licensing proceeding. In the EIS, the phenomena of Class 9 accidents was explicitly disregarded. (See EIS, pp. 7-1 to 7-2.). The supplemental EIS totally ignores the Class 9 accident.

It is intervenor's understanding that not only the NRC, but a special commission appointed by the President, is studying the Three Mile Island incident. Intervenors believe that it would be appropriate, therefore, for the Licensing Board to direct the staff to review all matters at issue in this proceeding, and to report back to the Licensing Board and the other parties in a reasonable time, (such as 90 days), with respect to whether or not:


1. The staff position on any issue in this proceeding should be modified to reflect a consideration of the Three Mile Island accident, and if so, when such modification can be expected.

2. Whether it would be appropriate to supplement the original EIS and supplemental EIS, to account for, discuss, disclose, and analyze, the consequences of Class 9 accidents, or at least, the actual consequences of the Three Mile Island accident, with respect to licensing this site.

Secondly, intervenors request that the Board rule that the actual and potential consequences of the Three Mile

Island accident, and of the potential for such an accident at the Skaqit site, be considered in this proceeding, and evidence be received accordingly, and that intervenors be entitled to maintain their contention J9.

DATED this 27 day of April, 1979.



ROGER M. LEED
Counsel for Intervenor SCANP

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
)
PUGET SOUND POWER & LIGHT) DOCKET NOS. STN 50-522
COMPANY, et al.,) 50-523
)
)
(Skagit Nuclear Power Project,)
Units 1 and 2))
)
)
)

APS 0855

CERTIFICATE OF SERVICE

I hereby certify that copies of:

INTERVENOR SCANP'S "MOTION FOR ORDER DIRECTING
REVIEW OF STAFF POSITION REGARDING CLASS 9 ACCIDENTS AND
RENEWING MOTION TO CONSIDER CLASS 9 ACCIDENTS" have been
served on the following by depositing the same in the United
States mail, postage prepaid, on this 27th day of April,
1979.

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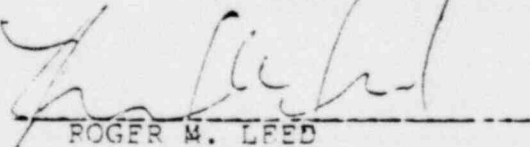
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