7/21/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES GENERATING COMPANY, ET AL.	)	Docket Nos. 50-445 50-446
	)	
(Comanche Peak Steam Electric Station, Units 1 and 2)	)	

NRC STAFF'S ANSWER TO APPLICANTS' STATEMENT OF OBJECTIONS TO PREHEARING CONFERENCE ORDER AND MOTION FOR MODIFICATION

Introduction

On July 1, 1980, Texas Utilities Generating Company, et al. ("Applicants") filed their "Statement of Objections to Prehearing Conference Order and Motion for Modification" ("Motion"), in which they object to the admission of six contentions by the Atomic Safety and Licensing Board ("Licensing Board") in its "Order Subsequent to the Prehearing Conference of April 30, 1980" ("Order"). Applicants move that the Licensing Board reconsider its ruling admitting Contentions 3, 4, 9, 11, 17, and 23, and "delete" these contentions in their entirety from the list of "Accepted Contentions" previously admitted by the Licensing Board. In the alternative, as to Contention 23, Applicants move to have the contention reworded along lines which they suggest.

For the reasons set forth below, the NRC Staff ("Staff") is of the view (a) that Contentions 3, 4, 9, 17, and 23 were properly admitted by the

Licensing Board, (b) that Contention 11 was improperly admitted by the Licensing Board, and (c) that a rewording of Contention 23 along the lines suggested by Applicants is not appropriate. Accordingly, it is the Staff's position that Applicants' motion to delete Contentions 3, 4, 9, 17, and 23 should be denied, that Applicants' motion to delete Contention 11 should be granted, and that Applicants' motion to reword Contention 23 should be denied. In the discussion which follows, each of these contentions will be addressed seriatim.

Discussion

I. APPLICANTS' MOTION TO DELETE CONTENTIONS

> Contention 3. The computer codes used in CPSES/FSAR must be tested and, if necessary, modified to accept the parameters reflecting the sequence of events at Three Mile Island and then to realistically predict plant behavior. (CFUR 2B)

In its Order of June 16, 1980, the Licensing Board accepted Contention 2B advanced by Citizens for Fair Utility Regulation (CFUR), and modified it "to provide for realistic prediction of the CPSES Westinghouse reactor system response to the sequence of events at TMI-2" (Order, at 3).[1/] Applicants object to the admission of this contention, asserting that the Commission

1/ CFUR's Contention 2B previously read as follows:

> The computer codes used in CPSES/FSAR must be tested and, if necessary, modified to accept the parameters reflecting the sequence of events at Three Mile Island and then used to realistically predict the behavior at Three Mile Island in consideration of these parameters.

"Report of CFUR's Position on Each Contention", dated April 10, 1980, Enclosure 1, p.9.

has precluded the litigation of such contentions in its recent "Statement of Policy" concerning the Three Mile Island accident.[2/] Applicants assert that this Statement of Policy "limited the scope of licensing reviews" and operated to preclude admission of "any contention which seeks to impose requirements related to events at TMI-2 in addition to those set forth in NUREG-0694"[3/] (Motion, at 2-3).

The NRC Staff acknowledges that those TMI-2 issues which may be raised in individual licensing proceedings are governed by the Commission's recent Statement of Policy. Although the Statement of Policy should properly be read and applied as a whole, the following extracts describe the basis for the Staff's opposition to Applicants' assertions.

In its Statement of Policy, the Commission stated as follows:

> [The] list of TMI-related requirements for new operating licenses found in NUREG-0694 is necessary and sufficient for responding to the TMI-2 accident. The Commission has decided that current operating license applications should be measured against the regulations, as augmented by the requirements.

(Statement of Policy, at 5) (footnote omitted). The Commission then outlined how these additional requirements should be treated in individual licensing proceedings:

2/ U.S. Nuclear Regulatory Commission, "Further Commission Guidance for Power Reactor Operating Licenses, Statement of Policy", dated June 16, 1980 ("Statement of Policy").

3/ U.S. Nuclear Regulatory Commission, "TMI-Related Requirements for New Operating Licenses", NUREG-0694 (June 1980).

> The Commission believes the TMI-related operating license requirements list . . . must be the principal basis for consideration of TMI-related issues in the adjudicatory process.

(Id., at 6). The Commission divided the requirements listed in NUREG-0694 into two categories:

> (1) those that interpret, refine or quantify the general language of existing regulations, and (2) those that supplement the existing regulations by imposing requirements in addition to specific ones already contained therein.

(Id., at 7). The Commission then specified that litigation of these requirements may be conducted in licensing proceedings, to the following extent:

> Insofar as the first category -- refinement of existing regulations -- is concerned, the parties may challenge the new requirements as unnecessary on the one hand or insufficient on the other ....
>
> Insofar as the second category -- supplementation of existing regulations -- is concerned, boards are to apply the new requirements unless they are challenged, but they may be litigated only to a limited extent. Specifically, the boards . . . may entertain contentions that one or more of the supplementary requirements are not being complied with; they may not entertain contentions asserting that additional supplementation is required.

(Id., at 7-8) (emphasis added).

In the Staff's view, Contention 3 is not, on its face, incompatible with the Commission's Statement of Policy. The contention raises the issue of whether computer codes used in the design of CPSES properly take account of the conditions experienced at TMI-2. This appears to be generally consistent

with NUREG-0694. NUREG-0694 (p. 13) refers to certain "Short-Term Recommendations" of the "NRR Lessons Learned Task Force", contained in Section 2.1.9 of NUREG-0578,[4/] and among the recommendations contained in NUREG-0578 is a prescribed series of computer calculations for transient and accident analyses (NUREG-0578, at A-45).[5/] Accordingly, the Staff is of the view that Contention 3 may be litigated in this proceeding, to the extent that such litigation is conducted within the parameters prescribed by the Commission's Statement of Policy.

Applicants' Motion with respect to this contention is without merit and should be denied.

> Contention 4. Some accident sequences heretofore considered to have probabilities so low as to be considered incredible, based, in part, upon the findings of WASH-1400, are in fact more probable in light of additional findings, such as those of the Lewis Committee and should be evaluated as credible accidents for CPSES. This evaluation should include a hydrogen explosion accident. In order to insure conservatism, the probabilities associated with such accident sequences should be the highest probabilities within the specified confidence band. (CFUR 3A, 3B and ACORN 11)

In the discussion which follows, we address, first, Applicants' assertion that the Class 9 aspect of this contention is inadmissible and, second, Applicants' assertion that the hydrogen explosion aspect of the contention is inadmissible.

4/ Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations" (July 1979).

5/ Applicants, themselves, appear to recognize this fact, as demonstrated by their reference to computer calculations reflecting certain transients and accident analyses which are required to be made pursuant to NUREG-0694 and NUREG-0578 (Motion, at 3).

(a) Class 9 Accidents

In its Order of June 16, 1980, the Licensing Board accepted this contention upon consolidating and modifying in part ACORN's Contention 11 and CFUR's Contentions 3A and 3B. In doing so, the Licensing Board noted that prior to June 9, 1980, when the Commission issued its "Statement of Interim Policy",[6/] these contentions "would have been denied as a matter of Commission policy" inasmuch as they "involve consideration of Class 9 accidents" (Order, at 3).[7/] As the Licensing Board noted, that policy is no longer in effect; the recent Statement of Interim Policy "not only permits consideration of accident sequences previously referred to as 'Class 9' accidents" (Order, at 3-4), but in fact requires consideration of the environmental impacts of some such accidents. As stated by the Commission:

> Environmental Impact Statements shall include considerations of the site-specific environmental impacts attributable to accident sequences that lead to releases of radiation and/or radioactive materials, including sequences that can result in inadequate cooling of reactor fuel and to melting of the reactor core. In this regard, attention shall be given both to the probability of occurrence of such releases and to the environmental consequences of such releases.

6/ U.S. Nuclear Regulatory Commission, "Nuclear Power Plant Accident Considerations Under the National Environmental Policy Act of 1969", Statement of Interim Policy, dated June 9, 1980. 45 Fed. Reg. 40101 (June 13, 1980).

7/ Indeed, prior to the Commission's issuance of its "Statement of Interim Policy", this position was advanced by both the Applicants and the NRC Staff. See "NRC Staff's Report on Its Position Concerning the Admissibility of Intervenors' Contentions", dated April 10, 1980, at 14-16, and 74-77; "Applicants' Statement of Positions on Proposed CFUR Contentions", dated April 10, 1980, at 7-11; and "Applicants' Statement of Positions on Proposed ACORN Contentions", dated April 10, 1980, at 20-22.

(Statement of Interim Policy, at 1-2).[8/] The Licensing Board has directed the Staff to undertake this consideration with respect to Contention 4 (Order, at 4).

In their Motion, Applicants assert that the Commission's Statement of Interim Policy applies only to "environmental" contentions and not to "safety" contentions (Motion, at 5-6, 8). According to the Applicants, Contention 4 is solely a "safety" contention. They state: "A review of the bases advanced by CFUR and ACORN for Contention 4 concerning Class 9 accident considerations confirms that it was intended as a safety contention" (Motion, at 6). Applicants conclude that the Statement of Interim Policy precludes consideration of Contention 4 in this proceeding (Motion, at 8). We believe that Applicants' argument amounts to an attempt to create an artificial categorization of this contention in order to exclude it from this proceeding. We believe that this approach is without merit.

The Staff does not share Applicants' view that Contention 4 is solely a safety contention.[9/] Although the Applicants cite an array of safety

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8/ The Statement of Interim Policy was issued on June 9, 1980, and invited comments from all interested persons on or before September 11, 1980. Notwithstanding the fact that the time for the filing of comments has not yet expired, the Commission has stated that it "intends the interim policy guidance contained herein to be immediately effective". Statement of Interim Policy, at 2.

9/ To the extent that Contention 4 requires probability analyses, it is consistent with the Commission's Statement of Interim Policy that "attention shall be given both to the probability of occurrence of such releases and to the environmental consequences of such releases" (Statement of Interim Policy, at 1-2).

concerns expressed by Intervenors CFUR and ACORN, they overlook or dismiss other expressions of environmental concern. Thus, CFUR refers to recent movement within the Commission toward requiring an environmental impact analysis of Class 9 accidents,[10/] and ACORN refers to the recommendation of the Council on Environmental Quality that the Commission undertake the consideration of Class 9 accidents.[11/]

Furthermore, both the Applicants and the Staff have always treated this contention and its asserted bases as an environmental contention. Thus, until now, Applicants have argued that the contention is inadmissible because the Commission had previously "proscribed" the "evaluation of the consequences of Class 9 accidents in individual licensing proceedings for land-based reactors," since this was a matter to be considered by the Commission in rulemaking.[12/] For this reason, Applicants' attempt to cast Contention 4 as solely a "safety" contention is without merit.

10/ "Report of CFUR's Position on Each Contention", dated April 10, 1980, at Enclosure 1, p. 16.

11/ "ACORN's Statement of Position on Contentions", dated April 10, 1980, at 22-23.

12/ "Applicants' Statement of Positions on Proposed ACORN Contentions", dated April 10, 1980, at 20-21 (objecting to ACORN contention 11). Similar statements were made by Applicants in response to CFUR's contentions 3A and 3B which are included in this contention; see "Applicants' Statement of Positions on Proposed CFUR Contentions," dated April 10, 1980, at 7-11.

(b) Hydrogen Explosion Consideration

In formulating Contention 4, the Licensing Board combined the Class 9 contentions advanced by ACORN and CFUR with the hydrogen gas explosion contention advanced by CFUR. The Applicants object to the admission of the hydrogen contention on the ground that this issue is to be addressed by the Commission in rulemaking (Motion, at 8).

In the view of the NRC Staff, the litigation of issues related to hydrogen gas explosions is not precluded in this proceeding. In Metropolitan Edison Co. (Three Mile Island Nuclear Station, Unit 1), CLI-80-16, 11 NRC _____ (May 16, 1980), the Commission decided that a hydrogen gas control issue may properly be litigated in individual licensing proceedings under 10 CFR Part 100, provided that certain threshold showings are made. There, the Commission was presented with two questions certified to it by the Licensing Board. The Commission held that the assumptions contained in 10 CFR § 50.44 constitute the applicable requirements with regard to hydrogen generation, and that those requirements were not to be waived or challenged in that case. The Commission ruled, however, that some litigation of this issue would be permitted:

> [Q]uite apart from 10 CFR 50.44, hydrogen gas control could properly be litigated in this proceeding under 10 CFR Part 100. Under Part 100, hydrogen control measures beyond those required by 10 CFR 50.44 would be required if it is determined that there is a credible loss-of-coolant accident scenario entailing hydrogen generation, hydrogen combustion, containment breach or leaking, and offsite radiation doses in excess of Part 100 guideline values. The design basis assumptions of 10 CFR 50.44, in particular the assumption that hydrogen generation following a loss-of-coolant

> accident is dependent on ECCS design as opposed to actual ECCS operation, do not constrain the choice of credible accident sequences used under 10 CFR 100.11(a). ...
>
> * * * *
>
> We have stated above that the hydrogen control issue can be litigated under 10 CFR Part 100. Under Part 100 the likelihood of an accident entailing generation of substantial (in excess of 10 CFR 50.44 design bases) quantities of hydrogen, the likelihood and extent of hydrogen combustion, and the ability of the reactor containment to withstand any hydrogen combustion at pressures below or above containment design pressure would all be at issue. A critical issue here would be the likelihood of an operator interfering with ECCS operations.

(Id., at 2-3).

In view of the guidance afforded by this decision, the Staff submits that litigation of the hydrogen explosion issue is permissible in this proceeding, to the extent that the contention is litigated within the parameters outlined in CLI-80-16. Thus, to the extent that the contention asserts that 10 CFR § 50.44 is not being complied with, the contention is admissible. Also, to the extent that the contention asserts that there is a credible accident scenario which entails hydrogen gas generation or combustion leading to offsite radiation doses in excess of Part 100 guidelines, the contention is admissible. Although it is unclear at present to what extent the hydrogen explosion portion of Contention 4 is compatible with the guidelines established in CLI-80-16, this question would appear to be amenable to resolution at some later time, through the Commission's summary dispositon procedures.

Applicants' assertion that NUREG-0694 precludes consideration of this issue by its establishment that "the issue of hydrogen control will be dealt with

by rulemaking" (Motion, at 9), does not preclude consideration of this issue along the lines formulated in CLI-80-16 which cast such questions in terms of present Commission regulations. Accordingly, the Staff is of the view that Applicants' motion with respect to Contention 4 is without merit and should be denied.

> Contention 9. Applicants have failed to make any effort to determine the effect of radioactive releases on the general public other than at the exclusion boundary. Various transport mechanisms may cause, in certain cases, the bulk of the health effects to occur some distance from the exclusion boundary. (CFUR 8)

The Applicants object to the admission of Contention 9 on the grounds that (a) it constitutes "a challenge to Commission regulations governing routine radioactive releases" (Motion, at 11), and (b) it concerns a generic issue which is the topic of a pending rulemaking, insofar as it seeks "to impose emergency planning requirements beyond a 50-mile radius" (Motion, at 12). In the view of the NRC Staff, Applicants' arguments with respect to this contention are without merit.

It is true, as Applicants assert, that Commission regulations do govern the release of radioactive materials during normal reactor operation; pursuant to 10 CFR § 50.36a, such releases must be kept "as low as is reasonably achievable," and Appendix I to 10 CFR Part 50 provides "numerical guidance" in this regard (Id.). The Staff does not perceive that CFUR has challenged the sufficiency of Commission regulations; rather, the contention appears to

assert that Applicants will fail to comply with those regulations.[13/] Thus, CFUR has alleged that the wind rose used by CPSES reflects a significantly different weather pattern than that which is indicated by actual "local weather reports."[14/] Similarly, CFUR has urged that "more sophisticated weather data is required to minimize the effects of gaseous batch releases from CPSES in conformance with the ALARA requirements of 10 CFR Part 50."[15/]

Furthermore, the Staff disagrees with Applicants' assertion that Contention 9 concerns a generic issue which is the subject of rulemaking, except possibly to the limited extent that the contention raises an issue involving emergency planning. Whether emergency planning is involved in this contention may be determined later through the discovery process. At that time, summary disposition may be an appropriate procedure. In sum, it is the Staff's view that Contention 9, on its face, does not constitute an attack on Commission

13/ The Staff's understanting of Contention 9 differs in part from our previous reading of that contention. Thus, we previously stated that the contention appeared to challenge the Commission's regulations, and that CFUR had failed to allege special circumstances that would demonstrate the inadequacy of radiation release standards with respect to CPSES. See "NRC Staff's Report on Its Position Concerning the Admissibility of Intervenors' Contentions," dated April 10, 1980, at 23. However, the Staff now believes that this contention may be read as asserting that the effects (impacts) of releases within the limits of the regulations should be considered. It is the Staff's view that such consideration is appropriate in evaluating the environmental costs of operation and would not constitute a challenge to the regulations.

14/ "Motion to Add Contention," dated October 31, 1979, at 2; "Report of CFUR's Position on Each Contention," dated April 10, 1980, at Enclosure 1, p. 23.

15/ "Report of CFUR's Position on Each Contention," dated April 10, 1980, at Enclosure 1, p. 24.

regulations or an attempt to litigate a generic issue now in rulemaking. Accordingly, Applicants' motion with respect to this contention should be denied.

> Contention 11. Neither the Applicants nor the Staff has a reliable method for evaluating or insuring that Class IE safety-related equipment is designed to accommodate the affects of and to be compatible with the environmental conditions associated with the most severe postulated accident; thus General Design Criterion 4 has not been satisfied. (ACORN 3)

The Applicants object to the admission of this contention on the grounds that the Commission's decision in Petition for Emergency and Remedial Action (Union of Concerned Scientists (UCS)), CLI-80-21 (slip op., May 23, 1980), resolved this issue by "establishing the requirements for satisfying GDC-4" (Motion, at 14). The NRC Staff is of the view that Applicants' Motion presents a proper objection to the admission of this contention and that this contention should be rejected.

In UCS, the Commission considered a request for review and emergency relief with respect to fire protection for electrical cables and environmental qualification of electrical components. After an extended review of the questions raised by UCS, the Commission reaffirmed its earlier decision in which, inter alia, it had denied a request to shut down all operating reactors,[16/] and stated as follows (p. 3):

16/ Petition for Emergency and Remedial Action (Union of Concerned Scientists), CLI-78-006, 7 NRC 400 (1978).

> We believe that current Commission regulations in the fire protection and environmental qualification areas and those actions we order today provide reasonable assurance that the public health and safety is being adequately protected during the time necessary for corrective action.

The Commission noted that the applicable legal requirements for qualification are contained in General Design Criteria 1 and 4 of Appendix A to Part 50, Criterion III of Appendix B to Part 50, and 10 CFR § 50.55(h); and that it "has used a variety of methods to see that these general legal requirements are met for electrical safety equipment," including IEEE-323-1971, IEEE-323-1974, and Reg. Guide 1.89 (UCS, at 4-5). The Commission then observed that recently, the Staff has published two other documents in this regard -- the DOR Guidelines[17/] and NUREG-0588[18/] -- "which substantially improve upon the 1971 standard and should provide greater assurance that equipment is adequately qualified" (Id., at 6). The Commission endorsed the Staff's use of the DOR Guidelines and NUREG-0588, and ordered that:

> [T]hese two documents form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10 CFR 50, Appendix A, General Design Criteria (GDC)-4 which relate to environmental qualification of safety-related electrical equipment.

(Id.). Finally, the Commission concluded that a rulemaking on environmental qualification of safety-grade electrical equipment is appropriate, and that

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17/ Division of Operating Reactors, U.S. Nuclear Regulatory Commission, "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" ("DOR Guidelines") (November 1979).

18/ Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment" (NUREG-0588) (December 1979).

"the Guidelines and NUREG-0588 will state the requirements of GDC-4 until the rulemaking has been completed" (Id., at 7, 8).

To the extent that this contention asserts that there is no valid standard for determining whether GDC-4 has been satisfied, the Commission's decision in UCS removed the basis for this contention.[19/] Accordingly, the Staff recommends that Applicants' motion with respect to this contention should be granted and that Contention 11 should be deleted from the list of Accepted Contentions which are to be litigated in this proceeding.[20/]

> Contention 17. Neither the Applicants nor the Staff has adequately considered the effects of aging and cumulative radiation on safety-related equipment which must be seismically and environmentally qualified, thus, General Design Criterion 4 has not been satisfied. (ACORN 10)

The Applicants object to the admission of this contention on the grounds that it "raises issues (aging and cumulative radiation) which are by implication accounted for in the Commission's Order" (Motion, at 14). The Applicants urge that Contention 17, like Contention 11, should be dismissed as a challenge to the Commission's decision in UCS.

19/ The Staff notes that the Commission issued its decision in UCS substantially after the date of the prehearing conference, after all pleadings concerning contentions had been filed in this proceeding, and just shortly before the Licensing Board issued its Order of June 15, 1980. The Staff notes that prior to the time the Commission issued its UCS decision, the Staff was of the view that Contention 11 did constitute a valid contention. See "NRC Staff's Report on Its Position Concerning the Admissibility of Intervenors' Contentions," dated April 10, 1980, at 68.

20/ To the extent that ACORN wishes to modify its contention based upon the UCS decision, the Commission's Rules of Practice provide that it may file an amended contention pursuant to the provisions of 10 CFR § 2.714(a).

In the view of the NRC Staff, Applicants' argument is without merit. Thus, although the subjects of aging and radiation effects are among the topics discussed in NUREG-0588 (pp. 7-10, 15-16), we do not believe that Contention 17 challenges the sufficiency of the Commission's requirements. Rather, Contention 17 appears to question the Applicants' compliance with the Commission's requirements, and to that extent, it is an admissible contention.[21/] Accordingly, the Staff submits that Applicants' motion with respect to this contention should be denied.

> Contention 23. Neither the Applicants nor the Staff has adequately considered the health effects of low-level radiation on the population surrounding CPSES in as much that the CPSES design does not assure that radioactive emissions will be as low as is reasonably achievable. (ACORN 25 and CASE 9)

In accepting this contention, the Licensing Board consolidated and modified, in part ACORN's Contention 25 and CASE's Contention 9. The Applicants object to the admission of this contention on the grounds that it constitutes "a challenge to Commission regulations" (Motion, at 14-15). In the alternative, if the contention is not dismissed, Applicants urge that the contention should be reworded and confined to the issue of whether the CPSES design is in compliance with the Commission's ALARA standards for radioactive releases. Applicants propose the following language:

> The CPSES design does not assure that radioactive emissions will be as low as is reasonably achievable.

21/ In the event that Contention 17 should later be discovered to constitute an attack on Commission requirements, then resort to the Commission's summary disposition procedures may be appropriate.

(Motion, at 15). In the view of the NRC Staff, Contention 23, as presently worded, is an admissible contention, to the extent that it challenges Applicants' compliance with Commission regulations governing the release of radiation and/or radioactive materials. To this extent, the Staff is of the view that Applicants' argument that Contention 23 should not be admitted is incorrect. We do not agree that the contention should be reworded as Applicants have proposed. The revised language proposed by Applicants does not appear to encompass the entire permissible scope of consideration of the environmental impacts (health effects) that may be associated with releases from a facility whose design is asserted to be inadequate to satisfy the Commission's ALARA requirements. Accordingly, the NRC Staff opposes Applicants' motion.

Conclusion

For the foregoing reasons, the NRC Staff respectfully submits that Applicants' motion to delete Contentions 3, 4, 9, 17 and 23 should be denied, that Applicants' motion to delete Contention 11 should be granted, and that Applicants' motion seeking to reword Contention 23 should be denied.

Respectfully submitted,

Sherwin E Turk

Sherwin E. Turk
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 21st day of July, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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TEXAS UTILITIES GENERATING COMPANY, ET AL.	)	Docket Nos. 50-445
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(Comanche Peak Steam Electric Station, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S ANSWER TO APPLICANTS' STATEMENT OF OBJECTIONS TO PREHEARING CONFERENCE ORDER AND MOTION FOR MODIFICATION" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 21st day of July, 1980:

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