Before the
UNITED STATES
NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

In the Matter of	)	
	)	
UNITED STATES DEPARTMENT OF ENERGY	)	
PROJECT MANAGEMENT CORPORATION	)	Docket No. 50-537
TENNESSEE VALLEY AUTHORITY	)	
	)	
(Clinch River Breeder Reactor Plant)	)	

MEMORANDUM OF INTERVENORS, NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB, IN SUPPORT OF THEIR MOTION FOR SUMMARY DENIAL OF APPLICANTS' SECTION 50.12 REQUEST; OR ALTERNATIVELY, REQUEST FOR ADJUDICATORY HEARING

The Commission has before it Applicants' third request in a little more than six months for an extraordinary variance, under 10 C.F.R. §50.12, from standard licensing practice. The request, if granted, would allow Applicants to conduct more than $80 million in major construction activities at the site of the Clinch River Breeder Reactor (the "CRBR"), [1/] without having to complete licensing procedures now underway before an Atomic Safety and Licensing

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[1/] The current projected cost is actually $81.5 million. See Applicants' Site Preparation Activities Report 3-23 (June 1982) (hereinafter cited as the "SPAR II").

Board. [2] Their request, rejected twice before by the Commission, is based on no change in law or fact; Applicants simply reiterate arguments which they have previously presented to the Commission. In such circumstances, consideration of this latest application is barred by principles of administrative finality and res judicata and should be summarily denied. Alternatively, if the Commission determines to consider the application, then Intervenors submit that an adjudicatory hearing is required as a matter of statutory law and administrative precedent.

I. Applicants' Section 50.12 Request Is Barred By Principles Of Administrative Finality and Res Judicata

It is elementary that at some point litigation must come to an end and administrative or judicial decisions be considered final. In this case, that point certainly has been reached.

Applicants' initial Section 50.12 request was filed on November 30, 1981. After extensive evidentiary submissions, briefing, questioning and argument, the

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[2] The hearing phase for environmental and site suitability issues is in fact scheduled to begin in only six weeks, on August 23. See Board's Prehearing Conference Order (Schedule), dated February 16, 1982.

Commission rendered a decision on March 16, 1982, denying the request. Order, CLI-82-4 (March 16, 1982). In so doing, the Commission applied the law to the facts and made the findings required for a Section 50.12 determination.

The Order fixed the rights of the parties and was final and appealable. Had Applicants considered themselves aggrieved by the Order, they could have sought judicial review (and vindication of their position) under Section 189 of the Atomic Energy Act. They chose not to do so.

Rather than appealing, Applicants, on May 14, 1982, filed a request for reconsideration of the Order. The Commission on May 17 divided equally on the question of reconsideration and, as a result, the earlier decision remained standing. See Order, CLI-82-8 (May 18, 1982).

Applicants have now returned for yet a third try. However, a review of Acting Secretary of Energy Davis' letter of July 1 and its supporting documentation reveals that Applicants seek to reargue the identical issues which have already been ruled upon by the Commission. Further, no new facts have been presented, no changes of circumstances cited, no modifications in applicable law pointed to, no shifts in

public policy relied upon. [3/] The only basis that one can discern for filing a new application is perhaps a hope

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[3/] While the new application perhaps lays greater stress on asserted "programmatic" benefits which allegedly would result from granting the request, Applicants of course had every opportunity to present these matters to the Commission in the extensive proceedings between December, 1981 and March, 1982, and in fact these matters were before the Commission in March, 1982. For example, "programmatic" benefits were discussed in the original Site Preparation Activities Report (November 1981) (the "SPAR") (at 7-1) and in Applicants' oral statements. See Transcript of February 16 Hearing at 82 (statement of Mr. Davis). They were also considered by the Commissioners. See Transcript of March 1 Meeting at 29 (Commissioner Palladino); Transcript of March 5 Meeting at 10 (Commissioner Roberts). "Informational" benefits were likewise mentioned in written presentations, see SPAR 7-1, 7-2, and oral statements, see Transcript of February 16 Hearing at 74 (statement of Mr. Edgar), and they, too, were considered by the Commission. See, e.g., Transcript of March 1 Meeting at 18, 25-26, 28, 40, 44 (statements of Commissioners Palladino, Gilinsky and Bradford, respectively). "National energy policy" was stressed from the very beginning by Applicants, see Secretary Edwards' letter of November 30, 1981 at 1, 3, 4 and emphasized at oral hearing. See Transcript of February 16 Hearing at 6, 87, 108 (statements of Messrs. Edgar, Davis and Kearney, respectively). The simple fact is that the Commission, in reaching its decision of March 16, did not ignore public interest factors other than cost. See Transcript of March 1 Meeting at 10, 12, 16 (statements of Commissioners Ahearne, Palladino and Bradford, respectively.)

for a favorable vote this time around. [4] In such circumstances, both the principle of administrative finality embodied in the Commission's Rules of Practice and the doctrine of res judicata bar favorable action on the new request.

(a) Administrative Finality Under the Commission's Rules of Practice

In the formal adjudicatory context, the Commission's Rules of Practice limit a party to a 10-day period in order to request reconsideration of a Commission ruling. See 10 C.F.R. §2.771. The purpose of this rule is to give some finality to the Commission's rulings and not to allow them to be relitigated at any time at the whim of a party. From the outset, it has been Intervenors' position that Applicants' Section 50.12 request is part and parcel of the CRBR licensing and must be treated as an adjudicatory matter. Thus, in our view, the Rules of Practice would apply. As a

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[4] As explained in Intervenors' Motion for Recusal, filed May 17, 1982, the actions of the Department of Energy, in particular, following the March 16 decision left the impression that a change in the composition of the Commission would produce a different substantive result. We would suggest that the impression still lingers and, even now, positive action on the new request, absent any new justification therefor, will inevitably raise questions about the independence and objectivity of the Commission and adversely affect public confidence in the integrity and impartiality of the Commission's decisionmaking process. Thus, important public policy considerations reinforce the desirability of "repose" in this case.

consequence, reconsideration on motion of the Applicants at this time is no longer permissible. Applicants cannot avoid this rule simply by denominating their request a new "application." Because they present nothing new, they plainly are doing no more than seeking reconsideration.

Even if 10 C.F.R. §2.771 might not be directly applicable, based upon the argument that a Section 50.12 proceeding is a "quasi" or "informal" adjudication to which Subpart G may not apply, the principle of providing finality to administrative decisions still has applicability in this context. Once the period for filing a petition for judicial review has passed, as it has here, reconsideration of a prior decision is no longer permissible. See generally, Greater Boston Television Corp. v. FCC, 463 F.2d 268 (D.C. Cir. 1971). See also, Farmers Union Central Exchange v. FERC, 584 F.2d 408 (D.C. Cir. 1978). The principle here is that once an order is final, i.e., no longer subject to appeal, and where no reconsideration is provided for by the regulatory statute or implementing regulations, then the need for "repose" must prevail over the need for administrative "flexibility". This principle obviously cannot be avoided by accepting a "new" Section 50.12 request identical to the request which has been denied. Once again such a result would exalt nomenclature over substance.

(b) Res Judicata

It seems equally clear that the doctrine of res judicata applies to the pending Section 50.12 request. 5/

The appropriateness of invoking the doctrine of res judicata in adminstrative proceedings has long been recognized. As Professor Davis has noted:

> The unsound idea that res judicata does not apply to administrative determinations is gradually being replaced by the sound idea that res judicata properly applies in some administrative determinations . . . .
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> 2 Davis, Administrative Law, § 18.12 (Supp. 1965).

When an administrative agency "acts in a judicial capacity and resolves disputed issues of fact that are properly before it which the parties have had an adequate opportunity to litigate," the logic of the res judicata principle in the administrative context is unassailable. See generally, United States v. Utah Construction and Mining Co., 384 U.S.

5/ Res judicata defenses, it should be noted, may properly be raised on motions to dismiss or for summary disposition. See Alabama Power Co. (Joseph M. Farley Nuclear Plant, Units 1 and 2), ALAB-182, 7 AEC 210, 218 (1974) and cases cited therein.

394, 422 (1966). In the words of the Fifth Circuit Court of Appeals:

> The policy considerations which underlie res judicata--finality to litigation, prevention of needless litigation, avoidance of unnecessary burdens of time and expense--are as relevant to the administrative process as to the judicial.

Painters Dist. Coun. No. 38, etc. v. Edgewood Contracting Co., 416 F.2d 1081, 1084 (5th Cir. 1969) (citations omitted). See also Safir v. Gibson, 432 F.2d 137, 143 (2d Cir.), cert. denied, 400 U.S. 942 (1970) (purpose of res judicata doctrine not only to enforce "repose" but "to protect a successful party from being vexed with needlessly duplicitous proceedings").

The Commission has adopted the res judicata principle in its proceedings. Alabama Power Co. (Joseph M. Farley Nuclear Plant, Units 1 and 2), ALAB-182, 7 AEC 210 (1974), remanded on other grounds, CLI 74-12, 7 AEC 203 (1974); Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-349, 4 NRC 235 (1976); Houston Lighting and Power Co. (South Texas Project, Units 1 and 2), LBP-79-27, 10 NRC 563 (1979); Cleveland Electric Illuminating Co. (Perry Nuclear Power Plant, Units 1 and 2), LBP-81-24, 14 NRC 175 (1981). The rule is straightforward: relitigation of issues

which have been fully ventilated and resolved in a proceeding involving the same parties should not be permitted, absent either a "particularized showing of . . . changed circumstances" or "some special public interest factor." Alabama Power Co., supra, 7 AEC at 203-204.

In this case, the reasons for applying the res judicata principle are manifest. An extensive proceeding (much of which involved the submission and assessment of evidence) was held involving the same issues and parties. 6/ Even if characterized as an "informal" or "quasi" adjudication, it was an "adjudication" of competing claims under 10 C.F.R. §50.12. And, it resulted in a final decision on the merits, resolving disputed issues of fact and applying law to fact to carry out the balancing required by the Commission's regulations. 7/

6/ The res judicata doctrine, of course, bars litigation of matters which could have been raised in a prior proceeding, as well as those which were in fact raised. See, e.g., Public Service Co. of New Hampshire, supra, 4 NRC at 246. It matters not, therefore, whether Applicants stressed, or failed to stress, "programmatic benefits" in connection with their previous application, for they plainly had every opportunity to make their case on these matters.

7/ It cannot be emphasized strongly enough that key findings under the "public interest" criterion of Section 50.12 related to costs of delay or "programmatic benefits" were essentially factual in nature and did not involve any interpretation of law or policy of the sort which might limit the application of res judicata.

Further, the enunciated exceptions to the rule are not relevant here. No significant, changed factual or legal circumstances bear on the request. Indeed, as far as appears from Applicants' papers, nothing has changed since the March decision. And, there are no significant "public interest" factors militating in favor of relitigation. All the asserted Administration policies in favor of expedition and the asserted damages from delay which Applicants cite in support of their request were made known to the Commission previously and were found insufficient to justify granting the exemption. It would thus be the sheerest bootstrapping to consider that any of these factors should now justify a second look at the exemption decision and outweigh the desirability of finality in administrative decisionmaking.

In sum, there is no justification for relitigating this matter and there are the strongest grounds for summarily denying Applicants' Section 50.12 request on grounds of administrative finality and res judicata.

II. If The Commission Determines To Consider The Request, An Adjudicatory Hearing Is Required

If the Commission proceeds to hear the Section 50.12 request and engage in a balancing of the four specific

criteria set forth in 10 C.F.R. §50.12, [8] involving the resolution of contested fact issues, then Intervenors submit that an adjudicatory hearing is required. [9] Intervenors argued on the earlier request that an adjudicatory hearing is compelled as a matter of law, relying basically on established Commission precedent. We continue

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[8] The Commission might still, of course, deny the request on threshold legal or policy grounds without resorting to an adjudicatory hearing. See generally, Intervenors' Memorandum of December 15, 1981, pp. 3-5. These grounds include: (1) it is highly questionable whether the exemption provision has any applicability to a project whose licensing began after 1974; (2) there is no mandate, Congressional or otherwise, for the Commission to deviate from standard licensing practice; (3) such a deviation would undercut a fundamental purpose of the CRBR project, which is to demonstrate the licensability of fast breeder reactors; (4) grant of an exemption would substantially undermine public confidence in the CRBR; (5) a waiver is impermissible, where, as here, it would result in the predetermination of Intervenors' environmental contentions; and (6) an exemption cannot be approved where, as here, the environmental record is incomplete. Id. Even if it follows this course, however, the Commission should provide an opportunity for all parties to be heard on these issues.

[9] Intervenors have previously argued that the Board seized with this matter is the proper entity to make an initial decision on the merits of the request, and this position is generally consistent with Commission precedent. See, e.g., Washington Public Power Supply System (WPPSS Nuclear Power Project Nos. 3 and 5), CLI-77-11, 5 NRC 719, 722 (1977); Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), CLI-76-17, 4 NRC 451 (1976); see Intervenors' Memorandum of December 15, 1981, pp. 36-39. Nonetheless, given the Commission's extensive involvement in the prior 50.12 proceeding and the Board's intense preparation for the upcoming LWA-1 hearing, it may make more sense for the Commissioners themselves to conduct the hearing, as they have the power to do.

to maintain that position. We further maintain now that such a hearing is statutorily required. 10/

It has been Intervenors' consistent position that Applicants' assertions with respect to their request meeting the criteria of Section 50.12 must be subject to testing by Intervenors and the Staff in an adjudicatory context. In every contested case in which the exemption issue has been raised, 11/ adjudicatory hearings have been considered necessary to sift the facts relevant to the request. See Washington Public Power Supply System (WPPSS

10/ In this regard, Intervenors would point out that there is nothing in the nature of the so-called "public interest" factors upon which Applicants place such great stress which would militate against an adjudicatory hearing. Indeed, an examination of Chapter 7 of the SPAR II confirms the essentially factual nature of Applicants' public interest contentions. Applicants assert that, if the Section 50.12 request is not granted, significant informational and programmatic benefits will be lost and that the United States' leadership role in nuclear issues will be hindered. See, e.g., SPAR II at 7-2. For example, they state that delays in the CRBR will "adversely affect the efforts to obtain international participation in the LMFBR Program," SPAR II at 7-4; hurt U.S. credibility as a nuclear supplier, SPAR II at 7-11; and diminish our "ability . . . to compete in the world nuclear markets over the long term." SPAR II at 7-11. But these assertions cannot simply be taken at face value. They are assertions of what will happen in the real world. And, as such, they deserve to be (and can be) properly tested in an adjudicatory context.

11/ In Gulf States Utilities Co. (River Bend Station, Units 1 and 2), CLI-76-16, 4 NRC 449 (1976), the only case where no hearing was held, intervenors did not contest the exemption request.

Nuclear Project Nos. 3 and 5), CLI-77-11, 5 NRC 719 (1977); Louisiana Power and Light Co. (Waterford Steam Electric Generating Station, Unit 3), CLI-73-25, 6 AEC 619 (1973); Kansas Gas and Electric Co., Kansas City Power and Light Co. (Wolf Creek Nuclear Generating Station, Unit No. 1), CLI-76-20, 4 NRC 476 (1976); The Carolina Power & Light Co. (Shearon Harris Nuclear Power Plant, Units 1, 2, 3 and 4), CLI-74-9, 7 AEC 197 (1974). Indeed, the Commission has gone out of its way to emphasize the importance of scrutinizing the factual issues on an exemption application in the context of a formal hearing. See Washington Public Power Supply System (WPPSS Nuclear Project Nos. 3 and 5), CLI-77-11, 5 NRC 719 (1977). In this case, there is no demonstrable basis for deviating from this established precedent. 12/

We think, in addition, the requirement for an adjudicatory hearing goes beyond administrative precedent. While we do not take issue with Applicants' assertion that neither the Atomic Energy Act nor the National Environmental

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12/ We agree with former Commissioner Bradford's characterization of the Commission's efforts in its earlier procedural order to distinguish this precedent: "[T]his labored history [Footnote 2 to the Commission's Order of December 24, 1981, CLI-81-35] amounts to exactly the situation described . . . as an erroneous intervenor view: The NRC has never granted a contested 50.12 exemption without an adjudicatory hearing." Order, CLI-81-35 (Dec. 24, 1981) (views of Commissioner Bradford).

Policy Act ("NEPA"), standing alone and separately, would require a hearing, see Applicants' Memorandum In Support of Request To Conduct Site Preparation Activities, dated July 1, 1982, pp. 9-11 (hereinafter "App. Mem."), when these laws are taken together a different result obtains.

It may be true, as Applicants state, that, prior to 1970, applicants for construction permits routinely initiated site preparation activities without any action (i.e., permit or hearing) by the Atomic Energy Commission. See App. Mem., pp. 10-11; Kansas Gas & Electric Co. (Wolf Creek Nuclear Generating Station, Unit 1), CLI-77-1, 5 NRC 1 (1977). However, the enactment of NEPA worked a fundamental change on the Commission's licensing requirements under the Atomic Energy Act. It was the purpose of NEPA to "make environmental protection a part of the . . . mandate of every federal agency and department." Calvert Cliffs' Coordinating Committtee, Inc. v. Atomic Energy Commission, 449 F.2d 1109, 1112 (D.C. Cir. 1971). After the enactment of NEPA, and in order to meet its mandate of environmental protection, site preparation activities could no longer be conducted without Commission permission. See generally 10 C.F.R. §50.10. And, once a permit is needed from the Commission to undertake such activities, then the hearing requirements of Section 189a. of the Atomic Energy Act are triggered.

Section 189a. of the Atomic Energy Act requires a hearing in "any proceeding under this Act, for the granting, suspending, revoking, or amending of any license or construction permit . . . ." Because the Atomic Energy Act, as modified by NEPA, requires Commission authorization, whether under Section 50.10 or 50.12, for the conduct of site preparation activities, if the Section 50.12 authorization is a "license" within the meaning of Section 189, then, upon request, a hearing must be granted.

The Atomic Energy Act does not define the term "license." The Administrative Procedure Act, however, does and does so broadly. It states that a "license" includes "the whole or a part of an agency permit, certificate, approval, registration, charter, membership, statutory exemption or other form of permission." 5 U.S.C. §551(8). Permission to conduct site preparation activities under Section 50.12 certainly falls within this general definition, and, therefore, it is the kind of action which is subject to the hearing requirements of Section 189a. of the Atomic Energy Act. Indeed, any other result would be inconsistent with the notion that, after enactment of NEPA, work affecting the environment could not go forward without formal Commission permission -- permission which could only be granted, under the terms of the Atomic Energy Act, at the

conclusion of an adjudicatory proceeding.

The conclusion just outlined is firmly supported by judicial precedent. Thus, for example, in Brooks v. Atomic Energy Commission, 479 F.2d 924 (D.C. Cir. 1973), the D.C. Circuit Court of Appeals held that, on application for the extension of a completion date under a construction permit, pursuant to 10 C.F.R. §50.55(b), a hearing was required on request. Similarly, in Sholly v. United States Nuclear Regulatory Commission, 651 F.2d 780 (D.C. Cir.), suggestion for rehearing en banc denied, 651 F.2d 792 (D.C. Cir. 1980), cert. granted, 451 U.S. 1016 (1981), the D.C. Circuit Court of Appeals held that the Atomic Energy Act required a hearing before any significant change in facility operation (in that case, a venting order) was authorized. It inevitably follows that the conduct of $80 million-plus worth of site preparation activities, no less than the extension of completion dates or issuance of a venting order, is the kind of change in the status quo which Congress contemplated would be subject to the full array of the Commission's adjudicatory procedures.

CONCLUSION

For all the reasons set forth above, Intervenors respectfully submit that Applicants' request under 10 C.F.R.

§50.12 to conduct site preparation activities should be summarily denied. Alternatively, if the Commission determines to proceed to hear this matter and conduct the balancing specified by the regulation, Intervenors submit that a full adjudicatory hearing is required as a matter of law.

Respectfully submitted,

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Dated: Washington, D.C.
July 9, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing MOTION FOR SUMMARY DENIAL OF APPLICANTS' SECTION 50.12 REQUEST; OR, ALTERNATIVELY, REQUEST FOR ADJUDICATORY HEARING and MEMORANDUM OF INTERVENORS, NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB, IN SUPPORT OF THEIR MOTION FOR SUMMARY DENIAL OF APPLICANTS' SECTION 50.12 REQUEST; OR, ALTERNATIVELY, REQUEST FOR ADJUDICATORY HEARING were delivered by hand this 9th day of July, 1982 to:

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