

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
UNRSC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '82 NOV 24 A11:14

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
PUGET SOUND POWER &) Nos. STN 50-522 & 50-523
LIGHT COMPANY, et al.)
) Date: November 22, 1982
(Skagit/Hanford Nuclear)
Project, Units 1 and 2))

MOTION OF THE NATURAL RESOURCES DEFENSE COUNCIL, INC.
TO AMEND ACCEPTED CONTENTION 3

Intervenor Natural Resources Defense Council, Inc.
requests the amendment of Contention 3, as presented in the
Board's Memorandum and Order of November 2, 1982, through the
addition of the underscored language set out below:

3. Applicants have misapplied the National
Environmental Policy Act (NEPA), 42 U.S.C. 432 [sic],*
by rejecting the following alternatives which are
available, environmentally preferable and more
economical than the proposed Skagit/Hanford Nuclear
Project: wind power, biomass, solar, conservation,
co-generation, ~~low-head~~ hydro, increases in the
efficiency of the electrical delivery system,
adjustments in wholesale and retail rate structures,
abandonment or modification of critical water
planning, ocean temperature differences and alcohol
fuel. Further, Applicants have followed a very
narrow view of this Act by considering each alterna-
tive separately. Applicants must also be required
to consider combinations of various appropriate
technologies as alternatives to the proposed project.

Reasons for granting the motion are as follows:

*The correct citation is 42 U.S.C. § 4321 et seq.

1. All three of the additional alternatives proposed for inclusion in Contention 3 were set out expressly as subparts of NRDC's proposed Contention 4, along with supporting bases. See Supplement to Amended Petition of NRDC for Leave to Intervene: Contentions (April 20, 1982) at 19 (increases in the efficiency of the electricity delivery system; 19-20 (adjustments in wholesale and retail rate structures); 20 (abandonment or modification of critical water planning). Individually and cumulatively, these options constitute a significant part of the spectrum of potential alternatives to Skagit/Hanford.

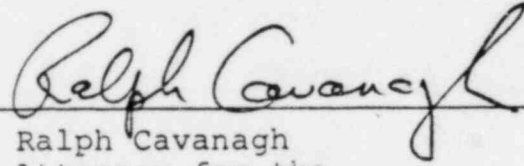
2. The proposed substitution of "hydro" for "low-head hydro" reflects the fact that the environmentally preferable hydro facilities described in NRDC's initial contention are not limited to "low-head" projects. See Supplement to Amended Petition of NRDC for Leave to Intervene: Contentions (April 20, 1982), at 18.

3. No party contested the admission of NRDC's Contention 4, of which these alternatives were a part. See Applicant's Answer to Supplemental Petitions to Intervene and Motion for Extension of Time (May 4, 1982), p. 2.

4. The Board has ruled that NRDC's "contentio[n] relating to ... alternative resources show[s] the specific aspects of the subject matter of the proceedings as to which the petitioner wishes to intervene as well as the basis therefore," and the Board has formally admitted this contention. Prehearing

Conference Memorandum and Order (July 1, 1982), at p. 4.
The proposed amendments simply conform Contention 3 to the
earlier-admitted NRDC contention on which Contention 3 is in
part based.

Respectfully submitted,

A handwritten signature in cursive script, reading "Ralph Cavanagh", is written over a horizontal line.

Ralph Cavanagh
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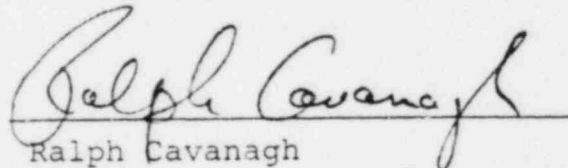
CERTIFICATE OF SERVICE

I hereby certify that the following:

1. Motion of the Natural Resources Defense Council, Inc. to Alter Designation of Lead Parties;
2. Motion of the Natural Resources Defense Council, Inc. to Amend Accepted Contention 3

in the above-captioned proceeding have been served upon the persons shown on the attached list by depositing copies thereof in the United States mail on November 22, 1982 with proper postage affixed for first class mail.

DATED: November 22, 1982



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SKAGIT/HANFORD SERVICE LIST

DATED: November 22, 1982

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