UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	Docket Nos. 50-338/339-OLA-1
VIRGINIA ELECTRIC AND POWER COMPANY	)	-OLA-2
	)	
(North Anna Power Station, Units 1 and 2)		

APPLICANT'S RESPONSE TO
QUESTIONS POSED BY THE LICENSING BOARD

Introduction

Virginia Electric and Power Company (the Applicant) files this Response to the following questions posed by the Board at the February 16, 1983 special prehearing conference:

I. Whether the Board may consider the health, safety and environmental impacts of the transshipment of spent fuel from Surry to North Anna.

II. Whether alternatives to the proposed action must be considered under Section 102(2)(E) of NEPA despite the absence of need for an EIS.

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I. The Board May Not Consider The Health, Safety and Environmental Impacts of the Transshipment of Spent Fuel From Surry to North Anna

A. The Health and Safety Aspects of Transshipment of Spent Fuel from Surry Are Beyond The Board's Jurisdiction and In Any Event Have Already Been Considered

As will be discussed more fully below, the health and safety aspects of transshipment of spent fuel from Surry to North Anna are beyond the scope of either North Anna proceeding, and the Board may not consider them.

The jurisdiction of a Licensing Board is limited by the terms of the notice of hearing published by the Commission. See, e.g., Northern Indiana Public Service Co. (Bailly Generating Station, Nuclear 1), ALAB-619, 12 NRC 558, 565 (1980). The Federal Register notice in proceeding OLA-1 provides that the proceeding will consider an amendment to the North Anna operating license to permit the "receipt and storage" of 500 spent fuel assemblies from Surry. 47 Fed. Reg. 41892 (Sept. 22, 1982). The notice in proceeding OLA-2 covers "the expansion of fuel storage capacity for North Anna Units 1 and 2." 47 Fed. Reg. 41893 (Sept. 22, 1982). Neither proceeding is one for cask licensing under 10 C.F.R. Part 71, or for route approval under 10 C.F.R. Part 73, or, for that matter, for any other approval of transportation of fuel from Surry to North

Anna. Vepco in fact needs no approval from the Board in order to transport spent fuel from Surry.[1] The transportation of spent fuel from Surry to North Anna is simply not within the scope of the activities to be considered as part of these amendment proceedings.

Mechanisms are provided in NRC practice for dealing with the health and safety aspects of transshipment of spent fuel from Surry. Shipments of spent fuel must comply with the safety requirements that have been prescribed by the Commission (10 C.F.R. Parts 71 and 73). Spent fuel shipments must also comply with Department of Transportation (DOT) requirements covering the packaging and movement of radioactive materials. 49 C.F.R. Parts 171-79. With respect to the possible sabotage of a spent fuel shipment, the Commission has imposed by rule routing and physical security requirements on spent fuel shipments. 10 C.F.R. § 73.37. The authority of this Board does not extend to determinations of compliance with Parts 71 and 73 and DOT regulations.

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[1] Vepco obtained route approvals for the proposed shipments under 10 C.F.R. § 73.37(b)(7) on July 28, 1982. And, Vepco will have a general license under 10 C.F.R. § 71.12(b) to deliver the fuel to a carrier if it uses a licensed cask, and that is what it plans to do. See Attachment A hereto.

The conclusion that this Board has no jurisdiction over the health and safety aspects of Applicant's shipment plans is amply supported by the cases. For example, in its application for an operating license for the Catawba Nuclear Station, Duke Power Company requested permission to receive and store at Catawba spent fuel from other reactors in its system that already had NRC licenses. An intervenor attempted to raise questions about the safety of transportation of spent fuel to Catawba. Specifically, one of the contentions at issue was that Applicant had not demonstrated its ability to transport and store irradiated fuel assemblies from other Duke facilities so as to provide reasonable assurance that the health and safety of the public was not endangered. See Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), Memorandum and Order at 7 (July 8, 1982). The Board excluded the portion of this contention that related to the transport of irradiated fuel "because the safety aspects of this activity are controlled by 10 CFR Parts 71 and 73, and by DOT regulations and is outside the scope of this hearing." Id. at 7-8.

Similarly, in Carolina Power and Light Co. (Shearon Harris Nuclear Power Plant, Units 1 and 2), Docket Nos. 50-400 OL, 50-401 OL, Memorandum and Order (September 22, 1982), intervenors in an operating license proceeding raised a contention that radiological monitoring along

routes to be used to ship spent fuel from CP&L's Robinson and Brunswick plants, which already held NRC licenses, would be inadequate. The Board rejected this contention, agreeing with the Applicant that "this is a health and safety issue over which the Board has no jurisdiction." Memorandum and Order at 57.

In any event, the health and safety impacts of transshipment of spent fuel from Surry were considered when Surry was licensed to operate, see Final Environmental Statement, Surry Power Station, Unit 1 at 128-131, 137-138 (May 1972), Final Environmental Statement, Surry Power Station, Unit 2 at 128-131, 137-138 (June 1972), and the Board should not reconsider them now.

B. The Environmental Impacts of Surry Spent Fuel Transportation Were Considered at the Time Surry Was Licensed and Are Not Subject To Litigation In This Proceeding

As will be discussed more fully below, the environmental impacts of the transshipment of spent fuel from Surry were considered at the time Surry received its operating license and may not now be reconsidered. Applicant's position on this issue comports with the recent ruling of the Catawba Licensing Board in Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), Docket Nos. 50-413, 50-414, Memorandum and Order (February 25, 1983).

At issue here is the authorization to receive and store spent fuel at North Anna, not the authority to transship. Pursuant to 10 C.F.R. § 70.42(b)(5), Vepco already has authority to transship spent fuel to a facility authorized to receive it. Having received a facility operating license for Surry, Vepco is authorized by general license to deliver spent fuel to a carrier for transport, subject to fulfillment of certain packaging requirements (10 C.F.R. § 71.12(b)), and to transport spent fuel outside the confines of its plant subject to compliance with DOT requirements (§ 71.5), provided that the transfer of spent fuel is to an authorized receiver. Vepco obtained NRC's prior route approval for the proposed shipments under § 73.37(b)(7) on July 28, 1983. Vepco has in addition arranged to deliver the spent fuel to a carrier using a licensed cask that Vepco has registered with NRC under § 71.12(b)(1)(iii). See Attachment A hereto.

While the authority to transship cannot be at issue here, and is beyond the Board's jurisdiction, since transshipment of spent fuel from Surry to North Anna is a reasonably foreseeable outcome of authorization to store spent fuel at North Anna, and a necessary step to accomplish such storage, the Board does have jurisdiction to consider the environmental impacts of such transportation. See Duke Power Co. (Catawba Nuclear

Station, Units 1 and 2), Docket Nos. 50-413, -414, Memorandum and Order at 6 (July 8, 1982). But the environmental impacts of the transportation of spent fuel from Surry have already been considered during Surry's operating license stage, and are not subject to litigation in this proceeding. See Catawba, Memorandum and Order of February 25, 1983 at 6-7.

When a facility receives its operating license, the environmental impacts of transportation involved in the fuel cycle--including the transportation of the spent fuel away from the site--are considered, usually in the form of Table S-4. See 10 C.F.R. § 51.20(g). Surry's operating license was issued prior to Table S-4. Vepco's proposal for transshipment, however, falls within the scope of the assumptions for the fuel shipment previously analyzed at the time Surry was licensed. NRC then considered the environmental impacts of transporting spent fuel from Surry. See Final Environmental Statement, Surry Power Station Unit 1 at 128-139 (May 1972), Final Environmental Statement, Surry Power Station Unit 2 at 128-139 (June 1972).

A Licensing Board may not "replow" environmental impacts of fuel transportation previously considered on either a generic or a site-specific basis. See Catawba, Memorandum and Order of February 25, 1983 at 5. This

Licensing Board should not consider environmental impacts of spent fuel transportation which have already been considered in the Surry docket, since to again consider environmental impacts that were previously considered and factored into the NEPA cost-benefit analysis for Surry would constitute a double counting of the same impacts. See Northern States Power Co. (Prairie Island Nuclear Generating Plant, Units 1 and 2), ALAB-455, 7 NRC 41, 46 n.4 (1978).[2]

In order for environmental impacts to be reconsidered in this proceeding, a showing must be made that new intervening circumstances arising from the North Anna application bring into question the validity of the environmental impacts already determined for fuel transport when Surry was licensed. See Catawba, Memorandum and Order of February 25, 1983 at 6-7. No special circumstances have been shown here.[3]

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[2]Said the Appeal Board in Prairie Island:

> Nothing in NEPA or in those judicial decisions to which our attention has been directed dictates that the same ground be wholly replowed in connection with a proposed amendment to [operating licenses for which a full environmental review was conducted].

7 NRC at 46 n.4.

[3]In Catawba, the environmental costs associated with

In fact, if new intervening circumstances justifying a reconsideration of Surry transshipment impacts because of the North Anna application are shown, Table S-4 values should be used to assess those impacts. As the Staff pointed out in the Catawba proceeding, Table S-4 was intended to provide a generic measure of fuel transport impacts. It was designed to eliminate the need for case-by-case, site-specific development of transshipment impacts absent a showing that the particular fuel transport contemplated involves distances, population exposures, accident probabilities or other factors much greater than those

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the shipments of spent fuel from Oconee and McGuire were already taken into account at the operating license stage of each reactor. In the case of Oconee, this was done in the FES issued prior to the existence of Table S-4. In the case of McGuire, this was done by application of Table S-4. The fact that the environmental costs that were factored into these earlier proceedings were estimated on the basis of the full span of time and distance from when the fuel left the reactor where generated until it reached a reprocessing plant, did not change the Board's conclusion that the Table S-4 analysis for McGuire and the FES review for Oconee adequately accounted for the environmental impacts of shipping spent fuel from Oconee and McGuire for intermediate storage at Catawba. Catawba, Memorandum and Order of February 25, 1983 at 5-6. So too, the fact that in Surry's case the review of the environmental impacts in the FES was based upon the assumption that the spent fuel would go to Barnwell, South Carolina, e.g., Final Environmental Statement, Surry Power Station Unit 1 at 128 (May 1972), would not amount to a "special circumstance" necessitating reconsideration of environmental impacts of transshipment from Surry.

assumed in developing the Table S-4 impact value such that a waiver of application of Table S-4 is warranted pursuant to 10 C.F.R. § 2.758. Intervenors would thus not be entitled to go behind Table S-4 since to do so would be challenging a Commission rule.

II. Section 102(2)(E) of NEPA Does Not Require Consideration of Alternatives Where, As Here, the Proposed Action Involves Neither Significant Environmental Impacts Nor A Substantial Resources Commitment Question

Section 102(2)(C) of NEPA, 42 U.S.C. § 4332(2)(C), requires preparation of an environmental impact statement (EIS) with respect to every recommendation by a federal agency of a major federal action significantly affecting the quality of the human environment. Section 102(2)(C)(iii) imposes an obligation on a federal agency to make with respect to a proposed major action a statement of "alternatives to the proposed action."[4]

Section 102(2)(E) of NEPA, 42 U.S.C. § 4332(E), provides that "all agencies of the Federal Government shall develop, and describe appropriate alternatives to recommended

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[4] NRC regulations make no mention of the necessity to include in an EIA a discussion of alternatives. See 10 C.F.R. § 51.7(b).

courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources."

Intervenors argue that § 102(2)(E) requires the NRC to consider alternatives to a proposed action even if the proposal has negligible environmental impacts--that is, despite the absence of need for an EIS--and that alternatives must be considered in the present case.

First, as will be discussed more fully below, the Appeal Board has repeatedly rejected this argument. Second, even if Intervenors were correct in the assertion that § 102(2)(E) requires consideration of alternatives whether or not an EIS is required, where, as here, the proposed action does not present an unresolved conflict of alternative uses of resources, § 102(2)(E) does not require consideration of alternatives to the proposed action.

In Duke Power Co. (Amendment to Materials License SNM-1773-Transportation of Spent Fuel from Oconee Nuclear Station for Storage at McGuire Nuclear Station), ALAB-651, 14 NRC 307, 321-22 (1981), after finding that the transshipment of spent fuel from Oconee to McGuire did not require the preparation of an environmental impact statement, the Appeal Board said:

> [N]either Section 102(2)(C) nor Section 102(2)(E) of NEPA obligates the federal agency "to search

> out possible alternatives to a course which itself will not either harm the environment or bring into serious question the manner in which this country's resources are being expended." [Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 266 (1979).] Accord, Virginia Electric and Power Co. (North Anna Nuclear Power Station, Units 1 and 2), ALAB-584, 11 NRC 451, 457-58 (1980); Public Service Electric and Gas Co. (Salem Nuclear Generating Station, Unit 1), ALAB-650, 14 NRC 43, 65 fn. 33 (July 17, 1981).

In an earlier case determining the scope of § 102(2)(E), the Appeal Board affirmed the Licensing Board's conclusion that alternatives need not be considered when the environmental impacts of the action proposed are insignificant and where the proposed action presents no unresolved conflict over the commitment of available resources:

> [t]he evidence establishes without contradiction that the process of installing the new racks in that pool and the operation of the pool with its expanded capacity will neither (1) entail more than negligible environmental impacts; nor (2) involve the commitment of available resources respecting which there are unresolved conflicts . . . . As we read it, the NEPA mandate that alternatives to the proposed licensing action be explored and evaluated [§ 102(2)(E)] does not come into play in such circumstances . . . .[5]

See Portland General Electric Co., (Trojan Nuclear Plant),

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[5] As the Licensing Board in Trojan pointed out, if the environmental effects of a proposed action are negligible, the impacts of any alternatives must be equal or greater. Alternatives that would result in similar or greater harm need not be evaluated. Portland General Electric Co. (Trojan Nuclear Plant) LBP-78-32, 8 NRC 413, 454 (1978) citing Sierra Club v. Morton, 510 F.2d 813, 825 (5th Cir. 1975).

ALAB-531, 9 NRC 263, 266 (1979).

Similarly, in Virginia Electric and Power Co. (North Anna Nuclear Power Station, Units 1 and 2), ALAB-584, 11 NRC 451, 457-58 (1980), the Appeal Board affirmed the Licensing Board's decision authorizing the issuance of a license amendment to permit a spent fuel pool modification and declining to order a hearing to further explore alternatives:

> In . . . Trojan. . . we were called upon to determine the applicability of Section 102(2)(E) of [NEPA], 42 U.S.C. 4332(2)(E), to a proposal (such as the one at bar) to install new racks in a spent fuel pool. That Section, which is not expressly limited to "major federal actions," requires the agency to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." Finding that the record established without contradiction that the installation and use of new racks in the Trojan pool would have negligible environmental impact and, additionally, would not present unresolved conflicts over the commitment of available resources, we held that this mandate did not come into play.
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> * * * *
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> As applied to this case, [previous] decisions teach that there was no necessity to explore further the Intervenors' suggested alternatives unless there was some basis for believing that the proposed modification might either have a significant environmental effect or give rise to a controversy over the allocation of resources. (Footnote omitted.)

Accord, Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), Docket No. 50-413, 50-414, Memorandum and Order at 4 n.1 (February 25, 1983).

Notwithstanding the clear pronouncements on this issue by the Appeal Board, Intervenors cite federal decisions suggesting that § 102(2)(E) might require consideration of alternatives whether or not an EIS is required, since § 102(2)(E) is not expressly limited to "major federal actions." To the extent there is a conflict between these cases and the Appeal Board decisions, the Licensing Board is bound by the decisions of the Appeal Board. In any event, these federal decisions cannot be read as supporting the conclusion that the NRC must consider alternatives where, as here, the environmental impacts of a proposed action are negligible[6] and where no substantial resources

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[6]The legislative history of 102(2)(E) also belies the notion that 102(2)(E) has no environmental threshold and requires consideration of alternatives for proposals regardless of the magnitude of any environmental impact. The provision was explained by Senator Jackson, one of the bill's sponsors, in the floor debate in Congress:

> The controversy over the construction of dams in the Grand Canyon, for example, could have been resolved at a much earlier date if the Department of the Interior had been required to present Congress with alternative proposals where, as in that case, there were unresolved major environmental conflicts. Section 102(d) [now § 102(2)(E)] of S.1075 would go far toward resolving such problems by requiring the development and presentation of alternatives in all future legislative reports on measures involving major unresolved

question is presented.[7]

In Aertsen v. Landrieu, 637 F.2d 12 (1st Cir. 1980), the court did state that the "obligation to describe alternatives is not limited to a proposed major action significantly affecting the human environment . . . ." 637 F.2d at 20. But the court went on to say that

> Yet the § 102(2)(E) obligation extends only to a proposal that has a certain magnitude, Trinity Episcopal Corporation v. Romney, supra, and is controversial. The text of § 102(2)(E) confines the obligation to a "proposal which involves unresolved conflicts concerning alternative uses of available resources."

637 F.2d at 20. (Footnote omitted.)

Trinity Episcopal School Corp. v. Romney, 523 F.2d 88 (2d Cir. 1975), involved a federally financed urban renewal project covering a 20-block area in Manhattan and its more than 35,000 residents. The Court of Appeals held that HUD

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environmental conflicts.

115 Cong. Rec. (Part 21) 29055 (1969). (Emphasis added.) In view of this legislative history, it is difficult to conclude that a program that has negligible environmental effects nevertheless presents an "unresolved conflict concerning alternate uses of available resources." This Board should not succumb to Intervenors' attempts to "trivialize NEPA." See Andrus v. Sierra Club, 442 U.S. 347, 364 n.23 (1979).

[7] Intervenors implied at the prehearing conference that § 102(2)(E) comes into play even absent a question of the conflicting use of resources. Transcript at 57.

had not complied with the mandate of § 102(2)(E) to consider alternatives, noting that

> Although this language [of § 102(2)(E)] might conceivably encompass an almost limitless range, we need not define its outer limits, since we are satisfied that where (as here) the objective of a major federal project can be achieved in one of two or more ways that will have differing impacts on the environment, the responsible agent is required to study, develop and describe each alternative for appropriate consideration.

523 F.2d at 93.

Intervenors may not seize upon this language to support the conclusion that there is no environmental threshold in § 102(2)(E). The facts the Second Circuit had before it involved a "major federal project," 523 F.2d at 93, involving 20 city blocks and 35,000 people. This case does not support the conclusion that § 102(2)(E) applies to proposals irrespective of the magnitude of any environmental impacts.

Moreover, even if § 102(2)(E) did require consideration of alternatives whether or not an EIS is required, there is no escaping § 102(2)(E)'s threshold requirement that a proposal present a resources commitment question. See Aertsen, supra, Consumers Power Co. (Big Rock Point Plant), Docket No. 50-155, Initial Decision, (September 15, 1982). Indeed, in Consumers Power Co., the Licensing Board specifically found that decisions relied on by intervenors in that case, such as Trinity, were not inconsistent with its holding that § 102(2)(E) requires studies of alternatives

only if there are "unresolved conflicts concerning alternative uses of available resources." Initial Decision at 1.

The Board went on to say that the issue of whether a discussion of alternatives is required by § 102(2)(E) despite the absence of the need for an EIS must be resolved by considering the adequacy of the EIA's finding that there are no unresolved conflicts about alternative uses of available resources. "If these Staff conclusions are supported by the evidence, there is no need for a discussion of alternatives under § 102(2)(E) of NEPA." Initial Decision at 6.

The Board ultimately rejected the argument that § 102(2)(E) required consideration of alternatives to the proposed spent fuel pool expansion, accepting the Staff's conclusion that there would be no significant changes in the use of land, water or air resources, and that there would be only a negligible commitment of resources. Id. at 7-9.

In sum, where the proposed action does not present an unresolved conflict of alternative uses of resources § 102(2)(E) does not require consideration of alternatives to the proposed action. That is precisely the case here. The Staff has said that no § 102(2)(E) type of conflict exists. See NRC Staff Response To Proposed Contentions of Concerned Citizens of Louisa County, Virginia at 10; Transcript of Prehearing Conference at 61-62. Assuming that the Staff's

EIA will in fact so conclude, and that the Board finds this conclusion to be supported by the evidence, then no alternatives need be considered in this case.

Indeed, if Intervenors attempt to demonstrate that Vepco's proposed actions present the type of "unresolved conflict" contemplated by § 102(2)(E), their task will not be an easy one. As the Appeal Board said in the Duke transshipment case:

> To our mind, it simply cannot be seriously contended that the transportation by motor carrier of 300 spent fuel assemblies over the 170-mile distance separating Oconee and McGuire presents a substantial national resources commitment question.

14 NRC at 322.

And, the environmental impacts of spent fuel pool expansions have repeatedly been found to be negligible and to involve the commitment of resources about which there are no unresolved conflicts. See, e.g., Consumers Power Co., supra; Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263 (1979); Virginia Electric and Power Company (North Anna Nuclear Power Station, Units 1 and 2), ALAB-584, 11 NRC 451 (1980). In granting the Applicant's motion for summary disposition on the need for an EIS or consideration of alternatives in a spent fuel pool expansion proceeding, the Appeal Board in North Anna noted that:

> [T]he intervenors have never endeavored to explain why the installation of new racks in a spent fuel pool might engender a conflict

> concerning alternative uses of available resources. And it is just as difficult now as it was a year ago (when Trojan was decided) to fathom how such a conflict might arise.

11 NRC at 458. It is equally difficult to fathom how a § 102(2)(E) type of conflict might arise in the instant case.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

Marcia R. Gelman

By /s/ Marcia R. Gelman
Marcia R. Gelman, Counsel

Of Counsel

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HUNTON & WILLIAMS
P. O. Box 1535
Richmond, Virginia 23212

Dated: April 1, 1983

CERTIFICATE OF SERVICE

I hereby certify that I have this day served Applicant's Response to Questions Posed By the Licensing Board upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Chief Docketing and
Service Section

Sheldon J. Wolfe, Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry Kline
Atomic Safety and Licensing Board
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Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C 20555

Marcia R. Gelman

By: /s/ Marcia R. Gelman
Marcia R. Gelman, Counsel
for Virginia Electric and
Power Company

Dated: April 1, 1983

In box ATTACHMENT A

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SERIAL # 052

DISTRIBUTION LIST - NRC
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71-9010
71-9015

JAN 21 1983

1-27-83

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart
Richmond, VA 23261

NOTED FEB 08 1983 B.H.W.

Gentlemen:

As requested in your letter dated December 21, 1982, we have registered you in accordance with the provisions of Paragraph 71.12(b) of 10 CFR Part 71 as a user of the following:

Model	Package Identification Number
NLI-1/2	USA/9010/B( )F
TN-8, TN-8L	USA/9015/B( )F

Sincerely,

Charles E. MacDonald

Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and
Material Safety, NMSS

December 21, 1982

Mr. Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and
Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Serial No.: 673
FRD/BHW

Docket Nos.: 50-280
50-281
50-338
50-339

License Nos.: DPR-32
DPR-37
NPF-4
NPF-7

Dear Mr. MacDonald:

REGISTRATION FOR USE OF SPENT FUEL SHIPPING PACKAGES

In accordance with 10 CFR 71.12.(1)(iii), Virginia Electric and Power Company (Vepco) wishes to register our Surry 1 and 2 and North Anna 1 and 2 Power Stations as users of the two spent fuel shipping packages listed in Attachment 1. As specified by the regulation, the License Numbers for Surry 1 and 2 and North Anna 1 and 2 are included above.

If you have any questions, please contact Mr. B. H. Wakeman at (804) 771-4141.

Very truly yours,

W. L. Stewart

Attachment

cc: Mr. B. R. Tour, Transnuclear, Inc.
Mr. C. R. Johnson, Nuclear Assurance Corporation
Mr. R. A. Clark, Chief, Operating Reactors Branch No. 3
Mr. S. A. Varga, Chief, Operating Reactors Branch No. 1
Mr. J. P. O'Reilly, Regional Administrator, Region II

ATTACHMENT 1

Licensee:	Transnuclear, Inc.	NL Industries, Inc.
Model No:	TN-8L	NLI 1/2
Certificate No.:	9015, Rev. 3	9010, Rev. 7
Package Identification No.:	USA/9015/B( )F	USA/9010/B( )F