

AUG 30 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
GULF STATES UTILITIES CO.,)	Docket Nos. 50-458
<u>et al.</u>)	50-459
(River Bend Station, Units 1 & 2))	

NRC STAFF PROPOSED PRELIMINARY FINDINGS
OF FACT AND CONCLUSIONS OF LAW (SAFETY CONTENTIONS)

Lee Scott Dewey
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August 30, 1984

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1. INTRODUCTION

These Preliminary Proposed Findings of Fact and Conclusions of Law are filed pursuant to the Board's Memorandum of June 22, 1984.

This particular set of Preliminary Proposed Findings of Fact and Conclusions of Law addresses the safety contentions in this proceeding which are:

- the Asiatic Clam Contentions (Contention 1)
- The Old River Control Structure Contention (Contention 2)

The remainder of the contentions in this proceeding deal with emergency planning issues and will be addressed in later preliminary proposed findings.

II. FINDINGS OF FACT

1. River Bend Station is a nuclear facility located on the east bank of the Mississippi River in West Feliciana Parish, Louisiana, approximately 24 miles north-northwest of the City of Baton Rouge, Louisiana. It is jointly owned by Gulf States Utilities Company and Cajun Electric Cooperative. The Gulf States Utilities Company is responsible for the operation of this unit. SER at 1-1.

Applicants agree; however, Gulf States Utilities Company and Cajun Electric Cooperative own River Bend Station as tenants in common, not as joint tenants.

2. The River Bend Nuclear Unit uses a BWR/6 boiling water reactor and a Mark III containment which are designed and supplied by the General Electric Company. It has a rated power level of 2,894 megawatts thermal with an equivalent electrical output of approximately 991 megawatts. SER at 1-4.

Applicants agree; however, the Mark III containment is being designed and supplied by Stone and Webster Engineering Corporation.

Contention 1 - Asiatic Clams

3. The Intervenor's position is that Applicants have failed to provide adequate assurance that the River Bend Station components and systems relying on Mississippi River water for their operation will be adequately protected against infestation by the Asiatic clam (*Corbicula leana*). They base this contention on IE Bulletin No. 81-03, "Flow Blockage of Cooling Water To Safety System Components by Corbicula Sp. (Asiatic Clam) and Mytilus Sp. (Mussel)," dated April 10, 1981.

Applicants - neutral.

4. I&E Bulletin No. 81-03 was issued following a shutdown at Arkansas Nuclear One in September 1980. That shutdown was caused by extensive plugging of containment cooling units by Asiatic clams entering the plant through the service water supply. According to IE Bulletin No. 81-03, this danger of biofouling by Asiatic clams exists for other units since this species has been found in freshwater lakes and tributaries in at least 33 states in this country. Based on this threat, IE Bulletin No. 81-03 required utilities: (1) to determine whether Asiatic Clams or mussels are present in the vicinity of their nuclear stations, (2) to list the components and systems affected, and (3) to describe the actions they are or will take to alleviate the problem. Bulletin at 5. Source - IE Bulletin No. 81-03.

Applicants - neutral.

5. The potential for biofouling of plant water systems by Asiatic clams, Corbicula sp., is recognized as a generic safety issue (GSI #51) by the NPC and has been placed in a category of generic issues which allows for resolution via a Task Action Plan. The Task Action Plan for this issue provides for ongoing research at Battelle's Northwest Laboratory and future implementation of the research results into generic and/or plant specific actions. The Staff expects that the generic resolution will result in the need for site-specific considerations for prevention, detection, surveillance and control. Until completion of the Task Action Plan, which is expected in FYI 1988, the biofouling problem is being addressed on a case specific basis during the interim period. The case specific approach provides assurance that the site and plant design features are considered thoroughly. Source - Staff testimony; IE Bulletin 81-03.

Applicants agree with Staff that the potential for biofouling caused by Asiatic clams is a generic issue. Applicants are neutral on the Staff's plans for resolution of this generic issue. Applicants disagree with the implication in sentences 3 and 4 that technical specifications related to the control of Asiatic clams for River Bend are required to be imposed at this time.

See also Staff finding 15.

6. Knowledge of the life-cycle of Corbicula is needed to provide for prevention and/or control of biofouling. The general life-cycle of Corbicula is well known as described by the literature. Site-specific information for River Bend on the life-cycle has been collected by the Applicant over the past twelve years to determine variations in the local population of Corbicula near the River Bend site. Source - Staff testimony.

Applicants agree.

7. The population of Corbicula in the River Bend site vicinity is low in density in comparison to other sites where biofouling of plant systems has occurred. There have been no substantiated incidents of Corbicula biofouling infestations at other industrial facilities near the River Bend Station. One such industrial facility, located two miles downstream, has 17 years of operating experience with no Corbicula biofouling incidents. Source - Staff testimony.

Applicants agree.

8. The Corbicula has several known natural predators and theoretically could be held in check by these predators in some situations. Local predators likely include the alligator, freshwater drum, and raccoons. Source - Staff testimony.

Applicants - neutral.

9. Mass mortalities of Corbicula have occurred recently in the Mississippi-Louisiana-Texas, and thus the recorded low population densities may decrease further. However, Corbicula mass mortalities are cyclical in nature and do not indicate that the population has been extirpated from a site. Future population abundance is not readily predictable by past data and continued surveillance of the larval population in the source water body is required as the first line of detection and prevention. Source - Staff testimony.

Applicants agree.

10. In order to prevent Corbicula from entering the River Bend plant and causing a biofouling problem, the Applicant has proposed a comprehensive monitoring program. This program, which represents state-of-the-art design, includes sampling in the source water body and in various points in the plant's water flow paths for both juvenile and adult Corbicula. Source - Staff testimony; 8/21/84 Gulf States letter.

Applicants agree; however, the monitoring program is designed to detect Corbicula, not prevent them from entering plant.

11. The Applicant's primary proposed control program for preventing the entry of the Corbicula is the injection of chlorine to water systems at residual concentrations of 0.6 to 0.8 ppm. This dosage has been proven successful in the prevention/control of Corbicula in other facilities. This chlorination injection will be done continuously at the normal service water pumps' discharge. The chlorination control program should be successful since it will be monitored by the Applicant's proposed Corbicula monitoring program and a revised level of control can be implemented to prevent biofouling events. Source - Staff testimony; 8/21/84 Gulf States letter.

Applicants agree; however, it is not the chlorine that will be monitored (as is suggested in the last sentence) but the presence of clams. The level of chlorination will be adjusted should clams be detected.

12. Corbicula will also be excluded from the plant by entrainment by wedge wire screens mounted at the plant's intake water supply and by the plant's clarifiers which are designed to remove suspended matter from the makeup water. Source - Staff testimony; 8/21/84 Gulf States letter.

Applicants agree.

13. In the event that Corbicula enters the River Bend system and causes a biofouling problem, the Applicant has proposed various methods by which it can detect Corbicula so that corrective measures can be taken. These methods include: (1) a heat balance for the diesel generator and RHR heat exchangers; (2) measurement of the flow rate versus a constant pressure drop for the auxiliary building unit coolers, water chillers, and the penetration leakage control system; (3) measurement of temperature for the penetration leakage control compressors; and (4) periodic visual inspection for Corbicula of safety related systems. Source - Staff testimony; 8/21/84 Gulf States letter.

Daily monitoring of systems having permanent instrumentation will be done by operators who will record this information in their daily log and, if prescribed limits are exceeded, will inform their supervisors. Daily Operating Logs will be reviewed periodically for trending purposes to predict degradation of the River Bend system. Source - 8/21/84 Gulf States letter.

Applicants agree.

14. If evidence of biofouling by Corbicula is noted, the systems involved will be flushed and the clams and clam debris removed. If any component contains clams large enough to foul heat exchangers, the performance testing of all other safety-related components served by the service water system will be conducted within seven days. If performance parameters exceed their prescribed limits, the component(s) will be opened for inspection. Additionally, further trending frequency will be increased. Source - 8/21/84 Gulf States letter.

15. The Staff will require Applicant to maintain certain standards to assure control of the Corbicula which will incorporate the principal aspects of Applicant's program. These requirements by Staff, together with Applicants' programs for sampling, monitoring and chlorination, will be adequate to insure safe operation of the facility. When Generic Issue 51 is resolved, Staff may amend these requirements. Source - Staff testimony.

Paragraph 14. Applicants agree.

Paragraph 15. Applicants disagree. Paragraph 15 implies that the Staff will impose technical specification regarding control of Asiatic clams in the River Bend operating license. Control of Asiatic clams is a generic issue, as is stated by the Staff in Paragraph 5. Applicants oppose the imposition of technical specifications regarding control of Asiatic clams that have not been imposed on other plants in similar circumstances.

Contention 2 - Old River Control Structure

16. The Intervenor's claim concerning Contention 2, as reworded by the Board, is that:

The probability of failure of the Old River Control Structure is sufficiently high that the consequences of operating the River Bend Station following such failure must be considered. Applicants have not considered the public health, safety, and environmental impacts of further facility operation under altered river flow and salinity conditions in the event of failure. October 7, 1983 Order.

Applicants agree.

17. The Old River Control Project, operated and maintained by the U.S. Corps of Engineers, is a key component of the Mississippi River and Tributaries Flood Control Plan and is located approximately 50 air miles northwest of Baton Rouge, Louisiana on the right descending bank of the Mississippi River. The purpose of this Project is to regulate and control the amount of water diverted from the Mississippi River into the Atchafalaya River, thereby maintaining the stability of both river systems and preventing the Mississippi from changing its course to that of the Atchafalaya. Observations and analysis of operations to date indicate that maintenance of a 70/30 annual distribution (30 percent of the total latitude flow from the Mississippi being diverted to the Atchafalaya River and the remainder passing down the Lower Mississippi River) is effective in maintaining a stable relationship between the two rivers. This project was placed in full operation in 1963. Source - Corps of Engineers (COE) testimony.

Applicants agree.

18. The current Federal Project for flood control and navigation along the lower Mississippi River has been under development for over 50 years and currently provides a reliable navigation system, a high degree of flood protection, and a dependable supply of fresh water. The Old River Control Project, by maintaining a stable relationship between the Mississippi and Atchafalaya River, is an essential element in the overall plan. A failure of the Old River project, resulting in a change in course of the Mississippi River, would have disastrous economic, social and environmental impacts on southern Louisiana and the entire nation. The abundant supply of fresh water in the lower Mississippi River, which New Orleans and other cities use for drinking water and on which billions of dollars of industrial development are dependent, would be reduced or eliminated. The tremendous volume of shallow draft navigation between the upper Mississippi and the international ports of Baton Rouge and New Orleans would be seriously disrupted. Source - COE testimony.

Applicants agree.

19. In the event of the Project's failure, the flood protection system along the Atchafalaya River would also not be able to accept the change in course without massive flooding and a long and costly redesign and reconstruction of the system. The continued existence of historic towns along the banks of the Atchafalaya River, such as Krotz Springs, Berwick and Morgan City would be threatened. Vast adverse environmental impacts would occur both in the Atchafalaya Basin, America's largest river swamp, and the coastal bays and marshes adjacent to the present outlets of the Atchafalaya and Mississippi Rivers. Source - COE testimony.

Applicants agree.

20. Among its components, the Old River Control Project consists of three mechanically operated controlled structures which are designated as the low sill control structure, the overbank control structure, and the auxiliary control structure (currently under construction). The low sill structure is located at about Mississippi River Mile 315 above the head of passes and is a controlled spillway having a gross width of 566 feet between training walls and consisting principally of gated openings, stilling basin, training walls and abutments. The spillway section is composed of 11 gate openings each 44 feet wide. Flows through the low sill structure are controlled by means of adjustable vertical steel gates. At high water stages the overbank control structure is operated together with the low sill structure to control flows. Upon completion of the auxiliary control structure, flow regulation will be accomplished by a combined operation of all three structures as appropriate. Source - COE testimony.

Applicants agree.

21. As a security measure to prevent damage to the low sill structure from loose barges floating down the Mississippi River, a picketboat system was instituted in 1968. The picketboat, stationed at the junction of the Mississippi River and the low sill inflow channel, monitors river traffic and has served on numerous occasions to aid vessels in distress in the vicinity of the structure and to prevent them from being drawn into the structure. In 1982 the picketboat system was enhanced by the installation of radar and closed circuit TV systems, providing increased ability to monitor river traffic further upstream and during periods of poor visibility. Source - COE testimony.

Applicants agree.

22. During the great flood of 1973 a scour hole (from erosion) was formed immediately in front of the low sill structure causing the collapse of one of the concrete inflow training walls, the loss of about one-half of a concrete approach slab in front of the structure, and the formation of a large void underneath the gated portion of the structure. To repair this damage, emergency repairs were required during 1973 and 1974 consisting of: filling the scour hole in front of the structure with riprap; construction of a riprap training dike to replace the concrete inflow training wall destroyed by the scour damage; and filling the void underneath the structure with cement grout. These repairs were successful in stabilizing conditions and preventing further damage. The foundation of the low sill structure was, however, permanently damaged so that the safe limit of differential head to which the structure could be exposed was estimated to be 22 feet, as compared to 37 feet for the original design. This meant that the low sill structure might not be able to withstand the very large differential heads which could occur in an emergency situation such as a barge accident. Source - COE testimony.

Applicants agree.

23. To further restore and improve upon the Project, from 1975 to the present time a comprehensive rehabilitation plan has been carried out. Work completed to date includes modification of the gates of the low sill structure to improve flow conditions through the structure; additional scour protection in both the inflow and outflow channels of the low sill structure; replacement piezometers at the low sill structure; repair of the stilling basin of the low sill structure; and modification to the overbank control structure. The repair and rehabilitation of the low sill structure enabled dependable control to be reestablished over the distribution of flow by 1977 and has provided a high degree of confidence in the ability of the project to meet normal day-to-day operating requirements, including major floods. Source - COE testimony.

Applicants agree.

24. In addition to this construction work carried out since 1975, to insure the Project's reliability, the picketboat operation, including the radar and IV system, is conducted on a 24 hour per day basis. Strict control is also placed on the allowable differential head at the low sill structure and a comprehensive daily surveillance program for the low sill structure and its adjacent channels has been established. In the surveillance program, technicians at the low sill structure monitor various indicators of structural integrity. Hydrographic and topographic surveys of the channel bottoms are performed daily as is monitoring of foundation pressures. Alignments and vibrations are periodically observed and recorded. As an additional safety measure, the stilling basin of the low sill structure is inspected annually, water levels permitting. Source - COE testimony.

Applicants agree.

25. The repairs and improvements that have been conducted since 1975 have proved successful since the project has demonstrated its effectiveness and reliability during the floods of 1979 and 1983. Source - COE testimony.

The reduction in differential head at the the low sill structure from 37 feet to 22 feet will be remedied by the construction of an auxiliary structure which will insure that the differential head at that structure does not exceed the safe limit of 22 feet. The auxiliary structure is designed to be operated together with the low sill structure which will act to reduce both hydraulic and structural stress at the low sill structure and provide operational flexibility. It is now under construction and is scheduled for completion in the fall of 1986. Source - COE testimony.

Applicants agree.

26. The Town of Vidalia, La. has been granted a license to construct and operate a hydropower plant at Old River. The design and construction of this plant would be governed by Corps of Engineers standards and would be reviewed and inspected by the Corps. This plant, if constructed, would be operated in conjunction with the flood control structures of the Corps of Engineers, resulting in a significant reduction in flow through the low sill structure which would act to improve the structure's reliability. The planning and design for the hydropower plant is presently stalled due to a lack of financial backing. Source - COE testimony.

Applicants - neutral.

27. In the unlikely event that the Old River Project might fail, studies have indicated three possible failure modes for the low sill structure. These are:

a. Failure of the stilling basin of the structure. The stilling basin is located underwater and downstream from the gates. Its function is to prevent stream bed erosion by the turbulent flow through the gates. Stilling basin failure would subject the river bed and foundation of the gated spillway to intense erosion which could undermine the low sill structure and cause its failure;

b. A failure of the main (gated portion) structure. This failure could occur from excessive head on the structure which could be caused, for example, by marine vessels being drawn into the gate bays.

c. Failure of the levee system, adjacent to the structure.

Source - COE testimony.

Applicants agree.

28. The likelihood of failure in mode c. (a levee failure) is no greater at Old River than any other point in the system. Source - COE testimony.

Applicants agree.

29. A failure of the low sill structure would set in motion the processes which, if not altered by emergency construction, would result in a change of course of the Mississippi River to the Atchafalaya River. Although under the most adverse conditions a failure of the structure might occur very suddenly there would not be a sudden shifting of the Mississippi River but rather the initiation of a gradual shifting which could take years to complete. The Mississippi River downstream of Old River would eventually receive little or no flow during low water periods and significant flows only during high water periods. Salt water incursion from the Gulf of Mexico would increase as flows in the lower Mississippi River decreased and at extreme conditions, where little or no flow was entering the river, salinity levels at River Bend would approach those of seawater. Source - COE testimony.

Applicants - neutral.

30. A contingency plan has been prepared for implementation in the event of incipient failure at the low sill structure. This plan provides for the construction of a riprap dam across the inflow channel to the low sill structure, providing either a partial or complete closure as the situation may require. It is estimated that about 2-1/2 months will be required to construct the first stage (partial closure) of the riprap dam and about 4 to 5 additional months to complete the full closure dam. Full restoration and/or replacement would require several years. During this 2-1/2 to 6 month period necessary for remedial construction, the flow in the Mississippi River might be decreased, but it is not expected to be sufficient enough to adversely affect the cooling water requirements for the River Bend Station. Source - COE testimony.

Applicants agree.

31. River Bend Station is not dependent upon Mississippi River Water for reaching and maintaining cold shutdown. Under accident conditions or loss of offsite power, the standby service water system would supply cooling water to the River Bend components necessary for safe shutdown. This system is supplied by the standby service water tower which holds 6.5 million gallons of fresh water. The inventory from this tower permits plant shutdown, cooldown, and decay heat removal for 30 days. Makeup water to this tower may be provided from a variety of sources including shallow and deep wells and water trucked in by tank truck. Two deep wells currently existing onsite and intended to provide makeup water to the plant can deliver about 432,000 gallons per day. Additional wells could be drilled if need be. At thirty days following plant shutdown, the conservative estimate of evaporative water loss from the standby service water tower is 116.8 gallons per minute (about 168,000 gallons per day). Source - Staff testimony.

Applicants agree; however, Applicants believe this finding is immaterial inasmuch as the safe shutdown of the facility was excluded from this contention by the Board.

32. In the event the Old River Control Structure fails, the Applicant would begin monitoring the Mississippi River's chloride content to determine the presence of sea water. If salinity at the makeup water suction point increased to the extent that damages to the plant's equipment could occur, the Applicant would have the option to either use an alternate source of fresh water or to modify its system to operate with saline water. Its decision, which could necessarily only be made at that time, would have to be concurred in by the NRC since operating licenses require operation of the facility in the manner described in the Final Safety Analysis Report and Environmental Report. NRC approval would further be required if changes were made regarding the Environmental Report since such approval is required by any operation or construction activity which may result in significant new adverse environmental impact than previously evaluated. Source - Staff testimony.

Applicants agree.

33. From a cost-benefit standpoint, there is no justification for withholding an operating license for River Bend based on the speculative assertion that operation of the River Board facility may in the future be retarded or halted by failure of the Old River Control Structure. The construction for River Bend is almost completed and its costs are already sunk. The benefits to be derived from the completed plant will accrue from the first day of its commercial operation and will continue to accrue during its operating life. Operating the plant will not increase the likelihood of the Old River Control Structure's failure. Source - Staff testimony.

Applicants agree.

34. Some negative impacts on cost-benefit could occur in the event that at some later date failure of the Structure prevents River Bend from operating. Dependable capacity on Applicants' system will be lost and higher cost replacement power will be necessary. However, this is no ground for denying the license since there would be a loss of power and need for replacement power if River Bend is never allowed to operate. Another possible cost caused by loss of the Structure would be the need to convert River Bend to salt water usage as a result of salt water incursion from the Gulf of Mexico. If conversion was not necessary, increased maintenance costs might be. If such conversions or modified maintenance procedures become necessary, at that time a decision can be made whether to make the necessary conversions, perform necessary maintenance, or permanently close the facility. A feasibility or cost benefit analysis would then be appropriate to make this decision. (Increased maintenance would ordinarily not tip the cost-benefit balance.) Until then, however, the cost-benefit for River Bend is obviously in favor of allowing it to operate. Source - Staff testimony.

Applicants agree.

III. CONCLUSIONS OF LAW

A. The Board has considered all of the evidence submitted by the parties regarding the Asiatic clam contention (Contention 1). Based upon the findings of fact set forth above, which are supported by reliable, probative, and substantial evidence as required by the Administrative Procedure Act and the Commission's Rules of Practice, the Board concludes that the Applicants have met their burden of proof with respect to this contention.

Applicants agree.

B. The Board has considered all of the evidence submitted by the parties regarding the Old River Control Structure contention. (Contention 4). Based on the findings of fact set forth above, which are supported by reliable, probative, and substantial evidence as required by the Administrative Procedure Act and the Commission's Rules of Practice, the Board concludes that the Applicants have met their burden of proof with respect to this contention. In so doing the Board specifically concludes with respect to this contention that, as a matter of law:

Applicants agree.

1. This Board would not be justified in denying the River Bend facility an operating license based upon the speculative and conjectural claim that at some unknown time in the future the Old River Control Structure may fail. This situation is similar to those in Arizona Public Service Company (Palo Verde Units 1, 2 & 3), LBP-82-11/A, 16 NRC 1964, 19 (1982) and Public Service Company of Oklahoma (Black Fox Station, Units 1 and 2), LBP-78-26, 8 NRC 102, 120 (1978) where licenses were granted even though cooling water supplies could conceivably have been interrupted. The test established was whether there was a "reasonable assurance" of the water supply. The situation here also establishes a "reasonable assurance" of the water supply since the record shows the likelihood of failure of the Old River Control Structure is almost nil.

Applicants agree.

2. In the event that failure of the Old River Control Structure causes the River Bend reactor to be exposed to salt water from Gulf of Mexico back-up, at that time the NRC will insure that appropriate measures will be taken. A license should not be withheld on the basis that it may later have to be modified by future adverse contingencies. See e.g.: Public Service Co. of New Hampshire (Seabrook Station, Units 1 & 2), CLI-77-8, 5 NRC 503, 509-510.

Applicants agree.

3. There is an obvious cost benefit in allowing the River Bend facility to operate at this time even if it is later forced to shut down as a result of the failure of the Old River Control Structure. Because the facility's construction is almost completed, its economic and environmental costs have already been sunk. Allowing the unit to operate and receive some return on this investment is obviously superior to not allowing it to operate at all and receiving nothing. See Arizona Public Service Co., supra, 16 NRC at 1993.

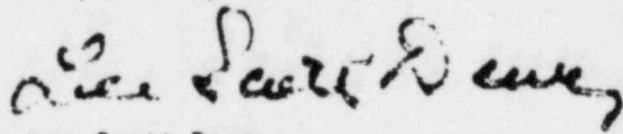
Applicants agree.

C. As regards those safety aspects involving the Asiatic clam and the Old River Control Structure that are in controversy in this proceeding, there is reasonable assurance that the River Bend Station, Unit 1 can be operated without endangering the health and safety of the public.

Applicants agree.

D. The Board concludes that as to the matters decided here, the Director of Nuclear Reactor Regulation is authorized, upon making requisite findings with respect to matters not resolved in this partial initial decision, and subject to favorable resolution of the remaining contentions, to issue to the Applicant a license to operate the River Bend Nuclear Station, Unit 1.

Respectfully submitted,

A handwritten signature in cursive script, reading "Lee Scott Dewey".

Lee Scott Dewey
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 30th day of August, 1964

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
GULF STATES UTILITIES CO.,) Docket Nos. 50-458
et al.) 50-459
(River Bend Station, Units 1 & 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF PROPOSED PRELIMINARY FINDINGS OF FACT AND CONCLUSIONS OF LAW (SAFETY CONTENTIONS)" 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 30th day of August, 1984:

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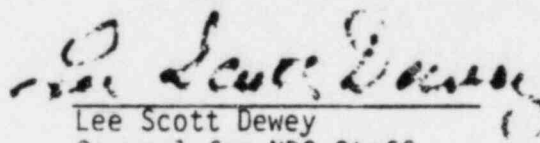
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
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GULF STATES UTILITIES) Docket No. 50-458 OL
COMPANY, et al.)
)
(River Bend Station))

SERVICE LIST

I hereby certify that copies of "Transmittal of Applicants' Testimony and Proposed Findings of Fact and Conclusions of Law With Respect to Contentions 1 and 2," dated September 17, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 17th day of September, 1984:

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