

SAFETY EVALUATION FOR
EXTENSION OF THE LATEST CONSTRUCTION COMPLETION DATE
FOR WASHINGTON PUBLIC POWER SUPPLY SYSTEM'S NUCLEAR PROJECT NO. 1
DOCKET NO. 50-460

INTRODUCTION

Pursuant to 10 CFR 50.55(b), the Washington Public Power Supply System (WPPSS or permittee) requested an amendment to the WPPSS Nuclear Project No. 1 (WNP-1) Construction Permit No. CPPR-134. By a letter dated July 21, 1981, the permittee requested an extension to the currently specified latest construction completion date of January 1, 1982, to June 1, 1986. The permittee presented five reasons for the proposed amendment, and indicated that the stated reasons (1) caused delay which was beyond the permittee's control, and (2) involved no significant public health and safety or environmental concern.

Subsequently, by a letter dated January 11, 1983, WPPSS requested that its pending amendment request of July 21, 1981, be modified to reflect additional WNP-1 construction completion delays dictated by the Bonneville Power Administration (BPA) informing the WPPSS that the power from WNP-1 would not be needed until the early 1990s. The WPPSS has requested that the earliest construction completion date be modified to June 1, 1988, and the latest construction completion date be modified to June 1, 1991.

This evaluation examines the WPPSS reasons for construction completion delays to determine if the delays and deferrals were beyond the control of the permittee and if the requested amendment constitutes any significant safety or environmental concern.

EVALUATION

The staff has evaluated the reasonableness of the following factors which the permittee has cited in the requests for amendment of the latest construction completion date:

- (1) Changes in the scope of the project including increases in the amount of material and engineering required as a result of regulatory actions, in particular those subsequent to the TMI-2 accident;
- (2) construction delays and lower than estimated productivity, which resulted in delays in installation of material and equipment and delays in completion of the systems necessitating rescheduling of preoperational testing;
- (3) strikes by portions of the construction work force;

- (4) changes in plant design;
- (5) delays in delivery of equipment and materials; and
- (6) recommendations of the BPA to WPPSS that the construction on WNP-1 be delayed for an additional period of two to five years (beyond June 1, 1986) due to load/response balance changes and economic factors identified in the BPA's report, "Analysis of Resource Alternatives" dated April 19, 1982.

In a letter, dated March 9, 1983, the WPPSS summarized the estimated delays contributed by the first five factors to range from about 39 months to about 66 months. (Delays attributed to these factors were; factor 1. 8-15 months; factor 2. 14-24 months; factor 3. 16-24 months; factor 4. delay included in the delay for factor 1; and factor 5. 1-3 months). These delays are beyond the control of the permittee, and are comparable to the delays estimated by others for plants subjected to similar constraints (e.g. Vogtle Electric Generating Plant - Units 1 & 2).

Therefore, the staff finds that the first five factors constitute a reasonable delay and good cause for the July 21, 1981, request for the extension of construction completion date from January 1, 1982, to June 1, 1986.

The sixth factor was cited in support of an additional extension of the latest construction completion date dictated by BPA's recommendation to WPPSS that the power from WNP-1 will not be needed until 1991. The staff has reviewed WPPSS's letter and its enclosure, dated April 30, 1982, providing the BPA analysis of resource alternatives and the conclusions derived from that analysis. The following discussion provides the summary of staff findings.

BPA, which is charged with the responsibility of providing electrical energy to the northwest region and is the designated recipient of all WNP-1 power output, has performed analyses of load/resource characteristics, conservation and renewable resources, economics of WPPSS Projects #1, #2 and #3 alternatives, and financial and rate analyses including evaluation of legal and political implications of available options. Based on the results of these analyses, the BPA advised the WPPSS to defer the completion of WNP-1 "from 2 to 5 years". WPPSS states, and the staff agrees, that BPA support is essential to financing of all three nuclear projects. Recognizing these realities the WPPSS Board on April 29, 1982, accepted the BPA recommendations and deferred the construction of WNP-1 for 2 to 5 years. The staff finds that the above circumstances were indeed beyond the control of WPPSS, the additional delay is reasonable and adequately constitutes good cause for delay in completion of the construction of WNP-1.

The staff has considered the public health and safety significance of mothballing of WNP-1 which is more than 60 percent constructed and has reviewed (1) the WPPSS construction delay management plan (WPPSS transmittal dated December 29, 1982,

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from R. W. Root, Jr. to Nuclear Regulatory Commission, Region V, for the attention of R. M. Engelken) and the proposed engineering considerations to adequately maintain the equipment/materials/structures in a licensable condition, and (2) a draft report issued by the Northwest Power Planning Council on "Regional Conservation and Electric Power Plan 1983" which states that its task force of nuclear experts has concluded that it would be difficult to mothball a nuclear plant for more than five years. The staff finds that the Northwest Power Planning Council's statement based on the Nuclear Resource Task Force Report was related to the consideration of economic and commercial risks and not the public health and safety risks associated with long term mothballing. The staff concludes that, since the permittee will meet the staff requirements regarding licensable maintenance of the plant and the site, and since the staff will exercise the inspection/enforcement functions, the proposed WNP-1 mothballing is not likely to result in any significant increase in the public health and safety risks.

The permittee, in a letter dated June 11, 1982, has made the commitment that the final WNP-1 designs will satisfy the requirements of present regulations and any requirements of future regulations promulgated between the date of docketing and the resumption of the construction. The staff, therefore, does not expect that the proposed delay in completion of WNP-1 construction would result in any significant public health and safety risk issues associated with the permittee's final designs.

ENVIRONMENTAL CONSIDERATION

The staff has also considered the environmental impacts of the extension of construction permit, and has determined that the proposed action does not entail any significantly different construction activities from those which were considered in the Final Environmental Statement for WNP-1 and 4 (NUREG-75/012), dated March 1975. The staff, therefore, concludes that the proposed action will not alter the conclusions reached in NUREG-75/012 regarding the environmental impacts and cost/benefit balances of construction of WNP-1. Having made this determination, we have concluded that the extension involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR Section 51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this Order.

CONCLUSIONS

The staff, based on the above evaluation, concludes that the factors, which have prompted the permittee to delay the completion of construction of WNP-1, were beyond the control of the permittee, and constitute good cause for the delay in completion of construction under 10 CFR §50.55(b). Therefore, the staff finds that the requested amendment to the construction completion date is reasonable. The staff further concludes that the proposed delay would not result in any significant increase in public health and safety risks or environmental impacts. The only modification proposed by the permittee to the existing construction permit is an

extension of the latest completion date. The extension does not allow any work to be performed involving new safety information of a type not considered by the staff prior to issuance of existing construction permit.

Therefore, the staff finds that: (1) the requested extension period is reasonable and good cause exists for issuance of an order extending the completion date; (2) the proposed action does not involve a significant hazards consideration; and (3) there is reasonable assurance that the health and safety of the public and the quality of the environment will not be endangered by extension of the construction completion date. Accordingly, issuance of an Order extending the earliest construction completion date to June 1, 1988, and the latest construction completion date to June 1, 1991, should be authorized for WNP-1.

Principal Contributor: M. Thadani, Licensing Branch No. 4, DL

Date: June 16, 1983

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

April 30, 1982
G01-82-0169
Docket No. 50-460

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation/NRC
Phillips Bldg., Room P-404A
9720 Norfolk Avenue
Bethesda, Maryland 20014



Dear Mr. Denton:

Subject: STATUS OF WNP-1

The purpose of this letter is to provide you with current information regarding the status of activities related to continued construction of WNP-1.

On April 19, 1982, the Administrator of Bonneville Power Administration (BPA) recommended to the Supply System's Board of Directors that construction of WNP-1 be delayed for a period of "from 2 to 5 years" (see attached letter). On Wednesday (April 21) an order was issued by the Benton County Superior Court restraining the Board from taking any action to slowdown or terminate construction on WNP-1 for a two week period, until a show-cause hearing could be held. The Supply System Board met in Richland on Friday (April 23) to review the BPA recommendation with the Administrator and to receive further input from the Supply System staff and the public. Because of the existence of the restraining order, and to provide time for the Board to evaluate alternatives presented at the meeting, no action was taken by the Board at the April 23 meeting. As a result of a court hearing held on Monday (April 26) the restraining order against Board action on WNP-1 was lifted.

Several alternatives to the BPA recommendation were presented at the April 23 meeting, and others were prepared subsequent to that. The Board met again on Wednesday (April 28) in Seattle to hear further public comment on the BPA recommendation. At the conclusion of the April 28 meeting, the Board deferred their decision until Thursday (April 29) to provide time to review the alternatives and consider public comments. At the Thursday meeting, the BPA Administrator stated

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H. R. Denton
Page 2
April 30, 1982
Status of WNP-1

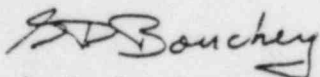
that none of the alternatives would be acceptable to BPA and that a construction delay on WNP-1 was required. Because BPA support is essential to the financing of all three Supply System projects, the Board voted to accept the BPA recommendation.

A ramp down of construction activities at WNP-1 will begin immediately. Activities essential to maintaining the Construction Permit will continue throughout the construction delay. This will include supporting NRC review of the FSAR as required, and processing of the OL Application. We would like to meet with the staff in the near future to discuss details of the WNP-1 licensing review schedule in light of the planned construction delay.

It should be noted that the most recent "need for power" study performed by BPA (attached), which was the basis for the recommendation to delay WNP-1, shows a clear need for all three of the Supply System projects. The only item being questioned is the time of the need. Therefore, the action taken on WNP-1 is only a deferral and not termination. Because WNP-1 is approximately 63% complete at this time and represents a valuable resource to the region, termination of the plant at this stage is not being considered. We firmly believe that construction will be resumed in the 2 to 5 year period discussed by BPA. For this reason, we believe it will be to our mutual benefit for the Commission to proceed with the docketing of the WNP-1 FSAR. The FSAR was submitted for acceptance review in November 1981, and it is our understanding that the staff has found it acceptable for docketing. Copies of the FSAR are now being prepared for docketing and it is our intent to submit those copies to the staff by May 14, 1982. Docketing of the Operating License Application at this time would avoid the need to repeat the acceptance review process when construction resumes.

We will continue to keep you apprised of the situation as further information is developed.

Very truly yours,



G. D. Bouchey, Deputy Director
Safety & Security

GCS/sm

Attachments

cc: CR Bryant BPA
 RW Hernan NRC
 AD Toth NRC
 DG Eisenhut NRC
 RH Engelken RO. V



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

OFFICE OF THE ADMINISTRATOR

April 19, 1982

In reply refer to: AP

Mr. Stanton H. Cain
Chairman, Executive Board
Washington Public Power Supply System
17930 Pacific Highway South
Suite 400
Seattle, Washington 98188

Dear Mr. Cain:

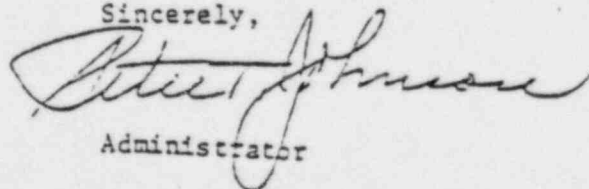
In accordance with my commitment to express my recommendation regarding the construction schedules to be maintained for the WNP 1, 2, and 3 projects, I am hereby notifying you of the conclusions which have been reached. It is necessary that these recommendations be fully understood by you and the members of your Board in the development of the Washington Public Power Supply System's 1983 budget and in the development of a future financing plan. To assist in this understanding, members of my staff and I will be available at the Executive Board meeting of April 19, 1982 to review the factors leading to this recommendation and will be available thereafter to respond to any further inquiries which you or members of your Board may develop.

I am recommending to the Board and staff of the Supply System that:

1. The construction of WNP #2 and WNP #3 proceed at full pace to maintain or improve the existing construction schedules for these projects.
2. The construction completion schedule of WNP #1 be delayed for a period of from 2 to 5 years; and
3. The Board instruct the staff of the Supply System to prepare a budget and financing plan consistent with these recommendations.

This recommendation is the result of careful consideration of many factors and, in view of the significant impact it will have on the region, was not an easy choice. However, I believe that as you and the other members of your Board become more fully acquainted with all of the financing, economic, marketing and load/resource balance studies and investigations which have preceded this recommendation you will share my belief that adherence to the proposal is the prudent action to be taken.

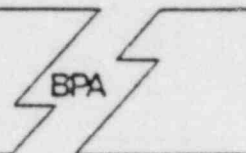
Sincerely,



Administrator

Analysis of Resource Alternatives

Bonneville Power Administration
U.S. Department of Energy



April 19, 1982

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ANALYSIS OF RESOURCE ALTERNATIVES

BONNEVILLE POWER ADMINISTRATION
April 19, 1982

SUMMARY

This paper presents the details of a decision which will have a significant impact on the future of the Pacific Northwest. Circumstances which are largely economic have placed in jeopardy major regional energy programs, the financial health of many of the region's electric utilities, and possibly the region's fiscal credibility. The incomes and employment of thousands of the region's citizens are being impacted by these circumstances.

The decision announced in this paper was made following extensive analysis of complex power financing and supply issues. There was wide consultation with regional leaders, concerned individuals, and experts inside and outside the region. The final decision was based upon the judgment of the Bonneville Power Administration (BPA), which is charged with the responsibility of providing electrical energy to the region on a "prudent and businesslike" basis.

The decision BPA has been addressing is what its recommendation should be to the Washington Public Power Supply System (Supply System) on future financing alternatives for the Supply System's projects #1, #2, and #3. Because of the need for additional financing in May 1982 to continue construction of these plants, decisions must be made immediately to provide as much certainty as possible about the future of these projects. The managers of the financing group which markets the Supply System's construction bonds for the projects have advised BPA that existing circumstances could make the next bond sale, scheduled for May 1982, more difficult and perhaps more expensive than past sales. The costs of these plants, as a result of long-term contracts called net-billing agreements, became the ultimate responsibility of BPA and its customers several years ago. The status and scheduling of these plants, therefore, inescapably affect every person and every consumer of electricity in the region.

In reaching a decision on the scheduling of resources needed in the region, a number of realities other than economics must be addressed. Not the least of these is the State of Washington Initiative 394 which signals a serious voter concern. BPA respects this concern and understands that the decision it makes regarding the Supply System projects, and other energy facilities, must be in the best interests of BPA's ultimate constituents--the ratepayers throughout the Pacific Northwest.

Actions taken now must provide sufficient flexibility for the region to respond to future load/resource imbalances and changes in power marketing conditions. Because of the enormous regional investment in the three Supply System projects, means must be found to realize the maximum value of these important regional assets.

In all of the analyses BPA performed, it was apparent that the on-schedule completion of WNP #2 is a critical event in the region from the standpoint of both power production and the economic benefits of the revenues it will produce. The advanced stage of completion of the project (it is about 90 percent complete), the large capital investment (more than \$2 billion already committed), and the near-term availability of the power and revenues (about 22 months away) make the early completion and operation of WNP #2 an economic imperative for the region.

On the basis of these analyses, BPA has concluded that from the viewpoint of need-for-power, economics, and financing, it will be feasible to extend the construction schedule of WNP #1 for a period of up to 5 years. Near-term funding options appear to be adequate to continue WNP #2 and WNP #3 on their current schedules and extend construction of WNP #1. A forecasted near-term power surplus supports extension of the WNP #1 construction schedule by up to 5 years. Construction can be restarted earlier if circumstances dictate.

Given the uncertainties involved, no one element of the BPA analyses is, by itself, persuasive. What is persuasive is the reinforcing consistency with which all factors--load/resource uncertainties, resource economics, and financial planning--point to the same conclusion. It is a matter of business prudence that BPA reduce its financial risk and not leverage itself further by incurring additional debt to support surplus capability.

Considering the interests of the ratepayers and the region as a whole, continuing WNP #2 and #3 on current schedules and extending the construction of WNP #1 best preserves and protects the economic and financial integrity of BPA and the region. It has fewer disadvantages and more advantages than any of the other options, and provides flexibility for the region in meeting future load/resource balances and in responding to rapid changes and contingencies.

OBJECTIVES

The principal objectives BPA used in performing the analyses and testing the decisions were:

1. To further the best interests of current and future ratepayers of the region.
2. To minimize the financial risks to, and maximize the fiscal integrity of, BPA and the region as a whole.
3. To preserve the region's economic ability to deliver the benefits of the Pacific Northwest Electric Power Planning and Conservation Act (Regional Act), including conservation and renewable resource development.
4. To bring greater certainty, stability, and predictability to rates and resource decisions.
5. To provide a maximum opportunity for the region's economy to recover and remain prosperous.

6. To identify the most effective strategy for marketing the bonds needed to finance the completion or preservation of the Supply System projects.
7. To maximize the region's flexibility to accommodate changing load and economic conditions.
8. To identify a choice which assures a healthy and positive construction environment within the Supply System in order that maximum efficiencies can be achieved.

LOAD/RESOURCE ANALYSIS

Recent demand forecasts, including BPA's preliminary forecast, show that the region, while needing additional electricity supplies in the 1990's, now faces possible surpluses of generating capacity in the 1980's. BPA's forecast shows annual average percentage load increases of .8, 1.7, and 2.5 percent as its low, base, and high case forecasts. Under the Regional Act, the Regional Power Planning Council has responsibility for forecasting future loads and resource requirements. It will be several months before the Regional Council can publish for comment its first load forecast which, in April 1983, will become a part of the official regional power plan. In this interim period BPA has been working closely with the Regional Council, and has reviewed the BPA preliminary forecast with the Council as well as other regional public and private utilities.

BPA also arranged to have its preliminary forecast independently reviewed by National Economic Research Associates (NERA), consulting economists from outside the region with an international reputation for expertise in electric energy demand forecasting. That firm suggested that the BPA range of load growth is too narrow and recommended that a higher range "would provide a more defensible guide to policy." A number of utility executives and experts believe it is prudent utility practice to plan resources to meet loads in the high portion of the forecasting range. Under these circumstances, and using the high range recommended, all three net-billed projects could prove to be needed on schedule. However, a driving element in the situation is that financial and other constraints preclude this option.

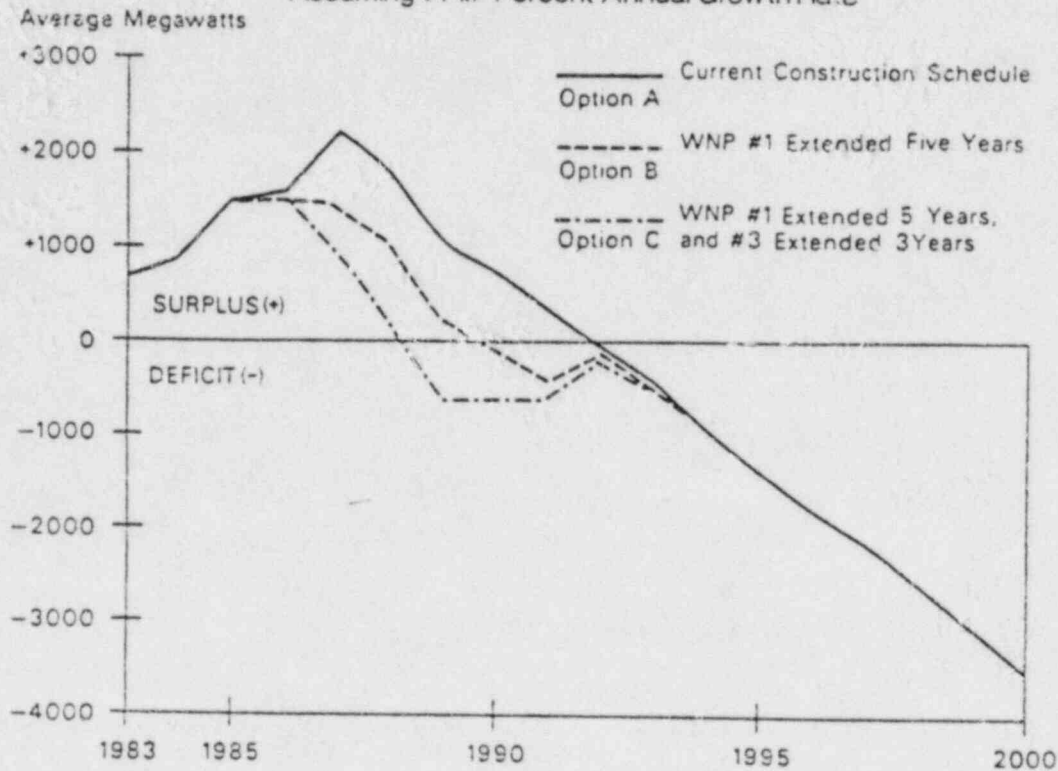
WNP #2 is currently scheduled to become commercially operational in February 1984, WNP #1 in June 1986, and WNP #3 in December 1986. Although numerous alternatives for revising the completion schedules were examined, in the following analysis only the three most likely options are depicted:

- Option A - Continue the current schedule for completing all three plants.
- Option B - Complete WNP #2 and #3 on schedule and extend completion of WNP #1 up to 5 years.
- Option C - Complete WNP #2 on schedule and extend completion of WNP #1 up to 5 years and #3 up to 3 years.

The following chart shows the effect of these options on the load/resource balance:

REGIONAL FIRM LOAD/RESOURCE BALANCE

Assuming A 1.7 Percent Annual Growth Rate



This chart suggests the following:

1. Clearly, all three plants are needed by the region since there will be significant firm deficits in the early 1990's. The questions are "When are they needed?" and "Should construction of any of the plants be extended?"
2. Under the current construction schedule for the three net-billed plants, there will be some significant surpluses in the mid- and late 1980's.
3. If construction is extended on two projects, there will be some significant firm load deficits in the late 1980's and early 1990's.
4. If the loads turn out to be greater, as some of the forecasts indicate, then the point at which deficits occur is moved up in time. For example, the upper forecast of 2.5 percent combined with all three plants on schedule would show a deficit in 1987 instead of the 1990 shown on the chart.

CONSERVATION AND RENEWABLE RESOURCES

The region's future power needs, forecasting uncertainties, and the desirability of having additional resources near-at-hand dictate that BPA's existing and announced conservation and small (under 5 average megawatts) renewable resources programs should continue to operate during the period of surplus. BPA considers these programs to be valuable, unfinished resources and will make an aggressive effort to complete them.

BPA has estimated that, at most, 450 average megawatts are achievable by 1990 in conservation and renewables in addition to the savings from programs already underway or included in BPA's preliminary forecast, at costs less than the incremental cost to complete and operate the Supply System projects.

The cost-effectiveness test for conservation and small renewables in this period will reflect the reduced value of the resources during the probable near-term surpluses.

BPA will continue to emphasize its residential conservation programs which have been offered to all regional utilities and which are underway in 96 utility service areas. The programs offer increased energy efficiency to qualifying households with electric space or water heat in these service areas at little or no cost to the homeowner.

Commitments to large renewable resources will be made on the basis of an extended planning horizon showing need for new power in the post-1990 period. BPA must continue to develop its policy, program, and organizational capability in renewables in order to be able to address this need effectively.

The principles of cost-effectiveness and the protection of the ratepayers' interest in assuring an adequate and reliable power supply will continue to be paramount in BPA's decisions and actions on conservation and renewable resources development.

ECONOMIC ANALYSIS OF ALTERNATIVES FOR SUPPLY SYSTEM PROJECTS #1, #2, AND #3

BPA's economic analysis examined a large number of resource alternatives including the alternative of completing all three plants on schedule but not operating WNP #1 and #3 until they are needed. The analysis then focused on the economic impact of the alternatives on revenues from power sales, including the examination of the most likely outlook for marketing any excess power. BPA estimated the construction costs, operating costs, fuel costs, the costs which would be incurred if the plants stood idle waiting to serve, and financing costs.

The net economic impacts of the three alternatives, when compared with the current schedules for completing and operating the three plants were found to be:

1. Completing all three plants on schedule but deferring the operation of WNP #1 and #3 (letting them sit idle) in the event of surplus would create

a net economic disadvantage of about \$128 million (compared with completing the plants on their current schedule, operating them and selling the surplus).

2. Constructing WNP #2 and #3 on schedule, but extending construction of WNP #1 up to 5 years would have an economic advantage of about \$212 million compared with bringing all the plants in on schedule (about \$340 million advantage over alternative 1).
3. Constructing WNP #2 on schedule, but extending construction of WNP #1 up to 5 years and #3 up to 3 years would also present a slight economic advantage of about \$20 million compared with completing all the plants on schedule (roughly \$200 million less advantage than option 2).

FINANCIAL ANALYSIS

In BPA's financial analysis, performed concurrently with the two analyses described previously, an equally large number of alternatives were examined. In order to fully assess the alternatives, BPA considered the following:

- a. The financing requirements for each plant.
- b. The revenue/rate impacts of the construction and operational alternatives.
- c. The limits of BPA's flexibility in financing the plants.
- d. The constraints of the financial markets (amounts that can be raised at reasonable interest rates).
- e. The impacts on the credit worthiness of BPA, the region's utilities, and states.
- f. The legal and political implications of the alternatives, including the possible impacts of Initiative 394.

Based on advice provided by underwriters (the people who market the bonds to individual investors) and financial advisors, it was determined that \$550 to \$650 million would be a reasonable amount for the bond offering this May. Therefore, BPA realistically has only two financing options available: (1) to fund WNP #2 to a level which will permit completion while continuing construction of one of the other two plants, or (2) to delay both other plants while applying all the proceeds of the bond sale toward completion of WNP #2.

Because the load/resource, resource economic, and financial analyses indicate the feasibility and prudence of continuing WNP #2 plus one other plant on their current schedules, a choice must be made between proceeding with WNP #1 or #3.

CHOICE OF WNP #1 OR WNP #3

There are several valid arguments for selecting WNP #1 over WNP #3 for on-schedule completion. WNP #1 would be in commercial operation about 6 months earlier than WNP #3; the power would be about 9 mills per kWh cheaper (or about 10 percent); and WNP #1 is located on the Hanford, Washington, nuclear reservation, near WNP #2.

However, since WNP #1 is located on the Hanford reservation, it is near numerous DOE nuclear programs and a skilled nuclear labor force. When a startup is required, remobilization of the work force should occur more rapidly at the WNP #1 plant at Hanford than at Satsop, Washington, location of WNP #3. Such an edge might prove to be a significant economic advantage in view of the rapid changes which have occurred in regional load/resource balances. This could result in significant cost savings to regional ratepayers.

WNP #3's location is west of the Cascade Range and closer to the major Pacific Northwest load centers than WNP #1, resulting in shorter transmission distances. This reduces line losses and increases transmission reliability--an additional potential cost savings to regional ratepayers.

In terms of the total financing required to complete all of WNP #1 and the Supply System's 70-percent share of WNP #3, there is little to distinguish between the projects. Roughly \$1.5 billion in additional Supply System financing is required to complete each plant.

It is of significance that the capability of WNP #1 has been wholly assigned to BPA. WNP #3 is jointly owned by the Supply System and four investor-owned utilities (IOU's) with only 70 percent of its capability assigned to BPA. A decision to extend the construction schedule of WNP #3 would require the agreement of the other owners and it now appears they may need that power earlier than BPA. Additionally, the other owners will assist BPA in furnishing oversight to the Supply System.

Finally, extending construction on WNP #1 will result in a slightly lower BPA rate increase next October than if WNP #3 construction schedules were extended instead.

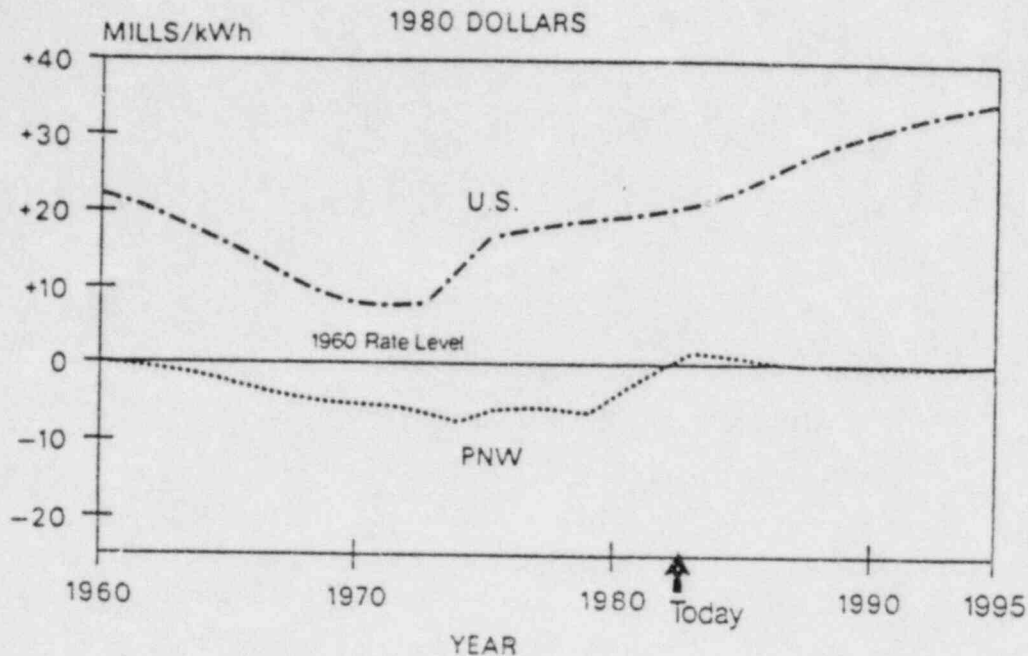
RATE IMPACTS

During a period when rates are rising rapidly, it is difficult to find cause for optimism. However, the future outlook is for stabilization of electricity rates in view of an estimated reduction in the need for expensive new resources. Also, the anticipated temporary resource surplus will allow the region to take advantage of time in anticipation of lower inflation and interest rates when it may meet its needs at reduced borrowing rates which will produce lower cost resources. Most importantly, the region will continue to enjoy electricity prices which, as a whole, are significantly lower than the national average, as shown on the chart on the following page.

AVERAGE RETAIL ELECTRICITY RATES

IN COMPARISON TO 1960 PNW RATES

PNW vs. U.S.



In addition, the results of our economic analysis and our review of the debt service BPA would have to pay on bonds yet to be issued for the construction of the Supply System projects #1, #2, and #3, indicate that:

1. Failing to go forward with WNP #2 would result in increased power purchases and higher rates both in the near- and long-term.
2. Going forward with all three projects would result in the need for a higher rate increase planned for next October.
3. If we proceed with WNP #2 and #3 on current schedules and extend construction of WNP #1 for 5 years, 1983 rates will be reduced by about \$90 million.
4. Finally, while extending construction schedules for all three projects could result in a short-term decrease in rates, it would result in much higher rates in the mid- and long-term.

Consequently, proceeding with current construction on WNP #2 and WNP #3, and extending the construction for WNP #1 will benefit ratepayers in both the short- and long-term while providing power supply flexibility necessary to support the regional economy.

NOTE: THE BONNEVILLE POWER ADMINISTRATION WELCOMES QUESTIONS AND COMMENTS ON THE INFORMATION PROVIDED IN THIS PAPER.

Moreover, the modified request for extension of completion date to 1991 does not constitute a "reasonable period of time" provided for in 10 CFR 50.55(b).

3. Pursuant to 10 CFR 50.55(b), permittee requested an amendment to the WPPSS Nuclear Project No. 1. (WNP-1) Construction Permit No. CPPR-134. By letter of July 21, 1981, permittee requested an extension of its latest construction completion date to June 1, 1986. In a letter of January 11, 1983 modifying its pending amendment request of July 21, 1981, permittee requested a further extension of five years, to June 1, 1991. The purpose of this affidavit is to demonstrate that permittee's decision to defer construction of WNP-1 was not dilatory and was for good cause, by providing further detailed explanation of the Staff's evaluation of the reason cited by permittee in support of its January 11, 1983 modification of its amendment request.

4. The reason put forth by permittee as justification for extension of its construction completion date is:

Subsequent to the filing of that amendment request, the Bonneville Power Administration ("BPA") recommended to the Supply System that construction on WNP-1 be delayed for a period of from two to five years. In view of that recommendation, the Supply System's Board of Directors voted to suspend construction on WNP-1 temporarily. The Board has determined that construction on WNP-1 will be delayed for at least two years, and that it is possible that the delay could be for as long as five years. The actual length of the delay will depend on regional energy demand considerations. (Permittee's letter dated January 11, 1983.)

CFSP Amended Contention 2 challenges that reason as being dilatory and without good cause. At issue is whether BPA's recommendation that the plant be deferred for 2 to 5 years is an act which is beyond the

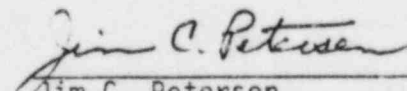
control of permittee and accordingly constitutes "good cause" for the extension. The pertinent question here is whether or not the relationship between BPA and WPPSS, and specifically the degree of BPA's influence over WPPSS, is such that BPA can effectively control the planned construction completion date of WNP-1. If the answer to this question is yes, then the BPA "recommendation" is a circumstance beyond the control of permittee and constitutes "good cause" under 10 CFR § 50.55(b) for extension of the construction permit completion date.

5. BPA's influence on and control over the construction of WNP-1 can be measured in at least two ways. First is the provision in the WNP-1 bond indenture which makes BPA ultimately responsible for payment of principal and interest on the WPPSS revenue bonds issued to finance the project. Since WPPSS is a public agency, its permanent financing for utility plants is all in the form of bonded indebtedness. There is no equity capital such as that contributed by the stockholders of an investor-owned utility. There are three levels of underlying security for repayment of the WNP-1 bonds. The first level of security for the bonds is the revenues that will be collected from ratepayers who use electricity generated by the plant. The second level of security is evidenced by the Net Billing Agreements between WPPSS and the publicly-owned utilities and by the Exchange Agreements between WPPSS and the privately-owned utilities. These contracts, to which BPA is also a party, provide that each participating utility will pay its share of WNP-1 costs (including all debt service costs) regardless of whether or not WNP-1 is completed, operable or operating. The third level of

security is provided by BPA's obligation, through such contracts, to make up any deficiencies in project costs (including all debt service costs) not provided by the participating utilities.

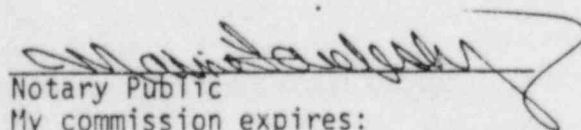
6. A second measure of BPA's effective control over WPPSS' decisions involving WNP-1 is BPA's approval authority over the issuance of WPPSS bonds to finance the project. The WNP-1 Project Agreement between BPA and WPPSS provides that BPA has approval/disapproval authority over WPPSS' issuance of WNP-1 revenue bonds. WPPSS must issue WNP-1 bonds in such amounts and at such times so as to fulfill the WPPSS' budget and financial plan over which BPA has approval authority.

7. Thus, BPA's financial stake (and financial responsibility) in the successful completion and operation of WNP-1 is so high as to give BPA a measure of control in significant decisions on the project. It is reasonable that such control and influence should extend, as it does, to the planned completion date of the facility, a factor that has major financial and operating significance to BPA and to WPPSS. Based on the information set forth above, I conclude that BPA's involvement in the WNP-1 project is so substantial and so integral that it effectively has control over such decisions as the planned completion date of the project.



Jim C. Petersen

SUBSCRIBED and sworn to before
me this 14 day of November, 1983



Notary Public

My commission expires:

2/1/86



JIM C. PETERSEN

PROFESSIONAL QUALIFICATIONS

OFFICE OF STATE PROGRAMS

I am Senior Licensee Relations Analyst in the Office of State Programs, U.S. Nuclear Regulatory Commission. I am responsible for the conduct of studies and evaluations of implementation of and compliance with NRC regulations by licensees and related industries. I am also responsible for the review and evaluation of the financial qualifications of nuclear facility license applicants to pursue proposed activities under a license, primarily the construction and operation of nuclear facilities. In this regard, I have prepared financial qualifications analyses for inclusion in the Staff's Safety Evaluations and for presentation as evidence on the record of the Atomic Safety and Licensing Board's safety hearings. I have served as a Staff witness before the Atomic Safety and Licensing Board in a number of proceedings. My work also involves keeping abreast of developments in the money and capital markets and in the electric utility and nuclear industries.

I received a Bachelor of Science in Business Administration degree (awarded cum laude) with a major in Accounting from the University of Denver in 1968. I have continued my formal education through college and university courses in finance, math, economics and computer science and through several intensive short courses. I am a member of Beta Gamma Sigma, the national business administration honorary, and Beta Alpha Psi, the national accounting honorary. The latter organization presented me with its award for outstanding service.

From 1968 through 1973, I was employed in a number of assignments on the staff of the Controller of the Atomic Energy Commission. These assignments included reviewing, designing and implementing accounting systems and procedures for AEC offices and AEC contractors. I also assisted in the financial review of nuclear facility license applicants during the period when that function was performed by independent staff members of the AEC Office of the Controller. That function was subsequently transferred in its entirety to the NRC. In January of 1974, I joined the regulatory staff and assumed responsibilities in the financial qualifications review of nuclear facility license applicants. I have worked in NRC financial analysis since that time, except for a one-year assignment at the U.S. Department of Energy where I worked on the financing of emerging energy technologies.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
WASHINGTON PUBLIC POWER SUPPLY SYSTEM) Docket No. 50-460 CPA
(WPPSS Nuclear Project No. 1))

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION FOR SUMMARY DISPOSITION OF CFSP AMENDED CONTENTION 2" 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, by deposit in the Nuclear Regulatory Commission's internal mail system, this 14th day of November, 1983:

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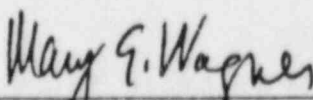
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