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

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Robert M. Lazo, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Dixon Callihan
Administrative Judge
Union Carbide Corporation
P.O. Box Y
Oak Ridge, TN 37830

James H. Carpenter
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

In the Matter of
ARIZONA PUBLIC SERVICE COMPANY, ET AL.
(Palo Verde Nuclear Generating Station, Units 2 and 3)
Docket Nos. STN 50-529 and STN 50-5300

Dear Administrative Judges:

On June 19, 1985 Staff received Applicants' proposed "Initial Decision and Order" for the Palo Verde operating license proceeding. The language proposed by Applicants appears satisfactory, except for paragraph one on page eight. 1/ We urge that the following paragraph be substituted for the language proposed by Applicants:

The testimony of the expert witnesses and other documentary materials made available to this Licensing Board establish there is very little likelihood that the amount

1/ This proposed paragraph reads:

"The measurements of cooling tower drift from the facilities performed by Mr. Wilber and the computer models discussed by Dr. Goldman demonstrates that there will be a minimal amount of drift from the cooling towers. The testimony of Drs. Curtis and McCune reviewing the University of Arizona study and that of Dr. Pentecost all indicate that there will be no adverse effect from the deposition of salt drift from the cooling towers on agricultural crops grown in the vicinity of the facilities."

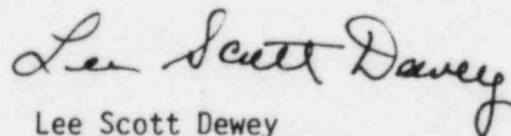
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of drift emitted from the Palo Verde facility will adversely affect crops grown in the vicinity of the facility. Moreover, the agricultural monitoring program to which the Joint Applicants have committed will provide a basis for determining whether agricultural crops will be damaged by salts emitted from the facility. If crop damage is detected, then Joint Applicants are required to report such damage and take appropriate action pursuant to the provisions of § 5.4.1 of the Palo Verde Nuclear Generating Station, Unit 1, Environmental Protection Plan, which provides that ". . . If harmful effects or evidence tends toward irreversible damage to the environment are observed, the licensees shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem."

The revised paragraph is more appropriate since Mr. Wilber's conclusions have been questioned by the testimony of Staff witness, Dr. Samworth, and are contradictory to the Board's Order of July 23, 1984, which provides (pursuant to stipulation of the parties) that the amount of salt deposition in this proceeding is to be based upon the predictions in Joint Applicants' environmental report. In addition, the paragraph we propose makes reference to the monitoring programs which Joint Applicants have committed to perform. Applicants' proposed paragraph fails to mention this important matter. Further, our proposed language would be more appropriate since the experts in this proceeding have not absolutely established that no crop damage can be caused by cooling tower salt deposition.

Sincerely,



Lee Scott Dewey
Counsel for NRC Staff

cc: Arthur C. Gehr, Esq.
Theodore W. Barudin
Atomic Safety and Licensing
Board Panel
Lynne Bernabei, Esq.
Docketing and Service Section

Charles Bischoff, Esq.
Ms. Lee Hourihan
Atomic Safety and Licensing
Appeal Board
Kenneth Berlin
Ron Rayner