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October 14, 1985

Alan S. Rosenthal, Chairman
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. W. Reed Johnson
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Howard A. Wilber
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: The Cleveland Electric Illuminating Company (Perry Nuclear Power Plant, Units 1 and 2)
Docket Nos. 50-440 and 50-441

OL

Gentlemen:

Enclosed for the Appeal Board's information is an October 11, 1985 letter from Cleveland Electric Illuminating Company to Harold R. Denton, Director, Office of Nuclear Reactor Regulation providing updated information on the plant status and readiness for fuel loading and operation of Perry Nuclear Power Plant, Unit 1. The letter states that Unit 1 may be ready to load fuel as early as November 8, 1985.

Very truly yours,

Jay E. Silberg

Jay E. Silberg
Counsel for Applicants

JES:L

Service List (w/encl.)

8510180215 851014
PDR ADOCK 05000440
G PDR

DS03

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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Plant Status and
Operational Readiness

Dear Mr. Denton:

The purpose of this letter is to provide updated information regarding the plant status and readiness for fuel loading and operation of Unit 1 of the Perry Nuclear Power Plant (PNPP). As discussed in our letter dated September 19, 1985, the design, construction, preoperational testing and licensing activities are essentially complete. PNPP Unit 1 may be ready to load fuel as early as November 8, 1985, and we respectfully request issuance of the operating license for PNPP Unit 1 at that time.

Our readiness for operation is based on our review of plant, preoperational testing and operation status, as summarized in our letter dated September 19, 1985 and updated in this letter.

Attachment 1 provides the updated plant readiness status and additionally describes a comprehensive and detailed review of the readiness of the Perry Nuclear Power Plant Unit 1 for fuel load. This review was performed by the Nuclear Safety Review Committee pursuant to my request at the Committee's first meeting on November 14, 1984. Spanning almost a year, the review was completed and a final report was approved by the NSRC on October 2, 1985.

Attachment 2 provides information in addition to our letter dated September 19, 1985 regarding the management plan to achieve fuel load and full power operation. This plan is well along in its implementation. The attachment describes the process that we have instituted to assure ourselves Perry Unit 1 is ready for fuel load, and activities to be completed beyond fuel load have been justified. Deferred completion items have been evaluated and found acceptable in terms of the startup testing program, safe operation of the plant and compliance with NRC regulations. Significant items that we propose to defer are described, each with justification for deferral in Attachment 3.

Finally, Attachment 4 identifies one-time Technical Specification exceptions that are necessary with justification for each waiver. We hereby request that the Final Draft of the PNPP Technical Specifications be issued to allow review and certification prior to issuance of the operating license. In summary, following our completion or disposition of remaining activities, I believe that Perry Nuclear Power Plant will be ready to commence fuel load and request your support so that this activity can proceed as planned.

Very truly yours,

Murray R. Edelman

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.
John Stefano (2)
J. G. Keppler, Region III
J. Grobe
C. Norelius
H. Thompson
B. J. Youngblood

PNPP PROJECT STATUS
AND OPERATIONAL READINESS

Operational Readiness

In our letter dated September 19, 1985, we addressed the Perry Plant staff operational readiness and qualifications. In preparation for fuel load we have taken further steps to assure our operational readiness. We have enhanced our project staff in several areas by integrating operationally experienced personnel into the project organization to provide advisory support to CEI personnel. We believe this supplements our capabilities and provides an even more experienced and qualified project staff to support operation of the Perry Nuclear Power Plant, Unit 1.

The operations manual is presently 95% complete and approved, and all procedures to support fuel load and power ascension will be approved within the next few weeks. Additional procedures related to post fuel load activities, such as inservice inspection and spent fuel shipment, have been identified for completion at later milestones.

CEI has implemented several programs to assure the overall adequacy and readiness of the PNPP operations manual procedures and instructions. In addition to utilizing operating instructions during the preoperational testing phase, and establishing a program to test run surveillance test instructions, we have also utilized the actual plant operating procedures during the Perry specific simulator training. To confirm complete implementation of all operations related commitments, an operations manual verification review was initiated. This review identified the operations commitments for verification that they are incorporated into appropriate procedures. Only a small fraction of identified commitments have required procedure revisions to clarify implementation of our commitments. Based on the results of this review to date, and an ongoing review to assure that procedures and instructions reflect the as-built plant design, we are confident that the Perry Plant Operations Manual will be ready to support fuel load.

Preoperational Testing

The bulk preoperational test program is nearing completion with less than approximately five percent of the total required system tests remaining to be completed. Over 80% of the preoperational test results are approved or in the results approval cycle. The major focus of current testing is close-out or the re-test of portions of the systems to address outstanding test exceptions. A detailed review of these test items is underway and specific retests to be completed after fuel load will be addressed by separate letter.

Inspection and Enforcement Items

Over the past month, we have accelerated our efforts to complete and provide resolutions to the NRC for closure of all open items. This has resulted in a completion rate of approximately 20 per week, with a 50% net reduction in total items requiring our response. The remaining items are scheduled to be complete in the next few weeks, which will allow for timely review and closure by the NRC. In addition, followup inspections in emergency planning and security have resolved a substantial number of items. The upcoming fire protection inspection is expected to closeout additional items.

NSRC Readiness Review

The Nuclear Safety Review Committee has performed a comprehensive and detailed review of the readiness of the Perry Nuclear Power Plant for fuel load. This was accomplished through a subcommittee of experienced senior level personnel, who were independent of the activities under review. Detailed checklists were completed in the four key areas of Organizational, Programmatic, Regulatory and Hardware readiness. Organizational staffing and readiness was reviewed for operations, maintenance, quality, training, health physics and engineering. Programmatic readiness covered nuclear programs and procedures for plant operation, engineering design, administration, technical operations, maintenance and surveillance. In the regulatory area, licensing commitments, operating experience, emergency plans, security plans and readiness of local, state and federal agencies were reviewed. Finally, hardware readiness was reviewed in terms of physical plant construction completeness, design changes, turnovers, testing and documentation. This included a systematic area-by-area walkdown of the plant. The final report of this Readiness Review includes the

details of the review process, the checklists used and the observations and recommendations.

Based on the results of the review, the NSRC has concluded that essentially all of the items reviewed were either ready for fuel load or have been identified and adequately tracked for completion. This conclusion recognizes the management plan for fuel load achievement, which provides a single focus for prioritizing, scheduling and tracking the remaining items to completion. NSRC has further concluded that these management controls are adequate to ensure completion of the remaining activities, or development of an adequate basis for deferral of any item, in a manner that establishes readiness for fuel load. With respect to the items that will not be completed at fuel load, NSRC is involved in the approval of the specific items identified in this letter. Prior to fuel load, the NSRC will confirm that the activities remaining to be completed after initial core load will not affect the plant readiness for loading fuel, and that the incomplete status will not affect safe operation of the plant nor affect the health and safety of the public.

MANAGEMENT PLAN TO ACHIEVE FUEL LOAD AND FULL POWER OPERATION

The management plan that we described in our letter dated September 19, 1985 is being implemented. Attachment 3 contains those work activities that have been identified for post fuel load completion. The identification process for post fuel load activities included consideration and documentation of the applicable items below. For each work activity proposed for completion beyond fuel load, the following information was developed and evaluated:

- Reference to the operability requirement or commitment.
- Definition of the part of a system or work activity estimated to be remaining open at the time of fuel load.
- Technical justification of why the item need not be completed before fuel load - including a safety evaluation, if necessary.
- The date or operating milestone by when the item will be complete; schedule for completion of the item is reasonable and achievable and organizational responsiblity for completion is assigned.
- Determination of whether compensatory actions are needed until completion of the item.
- Determination of any impact on operability of those systems required at fuel load due to deferred completion of the item.
- Determination of any impact (potential disruption) on the testing program due to deferred completion of the item.
- Copies of documents or a list of references to other CEI or NRC documents that propose or accept deferral of the item.

This information was generated in order to enable station management, PORC and NSRC to make reasoned decisions on the feasibility and suitability of proposed post fuel load work activities. Favorable decisions of this nature were an integral part of management's approval of deferred items.

The management plan also describes completion of plant systems, plant areas and programs. The fundamental aspect of completion is that systems, areas and programs meet operability requirements contained in the Technical Specifications, meet regulatory requirements and are capable of supporting scheduled testing and operating conditions. In a broader context, system completion is established using a checklist that addresses the following: construction, testing, design/licensing, procedures, programmatic items, documentation and configuration control. Area completion is established using a checklist that addresses items such as housekeeping, fire protection, seismic clearance, separation, documentation, finishing work, insulation and testing. In each system or area, work activities are confirmed to be done and closed, or identified as not yet complete. Those activities not closed are reviewed to determine whether they cause an adverse impact on the ability of a system, structure or component to perform its intended function. Remaining activities that do not cause an adverse impact; e.g., minor items similar in character to routine maintenance, need not be done to declare completion.

In order to ensure completeness and closure of remaining work, the Master Deficiency List (MDL) is being used not only for the approach to fuel load but also for completion of post fuel load activities. The MDL is a major component of the total listing of work activities that must be completed as operating milestones are achieved. The MDL identifies and tracks deficiencies in hardware and documentation, preoperational test exceptions, quality assurance inspection items and other work activities. Each item in the MDL is assigned a restraint code to identify the operating milestone before which the item must have been closed out or dispositioned.

Identification, evaluation and approval of post fuel load activities are initial steps in the process of ultimately assuring that these activities are properly completed in a controlled manner. Managerial controls are being instituted for the post fuel load implementation phase. This will assure controlled completion of post fuel load activities in a manner that does not compromise the operability of systems required, cause undue disruption of the startup testing program or result in adverse impacts on safe operation of the plant.

The mechanism by which accomplishment of this work will be controlled is through a coordination committee within the Power Ascension Testing Organization. Periodic meetings of this committee will be held with those responsible for completing post fuel load work activities, conducting startup testing, operating and maintaining the plant and scheduling plant evolutions. In conjunction with overall scheduling and development of the test plan of the day, required interfaces, potential impacts on system operability and potential test disruptions will be identified and evaluated. This level of coordination will ensure that integrated scheduling of plant evolutions is accomplished. As startup testing proceeds, the effectiveness of this committee will be evaluated periodically, and any lessons of experience will be incorporated to ensure that appropriate coordination is maintained throughout the testing program. In accordance with the regulations, operating license, technical specifications and Perry Plant procedures, existing requirements for PORC and NSRC involvement will continue to be satisfied, irrespective of the activities of the coordinating committee.

In summary, this management plan and associated initiatives provide a structure for us to assure ourselves that the Perry Nuclear Power Plant, Unit 1 is ready to load fuel and to achieve subsequent operating milestones as they approach. Specific work activities identified for post fuel load completion will be justified, reviewed and approved by management and appropriate committees and made available for reviews by the Resident Inspectors. Based on implemenation of the plan to date, we are confident that our objective of loading fuel and achieving full power operation in a safe and timely manner will be satisified.

SIGNIFICANT ITEMS REMAINING TO BE COMPLETED AFTER FUEL LOAD

I. Programmatic/Construction Completion Items

A) Seismic Clearance Inspection Program

Prior to fuel load, all final seismic clearance walkdown inspections will be completed. Final resolution of all items identified during the seismic clearance walkdown for the Reactor Building will be completed prior to fuel load. Items identified during the walkdown of the Control Room are already completed. To date, the overall program is approximately 95% complete. The engineering analysis and corrections, if necessary, for the remaining identified items will be completed prior to exceeding 5% power. These will be prioritized considering functional requirements of systems and ALARA concerns, and the nature of the identified seismic clearance violation, based on the low probability of a seismic event and the completion status of this program to date. Completion of this program after fuel load will have no adverse impact on the safe opertion of the plant.

B) Raceway Separation Barriers - (IE Item 85-018-01)

At this time, over 75% of the raceway separation barriers required to meet IEEE 384-1974 independence requirements have been installed. All separation barriers in the Control Room and Reactor Building will be complete prior to fuel load. Installation of the remainder of the separation barriers will be completed prior to initial criticality. This will eliminate unneccessary rework and minimize damage, thus allowing barrier installation as a final finishing item in affected areas. The other IEEE 384 independence requirements for electrical isolation and protection from other hazards such as pipe whip, jet impingement and missiles have been fully met. In addition, the redundant safe shutdown systems,

components, cables and associated circuits have been analyzed and protected in accordance with our 10CFR50 Appendix R safe shutdown analysis. The Appendix R protection features including cable wrapping will be completed by fuel load. The lack of separation barriers neither affects nor prevents any system functional capabilities. Since the Appendix R analysis and protection features assure that at least one redundant division is available to achieve and maintain cold shutdown, completion of this item after fuel load will not affect safe operation of the plant.

C) Ventilation Dampers (not related to Appendix R)

Several ventilation system dampers have been identified as potentially needing minor modifications to ensure conformance with design analyses. None of the dampers affected are associated with Appendix R separation of redundant trains of safe shutdown equipment or safety-related equipment. As such, there is no effect on the engineered fire protection design as described in the FSAR or FPER. In addition, the potential or identified modifications do not affect overall operability of the ventilation systems in which they are installed because the modifications only affect damper closure. Required modifications will be completed prior to exceeding 5% power. Completion of this item after fuel load can be accomplished without any impact on safe operation of the plant.

II. Preoperational Testing Items

A) Traversing Incore Probe System Preoperational Test (C51D)

The Traversing Incore Probe System (TIP) function is for calibration of the Local Power Range Monitors (LPRM) and for monitoring APLHGR, LHGR, MCPR and MFLPD. The TIP system will be installed prior to fuel load and the preoperational testing will be completed prior to entry into Test Condition #1 (approximately 5% power). This system has no function in mitigating the consequences of an accident and is not required for calibration of the APRM/LPRM's until 15% of rated thermal power. Since the Source

Range Monitors and Intermediate Range Monitors provide the necessary nuclear instrumentation for initial fuel load and low power physics testing, completion of the preoperational testing after fuel load will not affect safe operation of the plant.

B) Post Accident High Range Radiation Monitoring Preoperational Test (D19) - (IE Items 85-022-21, 85-022-22)

The post accident high range radiation monitors are required to provide the capability of reading substantially higher than normal radiation levels in containment and effluent paths that could result from a postulated accident which severely damages the core. Prior to fuel load, the high range radiation monitoring system (D19) will be completely installed and energized. Preoperational testing will be completed and the system operational prior to 5% rated thermal power. Verification of the Safety Parameter Display System signals associated with the D19 system will also be completed at that time. Prior to achieving 5% power, there will be no significant fission product inventory or decay heat. Even if an accident occurred prior to 5% power operation there would not be sufficient fission products released to the reactor coolant to cause containment or effluent high range radiation levels. The D17 monitors as required by Perry Technical Specifications will be installed, tested and operational prior to fuel load. Based on availability of adequate monitoring instrumentation insufficient fission product release and low likelihood of an accident, completion of this item after fuel load will have no adverse impact on the safe operation of the plant.

C) HVAC-Final Plant Preoperational Testing

Prior to fuel load, the plant HVAC systems will be installed and available to provide sufficient ventilation and cooling. Initial testing will be performed on all plant HVAC systems prior to fuel load. Final integrated system verification and all flow balancing to demonstrate flow from areas of low radiation to higher radiation areas will be completed prior to 5% power. Prior to fuel load, the preoperational testing, including final testing of the charcoal

filters, will be complete for the Annulus Exhaust Gas Treatment and the Control Room Emergency Recirculation Systems. Final testing of the charcoal filters for other ventilation exhaust treatment systems will be completed prior to initial criticality. These systems will be preoperationally tested and the charcoal loaded into the filters just prior to fuel load to avoid contamination due to construction cleanup activities. Due to the lack of significant fission product inventory and the operational availability of the ventilation exhaust treatment systems, completion of the final balancing prior to 5% power and filter testing prior to initial criticality will have no adverse impact on the safe operation of the plant.

D) HVAC System Additional Testing

The initial preoperational tests for the Containment Vessel Cooling (M11) and the Fuel Handling Area Ventilation (M40) systems were completed and results approved. The systems are completely installed and operating. As a result of test exceptions and component modifications, additional testing is required and final testing will be performed prior to 5% power. The M40 system will have charcoal loaded just prior to fuel load to avoid contamination and filter testing will be completed prior to achieving initial criticality. Since M11 provides adequate containment cooling and there will be no handling of irradiated fuel in the fuel handling building, completion of these final testing activities after fuel load can be accomplished without adverse effect on the safe operation of the plant.

E) Emergency Response Facilities Ventilation System Testing (IE Items 85-09-04, 85-09-05 and 85-060 A & B)

The ventilation systems for the Technical Support Center (TSC) and Emergency Operations Facility (EOF) are designed to protect personnel responding to a plant emergency from the effects of a postulated large release of fission products. These systems are completely installed and will be available prior to fuel load. Testing of the TSC and EOF ventilation (M52 & M53) and associated

radiation monitoring (D19) will be completed prior to exceeding 5% rated thermal power. Since there will be no significant fission product inventory and a very low likelihood of a postulated accident, completion of this item after fuel load can be accomplished without adversely affecting emergency capability or safe operation of the plant.

III. Miscellaneous

A) Medical Treatment/First Aid Facility (IE Item 85-09-07)

Presently the onsite medical/first aid treatment is provided from the construction contractor's first aid facility. This will continue to be the first aid station after fuel load, and the permanent medical/first-aid facility in the plant will not be completed and operational. Prior to startup following the first refueling outage or prior to the elimination of the construction contractor's first aid facility, the permanent facility will be fully equipped and operational. Since adequate medical treatment is provided, completion of this item after fuel load will have no adverse impact on plant emergency capabilities.

B) Guardhouse Ventilation System Testing

The guardhouse ventilation system has been in service and operating for several months. Final component testing will be completed prior to completing the warranty run. Completion of this testing after fuel load is a result of other priority ventilation system activities. Since adequate cooling exists, deferral of the component testing will have no adverse affect on safe operation of the plant.

IV. Licensing Items

Items and programs previously identified and accepted by NRR to be completed at milestones beyond fuel load include:

A) Detailed Control Room Design Review

Surveys, augmented verification and additional Human Engineering Deficiencies design improvements shall be completed in accordance with the schedule identified in CEI letter dated October 2, 1985.

Ref: CEI letter PY-CEI/NRR-0357L, dated October 2, 1985.

B) TDI Diesel Generators

Any further modification (from TDI Owner's Group recommendations) shall be completed (or recommendations reconciled) prior to startup from the first refueling outage.

Ref: CEI letter PY-CEI/NRR-0277L, dated June 28, 1985.

C) Hydrogen Control

CEI will comply with the proposed schedule in CEI letter dated June 25, 1985 for meeting the requirements of the final rule on hydrogen control. Equipment enhancements found necessary will be implemented prior to startup following the first refueling outage.

Ref: FSAR Amendment 21, September 30, 1985
NRC letter dated September 20, 1985 and September 24, 1985.

D) Turbine System Maintenance Program

CEI shall submit a turbine system maintenance program within three years from the date of the license.

Ref: FSAR Amendment 21, September 30, 1985
SSER #3, April, 1983

E) Containment Purge Criteria

CEI shall propose purge criteria prior to startup from the first refueling outage.

Ref: FSAR Amendment 21, September 30, 1985
SSER #4, February, 1984
NRR letter dated July 31, 1985

F) Inservice Inspection Program

CEI shall submit the initial inservice inspection program within one year from the date of the operating license.

Ref: FSAR Amendment 21, September 30, 1985
SSER #4, February 1984

G) Reg. Guide 1.97, Rev. 2

CEI shall follow industry development of a Category 1 neutron flux monitor, evaluate newly developed equipment and notify NRC of plans to install Category 1 instrumentation when a suitable instrument becomes available.

Ref. FSAR Amendment 21, September 30, 1985
SSER #6, April 1985

H) Salem ATWS - Generic Letter 83-28

CEI shall implement required actions on a schedule consistent with that committed to in letters dated April 6, 1984, August 28, 1985 and September 23, 1985.

Ref: FSAR Amendment 21, September 30, 1985

I) Mark III Containment System Issues

CEI shall provide submittals of any required additional information prior to startup following the first refueling outage.

Ref: CEI letter PY-CEI/NRR-0363L dated September 24, 1985.

TECHNICAL SPECIFICATION EXCEPTIONS

A. The following systems need not be OPERABLE until prior to exceeding 1% of RATED THERMAL POWER for the first time:

System	Technical Specification
C85 Turbine Bypass and Pressure Control System	3.7.8

Justification: During fuel load, shutdown margin demonstrations, initial criticality, and non-nuclear heatup, the main steam isolation valves shall remain closed.

N32 Turbine Control	3.3.8

Justification: Until exceeding 1% of RATED THERMAL POWER, non-condensible gases and steam will be bled from the reactor vessel directly to the main condenser through the turbine bypass valves. The turbine will not be rolled using steam, so no turbine control is necessary.

B. The following systems need not be OPERABLE until prior to 5% of RATED THERMAL POWER for the first time:

D19 Post Accident Radiation Monitors	3.3.7.5, Table 3.3.7.5-1 Items 11-15

Justification: All the D17 (Plant Radiation Monitors) monitors required to be OPERABLE will be in service. Prior to 5% there would not be sufficient fission products released to the reactor coolant to cause containment or effluent high range radiation levels.

C. The following systems need not be OPERABLE until after non-nuclear heatup following initial criticality:

System	Technical Specification
E51 Reactor Core Isolation Cooling	3.7.3

Justification: The RCIC system is an Engineered Safety Feature (ESF) designed to remove decay heat in the event of a vessel isolation. Since the non-nuclear heatup will be conducted entirely under Operational Condition 3, there will be no decay heat to remove. Also, the non-nuclear heatup is conducted with the vessel and main steam line flooded (up to the inboard MSIV's), and pressure maintained with a nitrogen blanket. No steam will be produced and therefore, the RCIC system will be unavailable during this time.

G61 Liquid Radwaste Sumps	3.4.3.1.b

Justification: This system is not required until after non-nuclear heatup. Until that time, access to the drywell will be available for visual detection of leakage. Also, any leakage will have little or no contamination.

M16 Drywell Vacuum Relief	3.6.5.3

Justification: This system is not required to be OPERABLE until after non-nuclear heatup. The drywell vacuum relief system is designed to mitigate the effects of negative pressure in the drywell following LOCA conditions. During the non-nuclear heatup, there is not the initial power or the decay heat available to cause conditions similar to a LOCA.

Note: We also request exception to the Surveillance Requirements associated with all of the above Limiting Conditions for Operation.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.	)	Docket Nos. 50-440 50-441
	)	
(Perry Nuclear Power Plant, Units 1 and 2)	)	

SERVICE LIST

James P. Gleason, Chairman
513 Gilmoure Drive
Silver Spring, Maryland 20901

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

Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Alan S. Rosenthal, Chairman
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. W. Reed Johnson
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Howard A. Wilber
Atomic Safety and Licensing
Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

John G. Cardinal, Esquire
Prosecuting Attorney
Ashtabula County Courthouse
Jefferson, Ohio 44047

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

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Colleen Woodhead, Esquire
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Terry Lodge, Esquire
Suite 105
618 N. Michigan Street
Toledo, Ohio 43624

Donald T. Ezzone, Esquire
Assistant Prosecuting Attorney
Lake County Administration Center
105 Center Street
Painesville, Ohio 44077

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

Ms. Sue Hiatt
8275 Munson Avenue
Mentor, Ohio 44060