HL&P 6689 (5-84)

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION	NUMBER IP-8.9	REV. NO. 0
INTERDEPARTMENTAL PROCEDURE	PAGE 1 OF 22	
LICENSED OPERATOR REQUALIFICATION	EFFECTIVE DATE 01-15-86	

Sponsoring Department Approval: Dennis J. Cody — Date: 1/8/86
Manager, Nuclear Training Department

Concurrence: Warren H. Kinsey — Date: 1/9/86
Plant Manager, South Texas Project Electric Generating Station

UNCONTROLLED COPY

8603040363 860109
PDR ADOCK 05000498
V PDR

NUCLEAR PLANT OPERATIONS
Document Control Center
Controlled Copy No. 16

1.0 PURPOSE

This South Texas Project Electric Generating Station (STPEGS) Interdepartmental Procedure establishes the responsibilities associated with and provides instruction for the conduct of Licensed Senior Reactor Operator and Reactor Operator, Requalification. This training is provided to assure continuous operator competence and to ensure that the licenses' activities are conducted in compliance with the terms and conditions of their licenses, as well as the facility operating license.

2.0 SCOPE

This procedure applied to all NRC licensed personnel and all NRC Certified Instructor personnel for this facility.

3.0 DEFINITIONS

3.1 Requalification Training - That training implemented to maintain licensed operators at a level of knowledge and proficiency required for continued safe operation of STPEGS. This training also assures that all training requirements are met for timely reapplication and renewal of licenses for Reactor Operators and Senior Reactor Operators.

3.2 Annually - 12 months $\pm$ 3 months not to exceed 36 $\pm$ 3 months over a three year period.

3.3 Licensed Personnel - All personnel who hold a current NRC license on STPEGS either RO or SRO, regardless of staff position.

3.4 On-the-Job training - That training required by this procedure, other than classroom training, required for completion of the Requalification program. OJT may include but is not limited to:

1. Control manipulations
2. Assigned required reading
3. Assigned simulator training

4.0 REFERENCES

4.1 10 CFR 55, "Operator Licenses"

4.2 ANSI 3.1-1978

4.3 NUREG 1021, "Operator Licensing Examiner Standard"

4.4 ANSI/ANS 18.1-1971

4.5 NUREG 0737 "Clarification of TMI Action Plan Statements"

4.6 NRC (H. Denton) letter - March, 1980

4.7 Final Safety Analysis Report, Section 13.2

4.8 IP-8.5, Training Waiver Requests

5.0 RESPONSIBILITY

5.1 Nuclear Plant Operations Department

5.1.1 Vice President, Nuclear Plant Operations

The Vice President, Nuclear Plant Operations certifies that all licensed individuals have completed the approved Requalification Program as required by Section 50.54 (i-1) of 10 CFR 50, and have discharged their licensed responsibilities competently and safely.

5.1.2 Plant Manager

The Plant Manager assumes overall responsibility for the following:

5.1.2.1 Ensuring that an adequate number of licensed operators are available to operate the plant in accordance with regulations and attend Requalification training in accordance with this procedure.

5.1.2.2 Assuring that Requalification training, in accordance with this procedure, will maintain technically competent licensed personnel.

5.1.3 Reactor Operations Manager

The Reactor Operations Manager is responsible for the following:

5.1.3.1 Reviewing the Licensed Operator Performance Evaluations (Attachment IP-8.9-3) conducted by the Reactor Operations staff and forwarding a copy of those performance evaluations to the Manager, Operations Training Division (OTD).

5.1.3.2 Providing feedback to NTD, i.e., identifying needs for training.

5.1.3.3 Routing of required reading within NPOD when it is used for training purposes and forwarding the documented completion to NTD for records keeping.

5.1.3.4 Documenting reactivity manipulations performed by licensed personnel on the plant and forwarding that documentation to NTD for records keeping.

5.1.3.5 Providing assistance to the Manager, OTD in reviewing the content and scheduling of Requalification training to ensure availability to all licensed personnel and ensuring that licensed personnel are available to attend training for which they are scheduled.

5.1.3.6 Monitoring personnel performance and initiating or approving corrective action for non performance.

5.1.4 NRC Licensed or NRC Instructor Certified Personnel

Once the Requalification training schedule has been approved, all licensed and certified personnel are responsible for:

5.1.4.1 Ensuring they complete the scheduled Requalification training.

5.1.4.2 Ensuring their licenses are renewed in a timely manner.

5.1.4.3 Reporting any change in health which may affect the validity of their licenses, as stipulated in 10 CFR 55, to Manager, OTD.

5.2 Nuclear Training Department

5.2.1 Manager, Nuclear Training Department

The Manager, NTD is responsible for the following:

5.2.1.1 Ensuring the Requalification Training Program meets regulatory requirements and that the Nuclear Training Department conducts training in accordance with this procedure.

5.2.1.2 Certifying that all licensed personnel have completed the approved Requalification program as required by Section 50.54 (i-1) of 10 CFR 50 and discharged their licensed responsibilities competently and safely.

5.2.2 Manager, Operations Training Division

The Manager, OTD is responsible for the following:

5.2.2.1 Establishing content and developing the overall Requalification Training Program.

5.2.2.2 Scheduling and conducting of training.

5.2.2.3 Evaluation of student progress during the program and submitting regular reports of progress to the Reactor Operations Manager.

5.2.2.4 Maintaining retrievable training records.

5.2.2.5 Reporting any change in health of licensed personnel which may affect the validity of their licenses to the NRC.

6.0 REQUIREMENTS

6.1 Participation

6.1.1 All licensed personnel shall be required to participate in Requalification training.

6.1.2 Any newly licensed personnel shall enter the Requalification training program within 90 days of the effective date of his/her license.

6.1.3 Any waivers of the scheduled Requalification training program shall be processed in accordance with IP-8.5. Additionally, all requests for waiver of Requalification training must be received by the Manager, OTD no later than 7 days prior to the date the training is scheduled.

6.1.4 All licensed personnel shall participate in all portions of OJT.

6.1.5 All NRC certified personnel shall participate in OJT to the extent required to maintain their certification.

6.2 Requalification Training

Requalification training shall be conducted for a continuous period, not to exceed two years, and upon conclusion shall be promptly followed, pursuant to a continuous schedule, by successive requalification training. Requalification training on an annual

basis shall consist of the following with emphasis placed on those areas where weaknesses have been demonstrated on previous license or requalification examinations:

- o Classroom Training
- o On-the-Job Training
- o Simulator Training
- o Self Study
- o Annual Examination/Evaluation

6.2.1 Classroom Training

6.2.1.1 Lectures

Classroom requalification training lectures shall be scheduled to be given throughout the requalification period. Periodic examinations shall be given at appropriate intervals to evaluate each individual's progress throughout the requalification program. A minimum of six preplanned lectures per year shall be scheduled to cover all subjects within a year that are necessary to maintain operator proficiency. Emphasis shall be placed on those areas where Requalification and/or license examinations indicate generic weaknesses in operator knowledge. The general subject areas to be covered are:

- o Theory and Principles of Operation
- o General and Specific Plant Operating Characteristics
- o Plant Instrumentation and Control Systems
- o Plant Protection Systems
- o Engineered Safety Systems Features
- o Normal, Abnormal, and Emergency Operating Procedures
- o Radiation Control and Safety
- o Technical Specifications
- o Applicable portions of 10 CFR
- o Heat Transfer, Fluid Flow, and Thermodynamics
- o Mitigating Core Damage

In addition, pre-planned lectures may be conducted in those areas identified by the Training or Operations Department as needing special emphasis.

These may include, but are not limited to major design changes, I&E Bulletins, LERs, Operating

Experience Reports, Procedure and Technical Specification changes.

Training aids, such as films and video tapes, may be used to conduct certain portions of the lecture series. These are particularly suitable to training on a specific piece of equipment or general information training. The use of such aids may be used only to supplement the lecture series and under no circumstances may they comprise more than 50% of the total lecture series. In addition, when utilizing supplemental training aids, the presentation shall be supervised by an instructor.

6.2.1.2 Required Reading

During an assigned retraining week the Manager, OTD may assign items as required reading with time allotted for completion. These required reading assignments may include, but are not limited to the following:

- o Plant Procedures, Procedure Changes or New Procedures
- o Plant Design Changes
- o Plant License Changes
- o Operating Experience Reports
- o Portions of or changes to Technical Specifications

6.2.2 On-the-Job Training

6.2.2.1 Annually

Licensed and certified personnel (each shift cycle) may be assigned to read specific Off-Normal, Emergency, and/or Applicable Security procedures. These assignments shall be made by the Manager, OTD such that every year, personnel participating in Requalification training shall have reviewed the contents of all Off-Normal, Emergency, and/or applicable Security procedures which are not utilized during the simulator training session or are not covered during the classroom training.

6.2.2.2 Proficiency

All licensed personnel must actively perform the functions of an RO or SRO on shift to maintain proficiency. The minimum time acceptable on shift is one 8-hour shift day per month or three 8-hour shift days per quarter.

All certified personnel must actively engage in the day to day shift operations to the extent required by their certification.

6.2.2.3 Control Manipulations

All licensed personnel shall document the performance or supervision of the performance in the plant of any control manipulations required by section 6.2.3.1 of this procedure. Each entry into the control manipulation log shall be dated and initialed by the Shift Supervisor or Unit Supervisor on duty at the time of the control manipulation. Each completed control manipulation log sheet (Attachment 8.9-1) shall be forwarded to the Manager, OTD.

The Reactor Operations Manager should, to the extent possible, rotate personnel with equivalent qualification between different stations to maximize the variation of plant control manipulations performed.

A control manipulation which may be performed as part of normal plant evolutions shall either be performed on the plant or a simulator which reproduces the general operating characteristics of the plant.

6.2.3 Simulator Training

The purpose of simulator training is to assure that all licensed personnel demonstrate proficiency in plant manipulations, evolutions, and casualty operations. All RO licensed personnel shall manipulate the controls to accomplish the control manipulations required in section 6.2.3.1 of this procedure. All SRO licensed personnel shall either manipulate the controls or direct the activities of individuals during plant control manipulations.

Each control manipulation performed on the simulator shall be documented on a simulator training session observation record similar to Attachment IP-8.9-2 by the simulator instructor in charge of the training session.

NOTE: This procedure assumes the operability of the STPEGS plant specific simulator. If the STPEGS simulator is inoperable, control manipulations may be performed by:

1. Walkthrough actions in the control room or using simulated control boards.
2. Simulation on a non-plant specific simulator.

Training on the STPEGS simulator would be scheduled as soon as possible.

All licensed and certified personnel shall be assigned to a minimum of a five-day retraining course annually.

6.2.3.1 Control Manipulations

The following control manipulations and plant evolutions are acceptable for meeting the control manipulations required. The starred items are to be performed annually; all other items are to be performed on a two year cycle. At least one multiple failure casualty shall be included annually. The use of Technical Specifications should be maximized during simulator control manipulations.

* o Plant or reactor startups to include a range such that reactivity feedback from nuclear heat addition is noticeable and heatup rate is established.

* o Plant shutdown

* o Manual control of steam generators and/or feedwater during startup and shutdown

* o Boration and dilution during power operation

* o Any significant (10 percent) power changes with rod control in manual

* o Loss of coolant including:

  1. Significant steam generator tube leak
  2. Inside and outside containment
  3. Large and small, including leakrate determination
  4. Saturated reactor coolant response

* o Loss of instrument air

* o Loss of electrical power (or degraded power sources, or both)

* o Loss of core coolant flow/natural circulation

* o Loss of condenser vacuum

* o Loss of essential cooling water

* o Loss of all feedwater (normal and auxiliary)

o Loss of residual heat removal

o Loss of component cooling system or cooling to an individual component

o Loss of normal feedwater or normal feedwater system failure

o Loss of protective system channel

o Mispositioned control rod or and rods (or rod drops)

o Inability to drive control rods

o Conditions requiring the use of emergency boration

o Fuel cladding failure or high activity in reactor coolant or off gas

o Turbine or generator trip

o Malfunction of automatic control system(s) which affect reactivity

- o Malfunction of reactor coolant pressure/volume control system
- o Reactor trip
- o Main steam line break (inside or outside containment)
- o Nuclear instrumentation failure(s)

6.3 Program Evaluation

6.3.1 Written examinations shall be administered at appropriate intervals throughout the Requalification Program. The Written examinations shall evaluate the subjects addressed by the preplanned lecture series and may include questions regarding any required reading which has been completed.

The minimum acceptable grade is 80%. If a licensed individual scores less than 80%, he/she will require additional retraining.

6.3.2 Observations

During each requalification year, each licensed individual shall be evaluated by their appropriate department head or his/her designee and document this evaluation using attachment IP-8-9.3. This evaluation, in conjunction with supporting documentation from simulator observations (completed by NTD staff) shall be reviewed by the Manager, OTD.

If an area of unacceptable performance is noted, the Reactor Operations Manager shall be notified. In addition, each individual that receives an unacceptable evaluation shall be entered into an accelerated Requalification training program as outlined in section 6.3.4 of this procedure.

6.3.3 Annual Examinations

Annual written Requalification exams shall be administered to all licensed personnel. The annual written examination shall be comparable in scope and degree of difficulty to an NRC examination consistent with the type of license held.

6.3.4 Accelerated Requalification Training

Should an operator score less than 70% on any section or less than 80% overall on the annual Requalification examination or fail the oral examination, he/she shall immediately be entered into and successfully complete accelerated requalifaction training. Accelerated Requalification training shall be determined on an individual basis by the Manager, OTD.

The Reactor Operations Manager shall take the necessary actions for the individual to be relieved of all licensed duties until he/she successfully completes the assigned accelerated Requalification Training Program.

Accelerated Requalification training shall be given in the categories required or areas identified in the written or oral examination. The assignment of accelerated Requalification training shall be made by means of a letter to the individual from the Manager of OTD via the Reactor Operations Manager. Successful completion of the program shall be measured by a re-examination of individual categories, completing an entire written examination or completing an oral examination as appropriate. A score of at least 70% on each previously failed section or 80% overall must be achieved.

6.4 Training Personnel

NTD personnel who hold Operator Licenses/Instructor certifications, and other license holders who conduct training (classroom or simulator) or evaluation (develop, administer, review for approval, or grade examinations either oral or written) shall be credited with that portion of the Requalification program.

6.5 Proficiency

If a licensed operator has not been actively performing licensed functions for the past four months, re-certification must be requested and approved by the NRC prior to allowing the individual to perform his/her licensed functions.

7.0 DOCUMENTATION

The following documentation of the Licensed Operator Requalification Program shall be maintained for as long as each individual is employed at STPEGS. In any event, each of the below listed records will be maintained in an auditable fashion for a minimum of five years.

7.1 Copies of written exams including answers and results

7.2 Copies of oral exam results

7.3 Documentation of additional training received

7.4 Summation of individual deficiencies

7.5 Copy of medical examinations/reports

7.6 Copy of performance evaluations conducted by the Reactor Operations staff

8.0 ATTACHMENTS

8.1 Attachment IP-8.9-1, Control Manipulation Logsheet

8.2 Attachment IP-8.9-2, Simulator Training Session Observation Record

8.3 Attachment IP-8.9-3, License Performance Evaluation

ATTACHMENT IP-8.9-1

CONTROL MANIPULATION LOGSHEET
PAGE 1 OF 3

I. PERSON PERFORMING CONTROL MANIPULATION:

_____ (name) _____ (employee number) RO/SRO circle one

			SS/US Initial	Date
*	1.	Plant or reactor startup to include a range that reactivity feedback from nuclear heat is noticeable and heatup rate is established.	____	____
*	2.	Plant shutdown.	____	____
*	3.	Manual control of steam generators and/or feedwater during startup or shutdown.	____	____
*	4.	Boration during power operation.	____	____
*	5.	Dilution during power operation.	____	____
*	6.	Any significant ($\geq$ 10%) power change with rod control in manual.	____	____
*	7.	Loss of coolant including:		
		1. Significant steam generator tube leak	____	____
		2. LOCA inside containment	____	____
		3. LOCA outside containment	____	____
		4. Large LOCA including leak rate determination	____	____
		5. Small LOCA including leak rate determination	____	____
		6. LOCA with saturated reactor coolout response	____	____

ATTACHMENT IP-8.9-1

CONTROL MANIPULATION LOGSHEET
PAGE 2 OF 3

			SS/US Initial	Date
*	8.	Loss of instrument air.	____	____
*	9.	Loss of electrical power sources (or degraded power sources, or both).	____	____
*	10.	Loss of core coolant flow/natural circulation.	____	____
*	11.	Loss of condenser vacuum.	____	____
*	12.	Loss of Essential Cooling Water.	____	____
*	13.	Loss of all feedwater (normal and auxiliary).	____	____
	14.	Loss of Residual Heat Removal.	____	____
	15.	Loss of Component Cooling System or cooling to an individual component.	____	____
	16.	Loss of normal feedwater or normal feedwater system failure.	____	____
	17.	Loss of a protective system channel.	____	____
	18.	Mispositioned control rod or rods (or rod drops).	____	____
	19.	Inability to drive control rods.	____	____
	20.	Conditions requiring the use of emergency boration.	____	____
	21.	Fuel cladding failure or high activity in reactor coolant or offgas.	____	____
	22.	Turbine or generator trip.	____	____
	23.	Malfunction of automatic control system(s) which affect reactivity.	____	____
	24.	Malfunction of reactor coolant pressure/volume control system.	____	____

ATTACHMENT IP-8.9-1

CONTROL MANIPULATION LOGSHEET
PAGE 3 OF 3

		SS/US Initial	Date
25.	Reactor Trip.	____	____
26.	Main steamline break (inside or outside containment).	____	____
27.	Nuclear Instrumentation failure(s).	____	____

NOTES:

1. * indicates annual requirement; all others required biannually
2. All RO licensed personnel are required to manipulate the controls; All SRO personnel shall either manipulate the controls or direct the activities of individuals during plant control manipulations.

INSTRUCTIONS FOR COMPLETING FORM:

1. Place name and employee number in Block I.
2. Circle either RO or SRO.
3. Have the Shift Supervisor or Unit Supervisor on shift at the time of the control manipulation initial and date in the columns provided for the control manipulations completed.
4. NTD personnel will collect the completed forms and supply new forms on a monthly basis.

ATTACHMENT IP-8-9.2

SIMULATOR TRAINING SESSION OBSERVATION RECORD

PAGE 1 OF 5

Instructors: _____ Date: _____

_____ _____ Length in Hours: _____

Exercise/Practice/Scenario/Exam #	Emergency, Abnormal Security Procedures Used/Reviewed
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

	Shift Assignments	Employee #	Reactivity Manipulations Completed
SS	_____	_____	_____
US	_____	_____	_____
RO	_____	_____	_____
RO	_____	_____	_____
STA	_____	_____	_____
Other	_____	_____	_____

EVALUATION

A. Supervisory Ability (N/A for RO, STA)	SS	US	RO	RO	STA
1. Effectively directs operation of plant.	____	____	____	____	____
2. Effectively directs actions of operators and utilization of resources.	____	____	____	____	____
3. Ensures communication between operators passing along information accurately and promptly.	____	____	____	____	____

ATTACHMENT IP-8-9.2

SIMULATOR TRAINING SESSION OBSERVATION RECORD

PAGE 2 OF 5

	SS	US	RO	RO	STA
B. Critical Response					
1. All operators communicate between other work station, passing along information accurately and promptly.	____	____	____	____	____
2. Responds promptly and correctly to annunciators.	____	____	____	____	____
3. Uses proper procedure, follows steps as designated.	____	____	____	____	____
4. Coordination and dexterity: Systematic and logical approach to operations, performs multiple tasks coincidentally.	____	____	____	____	____
5. Periodically checks indications.	____	____	____	____	____
6. Alertness - aware of plant conditions/evolutions.	____	____	____	____	____
7. Team work - works well as a team member.	____	____	____	____	____
C. Diagnostic Ability					
1. Uses available instruments to diagnose problems correctly.	____	____	____	____	____
2. Correctly prioritizes multiple casualties in order of importance.	____	____	____	____	____
3. Monitors for trends to predict approaching problems.	____	____	____	____	____

ATTACHMENT IP-8-9.2

SIMULATOR TRAINING SESSION OBSERVATION RECORD
PAGE 3 OF 5

EVALUATION CRITERIA

SATISFACTORY	Operator performance in this area is fully acceptable (e.g., takes appropriate actions on time).
*MARGINAL	Operator performance in this area is acceptable, but some weaknesses are evident (e.g., improper action, but recovers before "loss of control" or delayed action).
*UNSATISFACTORY	Operator performance in this area is not acceptable (e.g., improper actions, no recovery or no action when required).

*Comments are required for all Marginal and Unsatisfactory ratings.

ATTACHMENT IP-8-9.2

SIMULATOR TRAINING SESSION OBSERVATION RECORD

PAGE 4 OF 5

SIMULATOR SESSION COMMENTS:

ATTACHMENT IP-8-9.2

SIMULATOR TRAINING SESSION OBSERVATION RECORD
PAGE 5 OF 5

SESSION CRITIQUE: OVERALL GROUP EVALUATION: SAT UNSAT N/A

STUDENT COMMENTS:

INSTRUCTOR SIGNATURE: _____

ATTACHMENT IP-8-9.3

LICENSE PERFORMANCE EVALUATION

NAME: _____ RO _____ SRO _____

NOTE: Observation/Evaluation of Individual Operator Performance to include actions taken during actual or simulated, normal, abnormal, and emergency conditions.

Evaluation: Actual _____ Simulated _____

Description: _____

_____

Operator Performance: Satisfactory _____ Unsatisfactory _____

Comments: _____

_____

If Performance Unsatisfactory - Corrective Action Recommendation:

_____

_____

_____

Evaluation Performed By: _____ _____ _____
Date

*When complete forward Via Reactor Operations Manager to Manager OTD.

Reactor Operations Manager Review: _____ _____
Date

Corrective Action Taken: _____

_____

Corrective Action Completed By: _____ _____
Date

Reviewed:

_____ _____ _____ _____
Manager OTD Date Reactor Operations Manager Date

The Light company Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

February 27, 1986
ST-HL-AE-1610
File No.: G2.5

Mr. Vincent S. Noonan, Project Director
PWR Project Directorate #5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Licensed Operator Requalification Program

Dear Mr. Noonan:

During your staff's review of the South Texas Project Electric Generating System Nuclear Training Program late last year, your reviewer requested a copy of the Licensed Operator Requalification Program. At that time the program was in draft and we provided a draft copy to the reviewer. We have now issued Revision 0 of the program for use at STPEGS. Accordingly, we are forwarding the attached copy of Revision 0. There are no significant differences between the draft we provided last year and the attached.

If you should have any questions on this matter, please contact Mr. M. A. McBurnett at (512) 972-8530.

Very truly yours,

M. R. Wisenburg
Manager, Nuclear Licensing

MAM/ljm

Attachment: Licensed Operator Requalification Program Rev. 0

A003
1/1

L3/NRC/cc

cc:

Hugh L. Thompson, Jr., Director
Division of PWR Licensing - A
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Robert D. Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

N. Prasad Kadambi, Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Claude E. Johnson
Senior Resident Inspector/STP
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 910
Bay City, TX 77414

M.D. Schwarz, Jr., Esquire
Baker & Botts
One Shell Plaza
Houston, TX 77002

J.R. Newman, Esquire
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

Director, Office of Inspection
and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

T.V. Shockley/R.L. Range
Central Power & Light Company
P.O. Box 2121
Corpus Christi, TX 78403

H.L. Peterson/G. Pokorny
City of Austin
P.O. Box 1088
Austin, TX 78767

J.B. Poston/A. vonRosenberg
City Public Service Board
P.O. Box 1771
San Antonio, TX 78296

Brian E. Berwick, Esquire
Assistant Attorney General for
the State of Texas
P.O. Box 12548, Capitol Station
Austin, TX 78711

Lanny A. Sinkin
Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

Oreste R. Pirfo, Esquire
Hearing Attorney
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Charles Bechhoefer, Esquire
Chairman, Atomic Safety &
Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. James C. Lamb, III
313 Woodhaven Road
Chapel Hill, NC 27514

Judge Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Ray Goldstein, Esquire
1001 Vaughn Building
807 Brazos
Austin, TX 78701

Citizens for Equitable Utilities, Inc.
c/o Ms. Peggy Buchorn
Route 1, Box 1684
Brazoria, TX 77422

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(3 Copies)

Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
1717 H Street
Washington, DC 20555