

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

November 5, 1998 GO3-98-0215

Docket No. 50-508

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Subject: NUCLEAR PROJECT NO. 3 TERMINATION OF CONSTRUCTION PERMIT SECOND SUBMITTAL OF ADDITIONAL INFORMATION

References:

- 1) Letter GO3-96-110 dated August 8, 1996, JV Parrish (Supply System) to JM Taylor (NRC), "Termination of Construction Permit"
- 2) Letter GO3-98-128 dated June 15, 1998, DW Coleman (Supply System) to NRC, "Submittal of Additional Information"
- Letter GO3-98-107 dated May 8, 1998, CM Butros (Supply System) to B Banks (Grays Harbor Regional Planning), "Satsop Power Plant, Scope of Restoration"

In Reference 1 the Supply System requested termination of Construction Permit No. CPPR-154 for Nuclear Project No. 3 (WNP-3). In Reference 2 the Supply System provided the NRC information regarding the Supply System's plans to renovate the site for reuse as an industrial park by a local government entity. During the NRC's site visit on October 27 and 28, 1998, it was determined that NRC review would benefit from the submittal of additional detailed information regarding the restoration and renovation of the site buildings (Reference 3, attached).

Please be advised that the requested scope of restoration (Reference 3, attached) is subject to change. Although the major elements of this agreement have not been modified, details of the plan are expected to continue changing until the completion of the renovation work. Should you have any questions or desire additional information regarding this matter, please contact Mr. W.A. Kiel at 509-377-4490.

Respectfully, 'oleman

D.W. Coleman (Mail Drop PE20) Manager, Regulatory Affairs

Attachment

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cc: EW Merschoff - NRC RIV GA Pick - NRC RIV C Poslusny - NRR NRC Resident Inspector - 927N

MM Mendonca - NRR JH Wilson - NRR DL Williams - BPA/1399 PD Robinson - Winston & Strawn 400



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 1223 . Elma. Washington 98541-1223 . 1 360) 482-4428

G03-98-0107 May 8, 1998

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MAY 11 1998 GI3-98-0045

Mr. Bill Banks Grays Harbor Regional Planning 2109 Sumner Ave. Suite 202 Aberdeen, WA 98520

Subject: SATSOP POWER PLANT SCOPE OF RESTORATION

Dear Bill:

This letter transmits for your consideration, the planned scope of the restoration and renovations for the Satsop site. These general plans have been jointly established by representatives of the Supply System and the Satsop Redevelopment Project. They lay out the expected conditions for the site's facilities, infrastructure, and general conditions to be established by the Supply System as a condition to the SRP's assumption of ownership of the property. The scope is only generally defined and will be established in more detail as a contract for the work is developed.

As a basis for proceeding, the Supply System is requesting an acceptance of the planned scope for the work. This will be the basis to further establish the terms and conditions for the site's transfer and to conduct the work itself. At this time, we understand that the following clarifications regarding this document apply:

- 1. Individual or group expectations based on interpretations of what is contained in the document may and will require further clarification.
- 2. The requirements as written may be subject to amendments or adjustments based on law or good practices.
- 3. We will be developing a design/bid specification that may recommend an alternate approach to suggested design.

Bill Banks Page 2 May 8, 1998 SCOPE OF RESTORATION

- 4. Operating requirements may change for currently installed equipment or otherwise stored for possible installation, and that only reasonable efforts will be made to establish operability.
- 5. No nuclear grade specifications will be applied to any activities, equipment or improvements; only applicable commercial standards.
- 6. The restoration contractor will be required to establish the design and recommended formal configuration in the most cost effective manner. Those details are unknown at this time.
- 7. Certain items to remain are undetermined or remain to be negotiated (including, e.g., the truck scales) that are not directly related to the installed infrastructure.
- 8. The document spells out the basic joint understanding between the parties on the scope of the restoration and improvements, specific details remain to be determined.

Please indicate your acceptance of the Scope of Restoration document by signing below.

Respectfully,

C. M. Butros (700) WNP-3 Manager

CMB/LS/tn

Enclosure: Satsop Power Plant Site, Scope of Restoration dated May 7, 1998

cc: Tom Osborn, BPA

Concurrence:

Sur

Bill Banks, Executive Director Grays Harbor Regional Planning for the SRP

Date: 5/8/98

SATSOP POWER PLANT SITE SCOPE OF RESTORATION

This document describes the scope of restoration for the Satsop Power Plant site, initially developed for two nuclear power plants, designated WNP-3 and WNP-5. Major features of the site include two reactor buildings, two cooling towers, one essentially complete reactor auxiliary building (WNP-3), one partial reactor auxiliary building (WNP-5), and a common turbine generator building which connects the two reactor auxiliary buildings.

An Invitation for Bid will be issued to solicit bids for site restoration, based upon the scope presented in this document. Final site and system requirements, status and condition of site structures upon completion of work, general requirements for materials used for sealing building openings, and modifications to existing systems and structures are described. For restoration, demolition and system designs, the restoration contractor will retain the services of a Professional Engineer, licensed in the State of Washington. Table 1 lists, and Figure 1 shows the location of, the facilities that are expected to remain at the Satsop site at the completion of restoration.

Restoration Requirements

- (1) Wood or other materials subject to rot or deterioration due to weathering are not to be used to seal building openings and/or for doorways.
- (2) Materials used to permanently seal openings in buildings are to be concrete, concrete block, metal siding, or roofing material consistent with building designs.
- (3) Access openings in buildings must be sealed such that closures are weather tight, forced entry is discouraged and wildlife prevented from entering the buildings. Lockable metal doors are to be used at entrances to buildings.
- (4) Roof openings that are access points for equipment removal are to be sealed with a weather tight removable cover.
- (5) Where exposed by demolition, underground utilities may be abandoned in place after permanently disconnecting the systems and removing all exposed connections. Conduits and pipe are to be capped at these points to allow possible future use. Disconnected wiring in conduits shall be salvaged to the extent practical.
- (6) Designs for wall, floor or structural modifications caused by the removal of equipmen and materials shall not affect the structural integrity of the building and shall not introduce defects or safety hazards and shall be certified by a licensed Professional Engineer.

(7) All systems that are required in the area shall be designed, reinstalled or modified to meet existing federal, state, and local requirements and shall be certified by a licensed Professional Engineer.

Demolition Requirements

- (1) Demolition activities shall leave in place underground foundations, unless otherwise noted. Materials or equipment shall be removed, disassembled, packaged, and sold/recycled/disposed in accordance with federal, state and local regulations.
- (2) Products of demolition used for fill will not be limited by size, provided that voids are not created by their placement.
- (3) Products of demolition not meeting the requirements for on-site landfill will be sold, salvaged, or disposed off site in accordance with federal, state and local regulations.
- (4) Where the restoration contractor desires to remove an interior wall, or part thereof, a structural analysis will be performed by a licensed Professional Engineer. The restoration contractor will make a clean, rectangular opening with no floor obstructions.
- (5) Where the restoration contractor desires to remove a floor, or part thereof, a structural analysis will be performed by a licensed Professional Engineer. The floor must be restored to the original load bearing capacity, with no tripping hazards.

System Requirements

- (1) The final electrical configuration shall be such that at each elevation within a building, a minimum of 800 Amp service is available. 200 Amp service shall be available within each quadrant of the building on all elevations. In addition to 200 Amp service in each quadrant within the turbine building, the north and south ends of the common bay openings shall have 200 Amp service available.
- (2) The fire protection system piping, pumps, extinguishers and hose stations are to be left in a manner that conforms to the applicable Fire Codes. Any modifications to the system shall be designed and certified by a licensed Professional Engineer.
- (3) The building lighting system left at the completion of the contractor's work shall provide illumination levels for access to all areas within the buildings, designed in accordance with Illuminating Engineering Society and WISHA standards. The lighting system is to have local control points to allow the lights to be de-energized in areas not occupied. A master control point for the entire lighting system is to be maintained, such that all lighting circuits can be de-energized from a single location when a particular building or elevation is not occupied.

- (4) The installed communications system (Gai-tronics) will be available during restoration contract work. Upon completion of the contractor's work the system shall remain operable in all buildings, with a speaker and handset available within each quadrant of each building elevation.
- (5) Construction gas, water and air manifolds shall be operable within each building quadrant of Unit 3 reactor auxiliary building (RAB-3), Unit 3 reactor building (RB-3), and the turbine building upon completion of work.
- (6) The Cathodic Protection system, grid and anodes are to remain in operation.
- (7) The existing Potable Water, Sewage Collection and Treatment, Storm Water Drainage, Groundwater Drainage, Sump Pump Drainage, and Security Lighting systems shall remain in operation during restoration and will be operational systems upon completion of the restoration contractor's work.
- (8) Prior to completion of the restoration contractor's work, the operability, material condition and configuration of the equipment, structures and systems used by the contractor shall meet the following criteria:
 - (a) Equipment (such as cranes and hoists) and systems (such as fire protection) must be certified to meet the applicable federal, state and local code requirements.
 - (b) A joint walk-down will be performed by the restoration contractor, Supply System staff and Satsop Redevelopment Project (or their successor representatives) of structures, systems and equipment. A determination of any repairs, upgrades and/or modifications necessary to meet code requirements will be made.

Building and Area Requirements

Unit 5 Reactor Building, Raw Water Supply, and Potable Water Supply

- (1) Remove debris from the reactor building area.
- (2) Design conversion of the Unit 5 reactor building into a raw water storage facility per design criteria to be provided by the Satsop Redevelopment Project.
 - (a) Unit 3 temporary dome is to become tank cover. The restoration contractor will have a licensed Professional Engineer design a transition piece between the dome and the reactor building concrete wall.
 - (b) The deionized water storage tanks, presently located southwest of the turbine building common bay, will be used for potable water storage.
 - (c) Design and construct service points for inspection, water withdrawal and filling, recirculation and maintenance of the facility utilizing existing penetrations. Seal all other wall penetrations in the reactor building.

Unit 5 Reactor Auxiliary Building (RAB-5)

- (1) Remove debris, and clean interior walls and floors.
- (2) Design and construct a demolition and inert debris disposal area in the southwest corner of RAB-5. Design should provide for walls sealing off the corner of the building, and a ground level concrete pad capable of supporting a semi-truck unloading area.
- (3) Design and construct interface between the reactor building tank and the RAB-5 floor at the 390 elevation.
- (4) Design and construct a lighting system to provide illumination levels for access to all building elevations, in accordance with Illuminating Engineering Society and WISHA standards.
- (5) Design and construct completion of the 390 elevation floor. Design and construct modification of the existing 390 elevation drainage system directing drainage to a new passive oil water separator and into the existing storm water drainage system.
- (6) Design and construct enclosed weather tight lockable permanent stair well access points in the northeast and southeast corners of RAB-5. Install permanent stair rails and permanent steps in accordance with federal, state and local standards.
- (7) Install elevator in the southwest corner of RAB-5, in existing elevator shaft location, providing access from the 390 elevation (ground level) to the 362 and 335 elevations. Installation shall meet all federal, state and local regulations, including American National Standards Institute and WISHA standards. The restoration contractor may use an elevator previously purchased by the Supply System, and currently stored in the turbine building. The Supply System makes no warranties that use of previously purchased elevators will meet current standards.
- (8) Remove the cross connection between the RAB-5 sumps and the ground water drainage system. Design and complete the floor drain system to isolate the floor drains from the ground water drainage system. Discharge from the RAB-5 sumps must meet National Pollution Discharge Elimination System Permit standards.

Unit 5 Cooling Tower

- (1) Remove the south stairwell.
- (2) Design and install an interior lighting system for the enclosed north stairwell which meets Illuminating Engineering Society and WISHA standards.

- (3) Design and construct a replacement for the exterior wall covers on the north stairwell tower using cinder block or concrete walls up to the 40 foot elevation to prevent forced entry.
- (4) Install lockable metal doors on the north stairwell and at the entrance into the cooling tower space at the cross walk elevation.
- (5) Inspect the cooling tower for structural integrity per American Concrete Institute standards, including rust staining, cracking patterns, spalling of concrete surface, and effervescence staining. Repair any damage which could compromise structural integrity and provide certification by a licensed Professional Engineer that final conditions meet American Concrete Institute and WISHA standards.
- (6) Remove the vertical concrete riser columns located in the central area of the cooling tower basin. Maintain the concrete wind dampers located on the periphery.
- (7) Permanently seal the exposed tunnel openings in the basin utilizing concrete covers with load bearing capacity equal to or greater than the existing tunnel.
- (8) Tunnel and piping below ground is to remain for routing of services to the Cooling Tower.
- (9) Remove all above grade hazards from the cooling tower basin (rebar and crossbracing structural rods).
- (10) Backfill voids adjacent to the basin wall and fill to eliminate hazards and provide a minimum two foot earthen cover over concrete slabs. Grade area to provide drainage out of the basin to the storm water drainage system.
- (11) Design and install replacement cooling tower obstruction lighting to meet current federal, state and local standards.

Turbine Building

- (1) Provide all external doorways with weather-tight lockable metal doors.
- (2) Disconnect the circulating water pipe at the flange. Design and construct a sheet metal cover capable of bearing foot traffic.
- (3) Install elevator in the northwest elevator enclosure. Installation shall meet all federal, state and local regulations, including American National Standards Institute and WISHA standards. The restoration contractor may use an elevator previously purchased by the Supply System, and currently stored in the turbine building. The Supply System makes no warranties that use of previously purchased elevators will meet current standards.

- (4) The overhead bridge cranes are to remain operational.
- (5) The louvered openings on the north and south sides of the turbine building are to be weather tight. Fixed louvers will remain and movable louvers will be removed.
- (6) A Professional Engineer shall complete design of the conductors for the turbine building high bay lighting and peripheral quartz lighting systems. Installation of additional lighting and associated materials shall be completed to make the systems operational.
- (7) All floors, including those areas covered by grating, shall remain intact, with no degradation of load bearing capacity.
- (8) All large openings, pits and other fall hazards shall be removed or the areas protected with barricades that conform to the applicable WISHA requirements.
- (9) Electrical wiring, cable trays and conduits associated with the Ranney well field shall remain intact. Design and complete reconfiguration of the switchgear needed to supply power to the Ranney well field.
- (10) Electrical wiring, cable trays and conduits associated with the fire protection, Blowdown, and Water Treatment buildings shall remain intact. Design and complete reconfiguration of the switchgear needed to supply power.
- (11) The switchgear, wiring, cable trays and conduits associated with the 230 kV transformers and cable shall remain.
- (12) Design and complete modification of the 230 kV transformer enclosure to provide adequate protection for the 230 kV distribution system.
- (13) Penetrations (e.g., pipe, HVAC,) through the turbine building roof shall be permanently sealed with materials compatible with the existing roofing material and shall be constructed such that they meet the structural loading requirements of the turbine building roof.

Fire Protection Building, Chiller Building, Water Treatment Facility and North Tank Farm

- (1) The diesel and electric jockey pumps shall remain operational; the large electric fire pump shall be removed. Interties to the Fire Protection system may be made at the piping connections for the large electric fire pump. The contractor shall have an Electrical Engineer review revised electrical loading in the building.
- (2) Electrical power from the B21 switchgear will be used to supply power to the fire protection building, the water treatment facility and the north tank farm.

- (3) The vater treatment facility shall remain "as is".
- (4) The north tank farm shall remain "as is".
- (5) The Chiller Building and associated roof mounted heat exchangers shall remain intact.

Unit 3 Reactor Auxiliary Building (RAB-3)

- (1) Install an elevator in the northeast elevator shaft. Installation shall meet all federal, state and local regulations, including American National Standards Institute and WISHA standards. The restoration contractor may use an elevator previously purchased by the Supply System, and currently stored in the turbine building. The Supply System makes no warranties that use of previously purchased elevators will meet current standards.
- (2) To facilitate equipment and material removal, non-load-bearing walls originally installed as radiation protection on the 335 and 362 elevations shall be removed. After walls have been removed, the floor must be flush with surrounding floor areas and no tripping hazards shall remain.
- (3) Seal openings as necessary to prevent weather, animal or forced entry into the building.
- (4) Design and install a permanent seal at the boundary between the RAB and the Unit 3 reactor building roof.
- (5) On the RAB roof, in areas where rainwater would collect if the roof drain becomes clogged, design and install scuppers in the roof parapets as necessary to allow the water to drain off the building.
- (6) Permanent roof penetrations (e.g., crane access hatches, HVAC access points) shall be sealed with removable weather-tight covers.
- (7) On all roof elevations remove all temporary guardrails, catwalks and other temporary safety restraints. Design and install permanent barriers to prevent falls and provide access ladders to allow a minimum of one access point to all elevations of the RAB roof.
- (8) Remove the cross connection between the RAB sumps and the ground water drainage system. Design and reroute the roof drains to the storm water drainage system. Design and complete the floor drain system to isolate the floor drains from the ground water drainage system. Discharge from the RAB sumps must meet National Pollution Discharge Elimination System Permit standards.
- (9) Complete electrical connections to the fuel pool area cranes (150- and 10-ton cranes). Complete testing required by WISHA prior to using the cranes.

(10) Design and construct a ground level opening on the cast side of the fuel handling building accessible by the 150 ton crane. Provide a weather-tight closure for the opening. Establish hatch openings to the 335 elevation accessible by the 150 ton crane.

Unit 3 Reactor Building

- (1) Maintain and operate the polar crane in accordance with WISHA standards. Restoration contractor may use the polar crane for equipment removal.
- (2) Design and construct a permanent weather tight reactor building roof.
- (3) Remove construction materials from the reactor building and the space between the reactor building concrete wall and the reactor building pressure vessel wall.
- (4) Complete the permanent access ladder and platforms to the top of the reactor building, located on the inside of the concrete wall. Complete the external permanent access ladder to the reactor building roof.
- (5) Provide a minimum of 200 Amp electrical power service to the space between the reactor building concrete wall and the reactor building pressure vessel wall.
- (6) Complete construction of the lighting system along the inside of the concrete wall of the reactor building.
- (7) Install an elevator in the elevator shaft. Installation shall meet all federal, state and local regulations, including American National Standards Institute and WISHA standards. The restoration contractor may use an elevator previously purchased by the Supply System, and currently stored in the turbine building. The Supply System makes no warranties that use of previously purchased elevators will meet current standards.

Dry Cooling Tower Area

- (1) Remove all upright concrete structures (walls).
- (2) Fill and permanently seal with concrete all sumps and electrical pits in the base mat.
- (3) Remove the diesel storage tank overflow basins.
- (4) The fire hydrant at the northwest corner of the dry cooling tower area may be removed to facilitate equipment removal and dry cooling tower pad restoration.
- (5) Design and construct a modification to the ary cooling tower pad to eliminate all rebar and other safety hazards and extend the pad to RAB-3.

(6) Maintain access to the foundations of the 150-ton crane supports.

Blowdown Building Area

- (1) Maintain power to Motor Control Center B221 in the blowdown building.
- (2) Maintain a water supply to the makeup water line.
- (3) Design and install permanent safety barriers around the circulating water pump basin in accordance with WISHA standards.

Cooling Tower 3

- (1) Design and construct a replacement for the exterior wall covers on the north and south 40-foot-high stairwell towers using cinder block or concrete walls to prevent forced entry. Install lockable metal doors at ground level and at the entrance to the cross walks.
- (2) Design and install an interior lighting system for the enclosed stairwells which meets Illuminating Engineering Society and WISHA standards.
- (3) Design and install replacement cooling tower obstruction lighting to meet current federal, state and local standards.
- (4) Inspect the cooling tower for structural integrity per American Concrete Institute standards, including rust staining, cracking patterns, spalling of concrete surface, and effervescence staining. Repair any damage which could compromise structural integrity and provide certification by a licensed Professional Engineer that final conditions meet American Concrete Institute and WISHA standards.

Administration Building

- (1) All machinery and tools installed in the machine shop may be used by the restoration contractor. At the completion of the restoration contract, the machinery and tools in the machine shop shall be in good repair, and the shop kept clean and orderly.
- (2) The motor control centers on the second floor are to remain operational.
- (3) Design and construct an access portal between the north and south warehouse areas on the east end of the building to provide direct forklift access into RAB-3 to facilitate equipment removal. The portal shall be at least the same size as the roll up access door to the north warehouse area.
- (4) Seal the large opening at the southeast end of the building with concrete blc : or metal siding.

(5) Design and complete the concrete floor in the southeast warehouse area using 4000# concrete.

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South Tank Farm Area

- (1) Leave the tanks and associated equipment in the south tank farm area.
- (2) Design and construct drainage outlets in the interior and exterior walls such that rainwater will drain into the existing storm water drainage system.

Site Security Fencing and Lighting

- (1) Install a chain link fence between the Plant Island and the central site, as shown on Figure 2.
- (2) Design and construct a modification to the pole lighting system to provide adequate lighting for security purposes.

Emergency Response Facility Foundations

- (1) Remove all rebar and miscellaneous debris and backfill to grade level.
- (2) Re-vegetate the area as directed by the Supply System.

Incinerator Area

- (1) The restoration contractor may use the site incinerator, provided all federal, state, and local air quality regulations are met.
- (2) Upon completion of service, remove incinerator and incinerator area drains, and grade area to blend with surrounding area.

Miscellaneous

- (1) Seal all conduit and pipe ends exposed by concrete pad removals and area grading.
- (2) Fill and seal pits, sumps and hand-holes remaining after facilities removal.
- (3) Remove all unused rebar, slabs, walls, buildings and other items which present a safety hazard, or restrict use of an area.
- (4) Clear all developed property by removing all excess materials as directed by the Supply System.

(5) Remove and dispose of excess material and debris from undeveloped properties as directed by the Supply System.

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(6) Remove the security pass gates (Brass Alley gates), and replace with fencing as directed by the Supply System.

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| Facility Name | Designator |
|--|---|
| Construction Office Building (COB) | 140 |
| Warehouse 1 | 001 |
| Warehouse 2 | 002 |
| Warehouse 3 | 003 |
| | 003 |
| Warehouse 4 Metal Warehouse | 007 |
| Metal Warehouse | 008 |
| | 009 |
| Metal Warehouse | 047 |
| Fishbach & Moore Electrical Fabrication Shop | and a state of the second state |
| Fishbach & Moore Warehouse | 034 |
| Fishbach & Moore Office Building | 158 |
| Vehicle Maintenance Shop | 063 |
| Raw Water Tank | 163 |
| Potable Water Forwarding Pump House | 161 |
| Forwarding Pump House | 162 |
| Chemical Treatment Building (Storm Water) | 169 |
| Sewage Treatment Plant and Septic Tanks | 160 |
| Sewage Drainfields | 200 |
| Cooling Tower 3 | CT-3 |
| Blowdown Building and Tanks | 203 |
| Site Access Building | 131 |
| Change Shack | 049 |
| Change Shack | 050 |
| PKS Mech Warehouse/Office | 036 |
| PKS Warehouse/Office | 109 |
| Cooling Tower 5 | CT-5 |
| Reactor Auxiliary Building 5 | RAB-5 |
| Reactor Building 5 | RB-5 |
| Turbine Building (both WNP-3 and WNP-5) | TB |
| Reactor Auxiliary Building 3 | RAB-3 |
| Reactor Building 3 | RB-3 |
| South Tank Farm | STF |
| Yorth Tank Farm | NTF |
| Administration Building | ADM |
| Fire Protection Building and Tanks | 201 |
| Water Treatment Building | 202 |
| Chiller Building | 212 |
| Warehouse, Cooley | 015 |
| Warehouse, Cooley | 016 |
| Varehouse, Cooley | 017 |
| Varehouse, Cooley | 018 |
| Warehouse, Cooley | 019 |
| Varehouse, Cooley | 019 |
| Varehouse, Cooley | L072-041 |
| A A DAME AND A DA | 173 |
| Cooley Water Tank | a new property and with the second of the second |
| Cooley Pump House | 174 |
| Security Gate House | 204 |
| Truck Scales | 205 |

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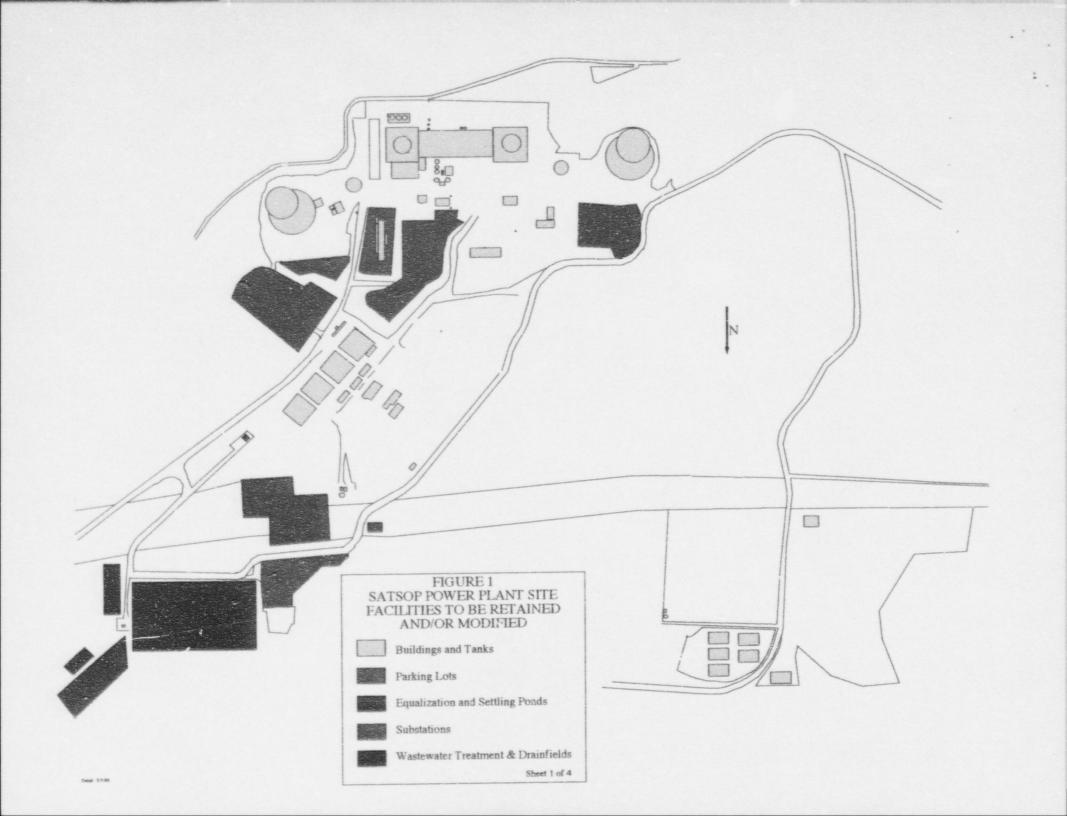
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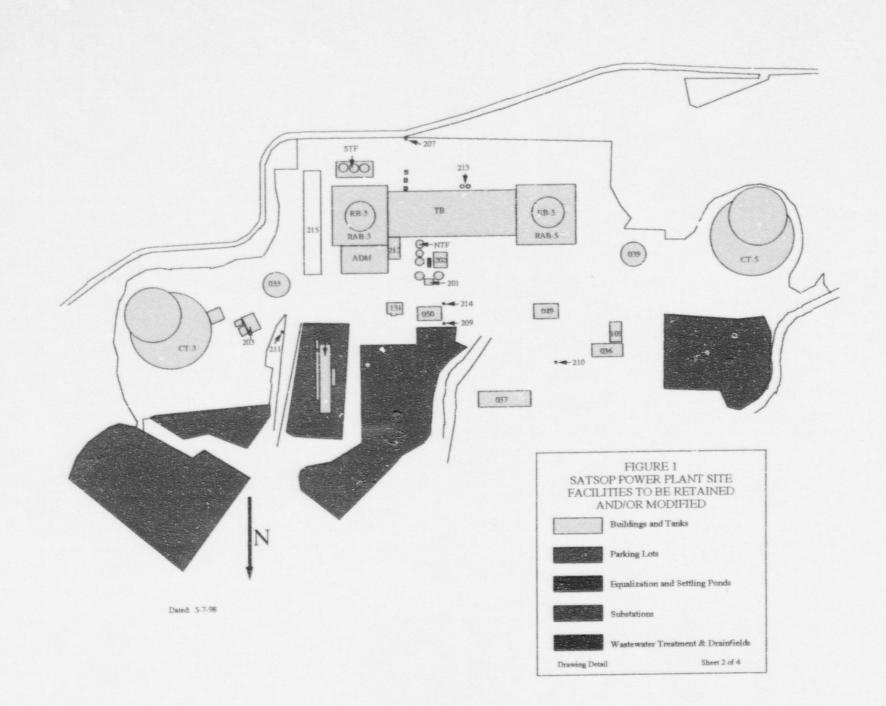
| TABLE 1 FACILITIES TO BE RETAINED AND/OR MODIFIED | |
|--|------------|
| FACILITIES TO BE RETAIL | Designator |
| Lift Station 2 | 207 |
| Lift Station 3 | 203 |
| Lift Station 4 | 209 |
| Lift Station 5 | 210 |
| Lift Station I | 211 |
| Unit 3 Dome Warehouse | 33 |
| Unit 5 Dome Warehouse | 39 |
| Deionized Water Storage Tanks | 213 |
| CB&I Warehouse | 037 |
| Lift Station G | 214 |
| Dry Cooling Tower Foundation | 215 |

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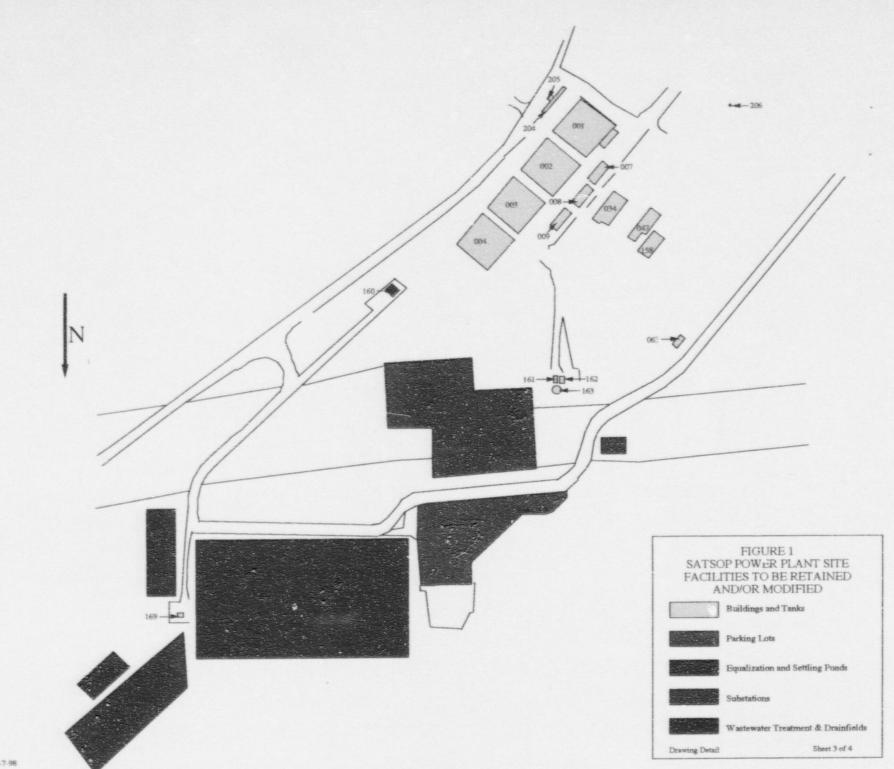
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Dated: 5-7-98

