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Attorney for the Petitioners
Douglas H. Bosco, Wesley Chesbro,
Daniel E. Hauser, Barry Keene,
the Redwood Alliance, Ralph Kraus
and Nona Kraus

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In The Matter Of)
Pacific Gas And Electric)
Company (Humboldt Bay)
Power Plant, Unit No. 3)

Docket No. 50-133 OLA

AMENDED PETITION TO INTERVENE
IN LICENSE AMENDMENT PROCEEDINGS,
REQUEST FOR HEARING, AND
REQUEST FOR FURTHER RELIEF

Pursuant to the Commission's Rules of Practice,
10 CFR 2.206(a) and 2.714, and the Commission's Notice of
Proposed Issuance of Amendment to Facility Operating Lic-
ense (51 Fed. Reg. 24458, July 5, 1986), petitioners, whose
identities and interests are set forth below, seek leave to
intervene, request a hearing with respect to the proposed
issuance of an amendment to the subject facility operating
license sought by the licensee's Application and Environ-
mental Report dated July 30, 1984, as revised February 28,
March 20, April 3, July 11 and 30, October 7, and December

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13, 1985, and March 13 and 14, May 14, 16 and 23, and June 12, 1985. Two letters each were dated May 16 and May 23, 1986. In support thereof, petitioners allege:

1. The name and address of the person on whom service may be made is as follows:

Scott L. Fielder
Attorney at Law
517 Third Street, Suite 14
Eureka, California 95501
Telephone: (707) 444-3031

Such person is an attorney appearing in a representative capacity on behalf of petitioners and is admitted to practice before the Supreme Court and all other courts of the State of California.

2. The Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. DPR-7, issued to Pacific Gas and Electric Company (the licensee) for the Humboldt Bay Power Plant, Unit No. 3 (the facility), located in Humboldt County, California. The amendment would accomplish the following:

(a) Deletion of license conditions related to seismic investigation, analysis, and modifications that would have to be accomplished prior to a return to power operation;

(b) Approval of the licensee's Decommissioning Plan, which involves 30 years of on-site storage of residual radioactivity followed by its removal (SAFSTOR), and the retaining of spent fuel on-site until a Federal repository is available for the spent fuel disposal. An Environ-

mental Report submitted with the Decommissioning Plan analyzes some of the environmental impacts of the SAFSTOR option and some of the potential accidents at the facility;

(c) Revision of the technical specifications to reflect the permanent shutdown and possess-but-not-operate status of the facility. Certain requirements would be deleted while others would be revised;

(d) Extension of License No. DPR-7 for 15 additional years from November 9, 2000 to November 9, 2015, to be consistent with the licensee's Decommissioning Plan.

3. Intervenor's Interest:

(a) Petitioner Redwood Alliance (Alliance) is an unincorporated organization with its principal office in the City of Arcata, California. Said organization has a membership of 1,500 persons, who are residents of the Eureka-Arcata area of Humboldt County and live within close proximity to the subject facility. The Alliance has been concerned about the Humboldt facility since the 1970's. It has participated in hearings before the NRC regarding the Environmental Report by the licensee in 1984, assisted intervenors Wesley Chesbro and Frederick Cranston in the successful effort to curtail further operation of the Humboldt facility based on the facility's close proximity to known earthquake faults, and intervened on behalf of residential ratepayers of California before the Public Utilities Commission regarding monies spent retrofitting the plant and the cost of decommissioning the Humboldt Nuclear facility.

The Alliance is concerned about the DES proposal that would authorize the SAFSTOR of the nuclear portion of the plant for 30 years, and the possible health and environmental impacts of this action on Alliance members. As a result of the Redwood Alliance's extensive experience with issues involving the subject facility, the Redwood Alliance believes it is uniquely qualified to act as a participant intervenor in the instant license amendment proceedings.

Petitioner Redwood Alliance has standing to participate in these proceedings, because Mr. Ralph Kraus and Mrs. Nona Kraus, who are members of the Redwood Alliance, both reside in close proximity to the plant at 2479 Wrigley Road, Eureka, California 95501.

The Kraus' residence is within five (5) miles of the Humboldt Nuclear facility. The Kraus' have each expressly authorized the Redwood Alliance to represent their interests in the present proceedings (see declarations attached). The Kraus', and the other members of the Redwood Alliance, have a strong interest in the outcome of these proceedings. The Kraus' and the members of the Redwood Alliance contend that the extension of PGandE's license for another 15 years could cause them physical or psychological injury, because the extension of the license would result in the continued long term storage of spent fuel and other radioactive material in an area of unusually high seismic activity. The Kraus' and the other members of the Redwood Alliance also contend that the termination of the seismic

monitoring and analysis program that PGandE is presently required to maintain could cause them physical and psychological injury-in-fact.

The Kraus' and the members of the Redwood Alliance contend that their rights to physical and mental health and safety can only be preserved by the continuance of a seismic monitoring and analysis program, and by the removal of all radioactive materials from the site at the earliest possible time.

(b) Petitioner Wesley Chesbro resides with his wife in Arcata, California less than 15 miles from the facility. He is, and since January, 1981 has been, a duly elected member of the Humboldt County Board of Supervisors, the duly constituted legislative government of that county under the laws of California. Supervisor Chesbro's Supervisorial District includes the incorporated territory and the voters and taxpayers of the City of Arcata. From 1974 until 1980 he served as an elected member of the Arcata City Council, the duly elected legislative government of that city under the laws of the State of California. In 1975, while Mr. Chesbro was a member of the Arcata City Council, as part of its general land use planning responsibility, the Arcata City Council received a report by Envicom Associates respecting the Seismic Safety Element of the city's proposed General Plan. That report contained detailed data on the capability of major earthquake faults in the region. This data indicated that the Humboldt

Nuclear facility was subject to seismic forces greater than those for which it was designed. On May 11, 1976, the Arcata City Council, with Mr. Chesbro voting in favor, approved a motion expressing its concern over the risks to public health and safety posed by the facility, and on April 26, 1976, the Council at Mr. Chesbro's urging, wrote to the Commission expressing its particular concern over seismic and geologic hazards revealed in the Envicom and Collins reports. Also in 1976, Wesley Chesbro, along with six other individuals and organizations petitioned the NRC for leave to participate as an Intervenor on the question of the seismic safety of the Humboldt Nuclear facility. Said petition for intervention was granted.

On April 8, 1980, a ballot measure, known as the Safe Energy Initiative, co-sponsored by Mr. Chesbro was adopted by the voters of Arcata. The measure which was approved by a margin of 60.3% in favor with a vote of 34.9% voting against called for the permanent closure of the Humboldt Nuclear facility, among other things. On April 16, 1980, in response to the passage of the Safe Energy Initiative the Arcata City Council unanimously approved Resolution No. 790-60 which resolved "that it is the official policy of the City of Arcata that reopening of the Humboldt Bay Nuclear Power Plant would be a hazard to the health and safety of Arcata residents", and further resolved that "Councilman Wesley Chesbro is designated as the official representative of the City of Arcata in proceedings before

the NRC on the issue of reopening the Humboldt Bay Nuclear Power Plant". On June 2, 1980, Mr. Chesbro appeared and presented testimony before a panel of the NRC at a hearing in Eureka as an Intervenor and as a designated representative of the City of Arcata. Between 1976 and 1983 Mr. Chesbro was represented as an intervenor before the NRC by Counsel in various petitions and responses. On December 4, 1984, in Eureka, Supervisor Chesbro testified before an NRC hearing panel scoping session on the Environmental review of the Humboldt Nuclear facility decommissioning. In early 1986, the Humboldt County Board of Supervisors voted unanimously to request that the NRC conduct a public hearing in Eureka to allow public input on the Draft EIS on the decommissioning plan for the Humboldt Nuclear facility. Petitioner appears here in his capacity as an individual elected official, representing Humboldt County's Third Supervisorial District including the City of Arcata, and not as a designated representative of the City Council or the Board of Supervisors and asserts a long record of concern for public health and safety reflected in his previous action, previous actions of the City Council and of the voters of the City of Arcata, and past votes of the Humboldt County Board of Supervisors. Based on petitioner's unique experience with and knowledge of the facility at issue, petitioner is uniquely qualified to participate as an intervenor in the instant license amendment proceeding.

Petitioner Chesbro has standing to participate in these proceedings, because he and his family lives within 15 miles of the facility and he maintains an office less than 10 miles from the facility. Due to the close proximity of petitioner, his family and his constituents to the facility, petitioner Chesbro is concerned that his, his family's and his constituents' physical and psychological health may be injured by the long term storage of spent fuel and other radioactive materials at the site due to the design of the facility, local weather patterns and the unusually high levels of seismic activity in the area. Petitioner Chesbro is also concerned that his, his family's and his constituents' physical and psychological health may be injured by the termination of the seismic monitoring and analysis program at the facility.

Petitioner Chesbro contends that his, his family's and his constituents' rights to physical and mental health and safety can only be preserved by the continuance of a seismic monitoring and analysis program, and by the removal of all radioactive materials from the facility at the earliest possible time.

(c) Petitioner Douglas H. Bosco is a Member of the United States Congress. He represents California's First Congressional District. Before his election to the Congress in 1982, petitioner served four years in the California Legislature. He was chairman of the Assembly Select Committee on Utility Performance, Rates and Regula-

tion and a member of the Assembly Energy and Natural Resources Committee. Petitioner has long been active in state and federal utility issues and has been an intervenor in a number of utility rate cases before the California Public Utilities Commission. Petitioner is well acquainted with the specific history of the facility at issue. Because of the long-standing community concerns with the Humboldt Bay Nuclear Power Plant and the possible precedent-setting nature of the Commission's decision, petitioner believes there is a need for broader public involvement in review of the decommissioning proposal and the Commission's Environmental Impact Statement. Based on petitioner's unique experience with and knowledge of the facility at issue, petitioner is uniquely qualified to participate as an intervenor in the instant license amendment proceeding.

Petitioner Bosco has standing to participate in these proceedings, because he maintains an office less than 10 miles from the facility. Due to the close proximity of petitioner, and his constituents to the facility, petitioner Bosco is concerned that his and his constituents' physical and psychological health may be injured by the long term storage of spent fuel and other radioactive materials at the site due to the design of the facility, local weather patterns and the unusually high levels of seismic activity in the area. Petitioner Bosco is also concerned that his and his constituents' physical and psychological health may be injured by the termination of the seismic monitoring

and analysis program at the facility.

Petitioner Bosco contends that his and his constituents' rights to physical and mental health and safety can only be preserved by the continuance of a seismic monitoring and analysis program, and by the removal of all radioactive materials from the facility at the earliest possible time.

(d) Petitioner Barry Keene is a member of the California Legislature. He represents California's Second Senate District, serving 600,000 residents of Del Norte, Humboldt, Mendocino, Sonoma and Solano Counties. Before his election to the Senate in 1978, petitioner served six years in the California Assembly. He co-authored the 1976 California Nuclear Safeguard Laws which provided for safe transportation, storage, and siting of nuclear materials and power plants in California and which required a demonstrated permanent nuclear waste disposal site in the United States prior to siting any new power plants in California. Petitioner played a lead role in urging the United States Navy to favor the land disposal of decommissioned nuclear submarines over sea bed disposal. Petitioner authored Senate Bill 444 of 1983 which required the California Department of Health Services to conduct a survey of edible fish products caught in the vicinity of the Farallon Islands radioactive waste disposal site. Petitioner presented testimony before the Nuclear Regulatory Commission at the public scoping session for the Draft Environmental

Statement for the decommissioning of the Humboldt Bay Nuclear Power Plant, Unit No. 3. He specifically requested full scale environmental analysis of decommissioning alternatives, with special emphasis placed on seismic factors, leakage, worker exposure, and the adjacent marine environment. Because of community concern and uncertainty regarding the decommissioning of Humboldt Bay Nuclear Power Plant the petitioner requested an extension of the public comment period and requested a public hearing be held in the local area in a letter to Herbert Berkow, Standardization and Special Projects Directorate, Nuclear Regulatory Commission on May 22, 1986. Petitioner was denied his request for a public hearing and wrote to the NRC again requesting a public hearing, citing the President's Council on Environmental Quality guidelines that a public hearing be held under specified circumstances, 40 CFR 15606.6(c), on July 28, 1986. Because of his long standing concern for the health and safety of the local community and the precedent-setting nature of the Nuclear Regulatory Commission's decision, petitioner believes there is a need for broader public involvement in the review of the decommissioning proposal and the Nuclear Regulatory Commission's Environmental Statement. Based on petitioner's unique experience with and knowledge of the facility at issue, petitioner is uniquely qualified to participate as an intervenor in the instant license amendment proceeding.

Petitioner Keene has standing to participate in these proceedings, because he maintains an office less than 10 miles from the facility. Due to the close proximity of petitioner and his constituents to the facility, petitioner Keene is concerned that his and his constituents' physical and psychological health may be injured by the long term storage of spent fuel and other radioactive materials at the site due to the design of the facility, the local weather patterns and the unusually high levels of seismic activity in the area. Petitioner Keene is also concerned that his and his constituents' physical and psychological health may be injured by the termination of the seismic monitoring and analysis program at the facility.

Petitioner Keene contends that his and his constituents' rights to physical and mental health and safety can only be preserved by the continuance of a seismic monitoring and analysis program, and by the removal of all radioactive materials from the facility at the earliest possible time.

(e) Petitioner Daniel E. Hauser resides with his wife and two children in Arcata, California, less than 15 miles from the facility. He is, and since 1982 has been, a duly elected member of the California State Assembly, a duly constituted legislative body of the government of the State of California. Prior to that, Mr. Hauser served on the Arcata City Council from 1974 for 1982 and was Mayor of Arcata from 1978 to 1982. In his capacity as the Assembly representative of the people of the Second Assembly

District, Assemblyman Hauser has authored Assembly Joint Resolution 36, which urges the Department of Energy to accept the spent fuel and other high-level nuclear waste currently stored and proposed for storage at the Humboldt Bay Nuclear Power Plant at sites designated for storage under its administration. Assemblyman Hauser has additionally submitted letters and testimony to the Nuclear Regulatory Commission on a number of occasions, including December 4, 1984, June 10, 1986 and July 14, 1986, regarding his concerns on the decommissioning plans for the Humboldt Bay Nuclear Power Plant, the safety of storing spent fuel rods on seismically active ground, and questions regarding the security of storing radioactive material on-site for 30 years. Petitioner appears here both in his individual capacity and as the representative for the people of the Second Assembly District in the California State Assembly. Based on petitioner's unique experience with and knowledge of the facility at issue, petitioner is uniquely qualified to participate as an intervenor in the instant license amendment proceeding.

Petitioner Hauser has standing to participate in these proceedings, because he and his family live within 15 miles of the facility and he maintains an office less than 10 miles from the facility. Due to the close proximity of petitioner, his family and his constituents to the facility, petitioner Hauser is concerned that his, his family's and his constituents' physical and psychological

health may be injured by the long term storage of spent fuel and other radioactive materials at the site due to the design of the facility, the local weather patterns and the unusually high levels of seismic activity in the area. Petitioner Hauser is also concerned that his, his family's and his constituents' physical and psychological health may be injured by the termination of the seismic monitoring and analysis program at the facility.

Petitioner Hauser contends that his, his family's and his constituents' rights to physical and mental health and safety can only be preserved by the continuance of a seismic monitoring and analysis program, and by the removal of all radioactive materials from the facility at the earliest possible time.

4. Petitioners' Facts and Contentions:

(a) The licensee has applied for permission to put the facility in SAFSTOR condition for 30 years followed by dismantlement. The nuclear portion of the Humboldt plant was shut down in 1976 for refueling and never reopened due to serious concerns about seismic safety of the the plant, changes in NRC regulations, and the economic costs and efficiencies of retrofitting the plant to resolve the above mentioned problems.

(b) The NRC released a Draft Environmental Statement (DES) for decommissioning Humboldt Bay Nuclear Power Plant, Unit No. 3 in April of 1986. Upon request by the Alliance and the Sierra Club, the public comment period

was extended from June 16 to August 15, 1986 as evidenced by a letter from Herbert N. Berkow of the NRC and dated June 12, 1986. A subsequent request for a public hearing on the DES by the Alliance, the Humboldt County Board of Supervisors, State Senator Barry Keene, Assemblyman Dan Hauser, Representative Doug Bosco, Senator Alan Cranston, and other interested persons was denied by the NRC dated July 18, 1986. However, the NRC stated that a Notice of Opportunity for Hearing, which it said would be published in the Federal Register, would subsequently give interested persons the opportunity to intervene and request a hearing.

(c) The petitioners have numerous concerns about the adequacy of the Draft Environmental Statement (DES) relative to the decommissioning of Humboldt Bay Power Plant, Unit No. 3 and the proposal to place the facility into SAFSTOR for an extended period. Petitioners' concerns and contentions are:

1. There is little discussion or analysis of the impact on the local environment and biota of the proposed activities. Humboldt Bay is the largest wetland and estuarine habitat in the California coastal zone, containing approximately 23 percent of the coastal wetlands in California. The DES does not document the potential significant environmental impacts on these coastal wetlands of long term storage of nuclear materials as is required by the National Environmental

Policy Act (NEPA) and the California Coastal Act.

2. There is inadequate discussion and analysis of the storage of spent fuel rods in a spent fuel pool which is already plagued by leakage. The leakage of the pool has persisted since 1966 and continues to this day. The DES states that, "Pumps keep water level in the liner gap lower than the water level in the pool and ground water level...the water from the liner gap is pumped to the radwaste system." However, such mechanical means of controlling the leak are subject to malfunction and potential impacts of increased contamination have not been discussed. In addition, there is some information in the ER to indicate that there are elevated and trace levels of certain radionuclides in surface soils at the plant site.

3. There is inadequate treatment of the seismic hazards to the site. The DES contains virtually no analysis of relevant seismic factors and only cursory consideration of those hazards' interactions with hazardous materials stored on site. This is unacceptable given the fact that: a) the Little Salmon Fault, Bay Entrance Fault, and Buhne Point Fault are located within $2\frac{1}{2}$ miles of the facility (the subsurface trace of the Buhne Fault comes within 600 feet of the plant foundation);

b) these faults are capable of generating major earthquakes (with magnitudes up to 7.5) that possibly could destroy the Humboldt facility; and
c) the close proximity of the plant to the city of Eureka could contribute to the severity of any emergency in the event of a large earthquake.

4. There is no discussion of evacuation plans to be implemented in the event of a major accident. For instance, a 1980 earthquake toppled a freeway overpass less than two miles from the plant, despite the epicenter's location being nearly 40 miles away. If a similar earthquake occurred on the adjacent faults, Highway 101 would probably be closed which would hamper emergency support activities and evacuation plans.

5. Viable alternatives such a shipping spent fuel to locations other than Diablo Canyon were not discussed. Petitioners contend that it may be possible to build an interim facility in a safer and more appropriate place until a permanent repository is constructed. Spent fuel could also be shipped to Hanford, Washington or Idaho Falls, Idaho, as was the case with the Three Mile Island plant. In addition, the petitioners contend that the proposal that SAFSTOR continue for thirty years is inappropriate in view of the real possibility that a permanent repository will be

in place by the year 1998. Petitioners submit that the license should be continued only until such time as the federal high level waste repository is available. Under the petitioners' alternate proposal, dismantlement would take place as soon as a high level waste repository is available. An early dismantlement proposal is consistent with PGandE's present proposal for decommissioning of the Diablo Canyon facility.

6. The DES fails to address the impact of a major flood, tsunami, or fire at the plant alone, or in conjunction with a major earthquake. As was mentioned in the petition to intervene, the DES failed to discuss the possible impacts of any of these phenomena on the people of Humboldt County or the surrounding environment. This oversight is significant given the fact that a tsunami previously destroyed a portion of Crescent City in 1964. Crescent City is 80 miles north of the facility. A 50 or 100 year flood coupled with high tides could possibly inundate the Humboldt plant, destroy fuel storage tanks, and cause unknown damage to the containment structures, and associated buildings and equipment. A serious fire could cause similar damage, particularly if caused by an earthquake.

7. The DES fails to address the impact on the fuel rods stored in the spent fuel pond, if the storage pool were to be emptied of water by a major earthquake and/or damaged by falling debris. During an earthquake, groundwater levels around the plant could fluctuate wildly and thereby allow the leakage from the fuel pond to be transported out into the bay by fluctuations in the water table. In addition, the DES fails to address the possible environmental impacts which could occur if one or both of the natural gas fired units were damaged by an earthquake.

8. Irrespective of whether the license is modified to allow for decommissioning under PGandE's 30 year plan, or is modified to only extend until the federal high level waste repository becomes available, petitioners contend that the license conditions requiring seismic investigation and analysis should not be deleted. The Humboldt facility is sited in an area of great and ever-changing seismic activity. Petitioners contend that the discontinuance of the utilities seismic investigation and analysis program would have a detrimental impact on the health and safety of themselves and residents of Humboldt County.

Finally, the petitioners had originally requested a public hearing on the DES which was denied by the NRC, and were forced to seek intervention in the present proceeding. The petitioners submit that unless a hearing is granted in this matter, the public will not have an opportunity to review the Final Environmental Statement Report (FES) or the Safety Evaluation Report (SER) before the license modification is approved. Thus, the inadequacies of the DES may still be present in the FES or the SER and the public will be prevented from meaningful participation in this important process.

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WHEREFORE, petitioners respectfully request:

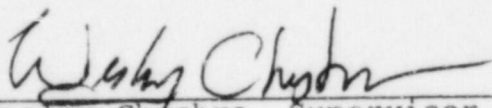
(a) That the Commission issue its order granting them leave to intervene in the within proceeding respecting each of the matters set forth above;

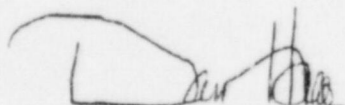
(b) That the Commission hold a hearing in the Eureka area to allow the intervenors to participate in the license modification process;

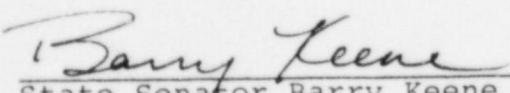
(c) That the Commission award attorneys' fees, costs and expenses to petitioners; and

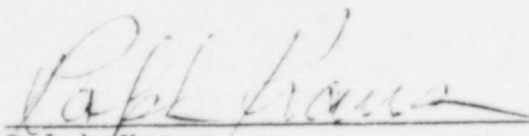
(d) That the Commission grant such further relief to petitioners as may appear appropriate in these proceedings.


Dated: September 26, 1986

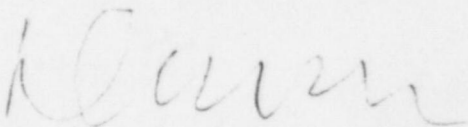

Wesley Chesbro, Supervisor
Third District

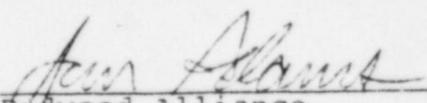

Dan Hauser, Assemblyman
Second District

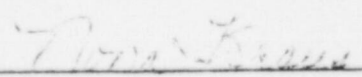

State Senator Barry Keene
Second Senate District


Ralph Kraus


Scott L. Fielder
Attorney for Petitioners


Representative Doug Bosco
First California Congressional
District


Redwood Alliance
By Jim Adams, Litigation
Coordinator


Nona Kraus

DECLARATION OF RALPH KRAUS

I, RALPH KRAUS, declare as follows:

I am a resident of Eureka, California and my address is 2479 Wrigley Road;

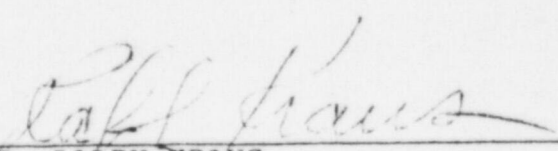
I live within close proximity to the closed Humboldt Bay Nuclear Power plant in that I am within five (5) miles of the plant;

I have a personal interest in the outcome of the afore referenced license amendment hearing in that I may be injured physically or psychologically by any radiation leaks or accidents that occur as a result of the retention of high and low level radioactive materials at the site beyond the present authorized date of November 9, 2000;

My physical and psychological health may also be injured by the termination of the seismic investigation and analysis requirement of the license;

I am a member of the Redwood Alliance and I have expressly authorized the Redwood Alliance to represent my interests in the present proceeding.

I declare that the foregoing is true and correct and that this declaration was signed on Sept. 26, 1986, at Eureka, California.


MR. RALPH KRAUS

DECLARATION OF NONA KRAUS

I, NONA KRAUS , declare as follows:

I am a resident of Eureka, California and my address is 2479 Wrigley Road;

I live within close proximity to the closed Humboldt Bay Nuclear Power plant in that I am within five (5) miles of the plant;

I have a personal interest in the outcome of the afore referenced license amendment hearing in that I may be injured physically or psychologically by any radiation leaks or accidents that occur as a result of the retention of high and low level radioactive materials at the site beyond the present authorized date of November 9, 2000;

My physical and psychological health may also be injured by the termination of the seismic investigation and analysis requirement of the license;

I am a member of the Redwood Alliance and I have expressly authorized the Redwood Alliance to represent my interests in the present proceeding.

I declare that the foregoing is true and correct and that this declaration was signed on September 26, 1986, at Eureka, California.



MRS. NONA KRAUS

PROOF OF SERVICE

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USNRC

'86 SEP 29 P2:33

I am a resident of the County of Humboldt; I am over the age of eighteen years and not a party to the within action; my business address is 517 - 3rd Street, Suite 14, Eureka, California, 95501.

OFFICE OF THE CLERK
DOCKETING BRANCH

On September 26, 1986, I served the within

AMENDED PETITION TO INTERVENE

on the interested parties in said action

(XX) By placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Eureka, California, addressed as listed below.

() By personally delivering a true copy thereof to the persons listed below.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Eureka, California, on September 26, 1986.

Melody Merrill
MELODY MERRILL

SEE ATTACHMENT

ATTACHMENT

United States Nuclear Regulatory Commission
Public Document Room
1717 "H" Street NW
Washington, D.C. 20555

Executive Legal Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

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Mitzi Young, Esq.
Office of the Executive Legal Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Secretary
United States Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Service Section

Robert M. Lazo, Esq.
Chairman
Atomic Safety and Licensing Board Panel
United States Nuclear Regulatory Commission
Washington, D.C. 20555

ATTACHMENT (con't)

Dr. James H. Carpenter, Member
Atomic Safety and Licensing Board Panel
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris, Member
Atomic Safety and Licensing Board Panel
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Ralph and Nona Kraus
2479 Wrigley Road
Eureka, California 95501

Honorable Dan Hauser
Assemblyman, 2nd District
1334 Fifth Street
Eureka, California 95501

Honorable Barry Keene
Second Senate District
533 "G" Street
Eureka, California 95501

Honorable Doug Bosco
U.S. Congressman
517 Seventh Street
Eureka, California 95501

Honorable Wesley Chesbro
Supervisor, Third District
Post Office Box 4661
Arcata, California 95521

Redwood Alliance
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Arcata, California 95521