

FILED: May 19, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

PUGET SOUND POWER & LIGHT CO., )  
et al. )

(Skagit/Hanford Nuclear )  
Project, Units 1 and 2) )  
\_\_\_\_\_ )

Docket Nos.  
STN 50-522, 50-523

SCHEDULING OF FURTHER PROCEEDINGS IN LIGHT OF NEED FOR POWER  
UNCERTAINTIES: JOINT COMMENTS AND RECOMMENDATIONS OF THE NATURAL  
RESOURCES DEFENSE COUNCIL AND THE NATIONAL WILDLIFE FEDERATION

INTRODUCTION

In a letter dated April 26, 1982,\* Applicants proposed deferral of evidentiary hearings on environmental issues in this proceeding until the spring of 1983, citing "still evolving uncertainties" on need-for-power issues. However, Applicants "urge[d] that, during the interim, other licensing activities proceed" on the present expedited schedule -- including "issuance by the NRC staff and the [Washington Energy Facility Site Evaluation] Council of the [Final Environmental Statement]" and "issuance by the NRC staff of the final supplement to the [Safety Evaluation Report]." (App. Letter at 4)

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\*Letter from F. Theodore Thomsen, Attorney for Applicants, to Judge John F. Wolf, Atomic Safety and Licensing Board, and Nicholas D. Lewis, Chairman, Washington Energy Facility Site Evaluation Council (April 26, 1982) (hereinafter cited as "App. Letter").

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At the Licensing Board's May 5, 1982 special prehearing conference, Applicants reiterated these recommendations. The intervenors did not oppose deferral of evidentiary hearings, but objected strongly to the proposal that other licensing activities should proceed on schedule in the interim. The Board took the entire matter under advisement, and requested that the parties submit their views in writing by May 19, 1982. The Board expressed particular interest in the implications of the need-for-power "uncertainties" cited by Applicants for scheduling of other matters in this proceeding. This statement presents the views of the Natural Resources Defense Council and the National Wildlife Federation (hereafter "NRDC/NWF"); both organizations were granted intervenor status at the special prehearing conference.

I. THE DISCLOSURES IN APPLICANTS' LETTER OF APRIL 26, 1982, AND CONTEMPORANEOUS DEVELOPMENTS, ELIMINATE ANY NEED-FOR-POWER JUSTIFICATION FOR THE EXPEDITED SCHEDULE THAT APPLICANTS CONTINUE TO ADVOCATE

When Applicants originally sought "an expeditious review" of their request for construction permits, "several reasons were noted with need for power in the Northwest being the foremost."\* This request produced an "extremely short

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\*Memorandum of Michael W. Mallory, Division of Licensing, "Skagit/Hanford CP Application Review Schedule Meeting -- November 18, 1981" (December 14, 1981).

schedule" that "called for DES issuance in April and FES in late July" and provided that "the normal courtesies afforded to late comments to the FES would be abbreviated ...."\*

Applicants seek in their letter of April 26, 1982 to preserve this environmental review schedule, and also to secure "issuance by the NRC staff of the final supplement to the SER," notwithstanding Applicants' additional recommendation that hearings on environmental issues be delayed for at least ten months. (App. Letter at 3, 4) The sole justification offered for this recommendation is that "[i]t is important that these and similar steps be accomplished during the interim so as to preserve Applicants' ability promptly to license the Skagit/Hanford units when the need-for-power uncertainties are resolved." (Id. at 4)

But the disclosures in Applicants' letter, and contemporaneous developments, make clear that the rationale governing the initial scheduling of these proceedings has been exploded. In presenting support for that contention below, it is not our intention to seek final resolution of the need-for-power issues raised by this proceeding. Rather, the following considerations are advanced to assist the Licensing Board in weighing the advantages of revising a schedule that -- as

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\*"Skagit/Hanford CP Application Site Move Review Schedule Meeting -- January 7, 1982," at p. 1 (February 16, 1982).

sections II and III below will argue -- is fatally flawed on both legal and policy grounds. For the reasons that follow, adherence to the original schedule clearly is unnecessary from the standpoint of regional energy needs.

(1) Deferral of WPPSS Units 1, 4, and 5: Northwest utilities have halted construction of three partially completed nuclear units, with a total capacity in excess of 3700 Megawatts. Two of those plants (WPPSS Units 1 and 4) occupy sites within a few miles of that proposed for the Skagit/Hanford Nuclear Project. These "mothballed" facilities, which are 15%, 25%, and 60% complete, respectively, offer perhaps the most eloquent refutation of Applicants' contention that the NRC must preserve the option promptly to license the Skagit/Hanford facility.

(2) The Washington State Forecast: According to Applicants, the March 1982 forecast commissioned by the Washington State Legislature "suggests that the Skagit/Hanford units will not be needed until after the turn of the century." (App. Letter at 2; emphasis supplied) The forecast's conclusions are not, in fact, framed as "suggestions": the report unequivocally states that "the need for new baseload generation\* is delayed ... beyond the end of the century" under

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\*The phrase "new baseload generation" encompasses WPPSS Units 4 and 5 (2490 MW) and Creston Units 1, 2, 3, and 4 (2000 MW), as well as the Skagit/Hanford Units. Id. at 86.

"most likely" demand growth conditions coupled with "moderate levels of conservation savings together with moderate levels of renewable resource development plus more use of combustion turbines and/or imports." Washington Energy Research Center, Washington State University/University of Washington, Final Report to the State Legislature 4 (March 1982). A subsequent addendum reduced forecasted power needs still further, "indicat[ing] that more emphasis should be given" to the report's initial recommendation, "which call[s] for reducing plans for new power plants." Walter R. Butcher, Deputy Project Director, "Independent Review of WNP-4 and WNP-5: Adjustment to Load Forecasts and the Need for Power" (undated: copy attached as Exhibit 1). These official, state-sponsored findings and recommendations clearly must take precedence, from the NRC's standpoint, over forecasts submitted by Applicants.\* In re Rochester Gas and Electric Corp. (Sterling Power Project, Nuclear Unit No. 1), ALAB-502, 8 NRC 383, 389 (1978); 47 Fed. Reg. 5960 (1982) (citing NRC's "substantial reliance on state assessments of need for power").

(3) Rulings of the Washington Utilities and Transportation Commission: Far from encouraging Applicants to

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\*As NRDC has demonstrated in an earlier filing, the forecasts relied on by Applicants have been consistently inaccurate and largely discredited. "Supplement to Petition of the Natural Resources Defense Council, Inc. for Leave to Intervene: Contentions" (April 20, 1982), at 7-11.

press forward with construction of the Skagit/Hanford Nuclear Project, Washington's utility regulators have denied "construction work in progress" treatment and AFUDC accruals for the Project, "because [its] economic feasibility, [its] need and [its] probability of construction have not been demonstrated." Washington Utilities and Transportation Commission v. Puget Sound Power & Light Company, Cause No. U-81-41, Second Supplemental Order at 7-8 (March 12, 1982); Fourth Supplemental Order at 2 (April 6, 1982). Among the organizations supporting this action by the Commission were the largest industrial consumers of electricity in Washington State. Second Supplemental Order, supra, at 7.

(4) Forecast and Resource Analysis of the Bonneville Power Administration: In Applicants' words, "[a]ccording to the most probable or "base" case presented in [Bonneville's April 1982] forecast, the Skagit/Hanford units will not be needed until the late 1990s." (App. Letter at 2) This concession does not, in fact, go far enough, since the Bonneville forecast does not include (1) contributions from wind machines, industrial cogeneration, biomass, geothermal, or small hydropower resources; (2) "savings which might be achieved through future conservation programs budgeted by BPA, by local and state governments, or by utilities;" or (3) the effects of building and appliance efficiency "standards which may be proposed by the Northwest Power Planning Council,

Federal, state or local governments ...." Bonneville Power Administration, Forecasts of Electricity Consumption in the Pacific Northwest 3, 35 (Draft: April 1982). In reliance upon this forecast, Bonneville Administrator Peter Johnson has recommended -- and WPPSS has imposed -- a suspension of construction for up to five years on WPPSS Unit 1, which had been scheduled to commence operations in 1986. See Bonneville Power Administration, Analysis of Resource Alternatives (April 19, 1982).

(5) Conclusion: What these official studies, decisions, and actions make manifest is that there is no reason grounded in need-for-power concerns to press ahead now with NRC environmental and safety reviews of the Skagit/Hanford Nuclear Project. The sections that follow argue that this course is independently precluded on both legal and policy grounds.

II. GIVEN APPLICANTS' ADMISSIONS, AND A RECENT D.C. CIRCUIT DECISION, ISSUANCE OF A FINAL ENVIRONMENTAL STATEMENT ON THE CURRENT SCHEDULE IS FUNDAMENTALLY INCONSISTENT WITH THE MANDATE OF THE NATIONAL ENVIRONMENTAL POLICY ACT AND THE NRC'S REGULATIONS

Applicants' letter advances two totally irreconcilable contentions. The first is that massive but temporary uncertainties preclude any resolution -- or even litigation -- of need-for-power issues in this proceeding until April of 1983 at the earliest. The second is that, well prior to April of

1983, the NRC should nonetheless complete an environmental review in which need for power is a central issue. NRDC/NWF submit that any construction permit premised on so premature and inherently incomplete an environmental analysis would violate the National Environmental Policy Act (NEPA).

A. THE DRAFT ENVIRONMENTAL STATEMENT SHOULD BE WITHDRAWN.

For purposes of the obligations that NEPA imposes on this Board, need-for-power is no peripheral concern. It is an integral and inseparable part of the "cost-benefit analysis" mandated for both draft and final environmental statements. See 10 CFR §§ 51.23(c), 51.26(a); In re Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-422, 6 NRC 33, 90 (1977). Applicants' letter returns repeatedly to the theme that manifold uncertainties -- on both the demand and resource side -- preclude them from presenting a case on the need-for-power question prior to April of 1983 at the earliest. "The facts are simply not in yet." (App. Letter at 3). But if the facts are not in yet from Applicants' perspective, the same is surely true for the NRC -- and accordingly, the agency's environmental review must be suspended until the temporary uncertainties that daunt Applicants themselves have subsided.

As the Ninth Circuit has emphasized in an analogous context, "[t]here are certainly instances where the



unavailability of information might require delays in filing draft statements or extensions of time in which to comment upon the statements, if the procedures of NEPA are to be conducted in a meaningful way." Jicarilla Apache Tribe of Indians v. Morton, 471 F.2d 1275, 1281 (9th Cir. 1973). Factors that "must be considered in addition to the possibility of obtaining more complete information" are "the consequences of delay, the present state of information concerning the environmental factors, and the degree of probative value and relevance of the information which may be gained by delay." Id.

Applicants' letter itself provides strong support for concluding that all these criteria counsel delay in the Skagit/Hanford proceeding. Thus, Applicants argue that more complete information will be forthcoming within one year, and emphasize both the inadequacy of "the present state of information" and the "probative value and relevance" of anticipated data. The letter gives no ground whatever for concluding that adverse consequences will attend delay, and Section I above should remove any remaining doubts. Under the circumstances, the NRC's obligations under NEPA are clear. "Simply put, the agency may not evade its duty. It must either assess the impact of the decision, or, if the factual situation will not permit that assessment (thus preventing the agency from performing its NEPA duties) the decision must be deferred until the agency has a sufficient factual basis to perform its

environmental analysis." California v. Bergland, 483 F. Supp. 465, 480 (E.D. Cal. 1980). Cf. In re Public Service Co. of New Hampshire (Seabrook Station, Units 1 & 2), CLI-77-8, 5 NRC 503, 525 (1977) ("[I]f the staff believes that inadequate data about environmental considerations is available or that reasonable alternatives have not been adequately explored, it can and should decline to issue a DES.")

B. IN THE ALTERNATIVE, THE PERIOD FOR PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL STATEMENT SHOULD BE EXTENDED THROUGH AT LEAST APRIL OF 1983.

The NRC has set a June 28, 1982 deadline for public comment on the DES. 47 Fed. Reg. 20234 (1982). By Applicants' own admission, "an informed decision on the need-for-power issues ... would be difficult at best" pending "the outcome of the WPPSS bond election and the findings of the Regional Council." (App. Letter at 3). Intervenors, and public commentators generally, cannot be expected to respond to the DES under time and information constraints that Applicants themselves find unsupportable. If the Board does not direct the withdrawal of the DES, it should at the very least extend the comment period to encompass the April 1983 release of the Regional Council's electric power and conservation plan, characterized by Applicants themselves as "[p]robably the most significant need-for-power development still to come in the near-term." (App. letter at 3). Cf. Jicarilla Apache Tribe of

Indians v. Morton, supra, 471 F.2d at 1281 (criteria governing decisions whether to award extensions of time in which to comment on draft environmental statements).

C. EXTENSION OF THE ENVIRONMENTAL REVIEW PROCESS IS ALSO NECESSARY IN LIGHT OF THE DISTRICT OF COLUMBIA CIRCUIT'S RECENT DECISION IN NRDC v. NRC.

Applicants' request that the Commission proceed with the preparation of a Final Environmental Statement is also ill-advised in light of the recent decision of the District of Columbia Circuit Court of Appeals in NRDC v. NRC, Civil Action No. 74-1586 (D.C. Cir., April 27, 1982). In that case, the Court held invalid the Commission's "Table S-3 Rule," and, in particular, rejected that Rule's analysis of the environmental impacts of long-term nuclear waste disposal. According to the Court, the Rule is inadequate under the National Environmental Policy Act, 42 U.S.C. § 4332 et seq., because it fails, inter alia, to assess and describe the "uncertainties concerning the long-term isolation of high-level and transuranic wastes ...." NRDC v. NRC, supra, Slip Op. at 11.

The Draft Environmental Statement (DES) issued by NRC staff for the Skagit/Hanford Project relies exclusively on Table S-3 to assess the fuel-cycle impact of the Project, and does nothing to illumine the uncertainties with which the Court in NRDC v. NRC was concerned. The DES is thus inadequate on its face. Either the Commission must respond to the Court's objections to Table S-3 in another generic proceeding, or it

must comply with the Court's interpretation of the requirements of NEPA in the site-specific DES and FES for Skagit/Hanford. If the NRC does not conduct an uncertainty analysis for Skagit/Hanford waste disposal, any decision to proceed with a Skagit/Hanford license will violate NEPA.

Moreover, if the Commission chooses to meet its NRDC v. NRC obligations in the site-specific environmental statement for the Skagit/Hanford Project, it may not properly rely on the current DES, and simply incorporate additional "uncertainty analysis" in the FES. To do so would deny the public and concerned governmental agencies the right to comment on a critical factor in the environmental analysis of the license application. Instead, the Commission must, at the very least, issue a revised DES (or relevant portions thereof) and circulate it for public comment. See, e.g., NRDC v. Hughes, 437 F. Supp. 981, 990-991 (D.D.C. 1977). See also Regulations of Council on Environmental Quality, 40 C.F.R. §1502.9(a) (revised draft required "if the draft statement is so inadequate as to preclude meaningful analysis"); and id. § 1502.9(c)(1)(ii) (Agencies must prepare, circulate and revise supplements to draft statements if "[t]here are significant new circumstances, or information relevant to environmental concerns and bearing on the proposed action or its impacts.") In sum, NRDC v. NRC affords an independent ground for rejecting Applicants' proposed schedule, extending the environmental review period, and withholding issuance of an FES.

III. DISCOVERY, THE NRC'S SAFETY EVALUATION REPORT, AND ALL  
OTHER PROCEEDINGS SHOULD BE HELD IN ABEYANCE PENDING  
RESOLUTION OF THE UNCERTAINTIES CITED IN APPLICANTS'  
LETTER OF APRIL 26, 1982

As Applicants forthrightly acknowledge, the tentative schedule for this proceeding was premised on the assumption that "the joint NRC/EFSEC evidentiary hearing on environmental matters [would] begin on June 15, 1982." (App. Letter at 2) It is only logical to conclude that deferral of those hearings for a minimum of ten months, as Applicants propose, should be accompanied by complementary rescheduling of other matters. If there is any lesson to be learned from the seven and one-half year history of this proceeding, it is that information prematurely generated is soon obsolete. Extra time can only improve the quality and extent of the geology/seismology data required by the NRC staff for its final SER supplement;\* the same is true of the discovery process accompanying environmental and safety contentions advanced by intervenors. Also, it is inequitable and illogical to hold either intervenors or an over-burdened NRC staff to discovery and SER schedules set by reference to an expedited hearing schedule that even Applicants now oppose.

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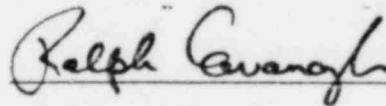
\*This is no abstract possibility, given the history of this proceeding. See In re Puget Sound Power & Light Co. (Skagit Nuclear Power Project, Units 1 & 2), LBP-78-38, 8 NRC 587, 590 n. 3 ("[T]his proceeding has been largely extended in time due to the additional exploratory geologic and seismic work that Applicants and their consultants have desired to undertake in further support of their application.")

Accordingly, NRDC/NWF recommend that this proceeding, in its entirety, be held in abeyance pending the release of the Regional Council's electric power and conservation plan in April 1983. Should that plan unambiguously reject the Skagit/Hanford Nuclear Project, the Project will almost certainly be terminated -- rendering fruitless any interim investment of time and resources by the Applicants, intervenors, and the NRC. Applicants concede that "the regional plan will play a major role in determining what new generating resources will be constructed in the region" (App. Letter at 3), and Puget Sound Power & Light's President and Chief Executive Officer, John Ellis, stated at a May 11, 1982 press conference that "[i]t would not make sense to start [Skagit/Hanford] unless the Northwest Power Council says it is needed ...." Seattle Post-Intelligencer, May 12, 1982 (copy attached as Exhibit 2). Before rejecting this NRDC/NWF recommendation, the Board should at least invite Mr. Ellis to confirm or deny that statement under oath. If it accurately characterizes Applicants' position, then the case for awaiting the Council's ruling is overwhelming. If that ruling is favorable to Applicants, then discovery, issuance of the SER supplement, and the NRC's environmental review can go forward expeditiously. The decision to hold the proceedings in abeyance will have cost Applicants less than one year, at no jeopardy to the region's load-resource balance (see pages 2-7

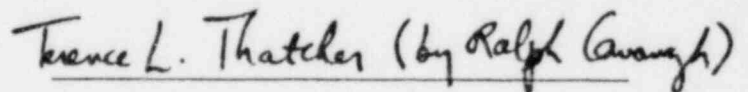
above). The alternative is to move ahead now with inadequate and premature discovery and environmental/safety analyses, while sanctioning NEPA violations that would invalidate any construction permit ultimately granted. By adopting the NRDC/NWF recommendations, the Licensing Board can forestall these manifestly undesirable results.

Dated this 19th day of May, 1982.

Respectfully submitted,



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EXHIBIT 1

Walter R. Butcher, Deputy Project Director,

"Independent Review of WNP-4 and WNP-5:  
Adjustment to Load Forecasts and the Need for Power"



# WASHINGTON STATE UNIVERSITY

PULLMAN, WASHINGTON 99164

OFFICE OF APPLIED ENERGY STUDIES

## MEMORANDUM

TO: Recipients of Final Report  
Independent Review of WNP-4 and 5

FROM: Walter R. Butcher *Walter R. Butcher*  
Deputy Project Director

The attached sheet explains a correction to our demand forecasts.  
It should be inserted in your copy of the final report.

## ADJUSTMENT TO LOAD FORECASTS AND THE NEED FOR POWER

After the Independent Review of WNP-4 and 5 had been completed and the Final Report printed, it was discovered that there was an error in calculating actual 1980 regional power sales for use in calibrating the demand forecasting model. The error was to assume that all 139 billion kilowatt hours of 1980 power consumption was firm power, since the Calendar Year 1980 Generation and Sales Statistics, reported by the Bonneville Power Administration reported only a negligible amount of non-firm sales. Actually, about 5 billion kWh (570 average megawatts) of the total was non-firm power, which was acquired from outside the region and, therefore, not included in the BPA statistics.

As a result of this error, the Independent Review's demand model was calibrated to yield a 1980 "forecast" of firm power demand that was too high, by about 570 MW, after adjusting to what demand would have been with a normally robust economy. Our Demand Module contractor, Charles River Associates, has determined that the overforecasting in 1980 occurred in the industrial sectors portion of the model. It appears that the industrial sectors have made a permanent reduction in their rate of firm power consumption. Thus, their forecasted demand should be reduced from 1980 to the end of the forecast period.

When the adjustment to industrial demand is inserted in the supply/demand balancing model, firm power demand forecasts are reduced by about 600 MW in 1980, declining gradually to only a 250 MW adjustment in 2000. The adjustment has the effect of delaying by about one year, the forecasted need for major generating resource additions during the 1990's.

The conclusions and recommendations of the Independent Review are not changed by this correction. At most, it indicates that more emphasis should be given to recommendations 1, 6, and 7 which call for reducing plans for new power plants, attempting to sell the output of WNP-4 and 5 and monitoring the conditions for a restart of the projects.

EXHIBIT 2

"Puget Power Awaits Nod for its Proposed N-Plant"

Seattle Post-Intelligencer

May 12, 1982

# Seattle Post-Intelligencer

Seattle Post-Intelligencer, Wednesday, May 12, 1982 •

## Puget Power awaits nod for its proposed N-plant

By Joel Connelly  
and Bruce Ramsey  
P-I Reporters

The Puget Sound Power & Light Co., stung by loss of a \$66 million investment in an Oregon nuclear project, will not lift a single shovel of earth on its proposed Skagit-Hanford nuclear plant until government agencies give it the green light.

"It would not make sense to start that plant unless the Northwest Power Council says it is needed and we get federal assurance that its construction can be completed in six or seven years," Puget Power President John Ellis told reporters after Puget's annual meeting in downtown Bellevue yesterday.

The long-delayed nuclear project, once scheduled for the Skagit Valley and now proposed for construction at Hanford in eastern Washington, is being kept "on hold," Ellis said.

The Skagit-Hanford project is one of two major nuclear developments once planned by the Northwest's private utilities.

Puget Power has already invested more than \$143 million in its planned twin reactors. It owns 40 percent of the project. Other shares are held by the Washington Water Power Co., Portland General Electric and Pacific Power & Light.

### Ratepayers charged

The Bellevue-based utility is also a 20 percent owner of the Pebble Springs nuclear project planned for eastern Oregon. The Oregon utility commission has drafted an order telling Portland General Electric and its partners to abandon the plant.

Puget Power has invested \$66 million in the ill-fated Oregon project. The Washington Utilities and Transportation Commission has permitted Puget to charge its ratepayers for costs incurred at Pebble Springs.

Despite the bad news from Oregon, Puget Power had a peaceful annual meeting yesterday. Shareholders approved a switch in the method of electing corporate directors to

make it harder for opponents of management to elect a dissident director.

Instead of one year, directors now will be elected to staggered three year terms.

No dissidents spoke at the annual meeting. But dissidents have formed to protest decisions of public power authorities and others recently ran an opposition candidate for director of Seafirst Corp., the holding company that owns Seattle-First National Bank.

### Composed of lay people

Puget Power presented a potential target, the company figured, because it has had cumulative voting, in which all a stockholder's votes for directors can be cast for one person.

Ellis told shareholders the move to three year terms will cultivate expertise among the utility's directors. He contrasted this to the Washington Public Power Supply System by saying that WPPSS' problems show "the difficulty that can be experienced with a board composed mostly of lay people."

Ellis also told stockholders the company is making progress in several areas including:

- **Conservation.** Within 10 years, Puget Power hopes its energy saving programs will save an amount of electricity equal to the generating output of all Puget Power hydroelectric plants.

- "This is equivalent to serve 100,000 new residential customers," said Gary Swofford, director of Puget Power's conservation programs.

- **Turbines.** While bigger power plants are being held up, Puget Power said it is moving ahead with construction of smaller gas-fired turbine plants designed to meet power needs temporarily.

The utility, which has completed three turbine plants, plans to build two more at a site near Bayview, Wash.

"With the completion of these units, Puget will have 800 megawatts of installed capacity," said Bob Myers,

peaking capacity and a reliable energy source during low water years."

- **Initiative 394.** Ellis, an attorney, said he feels the controversial initiative is "clearly unconstitutional." The initiative requires public votes on big energy projects such as the Washington Public Power Supply System's nuclear plants.

A federal court trial is slated for late June on constitutional challenges to the "WPPSS initiative." Puget Power has a stake in its outcome; the big private utility owns a 5 percent share of WPPSS' No. 3 nuclear plant at Satsop.

If Initiative 394 is upheld in court, Ellis said his utility is ready to join in a campaign to persuade voters to approve bonds for continuing WPPSS' nuclear program.

- **Coal plants.** Ellis predicted Northwest utilities will eventually have to choose between coal plants and nuclear projects as a means of meeting future energy demand.

"We could be looking at a choice," said Ellis. "Clearly the options will be between coal and nuclear."

Puget Power's shareholders voted to increase the authorized shares to 80 million from 50 million, which will allow the utility to raise money for power-generation, transmission and conservation programs by continuing to sell new shares of stock to the public. Ellis said further stock sales would not threaten the dividend payout to existing shareholders.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

PUGET SOUND POWER & LIGHT CO., )  
et al. )

(Skagit/Hanford Nuclear )  
Project, Units 1 and 2) )

Nos. STN 50-522, 50-523

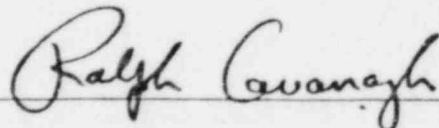
CERTIFICATE OF SERVICE

I hereby certify that the following:

SCHEDULING OF FURTHER PROCEEDINGS IN LIGHT OF NEED FOR POWER  
UNCERTAINTIES: JOINT COMMENTS AND RECOMMENDATIONS OF THE NATURAL  
RESOURCES DEFENSE COUNCIL AND THE NATIONAL WILDLIFE FEDERATION

in the above-captioned proceeding have been served upon the  
persons shown on the attached list by depositing copies thereof  
in the United States mail on May 19, 1982 with proper  
postage affixed for first class mail.

DATED: May 19, 1982



Ralph Cavanagh  
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DATED: May 19, 1982

COMMISSION

Secretary of the Commission  
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U.S. Nuclear Regulatory Commission  
Washington DC 20555

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Administrative Judge  
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