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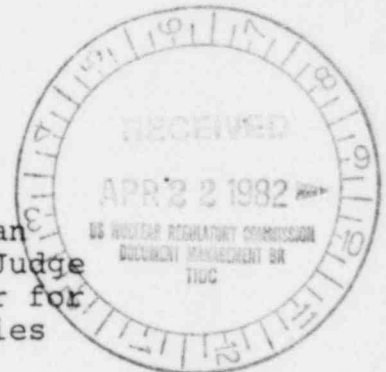
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April 20, 1982

Sheldon J. Wolfe, Esquire
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U.S. Nuclear Regulatory
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Dr. Walter H. Jordan
Administrative Judge
881 West Outer Drive
Oak Ridge, TN 37830

In the Matter of
Louisiana Power & Light Company
(Waterford Steam Electric Station, Unit 3)
Docket No. 50-382

Dear Administrative Judges:

Pursuant to the Board's ruling that testimony which is to be presented during the hearing session scheduled to resume on May 3, 1982 be filed on April 20, 1982, I am enclosing copies of the following testimony:

Direct Testimony on Emergency Planning

1. Applicant's Testimony of Robert G. Azzarello, Alexis Tsaggaris, and Ronald J. Perry on Radiological Emergency Response Plans, Contentions 17/26(1)(a), (c), (d), (e) and (f).

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2. Applicant's Testimony of Kevin P. Twine on Radiological Emergency Response Plans, Contention 17/26(1)(b).

3. Testimony of John M. Lucas on Radiological Emergency Response Plans.

4. Testimony of Bertram Paul Madere on Radiological Emergency Response Plans.

5. Testimony of Robert William Myers on Radiological Emergency Response Plans.

6. Applicant's Testimony of John J. Mauro on the Use of Potassium Iodide as a Thyroid Blocking Agent.

Rebuttal Testimony on Synergism

1. Applicant's Rebuttal Testimony of George B. Hutchison on Contention 8/9.

2. Applicant's Rebuttal Testimony of Jacob I. Fabrikant on Contention 8/9.

Additionally, counsel for the parties have stipulated to the admission of the following exhibits to be offered by Applicant:

Applicant Exhibit No. 1. The onsite emergency plan entitled, "Emergency Plan, Louisiana Power & Light, Waterford 3 Steam Electric Station," Revision 3.

Applicant Exhibit Nos. 2 and 3. The offsite emergency plan, in the form of two documents: "State of Louisiana, Peacetime Radiological Response Plan, Annex J, Appendix 7 to Louisiana Preparedness Plan for Emergency Operations," Revision 4, February 1982 (Applicant Exhibit No. 2) and "Attachment 1, Waterford 3 Steam Electric Station, State of Louisiana Peacetime Radiological Response Plan," Revision 3, September 1981 (Applicant Exhibit No. 3). This second document includes emergency preparedness plans relating specifically to St. Charles Parish and St. John the Baptist Parish.

Applicant Exhibit No. 4. "Evacuation Time Estimate by Louisiana Power & Light Company," Revision 1, February 1982.

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Applicant Exhibit No. 5. "Report -- Verification of the Siren Alert System for Waterford 3 Nuclear Power Station," February 1982, Rev. sed.

Applicant Exhibit No. 6. Wallace Laboratories Patient Package Insert for Thyro-Block (Potassium Iodide).

Applicant Exhibit No. 7. Department of Health, Education, and Welfare (Food and Drug Administration) Notice, Request for Submissions of New Drug Applications, Potassium Iodide as a Thyroid-Blocking Agent in a Radiation Emergency. 43 Fed. Reg. 58,798 (Dec. 15, 1978).

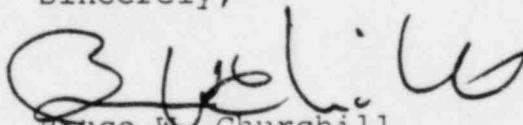
Applicant also plans to offer, as its Exhibit No. 8, a memorandum dated March 26, 1981 to William J. Dircks, NRC Executive Director for Operations, from Samuel J. Chilk, NRC Secretary. The parties have not yet completed discussions on stipulating to its admissibility.

Copies of Applicant Exhibit Nos. 1 through 5 were provided to the Board by letter dated March 10, 1982, and have previously been provided to counsel for the parties. (Exhibit No. 4 was included in Appendix B to Exhibit No. 1, the onsite emergency plan.) I am herewith enclosing copies of Applicant Exhibit Nos. 6, 7, and 8.

With respect to Contention 8/9, Applicant intends to present four rebuttal witnesses. Two of those witnesses will be Dr. Mauro and Dr. Hamilton, who have previously appeared and whose rebuttal testimony will be oral. The remaining two rebuttal witnesses will be Dr. George B. Hutchison and Dr. Jacob I. Fabrikant, who have not previously appeared, and whose rebuttal testimony and curriculum vitae are enclosed.

Counsel for the parties have conferred and agreed that rebuttal testimony on Contention 8/9 should be presented on Monday, May 10. Applicant's witnesses have been advised of this schedule and are available on that date. A letter to the Board describing further scheduling agreements for the two-week hearing schedule will be forthcoming.

Sincerely,



Bruce W. Churchill

BWC/tjc

cc: Service List (w/encls.)