

UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION



In the Matter of )  
Gulf States Utilities Company ) Docket No. 50-458  
(River Bend Station) )

REPLY OF CAJUN ELECTRIC POWER COOPERATIVE, INC.,  
TO THE RESPONSE OF GULF STATES UTILITIES  
COMPANY ON STAFF'S PROPOSED DETERMINATION  
THAT THE REQUESTED LICENSE AMENDMENTS DO NOT  
INVOLVE A SIGNIFICANT HAZARDS CONSIDERATION  
WITHIN THE MEANING OF 10 C.F.R. § 50.92

Cajun Electric Power Cooperative, Inc. ("Cajun"),  
pursuant to 10 C.F.R. § 2.706 (1993), hereby files its Reply to  
Gulf States Utilities Company's ("GSU") response on Staff's  
proposed determination that requested license amendments do not  
involve a significant hazards consideration ("Proposed  
Determination") within the meaning of 10 C.F.R. § 50.92 (1993).

On April 6, 1993, and on August 17, 1993, Cajun filed,  
respectively, its Comments and Amendments to Comments on the  
Proposed Determination. On August 23, 1993, GSU filed its  
Response with regard to the Proposed Determination. Cajun hereby  
submits its reply to GSU's Response.

To avoid burdening the record, particularly since GSU's  
response does not call into question Cajun's arguments, Cajun  
will not restate its arguments previously made in its August 6  
and August 17 pleadings.

Cajun does note, however, that GSU blithely indicates  
that Staff should have no concerns regarding the "safe" shutdown

of River Bend. See GSU Response at 6-8. Staff should have concerns regarding GSU's proposed solution regarding the shutdown scenario and those concerns should be substantial.

GSU utilizes a "trust me" approach arguing that Entergy Operations, Inc. ("EOI"), the proposed plant operator, would simply shut down the plant in the event of a GSU financial calamity resulting from its litigation with Cajun. However, among the matters which GSU fails to address area:

1. Does the premature shutdown of the nuclear facility increase the safety hazards related to the Plant?
2. How will EOI fund the shutdown if GSU no longer makes payments to EOI under the GSU/EOI River Bend Station Operating Agreement?
3. How can EOI effect a shutdown of River Bend if Cajun opposes GSU's shutdown decision?

On the record as currently developed, Staff is unable to make a determination that no significant hazard will result from the proposed license amendments.

WHEREFORE, for the foregoing reasons, and for the reasons set forth in Cajun's August 6 and August 17, 1993 pleadings, Cajun requests that the Staff and/or the Commission:

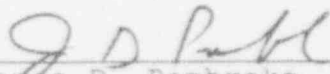
1. Grant Cajun's requested intervention in this proceeding for all purposes;
2. Deny the requested no significant hazards consideration determination; or, in the alternative, order a full evidentiary hearing to determine whether the requested no significant hazards consideration determination should be granted and whether the requested license amendments should be granted;
3. Impose on the issuance of the no significant hazards consideration determination and the

approval of the proposed license amendments, a condition which would (a) require Entergy to extend its credit to, indemnify and otherwise financially support GSU in the event GSU loses the Cajun Litigation or the Texas Litigation, and/or (b) require Entergy to fully fund EOI operation of River Bend to ensure its safe and reliable operation;

4. Approve the proposed license amendments only upon Cajun's consent;
5. Approve the license amendments only upon conditions which are adequate to protect Cajun's interests as a thirty percent owner of River Bend;
6. Order that GSU and EOI fully comply with River Bend license conditions 10 and 12; and
7. Grant such other relief as the Commission deems appropriate.

Dated: September 7, 1993

Respectfully submitted,

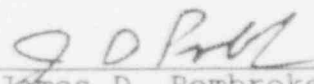
  
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CERTIFICATE OF SERVICE

I, James D. Pembroke, hereby certify that I have this 7th day of September 1993, served the foregoing document upon each person designated on the attached service list by first class mail, postage prepaid.

  
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