

793

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.
WASHINGTON, D. C. 20036

(202) 822-1000

DOCKETED
(202) 822-1000 (202) 822-1199RAPIFAX 100
(202) 822-1072

85 MAY -1 AM 11:12

B9 2693 (SHAWLAW WSH)

CABLE SHAWLAW

OFFICE OF SECRETARY
DOCKETING & SERVICE
501 PARK DRIVE
MCLEAN, VIRGINIA 22102JOHN F. DEALY*
RICHARD S. BEATTY
ROBERT E. CONN
COUNSELKENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
FREDERICK L. KLEIN
STEVEN P. DITLER
RICHARD J. PARRINO
ELLEN A. FREDERICK
MARIE N. DOLAND*
THOMAS C. HILL
L. DUANE CHEEK
MICHAEL K. MADDEN
RALPH A. TAYLOR JR.
HANNAH E. M. LIEBERMAN
JUDITH A. SANDLER
ANDREW D. ELLIS
RICHARD A. SAMP
THOMAS E. CROCKER, JR.
VICKI R. HARDING
PETER J. FERRARA
HELEN TORELLI
MARTHA BOONE ROWAN**
KENNETH R. MILLER
JOHN H. MORE
PAUL S. PILECKI
PAUL A. GAUKLER*
WENDELIN A. WHITE
STANLEY M. BARG
LESLIE K. SMITH
KATHERINE P. CHEEK
TRAVIS T. BROWN, JR.
STEPHEN B. HEINZ
PAMELA H. ANDERSON
ALEXANDER D. TOMASZCZUK
JEFFREY J. A. GIBBS
LAURENCE W. COHEN
DEREK W. LINDENSYLVIA M. LOTRECK
JEFFREY R. SNYDER*
DARYL ANNE LANDER
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA J. FINKELSTEIN
DAVID R. SAHR
C. BOWDOIN TRAIN
JEFFREY W. KAMPELMAN
KENNETH A. GALLO
DAVID R. LEWIS
A. PATRICK LEIGHTON III
JEFFREY G. BERMAN
KEVIN FLYNN
KENNETH D. AUERBACH
ALAN D. WASSERMAN
RICHARD K. A. BECKER*
WILBERT WASHINGTON II
DOROTHEA W. DICKERMAN
JONATHAN T. CAIN
DOUGLAS L. HILLEBOE*
RICHARD I. ANSBACHER*
JOYCE L. OLIVER
THOMAS J. CATLIOTA
EVANS HUBER*
JUDY WEISBURGH
ETHAN J. FRIEDMAN
PAUL M. BANGSER*
ROSE ANN SULLIVAN*
BARBARA BULGER HANNIGAN*
JOSEPH E. KENDALL
ROBERT M. D. GIOVANNI*
JOHN N. NASSIKAS III*
DIANE S. SHAPIRO** NOT ADMITTED IN D.C.
* ADMITTED IN VIRGINIA

April 30, 1985

WRITER'S DIRECT DIAL NUMBER

822-1398

Christine N. Kohl
Administrative Judge
Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555W. Reed Johnson
Administrative Judge
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555Howard A. Wilber
Administrative Judge
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555In the Matter of
Louisiana Power and Light Company
(Waterford Steam Electric Station, Unit 3)
Docket No. 50-382OL

Dear Administrative Judges:

On April 18, 1985, Applicant transmitted to the Appeal Board and to the parties, copies of its report and the report of the independent task force on the twenty-three issues identified in the letter of June 13, 1984 to Applicant from Darrell Eisenhut. By letter dated April 26, 1985, Joint Intervenors

8505020438 850430
PDR ADOCK 05000382
G PDR

7503

Administrative Judges

April 30, 1985

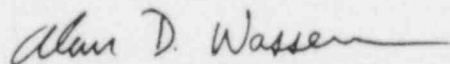
Page 2

object to this submission as unauthorized supplemental argument. They request an extension of time of two weeks to respond to ALAB-801, if the Appeal Board "chooses to consider" the submittal.

Joint Intervenors' letter request should be denied. Applicant did not and does not consider these reports to be supplemental argument. As clearly stated in the cover letter accompanying the two reports, the reports were provided at the request of counsel for the NRC staff and for the convenience of the Appeal Board. The reports earlier had been provided in December, 1984 and January, 1985, to the NRC staff. To the extent that Applicant has relied on information in the reports in opposing Joint Intervenors' November 8, 1984 motion to reopen the record, Applicant attached that information as exhibits to its timely submittals. See footnote 1, April 18, 1985 letter from Applicant to Appeal Board; LP&L Supplemental Exhibits 1 and 3 to its April 10, 1985 response to ALAB-801. To the extent the reports include information beyond that already provided to the Appeal Board, counsel is informed that that information is cumulative or beyond the scope of the matters put in issue by the Joint Intervenors' pending motion.

Nothing in either report constitutes supplemental argument. Accordingly, Joint Intervenors should file their response to ALAB-801 by May 6, 1985 as ordered by the Appeal Board.

Respectfully submitted,



Alan D. Wasserman
Counsel for Applicant

cc: Attached service list

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382 OL
)
(Waterford Steam Electric)
Station, Unit 3))

SERVICE LIST

Christine N. Kohl
Administrative Judge
Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

W. Reed Johnson
Administrative Judge
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Howard A. Wilber
Administrative Judge
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Sherwin E. Turk, Esquire
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Sheldon J. Wolfe
Administrative Judge
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Harry Foreman
Administrative Judge
Atomic Safety and Licensing
Board
Director, Center for Population
Studies
Box 395, Mayo
University of Minnesota
Minneapolis, MN 55455

Walter H. Jordan
Administrative Judge
Atomic Safety and Licensing
Board
881 West Outer Drive
Oak Ridge, TN 37830

Docketing & Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

LP&L
Service List-ASLAB
Page Two

Mr. Gary Groesch
2257 Bayou Road
New Orleans, LA 70119

Carole H. Burstein, Esq.
445 Walnut Street
New Orleans, LA 70118

Lynne Bernabei, Esq.
Government Accountability Project
1555 Connecticut Avenue, N.W.
Suite 202
Washington, DC 20009