

DOCKETED
JAN 13 1986
JAN 17 11:14

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN) Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power)
Plant))

APPLICANTS' MOTION FOR SUMMARY DISPOSITION
OF EDDLEMAN CONTENTION EPX-8
(EMERGENCY BROADCAST SYSTEM)

I. INTRODUCTION

Pursuant to 10 C.F.R. § 2.749 of the Nuclear Regulatory Commission's Rules of Practice, Applicants Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby move the Atomic Safety and Licensing Board for summary disposition in Applicants' favor of Wells Eddleman's Contention EPX-8. For the reasons explained herein, Applicants respectfully submit there is no genuine issue as to any fact material to this contention and that Applicants are entitled to a decision on this contention as a matter of law.

In support of this Motion, Applicants rely on the attached Affidavits of Russell Capps and Alvin H. Joyner, Applicants'

Statement of Material Facts as to Which There is No Genuine Issue to be Heard on Eddleman Contentions EPX-8, Applicants' Memorandum of Law in Support of Motions for Summary Disposition on Emergency Planning Contentions (October 8, 1984), and the pleadings and discovery in this proceeding regarding Contentions EPX-8.

II. BACKGROUND

On May 17 and 18, 1985, the pre-licensing full participation emergency planning exercise, required by 10 C.F.R. Part 50, Appendix E, § IV.F, was conducted for the Shearon Harris Nuclear Power Plant. The exercise involved the participation of Carolina Power & Light Company, the State of North Carolina, and the four counties within the plume emergency planning zone ("EPZ") -- Wake, Chatham, Harnett and Lee Counties. By all accounts, the exercise was a success, enabling the Federal Emergency Management Agency ("FEMA") to find "reasonable assurance that appropriate measures can be taken to protect the [public] health and safety" in the event of a radiological emergency at Harris. See Carolina Power & Light Co. (Shearon Harris Nuclear Power Plant), LBP-85-49, 22 N.R.C. ____, slip op. at 17 (Dec. 11, 1985).

Nevertheless, on September 30, 1985, intervenor Wells Eddleman filed twelve proposed "Contentions Based on Emergency Planning Exercise." The Licensing Board rejected ten of Mr. Eddleman's proposed contentions, but admitted two of them

(EPX-2 and EPX-8).^{1/}

The Board admitted EPX-8 as originally proposed:

Emergency Broadcast System use was incomplete and ineffectively managed (FEMA, 2.3.1. (2), page 13; see p. 12 discussion). Inadequacies include procedures for activation and use of the EBS (before the State assumes control); inadequate coverage of the emergency area and emergency response area, incomplete messages and instructions to the public. (Ref: FEMA report received 8/30/85 Board Notification 85-078.) Numerous problems with EBS activation mentioned on pp. 17-18 of the same report also need to be identified and rectified. All these problems must be resolved to ensure timely and effective notice to the public about nuclear/radiation emergencies so that the public can be protected in such emergencies.

Applicants have served one set of interrogatories and request for production of documents on Mr. Eddleman regarding EPX-8. See "Applicants' Emergency Planning Interrogatories and Request for Production of Documents to Intervenor Wells Eddleman (Third Set)" (November 25, 1985), at 6-8. "Wells Eddleman's Response to Applicants' (EPX) Emergency Planning Interrogatories and Request for Production of Documents (Third Set)" ("Eddleman Interrogatory Responses") was filed on December 23, 1985. Mr. Eddleman filed one set of interrogatories on the subject of EPX-8 on Applicants and a separate set of interrogatories on the NRC Staff and FEMA. See "Wells

^{1/} In its Partial Initial Decision on Emergency Planning and Safety Contentions, the Board explained the bases for its rulings on these proposed contentions. LBP-85-49, supra, slip op. at 14-24.

Eddleman's General Interrogatories to Applicants Carolina Power & Light et al. (EPX Set)" (November 26, 1985), at 17-20; "Wells Eddleman's Interrogatories to NRC Staff and FEMA (Eighth Set)" (November 26, 1985) at 11-14. "Applicants' Response to Wells Eddleman's General Interrogatories to Applicants Carolina Power & Light et al. (EPX Set)" and "Applicants' Response To Wells Eddleman's Request For Production of Documents (EPX Contentions)" were filed on December 20, 1985. FEMA's response to Mr. Eddleman's interrogatories is due January 16, 1986. The NRC Staff/FEMA filed no discovery requests on the subject of EPX-8.

Pursuant to the schedule established by the Board, the last date for filing discovery requests on EPX-8 was November 25, 1985. With the exception of FEMA's response to Mr. Eddleman's interrogatories, discovery on this contention is now complete.^{2/} Further, the Board established February 13, 1986 as the last day for filing summary disposition motions on this contention.^{3/} Thus, the instant Motion is timely.

^{2/} Applicants and Mr. Eddleman have also produced documents to one another and resolved a number of discovery matters. Applicants understand that Mr. Eddleman has given notice to the Board that he will seek to compel further discovery from Applicants on the basis of the alleged inadequacy of Applicants' response to one interrogatory. We understand that this matter will be the subject of a conference call with the Board.

^{3/} The NRC Staff/FEMA response to a summary disposition motion is due February 3, 1986, and Mr. Eddleman's response is due February 13, 1986. Tr. 10,206. The Board has indicated that it expects to decide summary disposition motions by the end of February. LBP-85-49, supra, slip op. at 24.

III. APPLICABLE LAW

The well-defined standards applicable to motions for summary disposition under 10 C.F.R. § 2.749 are discussed in detail in "Applicants' Memorandum of Law in Support of Motions for Summary Disposition on Emergency Planning Contentions," filed in this proceeding on October 8, 1984. Applicants rely upon the discussion therein, which is incorporated by reference, and upon the discussion herein regarding the application of those standards to EPX-8.

The Commission's emergency planning regulations require that means to provide "clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established". 10 C.F.R. § 50.47(b)(5). The regulations further provide that "[t]he design objective of the prompt public notification system shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes." 10 C.F.R. Part 50, Appendix E, § IV.D.3.^{4/}

^{4/} Mr. Eddleman asserts that EBS messages must be "out promptly, i.e. with delay minimal (at most a minute or two) once activation of the EBS is decided on by appropriate authority" and that the message must be "on the air within not more than 2 minutes after activation". See Eddleman Interrogatory Responses at 11 (responses to Interrogatories EPX-8-11 and EPX-8-12) (emphasis supplied). There is no regulatory basis whatsoever for his assertions. Moreover, while it is important that EBS activation is synchronized with siren activation, there can be no allegation here that this objective was not attained in the exercise.

The requirement for an emergency planning exercise prior to issuance of a license for a nuclear power plant is contained in 10 C.F.R. Part 50, Appendix E, § IV.F. That section provides, in pertinent part, that a "full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted at each site . . ." prior to issuance of an operating license. Mr. Eddleman asserts that the use of the Emergency Broadcast System ("EBS") in an exercise must be "flawless", in order to assure performance in an actual emergency. See Eddleman Interrogatory Responses, at 12 (response to Interrogatory EPX-8-12). However, there simply is no requirement in the Commission's regulations or otherwise that exercise performance be perfect in order to obtain an operating license. What is required instead is a finding of "reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency." 10 C.F.R. § 50.47(a)(1). Indeed, the evident purpose of an exercise is to identify areas for improvement, to enhance future emergency response capabilities.

In admitting EPX-8, the Board observed that the contention, if substantiated, could involve a "fundamental flaw" in planning. LBP-85-49, supra, slip op. at 18. The Board also noted, however, that if the concerns identified in the contention are "minor and ad hoc," the Board "would expect they would be amenable to summary disposition". Tr. 9973-74.

IV. ARGUMENT

EPX-8 is comprised of a series of quotations from the FEMA Exercise Report^{5/}, which identify concerns with Emergency Broadcast System ("EBS") use at the State and local levels during the Harris exercise. In its report, FEMA indicated that the procedures for EBS use "need attention". FEMA Exercise Report at 12. However, FEMA further observed that "[a]ctivation of the EBS did improve as the emergency continued". FEMA Exercise Report at 18. Certainly none of the relatively minor problems cited affords any basis for challenging FEMA's ultimate conclusion from the exercise that:

The State and local emergency plans are adequate and capable of being implemented, and the exercise demonstrated that offsite preparedness is adequate to provide a reasonable assurance that appropriate measures can be taken to protect the health and safety of the public living in the vicinity of the Shearon Harris Nuclear Power Station in the event of a radiological emergency.

LBP-85-49, supra, slip op. at 17 (citing Memorandum from R. Krimm (FEMA) to E. Jordan (NRC), dated August 7, 1985).^{6/}

^{5/} In late August, the NRC provided the Board and all parties with copies of Board Notification 85-078, dated August 21, 1985, re: "Interim Findings On Preparedness For the Shearon Harris Nuclear Power Station", which included (as Attachment 1 thereto) a report entitled "Shearon Harris Nuclear Station Exercise" (hereinafter "FEMA Exercise Report") and (as Attachment 2 thereto) FEMA's "Interim Findings Report" (hereinafter "FEMA Interim Findings").

^{6/} The Krimm memorandum was also served as part of Board Notification No. 85-078. See also FEMA Interim Findings at 8 (concluding that the regulatory planning standard governing public notification -- including the use of the EBS system -- "is adequately addressed in the plans and was demonstrated by the State and counties during the May 1985 exercise").

Moreover, all of the referenced problems are presently being addressed by the responsible State and local emergency preparedness officials, and appropriate corrective actions are being taken.

Each of the EBS problems identified in the contention -- and the corresponding response of the emergency preparedness officials -- is discussed below. Given the nature of the problems and the corrective actions being implemented by emergency preparedness officials, it is clear that the use of the EBS system is not fundamentally flawed. No genuine issues of material fact remain concerning the EBS problems which occurred in the exercise, and the instant Motion for Summary Disposition of EPX-8 should be granted in its entirety.

- A. Use of A New Conferencing Capability --
Combined With Training and Procedure
Changes to Clarify Responsibility for
Preparation of Initial and "Follow-Up" EBS
Messages -- Will Resolve EBS Problems
Experienced By Wake County During Exercise.

The basis for EPX-8, as it relates to EBS use at the local level, is found on pages 12, 17 and 18 of the FEMA Exercise Report. At page 12, the evaluator noted:

Before the State emergency-response team assumed control, there were some indications that procedures for activation and use of the EBS needed attention.

The FEMA Exercise Report continued, at pages 17-18:

The conferencing capability, which should allow the State and all counties to confer, could not conveniently be established. The telephone numbers for some facilities were not dedicated and would be busy, thereby adding lengthy delays in establishing the net. Once all parties were on a conference call, keeping an open line helped to eliminate the delays in getting all parties on line.

The mechanics of activating the EBS necessitated terminating a conference call then in progress. This presented numerous problems.

The future installation of a dedicated ring-down telephone network in the EOC promises to resolve these noted problems for conferencing. However, EBS activation needs to be reviewed and streamlined. Improved communications with EBS might be a consideration. Activation of the EBS did improve as the emergency continued.

These problems encountered by Wake County in activating EBS during the exercise are addressed in the accompanying Affidavit of Russell Capps, the Director of the Wake County Emergency Management Agency.

Mr. Capps explains that, on Friday, May 17, 1985 (relatively early in the exercise and prior to State assumption of control of emergency response), the scenario for the exercise postulated plant conditions warranting EBS activation by Wake County (the lead county for emergency response). This involved the preparation of an EBS message and the coordination of system activation with Chatham, Lee and Harnett Counties, as well as the State. Certain difficulties were encountered in these processes. "Affidavit of Russell Capps on Eddleman EPX-8" ("Capps Affidavit"), ¶ 4.

For purposes of the exercise, an EBS message had been prepared for actual broadcast during the exercise. The message was used for each EBS activation throughout the exercise, to inform the public that an exercise was in progress, and that there was no cause for concern. Nevertheless, it was also expected that preparation of an EBS message would be simulated by Wake County as part of the exercise. The purpose of the simulated message was to afford Wake County an opportunity to practice EBS message preparation; the simulated message was not for actual broadcast. Due to confusion about which Wake County staff member had responsibility for preparation of the simulated message during the exercise, no simulated EBS message was prepared. Similarly, there was no simulation of "follow-up" EBS messages by Wake County during the exercise. (In a real emergency, such messages are used to apprise the public of changes in the status of the emergency following the initial EBS activation.) Capps Affidavit, ¶ 5.

Problems also arose with the first efforts to activate the EBS. During the exercise, the State EOC and the four county EOCs were linked by a standard telephone conference call system (using speakerphones) which was utilized to coordinate the response to the simulated emergency, and particularly to coordinate EBS activation. This conference call was established early in the emergency exercise, through the state telephone operator. The initial EBS activation on Friday, May 17, was to be accomplished by adding additional parties -- including the

lead EBS station -- to the ongoing conference call. Mr. Capps mistakenly believed that the ongoing conference call had to be terminated and re-established to add the additional parties. (Shortly after terminating the call, he learned that the additional parties could have been added without terminating the call.) In attempting to re-establish the conference call, it was discovered that some of the telephone numbers in the procedure were incorrect, so that some calls had to be placed again. In addition, upon redialing, some of the lines were "busy". These problems resulted in a delay of approximately three or four minutes in EBS activation. Capps Affidavit, ¶ 6.

Had Mr. Capps originally known of the capability to add parties to the ongoing conference call, most of these difficulties would not have occurred.^{7/} This is so because all parties would have remained on the line, precluding the problems experienced on re-dialing with incorrect numbers and "busy signals".^{8/} In any event, once these initial difficulties with the conference call system were resolved, the EBS activation process proceeded very smoothly and quickly. The pre-recorded message intended for broadcast was on the air within three minutes (well within the performance objective for the system),

^{7/} To this extent, Wake County's problem with the conferencing system can fairly be characterized as ad hoc, and unlikely to be repeated.

^{8/} This is consistent with the FEMA evaluator's observation that "[o]nce all parties were on a conference call, keeping an open line helped to eliminate the delays in getting all parties on line". FEMA Exercise Report, at 17.

and numerous stations in addition to the lead EBS station carried the broadcast. Capps Affidavit, ¶ 7.

While the EBS problems Wake County experienced were not serious enough to prevent FEMA from finding that "the exercise demonstrated that offsite preparedness is adequate to provide a reasonable assurance that appropriate measures can be taken" to protect public health and safety, State and local emergency preparedness officials are nevertheless taking steps to enhance future use of the EBS system. In cooperation with the State, Wake County and the other counties of the EPZ have undertaken a comprehensive review and revision of EBS procedures, to "streamline" the procedures, and to clarify the responsibilities of personnel. In particular, the procedures are being clarified to assure that the responsibility for message preparation in an actual emergency is well-defined. The procedures are also being clarified to assure that "follow-up" EBS messages would be prepared in an actual emergency, and to specify the EOC staff personnel responsible for these activities. Capps Affidavit, ¶ 8.

The revised procedures will also reflect reliance on new equipment. With the support of Applicants, the State has initiated steps to accomplish the replacement of the conferencing system used during the exercise. The new conferencing capability will be based on use of a State-controlled, reserved, restricted state-wide telephone system dedicated to this purpose at the time of an emergency. The lines for use in the event of

an emergency at Harris are completely unavailable to the public, and invulnerable to heavy use of the commercial telephone network, including busy circuits. In contrast to commercial conference calling capability, the State system provides conference call capability that can be immediately cleared of all traffic in an emergency. It is immediately available (on a 24-hour per day basis) from any telephone within the 733 exchange, to any individual with the proper access code number. Any other commercial telephone can be interconnected to the system for conferencing. The present system allows the individual initiating the call to add up to 12 conferencing parties (soon to be 30 parties) without the assistance of a telephone operator, and without breaking any ongoing conference call. Capps Affidavit, ¶ 9; "Affidavit of Alvin H. Joyner on Eddleman EPX-8" ("Joyner Affidavit"), ¶ 8.

To facilitate use of this restricted network in the event of an emergency at Harris, Applicants are providing new telephones and lines on the State's 733 exchange and related equipment to the Wake County EOC and to the State EOC. Separate, reserved lines will be provided to the other county EOCs, to the plant and to the lead EBS station. (Lee, Chatham, and Harnett Counties, the plant, and the EBS station do not initiate calls, so the 733 exchange is not needed.) Joyner Affidavit, ¶ 8. These new telephones will have "unlisted" numbers (not available except in the procedures) and will be completely dedicated to the conferencing function between EOCs, including

EBS activation with its requirements for consultation and coordination. In the event of an emergency at Harris, the conferencing network can be established either by the State or by Wake County. Once established (immediately upon notification of an emergency), the network will be kept open on a continuous basis for the duration of the emergency; however, if for some reason the network were broken, it could be re-established immediately without operator assistance and irrespective of the level of public use of the commercial telephone system. Capps Affidavit, ¶ 9.

Finally, the revised procedures will be reviewed prior to implementation, and reverified periodically, to assure the accuracy of all information included there (e.g., the telephone numbers). Review and revision of the EBS procedures, and installation of all equipment for the new dedicated telephone conferencing capability, will be completed prior to full power licensing of Harris. Capps Affidavit, ¶ 10.

Additional training and practice on conferencing and EBS procedures -- including a "table-top exercise" -- also are being provided. The training program on the new equipment and associated procedure revisions will include all county emergency coordinators and alternates, the Wake County Public Information Officer ("PIO"), lead EBS station personnel, and appropriate State staff personnel. The program will particularly emphasize training for Wake County personnel (since Wake County serves as the coordinating county for EBS activation), and will

include instruction on the preparation of initial and "follow-up" EBS messages, as well as the addition of parties to the conference network without breaking the network. During the table-top exercise, Wake County will simulate preparation of an EBS message, and the relay of a message to the lead EBS station will be exercised. All relevant personnel will participate in the table-top exercise, actually using all telephones on the network. This training program, including the table-top exercise, will be completed prior to full-power licensing of the plant. The conferencing system will be re-tested over the life of the plant in each of the communications drills conducted in accordance with the emergency plans. Joyner Affidavit, ¶¶ 8-9; Capps Affidavit, ¶ 11.

Given the nature of the problems Wake County experienced with EBS use in the exercise, and the comprehensive corrective actions being taken by emergency preparedness officials, there is no genuine issue of material fact as to the capability of Wake County to manage the EBS system in the event of an accident at the Harris plant.

B. Modification of Plans and Procedures for
Message Preparation, With Training,
Will Resolve EBS Problems of State
During Exercise.

The basis for EPX-8, as it relates to EBS use at the State level, is found on page 12 of the FEMA Exercise Report. The evaluator there noted:

Even after the SERT [State Emergency Response Team] assumed control, the initial instructions to evacuate certain zones and take shelter in others were incomplete; subsequent use of the system to provide adequate coverage of the area was never realized. Instructions to the public were prepared for only two of the three siren activations, and one of these messages was incomplete.

These concerns about the State's use of the EBS system during the exercise are addressed in the accompanying Affidavit of Alvin H. Joyner, the Lead Planner for Fixed Nuclear Facilities for the State of North Carolina.

As Mr. Joyner explains, the exercise scenario postulated that, on Saturday, May 18, plant conditions and county response capabilities were such that the State was requested to assume overall direction and control of emergency response. The State did assume control of the response and, in that capacity, directed activation of the EBS and simulated preparation of EBS messages. On Saturday, there were two simulated activations of the EBS. Joyner Affidavit, ¶ 3. The EBS activation steps were conducted correctly and proceeded smoothly. The EBS message was simulated for broadcast in a timely fashion, and no communication problems were encountered. Nevertheless, the State's

experience with the EBS system in the exercise indicated the need for certain changes in the State's EBS procedures, to improve the use of the prescribed EBS messages included in the plan, to assure that those messages are released on a continuing basis after the initial activation so the public is properly informed throughout the emergency. Joyner Affidavit, ¶ 4.

The draft EBS messages are intended to facilitate the preparation of EBS messages in an emergency, by providing several standardized paragraphs covering the likely range of plant conditions and protective action instructions (including paragraphs suitable for both initial and "follow-up" broadcast). In an emergency, the preparer selects the appropriate paragraphs, completes the blanks in the paragraphs with situation-specific information, and assembles the paragraphs into a complete message. Joyner Affidavit, ¶ 5.

The simulated EBS messages prepared by the State during the exercise did not identify locations where evacuees without access to vehicles could obtain transportation, although it was indicated that pick-up points would be broadcast in a subsequent EBS message. While there is a separate draft message which would have provided this information, the preparation and release of that subsequent message was not simulated in the exercise. Similarly, the State did not simulate the preparation of "follow-up" EBS messages during the exercise; this is the

0 incompleteness in coverage" to which the FEMA Exercise Report referred.^{9/} Joyner Affidavit, ¶¶ 6-7.

To assure that information about transportation assistance is not omitted from the broadcast EBS messages in the event of an actual emergency, the steps used to process EBS messages will be revised by an expansion of the public education and information sections of the plans and related implementing procedures, to require the appropriate (State or county) PIO to assure the preparation and broadcast of messages including information such as the location of pick-up points. The PIO will also be specifically charged with assuring that there is a continuing release of information through EBS until the protective action (e.g., evacuation) is complete. These revisions will be completed prior to full power licensing of the plant. Joyner Affidavit, ¶¶ 6-7.

As discussed in greater detail in section IV.A, supra, appropriate state personnel will also receive training on the revised procedures, including instruction on the preparation of initial and "follow-up" EBS messages. Joyner Affidavit, ¶¶ 8-9. In addition, the State is expanding its ongoing program of table-top exercises to include practice in EBS activation wherever possible. Joyner Affidavit, ¶ 9.

^{9/} There was no geographic "incompleteness in coverage"; numerous stations, including the lead EBS station, carried the message broadcast during the exercise. Capps Affidavit, ¶ 7.

Accordingly, considering both the nature of the concerns about the State's use of the EBS system during the exercise and the corrective actions being implemented, there is no genuine issue of material fact as to the State's capability to use EBS in the event of an accident at the Harris plant.

V. CONCLUSION

Mr. Eddleman cannot avoid summary disposition of EPX-8 on the basis of mere speculation that the concerns expressed in that contention will not be resolved by the use of the new dedicated conferencing system, the comprehensive review and revision of EBS procedures, and the intensive training program which is planned.^{10/} Nor can Mr. Eddleman avoid summary disposition on the basis of guesses or suspicions, or on the hope that at the hearing Applicants' evidence may be discredited or that "something may turn up". See Gulf States Utilities Co. (River Bend Station, Units 1 and 2), LBP-75-10, 1 N.R.C. 246, 248 (1975). Mr. Eddleman's skepticism alone is simply insufficient to invoke an evidentiary hearing under the Commission's Rules of Practice.

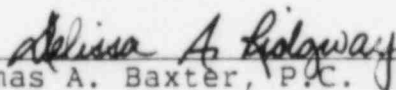
In sum, there is no genuine issue of material fact as to any of the concerns identified in EPX-8. The specific difficulties raised by this contention, viewed in context, represent

^{10/} Indeed, the Appeal Board has emphasized that licensing hearings are not to be "bogged down" with litigation over details such as implementing procedures. See Louisiana Power & Light Co. (Waterford Steam Electric Station, Unit 3), ALAB-732, 17 N.R.C. 1076, 1106-07 (1983).

relatively minor matters that are being fully addressed by the responsible emergency preparedness agencies. All necessary corrective actions are being taken and will be completed prior to full power licensing of the plant; and FEMA has committed to assure completion of the necessary corrective actions. See Memorandum from R. Krimm (FEMA) to E. Jordan (NRC), dated August 7, 1985. Accordingly, there is no issue of material fact as to EPX-8, and a hearing on this contention would serve no useful purpose. Applicants are entitled to a decision in their favor on this Motion as a matter of law.

For the foregoing reasons, Applicants respectfully request that this Motion for Summary Disposition of EPX-8 be granted.

Respectfully submitted,


Thomas A. Baxter, P.C.
Delissa A. Ridgway
SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

Richard E. Jones
Dale E. Hollar
CAROLINA POWER & LIGHT COMPANY
P.O. Box 1551
Raleigh, North Carolina 27602
(919) 836-8161

Counsel for Applicants

Dated: January 13, 1986