

March 30, 2000

Ms. Rita Kilpatrick
Campaign for a Prosperous Georgia
1083 Austin Avenue NE
Atlanta, Georgia 30307

SUBJECT: REPLY TO FEBRUARY 3 AND FEBRUARY 22, 2000, LETTERS TO THE
NUCLEAR REGULATORY COMMISSION

Dear Ms. Kilpatrick:

By letter dated February 3, 2000, to the Chairman of the Nuclear Regulatory Commission (NRC), Richard Meserve, Ms. Sara Barczak of your staff expressed concerns relating to Edwin I. Hatch Nuclear Plant, Units 1 and 2 (Hatch). She raised a number of issues and requested that Hatch be shut down and replaced with a safe energy supply for the region.

Because the letter requested that Hatch be shut down, a Petition Review Board (PRB) meeting was held on February 14, 2000, to determine whether or not the request meets the criteria for treatment as a petition under 10 CFR 2.206 in accordance with the NRC's Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions."

At the PRB meeting, in which Ms. Barczak and you participated by phone, you were asked to provide additional clarification related to some of your concerns. You provided this clarification and additional concerns in your letter dated February 22, 2000, to the Director of Nuclear Reactor Regulation, which was submitted as a petition under Section 2.206 of 10 CFR.

We have completed our review of the concerns raised in both letters. As discussed below, we find that the issues that you have raised have been previously evaluated and dispositioned by the NRC staff, or are currently being satisfactorily addressed by the NRC staff. Accordingly, we have determined that your request does not meet the threshold criteria stated in Part II of MD 8.11, Page 8; therefore, your request will not be treated as a 2.206 petition.

The first concern in the February 3, 2000, letter relates to the January 26, 2000, reactor trip of Hatch Unit 1. You stated that the plant came "too close to putting workers, the public, and the environment of Georgia at great risk". The NRC monitored the licensee's response to the event to ensure that the plant was safely shutdown and dispatched a Special Inspection Team to the site to assist the resident inspector staff in the investigation of the event. On January 28, 2000, the NRC decided to upgrade the inspection effort to an Augmented Inspection Team (AIT) because the reactor trip and subsequent transient involved possible important generic lessons and several complications that were initially difficult to understand. An additional technical expert and a manager were dispatched to the site over the course of the weekend. The AIT report was issued on February 28, 2000, and concluded that the event did not adversely impact the health and safety of public, that there was no radiological release associated with the event, and that no operational safety limits were approached or exceeded.

Your February 3, 2000, letter expressed concern about the public notification of the event. As noted in the letter, the event was immediately reported on the NRC's Daily Event Report website. The NRC's Office of Public Affairs normally issues press releases in connection with NRC actions or responses to operational events at nuclear power plants. The decision to issue news releases for Special Inspection Team visits is made on a case-by-case basis. Because we immediately determined that the event was not a threat to the health and safety of the public and that there was no release of radioactivity associated with the event, we decided to not issue a press release discussing the Special Inspection Team. When the decision was made to upgrade to an AIT, a press release was issued.

You requested that the NRC not grant the proposal, which was submitted on February 29, 2000, to extend the Hatch license. Notice of this proposal and an opportunity for public comment on the proposal will be published in the Federal Register. The NRC will review the proposal to ensure that it meets the requirements of 10 CFR Part 54. Thus, this request should be made in the context of the licensing action and is not an appropriate request under 10 CFR 2.206. See Part II of MD 8.11, page 9.

You requested adequate compensation of contaminated workers and the general public who have been affected by the plant. As discussed below, the plant has operated within NRC requirements with respect to the radiation received by workers and the general public. Therefore, there is no need to address the issue of compensation, and in any case, the NRC has no authority to order a licensee to compensate workers or members of the public.

The rest of the concerns raised in the February 3, 2000, letter were reiterated, with additional clarification, in your February 22, 2000, letter and are addressed below.

- (a) You noted that Inspection Report Nos. 50-321/94-23 and 50-366/94-23, dated October 4, 1994, stated that several licensed operators at Hatch and Vogtle had tested positive for drugs. The October 4, 1994, inspection report states that since January 1, 1990, there had been five events involving licensed operators testing positive for drugs, three events at Hatch and two events at Vogtle. The staff believes that these are isolated events and do not constitute a pervasive or ongoing fitness-for-duty problem at either facility. The inspection report states, "The licensee's proposed measures appear to be appropriate to verify the drug free working condition of operators and others in the Nuclear Operations Department. The licensee continues to have an effective and well managed Fitness For Duty Program."
- (b) You make a general statement that "the facility is decrepit, decayed and contaminated". The NRC continually monitors the condition of the facility through its inspection program, comprised of resident inspectors located at the facility who are assisted by personnel from the NRC's regional office in Atlanta, Georgia, and Headquarters in Rockville, Maryland. Furthermore, the staff will be conducting a detailed review of the condition of the facility during its review of the licensee's application for license renewal.

- (c) You cite two documents as evidence that Hatch has had problems exceeding Technical Specifications. The first document, dated November 1, 1974, is an application for an amendment to the Unit 1 Technical Specifications dealing with reactor coolant chemistry. This application was reviewed and approved by the staff and the amendment with the revised reactor coolant chemistry limits was issued on December 23, 1974.

The second document, dated February 1, 1977, is a Licensee Event Report (LER). The LER reports a condition for Unit 1 where the containment atmosphere concentration exceeded the limit in the Technical Specifications (TS) and, in compliance with the TS, an orderly shutdown was commenced. Events of this nature, exceeding the limits of the TS, occasionally occur and the TS provide appropriate Action Statements. They do not constitute a safety hazard to the public.

In this item you also reference a December 15, 1975, letter that discusses lost pieces found in the Unit 1 reactor. The determination made at that time was that these pieces presented no safety concern. The NRC is unaware of any ongoing problem with loose pieces in either Hatch unit.

- (d) You reference the letter dated September 19, 1975, which discusses a vibration problem with the low power radiation monitors (LPRM) in reactors similar to Hatch. The problem has since been resolved and the staff knows of no current LPRM vibration problem at Hatch.
- (e) You expressed concern that the Unit 2 Startup Test Report was not submitted within 9 months after criticality. Unit 2 achieved initial criticality on July 4, 1978. The Unit 2 startup test program included several hold points at which test results are evaluated and approved before continuing power ascension. Any problems detected that could impact safety would have been corrected prior to continuing power ascension. As stated in Inspection Report Nos. 50-321/79-09 and 50-366/79-11, dated March 23, 1979, an NRC inspector witnessed on a sampling basis the overall conduct of the power ascension test program. The Startup Test Report for Unit 2 was submitted on October 4, 1979, which was 15 months after criticality. It is a documentation of the startup test results and is retained as part of the plant historical record. It was reviewed and approved by the staff. Its submittal 15 months after criticality, rather than 9 months after criticality, does not pose any safety concern.
- (f) You expressed concern with the cracks found in the Unit 1 core shroud. Cracking of core shrouds from inter-granular stress corrosion is an issue that is of concern for all boiling water reactors, such as Hatch. The industry has a generic program to address inspection and evaluation of the degradation, as well as the repair, of cracked core shrouds. Both units at Hatch have been inspected, and any identified cracking has been evaluated and repaired to satisfy the generic industry criteria that have been reviewed and approved by the NRC. As a result, a repair modification has been installed on the core shroud in Unit 1. This repair design, which has been approved by the staff, is intended to maintain the structural integrity of the core shroud. The effects of vibrations and loads associated with normal operation, and postulated loads from

transients and accidents, have also been included. Unit 1, with this repair, has been operating satisfactorily for the past several years. The core shroud and repair assembly are periodically inspected in accordance with NRC-approved procedures and guidelines. The staff concludes that the core shrouds at Hatch do not pose a safety problem.

- (g) The issue you raised regarding feedwater nozzle inside radius and bore cracking, which is caused by thermal fatigue, was identified in the early 1970s. An industry program was implemented to inspect for potential cracking and to institute repairs that would eliminate by-pass flow past the thermal shield. This issue has been adequately addressed. No cracking of the feedwater nozzles at Hatch has been identified through the inspections. Furthermore, the Hatch feedwater spargers were repaired to minimize any by-pass flow.
- (h) You stated that the October 3, 1994, Inspection Report showed that the licensee had ignored recommendations concerning looking for weld defects on the core shroud and reduced inspection criteria. This report reviewed Inservice Inspection (ISI) program requirements and activities associated with the Unit 1 refueling outage. The report did document deficiencies associated with the scope of the inspection criteria used at Hatch. However, the report also stated that these deficiencies did not constitute violations of any regulatory requirements and that the deficiencies were adequately addressed by revising ISI procedures. A specific weld discrepancy was documented as an Unresolved Item by the inspector, but it was closed in a subsequent report and was also not a violation of regulatory requirements. The October 3, 1994, Inspection Report also documents the inspector's review of numerous videotapes of reactor core shroud visual examinations. Since these types of examinations are normally performed by a remote video probe and transmitted to high resolution monitors, review of videotapes of these examinations is an acceptable, thorough and independent inspection method. Section 2.b.3 of the report documents several other types of ISI examinations that were observed by the inspector.

You also mention other problems that were detailed in an inspection conducted from March 25 through April 1, 1994. These problems were documented in Inspection Report 50-321, 366/94-07 which reviewed ISI activities during a Unit 2 refueling outage. The inspection was conducted by the same ISI specialist who conducted the inspection discussed in the preceding paragraph. This Unit 2 report documented the incorrect positioning by the General Electric examiners of the ultrasonic test scanning fixture. However, the report notes that the affected welds (H-1 and H-2) were subsequently rescanned by the licensee as a corrective measure. This addressed the error and ensured adequate test data was obtained. Furthermore, the report documents examples where the licensee had elected to expand a planned weld examination sample size in response to potential indications.

In summary, although the two inspection reports that you reference did identify deficiencies with ISI activities at Hatch, all of the deficiencies were appropriately resolved and none constituted a violation of any regulatory requirements or any

decrease in safety. The NRC found that the licensee's inspections of the reactor core shroud welds were complete and appropriate.

- (i) You cite three events as examples of problems at Hatch. The first event occurred on June 15, 1999, on Unit 2 and was a manual scram due to loss of condenser vacuum with subsequent multiple equipment failures. An NRC Special Investigation Team evaluated the event and issued "NRC Special Team Inspection Report No. 50-321/99-10 and 50-366/99-10" on July 20, 1999.

The second event occurred on June 28, 1999, on Unit 2 and was a reactor trip caused by a procedural error which initiated a reactor water level transient. It is discussed in Inspection Report Nos. 50-321/99-04 and 50-366/99-04, dated August 4, 1999.

The third event, previously discussed in this letter, was the event on January 26, 2000, for which the NRC dispatched an Augmented Inspection Team.

None of these events posed a threat to the health and safety of the public, nor did they result in any releases of radioactivity.

- (j) In regards to your issues contained in items (j), (k), (l), (p), and (t); the NRC is aware of the information you presented through reports made by the licensee to the NRC and from its own inspection of the licensee's activities. Based on the available information you presented and the information contained in the licensee's reports to the NRC, as well as information gathered through NRC inspections, the staff concludes that the plant operation has not resulted in a significant impact on the environment. Following is an explanation of the NRC's program to ensure that radioactive effluents released from nuclear power plants are controlled and that the environment around the plant site is monitored for any adverse impact.

Radiological environmental monitoring and radiological effluent monitoring at nuclear power plants is important to verify the effectiveness of in-plant measures for controlling the release of radioactive material, and to verify that the levels of radioactive materials in the off-site environment do not exceed those originally anticipated in the Final Environmental Statement (FES) prior to licensing the plant. The FES for the Hatch Nuclear Plant, issued in March 1978, specifically addressed the release of liquid radioactive effluents into the aquatic environment at the point where the plant's radioactive liquid effluents mix with the Altamaha River. The analysis showed that full-power operation of the facility would not result in a significant impact on the environment. With over twenty years of radioactive effluent releases and corresponding environmental monitoring program data, the staff believes that the plant operation has not resulted in a significant impact on the environment.

The principal regulatory basis for requiring environmental monitoring and effluent monitoring is contained in General Design Criterion 64 of Appendix A to 10 CFR Part 50, and Section IV.B of Appendix I to 10 CFR Part 50. Section IV.B states that:

“The licensee shall establish an appropriate surveillance and monitoring program to: 1. Provide data on quantities of radioactive material released in liquid and gaseous effluents...; 2. Provide data on measurable levels of radiation and radioactive materials in the environment to evaluate the relationship between quantities of radioactive material released in effluents and the resultant radiation doses to individuals from principal pathways of exposure...”

Results from the environmental and effluent monitoring programs are reviewed. If the data indicate that the relationship between the quantities of effluents and doses to individuals is significantly greater than that assumed in the Hatch FES, then the NRC, pursuant to Section IV.C of Appendix I to 10 CFR Part 50, may modify the allowable quantities of radioactive materials that may be released. This provides further assurance that the operation of the plant will not have a significant impact on members of the public or the environment.

The licensee’s Radiological Environmental Monitoring Program (REMP) is reviewed by NRC staff against the criteria contained in the Radiological Assessment Branch Technical Position, Revision 1, November 1979, “An Acceptable Radiological Environmental Monitoring Program”. The Branch Technical Position (BTP) contains an example of an acceptable minimum radiological monitoring program. The monitoring program includes a diverse collection of environmental media that have the potential to contain radioactive material released from the plant and thus affect members of the public. Sampling of the air, water, sediment, milk, food products, and fish and invertebrates is performed. The water sampling includes samples of surface, ground, and drinking water. In addition, the BTP also includes sampling of sediment from the shoreline. All these samples receive gamma isotopic analysis to identify concentrations of any radionuclides that may be present. This sampling adequately represents all potential exposure pathways to members of the public.

The results of the licensee’s REMP and effluent monitoring programs are reported annually to the NRC. On a periodic basis, the NRC inspects licensees’ effluent and environmental monitoring programs to verify regulatory compliance and to note trends in the data.

In response to the spill of spent fuel pool water which occurred on December 3, 1986, the licensee, on December 4, 1986, expanded the REMP to include radiological sampling and analyses of the swamp and river. The analysis at that time showed that contamination of the swamp was limited to the west side (i.e., closest to the plant structures), and that migration of radionuclides to the river did not occur. In addition, the licensee established an augmented REMP on December 15, 1986. As part of the REMP, the licensee submits annual reports of the radiological monitoring program to the NRC. Review of these annual reports is a routine part of the NRC’s Inspection Program.

The radiological environmental and effluent monitoring programs required by the NRC are sufficiently comprehensive to provide an adequate assessment of the radiological impact of plant operation on the off-site environment. The available environmental monitoring data for the Hatch Nuclear Plant supports the conclusion that, while there are low levels of radioactive material that came from the facility, this material is within the levels previously analyzed for during the licensing of the plant, is within the radiation safety limits of 10 CFR Part 20, and therefore has not adversely impacted the health and safety of the public or the environment.

For radioactive material that remains on the plant property, there is a regulation, 10 CFR 50.75(g), which requires each licensee to keep records of information important to the safe and effective decommissioning of the facility. The information that should be recorded includes records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site. Information on the types and amounts of radioactive material must be recorded. The regulation recognizes that during the course of plant operation there will be situations (i.e., spills, leaks, etc.) which will result in contamination of the plant site. This does not allow the licensee to grossly contaminate its site without action from the NRC, because there are regulatory limits in 10 CFR Part 20 that must be adhered to for radiation exposures to plant workers and members of the public as well as effluent releases during plant operation and, later, after the plant is decommissioned. The records of radioactive contamination in and around the plant site are of primary importance at the time when plant decommissioning starts.

- (m) In this item, you addressed Relief Request RR-25, which was submitted on July 9, 1999, and modified by letters dated January 11, 2000 and March 3, 2000. RR-25 proposes, for certain pipes at Hatch, a repair technique different from that specified in the Code endorsed by American Society for Mechanical Engineers. The staff is currently reviewing Relief Request RR-25. Before the relief request is approved, the staff will ensure that the alternative repair provides the same margin of safety as the Code repair. Furthermore, if granted, the relief request will only be granted for a limited period of time.
- (n) You expressed concern that refueling has caused contamination of workers and the surrounding site. The NRC monitors licensee performance on a daily basis through inspections by NRC inspectors stationed at the plant and with periodic inspections by radiation protection specialists from the Regional NRC office located in Atlanta, Georgia. These inspections allow the staff to maintain an on-going oversight and assessment of the licensee's performance in the radiation protection area. The licensee is required, by regulation (10 CFR Part 20), to have and maintain a radiation protection program to ensure that radiation exposure of plant workers is not only controlled below limits, but to go further and have a program to keep doses as low as is reasonably achievable (ALARA). Additionally, by regulation (10 CFR Part 19), all plant workers who could receive a small fraction of the yearly dose limit must receive radiation protection and emergency training on the hazards and safety programs at the plant. The degree of training is commensurate with the type of work the individual will perform.

The NRC is aware that, in the area of radiation protection, the licensee's performance level needs to improve. However, NRC inspections show that there are no significant performance problems that threaten the safety of the plant workers. The regulations allow for plant workers to receive radiation exposure (both external and internal) while working at the plant. The event you reference was documented in an NRC inspection report, and the resulting exposure levels are allowable under the regulations.

- (o) As you noted, the NRC's January 8, 1993, Inspection Report discussed the licensee's disposal of contaminated sludge. In that inspection report, the NRC issued to the licensee a Notice of Violation (NOV). In response to the NOV, the licensee suspended the on-site disposal of sludge and committed to make changes to the radiation survey program to ensure that more sensitive radiation surveys will be performed so that a recurrence of this issue is precluded. The licensee's radioactive material control program is inspected regularly by NRC radiation protection inspectors from the Region II office to ensure that the licensee maintains adequate control of its licensed radioactive material in compliance with the requirements of 10 CFR Part 20.

In the event that the licensee decides to resume disposal of radioactively contaminated sludge, the disposal of this sludge within or outside of the licensee's site is within the jurisdiction of the State of Georgia because of its status with the NRC as an Agreement State. Therefore, applications for disposal of radioactive contaminated material in Agreement States must be submitted to the Agreement State.

- (p) See response to item (j)
- (q) You expressed concern about earthquakes at Hatch. The design of nuclear power plants must take into account the potential effects of earthquake ground motion. Hatch has undergone thorough and comprehensive geologic and seismic investigations and reviews. The seismic design of Hatch is based on the assumed occurrence of an earthquake of magnitude 5.3 at the site. This is larger than any earthquake which has occurred in the region surrounding the site. The 1886 Charleston, South Carolina, magnitude 6.9 earthquake was approximately 150 miles from the Hatch site and if it recurred it would not cause any damage to the plant.

The earthquake postulated for the seismic design of a plant, called the Safe Shutdown Earthquake (SSE), defines the maximum ground motion for which certain structures, systems and components necessary for safe operation and shutdown are designed to remain functional (e.g. for decay heat removal after the reactor is shutdown). Appendix A to 10 CFR Part 100, "Seismic And Geologic Siting Criteria For Nuclear Power Plants," requires that the design bases for earthquakes be determined through evaluation of the geologic and seismic history of the site and surrounding region. Ground accelerations associated with the SSE used for the design bases of the plant are conservatively selected; as a result, there is an extremely low probability that ground accelerations in excess of the SSE will occur at the Hatch site.

In addition, the plant has design margins (capability) well beyond the design basis earthquake. The ability of a nuclear power plant to resist the forces generated by the ground motion during an earthquake is thoroughly investigated in the design and construction phases. Industry codes and practices that govern the design of nuclear power plant structures and components are far more stringent than those used in the design of residences and commercial buildings. As a result, nuclear power plants are able to resist earthquake ground motions well beyond their design bases and well beyond the ground motion that would result in damage to commercial buildings.

As a safety requirement, nuclear power plants have strong ground motion seismic instruments in and near the sites. If the ground motion at a site exceeds a specified level, which is one-half or less of the Safe Shutdown Earthquake, the plant is required to shut down. Prior to resuming operations, the licensee is required to demonstrate to the Commission that no functional damage has occurred to those plant features necessary for continued safe operation.

The earthquake on January 18, 2000, had a magnitude of 3.5 and was located approximately 89 miles from the Hatch site. Ground motion at the Hatch nuclear power plant from this earthquake was extremely small, well below the seismic design of the plant, and of no safety significance.

- (r) You expressed concern about failure of the dam on Lake Sinclair. Failure of this dam was addressed in the NRC's, "Safety Evaluation of the Edwin I. Hatch Nuclear Plant Unit 1," dated May 11, 1973. This document states that the applicant has shown that a failure of the dam would be expected to produce water levels at the Hatch site which are less than the Probable Maximum Flood (PMF); the plant is designed to withstand the PMF. Thus, the failure of the dam on Lake Sinclair, which is about 169 miles upstream of the plant, is not a safety concern.
- (s) You expressed concern about the doses resulting from the dry casks (also known as ISFSI casks). The dose limits of 125 millirems per hour on the side and 85 millirem per hour on the top are the maximum average surface dose rates (neutron and gamma total) allowed by the NRC technical specifications for the HOLTEC HI-STAR 100 cask system in use at Hatch. The design was approved for use by the NRC through a public rulemaking process (Federal Register Notice 64FR171, dated September 3, 1999). Actual dose rates for loaded casks are expected to be less.

In its Safety Evaluation Report for this system, NRC found that the cask meets the requirements for providing adequate radiological protection to licensee personnel and members of the public.

Hatch must comply with 10 CFR 72.104 which limits the annual dose rate during normal operations and anticipated occurrences. The regulatory limit for any real individual located beyond the controlled area is 25 millirems per year to the whole body. This

dose includes all radiation received by an individual from the ISFSI and from plant discharges. Additionally, the plant is required to maintain these doses as low as is reasonably achievable. Consequently, the dose rates to members of the public are expected to be lower than the regulatory limit.

- (t) See response to (j).
- (u) You state that there would be an unacceptable number of fatalities and injuries from a meltdown of the reactor or the spent fuel pool. Nuclear power plants are designed with a "defense-in-depth" philosophy. Briefly stated, this philosophy: (1) requires high quality in the design, construction and operation of nuclear plants to reduce the likelihood of malfunctions in the first instance; (2) recognizes that equipment can fail and operators can make errors, therefore requiring safety systems to reduce the chances that malfunctions will lead to accidents that release fission products from the fuel; and (3) recognizes that, in spite of these precautions, serious fuel damage accidents can happen, therefore requiring containment structures and other safety features to prevent the release of fission products offsite. Furthermore, the added feature of emergency planning to the defense-in-depth philosophy provides that, even in the unlikely event of a release of radioactive materials to the environment, there is reasonable assurance that emergency protective actions can be taken to protect the population around nuclear power plants.

Therefore, we conclude that your concerns have been adequately addressed by the NRC in the past, or are currently being satisfactorily addressed by the NRC, and we do not find it necessary to initiate further actions on your concerns.

We trust that this explanation is responsive to your concerns. Should you have any questions or comments regarding these matters, please call Leonard Olshan of my staff toll-free at 1-800-368-5642.

Sincerely,

/RA/

John A. Zwolinski, Director
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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