

6/29/79

June 29, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
PENNSYLVANIA POWER & LIGHT COMPANY	)	Docket Nos. 50-387
and	)	50-388
ALLEGHENY ELECTRIC COOPERATIVE, INC.	)	
	)	
(Susquehanna Steam Electric Station,	)	
Units 1 and 2)	)	

APPLICANTS' ANSWERS TO  
CITIZENS AGAINST NUCLEAR DANGERS  
INTERROGATORIES AND REQUEST FOR DOCUMENTS

Pennsylvania Power & Light Company and Allegheny Electric Cooperative, Inc. ("Applicants"), for their answers to the interrogatories and request for documents filed by Citizens Against Nuclear Dangers ("CAND") by letter dated May 22, 1979, state as follows:

As indicated below, documents (identified herein as exhibits) are either transmitted by separate letter or are available for inspection at the office of Bryan Snapp, Esquire, Pennsylvania Power & Light Company, 2 North Ninth Street, Allentown, Pennsylvania 18101 (Telephone 215-821-4397). Arrangements to inspect documents which are not transmitted separately should be made by contacting Mr. Snapp. A list of the documents and files which are being transmitted or are available is attached hereto as an Appendix.

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Interrogatory/Request 1. Documents containing the available requested information are included in Exhibit C-1 and are being transmitted under separate cover.

Interrogatory/Request 2. Objection.\*

Interrogatory/Request 3. Objection in part. Documents containing the available requested information relating to the generation of electricity by solar energy are included in Exhibit C-2 and are available for inspection.

Interrogatory/Request 4. Documents included in Exhibit C-3 are transmitted under separate cover. Relevant portions of files included in Exhibit C-4 are available for inspection.

Interrogatory/Request 5. Objection.

Interrogatory/Request 6. Objection.

Interrogatory/Request 7. Copies of Pennsylvania Power & Light Company Annual Reports for 1968 - 1978 and copies of Allegheny Electric Cooperative, Inc. Annual Reports for 1972 and 1974 - 1977 are included in Exhibit C-5 and C-6, respectively, and are being transmitted under separate cover. No Allegheny Electric Annual Reports were printed in 1973 or prior to 1972. The Allegheny Electric Annual Report for 1978 is not yet available. Copies of the PP&L Reporter from January, 1972 through May, 1979 are included in Exhibit C-7 and are available for inspection. No PP&L Reporters were issued during June - August, 1974.

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\*Applicants objections to some of the interrogatories and requests for documents are set forth in "Applicants' Objections to Certain Interrogatories From Intervenor Citizens Against Nuclear Dangers", dated June 29, 1979.

Interrogatory/Request 8. Objection.

Interrogatory/Request 9. Objection in part. Applicants do not have a listing or copies of docket entries or copies of Court Docket title pages for any federal or state litigation involving the Susquehanna Steam Electric Station. The captions including docket numbers of all litigation, present or concluded, in the federal or Pennsylvania courts involving the Susquehanna Steam Electric Station in which the Applicants are parties are as follows:

1. Stanley Shortz and Joyce Shortz, his wife, et al. v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County, No. 9134
2. Pennsylvania Power & Light Company v. Gulf Oil Corporation, Royal Dutch/Shell Group, and Scallop Nuclear, Inc., Individually and Trading as General Atomic Company.  
Court of Common Pleas of Lehigh County, No. 453 -  
January Term, 1975 In Assumpsit
3. General Electric Company v. Pennsylvania Power & Light Company, Bechtel Corporation and Bechtel Power Corporation  
Court of Common Pleas of Lehigh County, No. 259  
April Term, 1977
4. Bechtel Power Corporation and Bechtel Corporation v. Pennsylvania Power & Light Company  
Court of Common Pleas of Philadelphia, No. 5700  
January Term, 1977
5. Pennsylvania Power & Light Company v. Bechtel Corporation and Bechtel Power Corporation  
Court of Common Pleas of Lehigh County, Nos. 243, 244, 245 and 246  
April Term, 1977
6. Edward Naunczek & John Naunczek v. Pennsylvania Power & Light Company, Court of Common Pleas of Luzerne County.  
Civil Division - Eminent Domain  
No. 8655 of Term 1977
7. Frank & Helen Rogers, Joseph Calicchio and Mary Ann Calicchio, Anthony Rogers and Evelyn Rogers, Ronald R. Rogers and Charlene Rogers v. Pennsylvania Power & Light Company v. Bernard C. Cigarski and Irene Cigarski, his wife, and Frank Shevock  
Court of Common Pleas of Luzerne County - No. 11819, Term 1978

8. John W. Conrad and Faith E. Conrad, his wife v. Clyde E. Workman, Wilfred F. Markey, Jr., Individually and t/a W. F. Markey, Bechtel Power Corporation, General Electric Corporation and Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County, No. 3914, Term 1978
9. John J. Alaimo and Maureen L. Alaimo v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County No. 425 of 1978
10. Thomas M. Bishof v. G&H Steel Service, Inc., Bechtel Power Corporation, Research Cottrell Corporation, Harmon Cooling Tower Division and Pennsylvania Power & Light Company  
United States District Court-Eastern District of Pennsylvania.  
No. 78-2010
11. Donald L. Dickson and Jean J. Dickson v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County No. 83 of 1977
12. Eva Thomas v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County -  
Eminent Domain Civil Division No. 2181 of 1975
13. In Re: Condemnation by the Pennsylvania Power & Light Company of Surface and Subsurface Interest in Property located in Salem Township, Luzerne County, Pennsylvania, for the Construction of Facilities for the Generation and Supply of Light, Heat and Power by means of Electricity to the Public  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 2467 October Term, 1972
14. Stanley E. and Joyce Shortz v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 656 May Term 1972
15. Mrs. Kenneth Nason v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 1131 May Term 1972
16. Harry W. and Leonore S. Kline v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 1132 May Term 1972
17. Julia Mont v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 657 May Term 1972

18. Charles E. and Virginia D. Golomb v. Pennsylvania Power & Light Company  
Court of Common Pleas of Luzerne County  
Eminent Domain No. 658 May Term 1972
19. Commonwealth of Pennsylvania v. Pennsylvania Power & Light Company  
Magisterial District No. 11-3-02 .  
Complaint No. 78-C-91

Interrogatory/Request 10. Objection.

Interrogatory/Request 11. Objection.

Interrogatory/Request 12. Documents containing the available requested information are included in Exhibit C-8 and are transmitted under separate cover.

Interrogatory/Request 13. Documents containing the available requested information are included in Exhibit C-9 and are transmitted under separate cover.

Interrogatory/Request 14. Objection.

Interrogatory/Request 15. Objection.

Interrogatory/Request 16. A list of grantors, grantors' addresses where available, the Deed Book and page number for each transaction document, and plan and profile drawings (scale 1" to 400'), showing the right-of-way and each tract of land it crosses, relating to the transmission lines associated with the Susquehanna Steam Electric Station, are included in Exhibit C-10 and are transmitted under separate cover.

Interrogatory/Request 17. Objection in part. Documents containing the available requested information regarding Pennsylvania Power & Light Company's participation in research


by High Voltage Power Corp. on extra-high voltage underground transmission are included in Exhibit C-11 and are being transmitted under separate cover.

Interrogatory/Request 18. Objection.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By

  
\_\_\_\_\_  
Jay E. Silberg  
Alan R. Yuspeh

1800 M Street, N. W.  
Washington, D. C. 20036  
(202) 331-4100

Dated: June 29, 1979

## APPENDIX

### Exhibit C-1

1. Regulatory and Interconnection Considerations 11/29/78
2. Technology and Energy Assessment, Report #23 10/20/78
3. A Fully Interconnected Wind System March 1979
4. Harwood Wind Electric System Daily Log Sheets 10/20/78

### Exhibit C-2

1. Wind Energy Information - Lehigh  
Solar and Wind Data
2. Criteria for Energy Storage R&D 1976  
The National Research Council, Washington, D.C.
3. Analysis of Storage R&D Requirements for WECS & PV 1 April 1979  
Applications Prepared for National Research Council  
Committee on Advanced Energy Storage Systems  
Solar Energy Panel (H. Davitian, Brookhaven National  
Laboratory, Upton, New York; M. D. Pope, MIT Lincoln  
Laboratory, Lexington, Massachusetts; R. D. Tabors,  
MIT Energy Laboratory, Cambridge, Massachusetts)
4. Solar/Utility System Interface Work Group  
Draft Document - Outline
5. Solar Energy Panel 11/28/78  
5 - High Temperature Solar-Thermal Conversion
6. Executive Report of Workshop Conference on 23-  
Photovoltaic Conversion of Solar Energy for 25 1973  
Terrestrial Applications held at Cherry Hill, N.J.  
Prepared by Jet Propulsion Laboratory, California  
Institute of Technology, Sponsored by National  
Science Foundation RANN - Research Applied to  
National Needs October 15, 1974 - Grant No. AG-485
7. Workshop Proceedings Photovoltaic Conservation 23-  
of Solar Energy for Terrestrial Applications 25 1973  
Vol. 1. Working Group and Panel Reports  
Held Cherry Hill, New Jersey  
Organized by Jet Propulsion Laboratory, California  
Institute of Technology, Sponsored by National  
Science Foundation RANN - Research Applied to  
National Needs - Grant No. AG-485

8. Solar Thermal Conversion Mission Analysis Summary Report Volume 1 - Report No. ATR-74(7417-05)-1, Vol. 1 Prepared for The National Science Foundation/Research Applied to National Needs, Washington, D. C. Prepared by: Civil Programs Division, The Aerospace Corporation, El Segundo, California, Contract No. NSF-C797 1/15/74
9. General Electric Conceptual Design and Systems Analysis of Photovoltaic Systems - Final Report Report No. ALO-3686-14 - Volume II - Study Results & Volume III - Appendices March 19 1977
10. Electric Power Research Institute  
Assessment of Cadmium Sulfide Photovoltaic Arrays for Large Scale Electric Utility Applications EPRI ER-188, Project WS 75-21 Final Report Prepared by Brown University, Providence, R.I. Feb. 1976
11. Penetration Analysis and Margin Requirements Associated with Large-Scale Utilization of Solar Power Plants EPRI ER-198, TPS 75-611 Final Report Prepared by The Aerospace Corporation, El Segundo, California Aug. 1976
12. Silicon Photovoltaic Cells in Thermophotovoltaic Conversion EPRI ER-478, Project 790-1 Progress Report Prepared by Stanford Electronics Laboratories, Stanford, California Feb. 1977
13. Solar Thermal Conversion to Electricity Utilizing a Central Receiver, Open Cycle Gas Turbine Design EPRI ER-387-SY, Project 475-1 Summary Report Prepared by Black & Veatch Consulting Engineers, Kansas City, Missouri March 1977
14. Preliminary System Analysis of a Fixed Mirror Solar Power Central Station EPRI ER-434, Project 739-1 Final Report Prepared by General Atomic Company, San Diego, California June 1977
15. Closed-Cycle, High-Temperature Central Receiver Concept for Solar Electric Power EPRI ER-629, Project 377-1, Final Report Prepared by Boeing Engineering and Construction Seattle, Washington Jan. 1978



16. Perspectives on Utility Central Station Photovoltaic Applications  
EPRI ER-589-SR Special Report  
Prepared by Electric Power Research Institute  
Palo Alto, California Jan. 1978
17. Electric Utility Solar Energy Activities 1977 Survey  
EPRI ER-649-SR Special Report  
Prepared by Electric Power Research Institute  
Palo Alto, California Feb. 1978
18. Silicon Photovoltaic Cells in TPV Conversion  
EPRI ER-633 Project 790-1 Interim Report  
Prepared by Stanford University, California Feb. 1978
19. Solar-Thermal Conversion to Electricity Utilizing a Central Receiver, Open-Cycle Gas Turbine Design  
EPRI ER-652, Project 475-1 Final Report  
Prepared by Black & Veatch Consulting Engineers,  
Kansas City, Missouri March 1978
20. Electric Power Research Institute  
  
Requirements Assessment of Photovoltaic Power  
Plants in Electric Utility Systems  
EPRI ER-685-SY, Volume 1 - Summary Report  
Project 651-1 Volume 2 - Technical Report  
Volume 3 - Appendices  
Prepared by General Electric Company,  
Schenectady, New York June 1978
21. Physiological Effects of Redirected Solar Radiation  
EPRI ER-651, Project 955-1 Topical Report  
Prepared by Black & Veatch Consulting Engineers  
Kansas City, Missouri Aug. 1978

Exhibit C-3

1. Annual Conservation Report of the Pennsylvania Power & Light Company to the Pennsylvania Public Utility Commission  
December 1978 - Revised 4/79
2. Pennsylvania Power & Light Company Energy Conservation Programs 2/7/77
3. Status of Energy Conservation & Energy Management  
Pennsylvania Power & Light Company  
June 1977

4. "Report of Measures to Implement Conservation of Natural Resources for the Calendar Year - 1975" filed by Pennsylvania Power & Light Company with the FPC on Conservation of Natural Resources Docket No. R-454.
5. "Report of Measures to Implement Conservation of Natural Resources for the Calendar Year - 1974" filed by Pennsylvania Power & Light Company with the FPC on Conservation of Natural Resources Docket No. R-454.
6. "Report of Measures to Implement Conservation of Natural Resources for the Calendar Year - 1973" filed by Pennsylvania Power & Light Company with the FPC on Conservation of Natural Resources Docket No. R-454.
7. "Report of Measures to Implement Conservation of Natural Resources for the Calendar Year - 1972" filed by Pennsylvania Power & Light Company with the FPC on Conservation of Natural Resources Docket No. R-454.

Exhibit C-4

1. Conservation Research & Technology Program Approval Document (Energy Research & Development Administration - Office of Conservation, Division of Conservation Research & Technology, Washington, D. C. 20545) March 1976
2. Proceedings of the Energy Research and Development Administration Conference on: Cogeneration and Integrated Energy/Utility Systems (Energy Research and Development Administration - Office of Conservation, Division of Buildings and Community Systems) June 3, 1977
3. Towards Energy Independence in '76 (Consumer & Community Affairs Program - PP&L)
4. PP&L Energy Efficient House Simulation of System Performance (Prepared by Consultants: Bernard B. Hamel, Professor Mechanical Engineering and Mechanics and Harry L. Brown, Professor, Mechanical Engineering and Mechanics, Drexel University, Philadelphia, Pa.; and Wm. Steigelmann, Mgr., Energy Systems Laboratory, Franklin Institute Research Laboratories, Philadelphia, Pennsylvania) June 1976

5. A Proposal to Build and Demonstrate A Modular Self-Contained Electrically Assisted Solar Heat Pump (Charles A. Berg) May 12, 1977
6. Efficient Electricity Use April 1976  
A Handbook for an Energy Constrained World  
Electric Power Research Institute (EPRI)  
EC-127 Final Report
7. SHACOB: Requirements Definition and Impact Analysis June 1978  
EPRI ER-808 - Project 553 Final Report Volumes 1,  
2, 3 & 4
8. SHACOB: Requirements Definition and Impact Analysis June 1978  
EPRI ER-808-SY - Project 553 Summary Report
9. Solar Heating and Cooling Computer Program EMPSS July 1978  
EPRI ER-770-SY - Project 926 Summary Report
10. Commercial Solar Augmented Heat Pump System March 1979  
EPRI ER-1004 - Project 925-1 Interim Report  
(Electric Power Research Institute)  
(Prepared by Southern California Edison Company,  
Rosemead, California)
11. Files from PP&L's Conservation Services Department:  
Corporate
  - 1.03 Corporate Objectives
  - 2.01 Annual Reports to Shareowners
  - 2.04 Quarterly Reports to Shareowners
  - 2.05 Shareowners Annual Meetings
  - 5.04 Proceedings Pending before Courts and  
Governmental Agencies
  - 8.00 Governments - Federal
    - 8.01 Atomic Energy Commission
    - 8.02 Bureau of Mines
    - 8.03 Department of Transportation
    - 8.04 Department of Agriculture

- 8.05 Department of Commerce
- 8.06 Department of Defense
- 8.07 Department of Health, Education and Welfare
- 8.08 Department of Interior
- 8.14 Federal laws - Residential Conservation Services Program
- 8.15 Federal Energy Regulatory Commission
- 8.23 Housing and Urban Development
- 8.24 Federal Housing Administration
- 8.27 Federal Energy Agency
- 8.28 Department of Energy (DOE)
- 8.40 Government - State
- 8.46 Department of Labor and Industry
- 8.54 Public Utility Commission
- 8.54.1 Public Utility Commission - Annual Review
- 8.59 Department of Community Affairs
- 8.60 Office of State Planning & Development
- 8.61 Governor's Committee for Preservation of Agricultural Land
- 8.63 Pennsylvania Technical Assistance Program
- 8.64 Office of Consumer Advocate
- 8.80 Governments - Local
- 8.83 Municipal Governments
- 8.84 Planning Commissions
- 8.85 School Districts

Property  
& Plant

11.00 Buildings and Building Facilities

Financial

19.00 Financial Statements & Statistical Data  
19.01 Division Sales & Revenue and Division  
Sales Analysis  
19.02 Electric Operating Expenses  
19.03 Electric Sales Statistical Report  
19.04 Forecasts of Sales & Revenue  
19.05 Operating Revenues & Expenses by Location  
19.06 Statistical Review (Publication)  
19.08 Electric Sales Reports  
19.10 PP&L Quarterly Review

Payroll &  
Personnel

24.36 Job Evaluation  
26.10 Consumer & Community Services Training  
for Employees  
27.02 Operational Changes  
27.03 Organization Changes  
27.04 Organization Charts

Conservation  
Services

32.00 Marketing Program & Reports  
32.02 Awards (Consumer & Community Affairs)  
32.03 Building Contractors

32.04	Commercial Cooking
32.05	Marketing Survey
32.06	Mobile Homes Program
32.07	Modular Housing
32.08	Power - New Business
32.09	Reddy Kilowatt Dealers
32.11	Water:Heater:Program
32.12	Wiring Programs & Applications
32.13	Competitive Marketing Practices.
32.14	Consumer Affairs Reports
32.15	Consumer Arrairs Public Appearances & Interviews
32.16	Operation: CARE
32.17	Consumer Concerns
32.18	Architects & Engineers
32.19	Energy Crisis (C&CA Programs and Reports Only)
32.20	Consumer Surveys
32.21	Consumer Education - Reports & Programs
32.22	Residential Reports & Programs
32.23	Industrial & Commercial Reports & Programs
32.24	Community Affairs Reports
32.25	Customer Training Programs
32.26	Nuclear Information and Programs
32.27	Consumer & Community Affairs Dept. Report
32.30	Consumer Communications
32.31	Communication Channels - Consumer Affairs

32.32	Energy Sources
32.33	Load Management Programs
32.34	Consumer Groups
32.35	Monitor Graphs
33.00	Rates, Tariffs & Schedules
33.01	Active Tariffs & Schedules
33.05	Rate Filing
33.06	Rate Tariff Comparisons - Individual Customers
33.12	Peak Load Forecast
33.13	Revenue Budget and Budget Check
33.15	Load Studies (By Rate Class)
33.16	Contribution to Peak
33.20	Peak Load Pricing
33.21	Experimental Rates - Time of Day Pricing
34.10	Buildings Available
34.14	Regional Growth Study & Guides
34.15	Bicentennial Activities
34.20	Mass Transit - Area Development
34.21	Rail Transit - Area Development
34.22	Community Planning Programs & Activities
34.24	Population and Economic Data
34.26	Transportation - General
35.01	Commercial Customers
35.02	Industrial Customers
35.03	Municipal Customers
35.05	Residential Customers

35.06 Rural Customers  
35.07 System Customers  
35.09 State and Federal Customers  
36.01 Commercial Air Conditioning & Heating  
36.02 Competitive Fuel Cost Comparison for Air  
Cond. & Heating  
36.03 Heating Studies  
36.04 Industrial Air Cond. & Heating  
36.05 Residential Air Cond. & Heating  
38.01 Area Lighting  
38.02 Municipal Christmas Lighting  
38.03 Street Lighting

Customer  
Service

42.03 Budget Billing  
42.04 Customer Information System  
42.13 Energy Vouchers  
43.15 Third Party Program  
43.16 Senior Citizens - Extended Net Rate  
45.07 Welcome Letters to New Customers  
46.01 Customer Inquiries

Operations

54.14 Cogeneration  
63.01 Demand Metering  
63.09 Demand Metering Pulses to Customers'  
Equipment



67.01 Cooling and Degree Days  
67.02 Weather Observers  
67.03 Climatological Data  
72.16 Electric Vehicles

Communications

83.01 Advertising  
83.02 Area Development Advertising  
83.03 Bill Inserts  
83.05 Decal Program  
83.07 Energy of Man Train  
83.08 Newspaper and Magazine Advertising  
83.11 Radio and Television Advertising  
83.12 Reddy Kilowatt Ad. Serv.  
83.15 Vehicle Ad.  
83.16 Window Displays & Exhibits  
83.17 Information Summary Weekly Report  
84.01 Catalogues  
84.02 Magazines  
84.03 Newspapers  
84.04 Publications (Misc.)  
86.02 Comments & Questions  
86.03 "Fact Finder"  
86.04 Information Racks  
86.05 PP&L Reporter  
86.07 Talks to Employees

- 87.02 Conferences, Conventions, Seminars & Forums, Workshops, etc.
- 87.04 Division Operations Staff Mtg.
- 87.06 Consumer and Community Services Mtgs.
- 87.12 Consumer Education Meetings
- 88.02 Associations
- 88.07 Service Clubs
- 88.08 Edison Electric Institute
- 88.09 Pennsylvania Electric Association
- 88.10 Electric Energy Association
- 88.12 Association of Edison Illuminating Companies
- 88.13 American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE)
- 88.14 National Economic Research Association

Community Relations

- 93.15 Public Participation Programs
- 94.00 Energy Crisis
- 94.01 Energy Conservation
- 94.02 Energy Reduction Programs and Reports
- 94.03 Fuel Related Developments
- 94.04 Solar Home
- 94.05 Energy Conservation - Insulation
- 94.06 Governor's Energy Council
- 94.07 Energy Conservation Procedures
- 94.08 Wind Generators
- 94.09 Corporate Energy Planning Council

- 94.01.1 National Energy Plan
- 94.01.4 Energy Issues
- 94.01.5 Thermographic Studies

General

- 95.08 Research Budget
- 96.01 Consumer & Community Affairs Guides  
(Formerly Marketing Guide)
- 98.02 Task Force Studies
- 99.01 Division Daily Report
- 99.02 Division Operations Report (Monthly)

Exhibit C-5

- 1. Pennsylvania Power & Light Company Annual Reports,  
1968 - 1978

Exhibit C-6

- 1. Allegheny Electric Cooperative, Inc. Annual Reports,  
1972, 1974 - 1977

Exhibit C-7

- 1. PP&L Reporter, January, 1972 - May, 1974 and  
September 1974 - May 1979

Exhibit C-8

- 1. Memoranda to files, memoranda, and letters concerning  
meetings between Pennsylvania Power & Light Company  
and Salem Township Supervisors.

Exhibit C-9

- 1. RMC-TR-78-07 Environmental Dose Rate Measurements  
in the Vicinity of SSES

2. RMC-TR-76-10 Agricultural Land Use Analyses in the Vicinity of SSES
3. RMC-TR-73-15 Environmental Dose Rate Measurements for SSES
4. RMC-TR-78-01 SSES Radiological Environmental Monitoring Program 1977 Annual Report
5. RMC-TR-77-04 SSES Radiological Environmental Monitoring Program 1976 Annual Report
6. RMC-TR-76-05 SSES Radiological Environmental Monitoring Program 1975 Annual Report
7. RMC-TR-75-07 SSES Preoperational Radiological Environmental Monitoring Program 1974 Annual Report
8. RMC-TR-74-07 SSES Preoperational Radiological Environmental Monitoring Program 1973
9. RMC-TR-73-14 SSES Radiological Environmental Monitoring Program Report #1 (April - December 1972)
10. Ecological Studies of the Susquehanna River in the Vicinity of the SSES Annual Report for 1977 April 1978
11. Ecological Studies of the Susquehanna River in the Vicinity of the SSES Annual Report for 1976 October 1977
12. Ecological Studies of the North Branch Susquehanna River in the Vicinity of the SSES Annual Report for 1975 August 1976
13. Ecological Studies of the North Branch Susquehanna River in the Vicinity of the SSES Progress Report for the Period January - December 1974 May 1976
14. An Ecological Study of the North Branch Susquehanna River in the Vicinity of Berwick, Pennsylvania Progress Report for the Period January - December 1973 Nov. 1974

15. An Ecological Study of the North Branch Susquehanna River in the Vicinity of Berwick, Pennsylvania  
Progress Report for the Period January - December 1972 Sept. 1973
16. An Ecological Study of the North Branch Susquehanna River in the Vicinity of Berwick, Pennsylvania  
Progress Report for the Period January - December 1971 . July 1972

Exhibit C-10

1. Line listing for Sunbury-Susquehanna 500 kv line  
Parcels 1-304
2. Line listing for Susquehanna-Lackawanna 500 kv line  
Parcels 1-131
3. Line listing for Susquehanna-Siegfried 500 kv line  
Parcels 1-226
4. Plan and profile drawings for Sunbury-Susquehanna 500 kv line
5. Plan and profile drawings for Susquehanna-Lackawanna 500 kv line
6. Plan and profile drawings for Susquehanna-Siegfried 500 kv line

Exhibit C-11

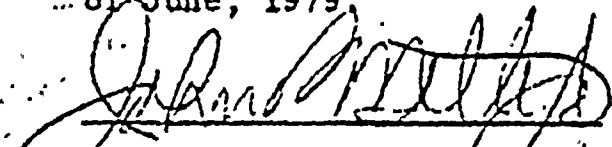
1. Design and Test of Three-Conductor Gas-Insulated Cable, prepared by High Voltage Power Corp., Westboro, Massachusetts EPRI 7816 June 1975

COMMONWEALTH OF PENNSYLVANIA)  
  : SS  
COUNTY OF LEHIGH                  )

WILLIAM BARBERICH, being duly sworn according to law, deposes and says that he is Nuclear Licensing Group Supervisor of Pennsylvania Power & Light Company and that the facts set forth in the foregoing Applicants' Answers to Citizens Against Nuclear Dangers Interrogatories And Request For Documents dated June 29, 1979, are true and correct to the best of his knowledge, information and belief.

William Barberich

Sworn to and subscribed  
before me this 29th day  
of June, 1979.

  
JOHN P. MILLER, JR., Notary Public  
Allentown, Lehigh County, Pa.  
My Commission Expires May 24, 1981