

Discovery Request 1. Objection.*

Discovery Request 2. Documents included in Exhibit E-1 are transmitted under separate cover. Documents included in Exhibit E-2 are available for inspection.

Discovery Requests 3(a) and (b). Documents containing the available requested information are included in Exhibit E-3 and are available for inspection.

Discovery Request 3(c). The emergency preparedness and evacuation plans made available in response to Discovery Request 3(a) are based upon the criteria set forth in Regulatory Guide 1.3 and 10 C.F.R. Part 100, which are more conservative than those for mechanistic Design Basis Accidents.

Discovery Request 3(d). Information on radiation monitoring in the vicinity of the Susquehanna plant subsequent to the March 28, 1979, accident at Three Mile Island, Unit 2 is not currently available, and will be included in the radiological environmental monitoring program annual report for 1979 when that report is issued.

Discovery Request 4. Listed in the Appendix hereto and included in Exhibit E-4 are those documents listed in FSAR Chapter 1.6 and requested by ECNP which are available for inspection. Applicants object to the production of the remaining FSAR Chapter 1.6 documents requested by ECNP.

*Applicants' objections to some of the discovery requests of ECNP are set forth in "Applicants' Objections to Certain First Round Discovery Requests of Intervenor Environmental Coalition on Nuclear Power", dated June 29, 1979.

Request 4 also seeks "the report authored by Dr. Charles Reed of General Electric." Applicants do not have a copy of this report. General Electric Company has agreed to make available to ECNP's representatives those portions of the "Reed Report" which are relevant to Contention 7. However, because General Electric regards the "Reed Report" as proprietary information whose disclosure could cause substantial harm to its competitive position, General Electric will make available the relevant portions of the "Reed Report" only on signing of an appropriate non-disclosure agreement. General Electric is transmitting such an agreement to ECNP's representatives under separate cover.

Request 4 also asks for the bases for the assumptions in the "assessment of likelihood" of "rare" and "extremely rare" as used in Environmental Report Table 7.1-17. The classification of accident types as "rare" and "extremely rare" is based upon engineering judgment.

Discovery Request 5. Applicants have developed no data, cost estimates, or worker exposure estimates associated with decommissioning since the filing of the Final Safety Analysis Report or subsequent to the March 28, 1979 accident at Three Mile Island, Unit 2.

Discovery Request 6: PP&L is considering the following EPA-approved herbicides for use in 1979 for transmission right-of-way maintenance:

1. A mixture of equal parts of Weedone 170 and Banvel 520;
2. Krenite;
3. A mixture of equal parts of Weedone 2, 4-DP and either Amdon 101 or Tordon 101.

Handclearing means of maintenance are carried out with chain or brush saws. Mechanical means of maintenance include use of Hydro-ax, Kershaw, or Brushhog machinery.

PP&L has not performed environmental analyses of the herbicides listed and relies upon EPA approval based upon the analyses performed by EPA, the manufacturers, and others. PP&L has not performed environmental analyses of handclearing or mechanical means of clearance. PP&L is generally aware that significant adverse environmental impacts can occur both with improper use of herbicides and with physical and mechanical clearing which is improperly carried out.

PP&L's specifications for controlling vegetation are set forth in "Specifications for Control Maintenance of Vegetation on or Adjacent to Electric Line Right of Way by Use of Herbicides, Mechanical and Handclearing Methods", included in Exhibit E-5 and transmitted under separate cover. The schedule for clearing is based upon need determined by inspection of the right-of-way. Herbicides are used for vegetation control unless the height of the vegetation precludes effective herbicide use. The choice of handclearing versus mechanical clearing is made based upon

accessibility and terrain. Handclearing and mechanical clearing cannot be substituted for herbicide use generally or on a long-term basis because of lack of manpower, problems associated with regrowth of certain species, financial cost, and fostering of growth of some undersirable species.

PP&L contracts all right-of-way vegetation maintenance services through competitive bidding and accepts only contractors certified by the Pennsylvania Department of Agriculture as commercial herbicide applicators. A list of those firms presently under contract are as follows:

Asplundh Tree Expert Co.
Blair Mill Road
Willow Grove, Pennsylvania 19090
(physical and herbicide clearing)

Jaflo, Inc.
P. O. Box 262
Allentown, Pennsylvania 18105
(physical clearing)

Quaker City Tree Surgeons, Inc.
6325 Chew Avenue
Philadelphia, Pennsylvania 19138
(herbicide clearing)

Shannon Tree Co.
Glen Crest
Milford, Pennsylvania 17744
(physical and herbicide clearing)

McKibben & McKibben
R. D. 2
Linden, Pennsylvania 17747
(physical clearing)

Swank Service Co.
P. O. Box 386
East Stroudsburg, Pennsylvania 18301
(physical clearing)

Samples of the contracts used for PP&L's herbicide and physical clearance programs are included in Exhibit E-5 and are transmitted under separate cover.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By



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Dated: June 29, 1979

APPENDIX

Exhibit E-1

1. "Pennsylvania Power & Light Company Energy Forecasting Model Volume I - Methodology" - prepared by Data Resources, Inc. dated August, 1976.
2. "Pennsylvania Power & Light Company Energy Model - Documentation - Part 2" prepared by Data Resources, Inc. dated May, 1976. This volume includes list of levers, model, regression results, dummy variables and reports.
3. The Data Resources US Long-term Bulletin, "The Economic Outlook 1975-1990 Trend and Cycle Simulations, Special Study, the Young, the Old and Their Incomes: The Impact on Personal Savings" prepared by Data Resources, Inc. dated Summer, 1976.
4. "Pennsylvania Power & Light Company Preliminary Residential Sector Documentation" prepared by Data Resources, Inc. dated August 29, 1977.
5. The Data Resources US Long-term Review dated Spring, 1978
6. Preliminary working draft "Pennsylvania Power & Light Energy Model Documentation Part 2" for 1978. These documents include list of levers, model, regression results, dummy variables and reports.
7. "Pennsylvania Power & Light Long-range Outlook Energy Sales & Peak Load 1978-1990" prepared by Market Research dated October, 1978.
8. Pennsylvania Power & Light Company "1979-1980 Construction Budget" dated November, 1978.

Exhibit E-2

1. "Study of factors relating to the retirement of fossil-fueled generating units" prepared by PP&L's System Planning Department.
2. REA Bulletin No. 120-1 dated March 5, 1974.
3. Allegheny Electric Cooperative, Inc. (AE)
"Monthly Supply Demand and Energy Forecasts 1980-1990"
4. AE "Power Requirement Study 1975-1990 dated October 14, 1976 with Review dated June 19, 1978"

5. Fifteen files containing backup information for AE power requirement study.
6. Monthly, quarterly, and annual customer and KWH Data - various formats - some hardcopy, some in computer systems.
7. DRI short and long-term macro forecast reviews - late 1974 to current.
8. DRI-PP&L Regional economic and energy model - development and existing documentation.
9. 1976 Forecast working files of Forecasting Section.
 - A. Short-term - specific division and certain individual customer information.
 - B. Long-term -
 1. Preliminary version & miscellaneous back-up
 2. Final version - miscellaneous back-up
 3. Model review
 4. Forecast reviews
10. 1978 Forecast working files of Forecasting Section
 - A. Short-term - specific division and individual customer information.
 - B. Long-term -
 1. New dwelling unit survey books
 2. Newspaper & other clippings
 3. Analysis runs
 4. Sensitivity runs
 5. Studies conducted
 6. Miscellaneous back-up files
11. Back-up files for transforming energy estimates into demand estimates (load research section files).
12. Demand (peak load) computation files.
13. Market Research Section's central files containing material and data which may have been reviewed by members of the Forecasting Section.
14. Source listing of PP&L's load capacity reserve computer program PEOJI 10, together with Users' Guide.

Exhibit E-3

1. Susquehanna Steam Electric Station, Units 1 and 2, Emergency Plan, volume 1 (there are currently no additional volumes).

Exhibit E-4

1. APED-5458 Effectiveness of Core Standby Cooling Systems for General Electric Boiling Water Reactors (March 1968)
2. GEAP-13112 Thermal Response and Cladding Performance of an Internally Pressurized, Zircaloy-Clad, Simulated BWR Bundle Cooled by Spray Under Loss-of-Coolant Conditions (April 1971)
3. NEDO-10320 The General Electric Pressure Suppression Containment Analytical Model (April 1971) Supplement 1 (May 1971)
4. NEDO-10329 Loss-of-Coolant Accident and Emergency Core Cooling Models for General Electric Boiling Water Reactors (April 1971) Supplement 1 (April 1971) Addenda (May 1971)
5. NEDO-10349 Analysis of Anticipated Transients Without Scram (March 1971)
6. NEDO-10801 Modeling the BWR/6 Loss-of-Coolant Accident: Core Spray and Bottom Flooding Heat Transfer Effectiveness (March 1973)
7. NEDO-10802 Analytical Methods of Plant Transient Evaluations for General Electric Boiling Water Reactor (February 1973)
8. NEDO-10846 BWR Core Spray Distribution (April 1973)
9. NEDO-20566 General Electric Company Model for Loss-of-Coolant Accident Analysis in Accordance with 10 C.F.R. 50, Appendix K (January 1976)
10. NEDO-20626 Studies of BWR Designs for Mitigation of Anticipated Transients without Scrams (October 1974)

11. NEDO-20626-1 Studies of BWR Designs for Mitigation of Anticipated Transients without Scrams (June 1975)
12. NEDO-20626-2 Studies of BWR Designs for Mitigation of Anticipated Transients without Scrams (July 1975)
13. NEDO-20651* Mechanical Property Surveillance of Reactor Pressure Vessels for General Electric BWR/6 Plants (March 1975)

Exhibit E-5

1. Sample contract used for 1979 Spraying Program.
2. Sample contract used for physical/mechanical clearing
3. "Specifications for Control Maintenance of Vegetation on or Adjacent to Electric Line Right of Way by Use of Herbicides, Mechanical and Handclearing Methods"

*Incorrectly numbered as NEDO-20631 in FSAR chapter 1.6

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF LEHIGH) SS

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 Environmental Coalition On Nuclear Power First Round Discovery Requests 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.
JOHN P. MILLER, JR., Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires May 24, 1981

