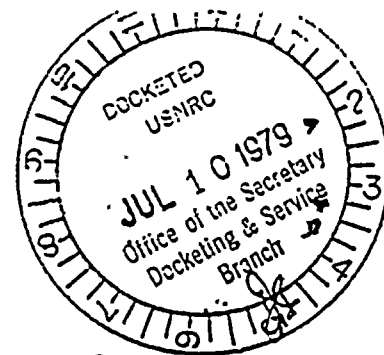


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

NRC PUBLIC DOCUMENT ROOM



In the Matter of

PENNSYLVANIA POWER AND LIGHT CO.
ALLEGHENY ELECTRIC COOPERATIVE, INC.

Docket Nos. 50-387
50-388

(Susquehanna Units 1 and 2)

CITIZENS AGAINST NUCLEAR DANGERS'
RESPONSE TO THE MEMORANDUM OF
THE ATOMIC SAFETY AND LICENSING BOARD

In the initial communication to the NRC, dated September 7, 1978, regarding intervention, the Citizens Against Nuclear Dangers stated in part: "The Citizens identify the specific aspects of the subject matter as the probable dangers to public health and safety from the operation of the Berwick plant concerning....Transportation of radioactive materials to and from the Berwick plant."

On or about January 8, 1979, the Citizens Against Nuclear Dangers submitted to the Board and other parties a petition to be known as Contention No. 12 "Transportation of Nuclear Fuel." (copy attached). This contention was not admitted by the Board.

The contention that was admitted on this general subject dealing with the on-site transportation safety issue only, is, in our judgement, unrealistic, and does not delve into the very real problems alluded to in the recently formulated Interim Final Rule of the NRC, entitled "Physical Protection of Irradiated Reactor Fuel in Transit."

Our comment to the Board on this matter is simply that the Board should reconsider the previously rejected contentions on Transportation argued by Marsh et al., the Advocates, and the Citizens Against Nuclear Dangers, and then admit a contention or contentions that relate to the intent of the aforementioned NRC rule.

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens Against Nuclear Dangers' Response To The Memorandum Of The Atomic Safety And Licensing Board have been served on the following by deposit in the United States mail, first class, this 7th day of July, 1979.

Charles Bechhoefer, Esq., Chairman
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Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
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Dr. Oscar H. Paris
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Atomic Safety and Licensing
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James M. Cutchin, IV, Esquire
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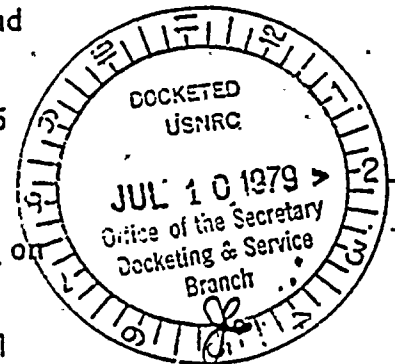
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Susquehanna Environmental
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Wilkes-Barre, PA 18702



Thomas J. Halligan

Thomas J. Halligan
Correspondent

Serving as a public interest ad hoc group to announce the concerns of many citizens living in relative close proximity to Salem Township,

Believing that the government has thus far failed to adequately protect people from the risk of nuclear dangers, that might occur as a result of the operation of the Applicants' atomic power plant,

Determined to intervene in the interest of public health and safety, The Citizens Against Nuclear Dangers hereby allege, contend, and aver the following:

Whereas, the United Transportation Union is hesitant to expose train workers to the dangers of industrial radiation while transporting nuclear fuels to the Berwick atomic power plant, and elsewhere;

Whereas, the Federal Railway Administration and the Public Utility Commission presently have only a handful of inspectors to inspect the thousands of miles of rail lines in Pennsylvania;

Whereas, because of, among other things, the lack of Federal regulation, local communities are planning to legislatively ban or restrict the quantities of radioactive fuel shipments sent by train or truck through their communities;

Whereas, the Applicants plan to ship to and from Salem Township via rail an average of twenty shipments (each containing 18 BWR fuel assemblies per cask) an average distance of one thousand miles;

Therefore, because of the badly deteriorating roadbeds and trackage of CONRAIL and the other rail carriers, and the crushing sixty-five ton weight of each fuel cask, the shipment of radioactive cargoes is definitely unsafe at any speed. There should be a moratorium placed on any shipment of atomic fuel to the Applicants' Salem plant until all railway roadbeds and trackage enroute are rebuilt and inspected;

Therefore, the Nuclear Regulatory Commission should also place emphasis on ways and means of dealing with problems that will arise from derailments and collisions especially at: grade crossings, over-passes, under-passes, tunnels, bridges and barge crossings, as well as emergency evacuation plans enroute