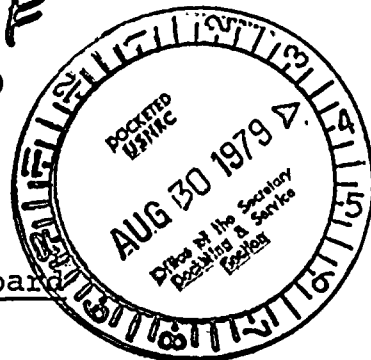


August 29, 1979

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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'  
SUPPLEMENTAL DISCOVERY REQUESTS

Pennsylvania Power & Light Company and Allegheny Electric Cooperative, Inc. ("Applicants") for their answers to Citizens Against Nuclear Dangers' supplemental discovery requests, dated July 25, 1979, state as follows:

Interrogatory No. 1

Applicants have sent over 390 pieces of correspondence to the NRC or its predecessor agencies. Some of those letters included information which may pertain to environmental issues. Except as indicated in the Draft Environmental Statement (DES) itself, Applicants do not know and have not been informed by the NRC which of those documents were "utilized by the NRC as background material in the preparation and publication of the DES", or which, if any, were used "without verification from independent third party analysis."



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The documents Applicants furnished to NRC prior to the issuance of the DES which Applicants believe were, or were most probably, used by NRC in connection with the environmental review of the Operating License application for the Susquehanna facility are:

1. Environmental Report - Operating License Stage (as amended).
2. Documents included in Exhibit C-9 of Applicants' Answers to Citizens Against Nuclear Dangers' Interrogatories and Request for Documents dated June 29, 1979.
3. A "Monitoring Study of Community Impact" dated June 1976, together with an update dated December 1978.
4. Attachments to Applicants' Responses to NRC Questions:
  - a. Industrial Waste Permit
  - b. Sanitary Discharge Permit
  - c. National Pollutant Discharge Elimination System (NPDES) Application
  - d. Figure of the Topography of the Flood Plain
  - e. Forms 1 and 12 filed with the Federal Energy Regulatory Commission (FERC)
5. Site photographs sent to NRC on September 28, 1978.

The Environmental Report (No. 1) should be available for inspection at the local public document room and the Berwick library, and is available at the office of Bryan Snapp, Esq., Pennsylvania Power & Light Company, Two North Ninth Street, Allentown, Pennsylvania 18101 (Telephone No. 215/821-4397). The documents included in Exhibit C-9 (No. 2) are also available for inspection at Mr. Snapp's office, as



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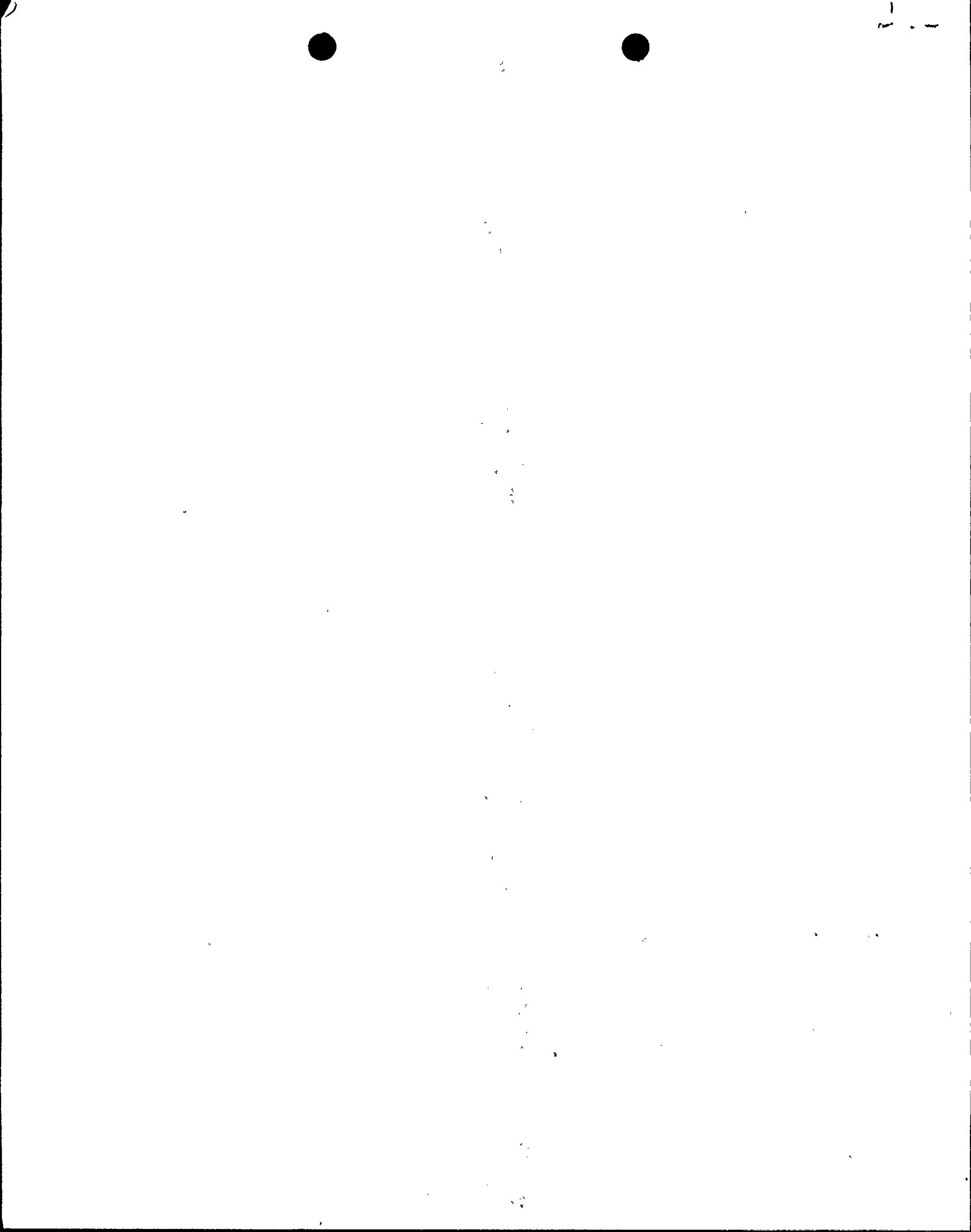
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set forth in Applicants' Answers to Citizens Against Nuclear Dangers' Interrogatories and Request for Documents dated June 29, 1979. Documents No. 4 and 5 are available for inspection at Mr. Snapp's office. Document No. 3 is being forwarded under separate cover. With the exception of documents not subject to disclosure under Commission regulations, the remaining correspondence and enclosures should be available for inspection in the local public document room and are available at Mr. Snapp's office.

Interrogatory No. 2

This interrogatory seeks "a detailed and lengthy explanation of just how Applicants will defend their position on each and every conclusion, evaluation and recommendation published in the DES, especially as the Applicants' arguments relate to the relevant contentions before the Board". As this interrogatory relates to the admitted contentions, Applicants' position and an explanation of that position will be set forth in written testimony and/or affidavits which will be prepared and served upon all parties in accordance with schedules set by the Licensing Board. Such testimony and/or affidavits have not yet been prepared. As set forth on the Licensing Board's Memorandum and Order on Scheduling and Discovery Motions (August 24, 1979), p. 15, information on witnesses is to be provided at least 60 days in advance of the scheduled hearing date.




Applicants object to this interrogatory to the extent that it extends to matters beyond the scope of the admitted contentions. See 10 CFR §2.740(b)(1); 10 CFR Part 2, App. A., §IV(A); Allied General Nuclear Services (Barnwell Fuel Receiving and Storage Station), LBP-77-13, 5 NRC 489 (1977).

Respectfully submitted,

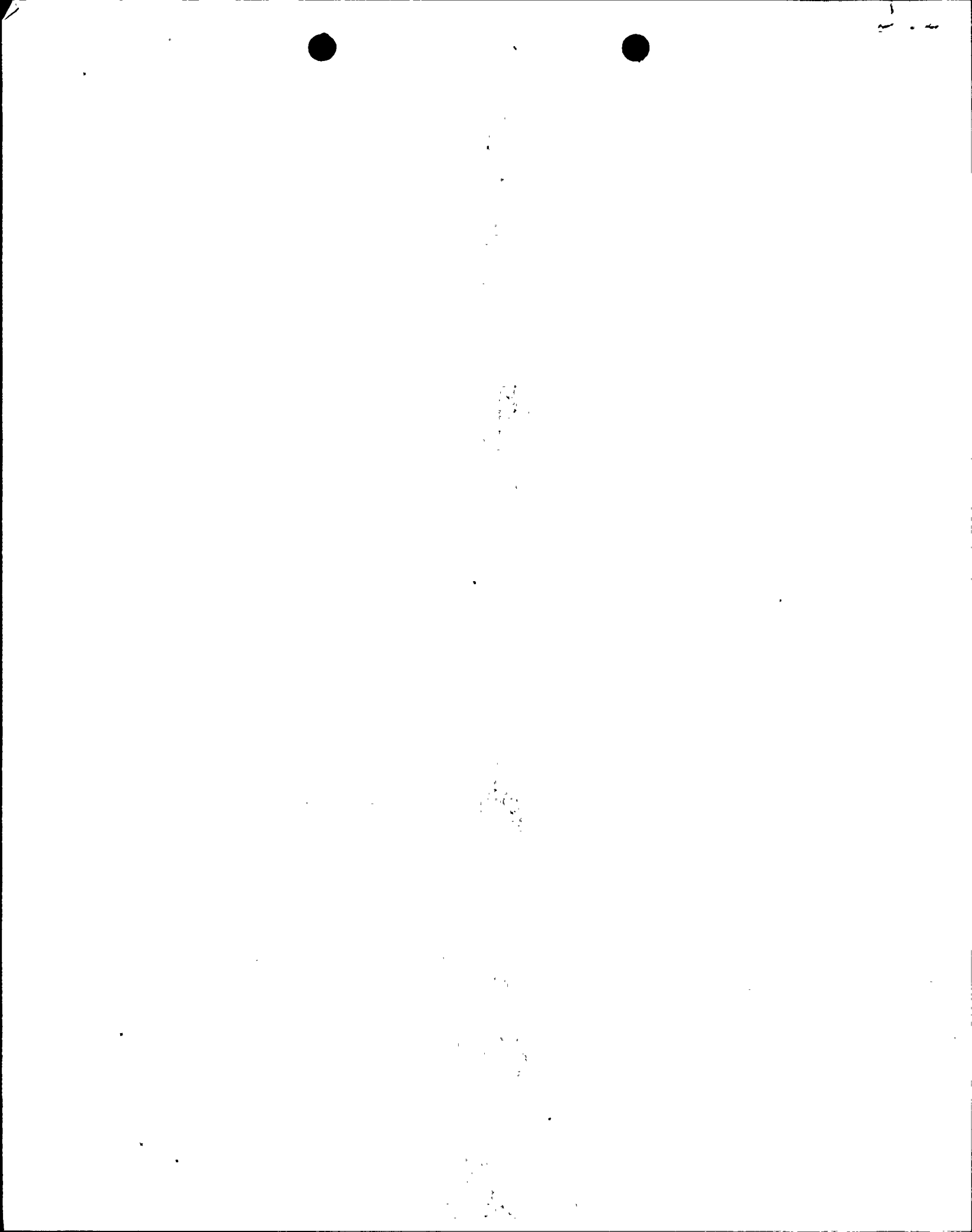
SHAW, PITTMAN, POTTS & TROWBRIDGE

By

  
Jay E. Silberg  
Alan R. Yuspeh

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

Dated: August 29, 1979





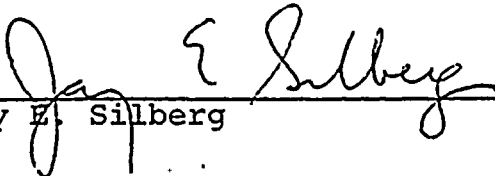
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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 and ) 50-388  
ALLEGHENY ELECTRIC COOPERATIVE, INC. )  
 )  
(Susquehanna Steam Electric Station, )  
Units 1 and 2) )

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Answers to Citizens Against Nuclear Dangers' Supplemental Discovery Requests" were served by deposit in the U.S. Mail, First Class, postage prepaid this 29th day of August, 1979, to all those on the attached Service List.

  
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Jay E. Silberg

Dated: August 29, 1979



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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Docket Nos. 50-387  
50-388

SERVICE LIST

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11