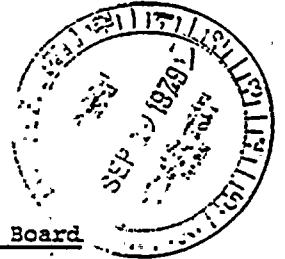


9/17/79

CT

NRQ PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

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

Docket Nos. 50-387  
50-388

APPLICANTS' ANSWER TO CITIZENS AGAINST  
NUCLEAR DANGERS' "SUPPLEMENTAL APPEAL"  
REGARDING DISCOVERY REQUEST NUMBER 18

On May 22, 1979, intervenor Citizens Against Nuclear Dangers (CAND) filed interrogatories and requests for documents directed to Applicants and the Commonwealth of Pennsylvania. On June 29, 1979, Applicants answered certain CAND discovery requests and objected to other discovery requests. On August 24, 1979, the Board issued a Memorandum and Order granting Applicants a protective order with regard to the discovery requests to which they had objected. See Memorandum and Order at 11. This included CAND discovery request Number 18, dealing with the fabrication of the Susquehanna reactor pressure vessels. However, the Board also indicated in its Order that CAND would be permitted to file a response to Applicants' objections within five days of service of the August 24 order. On September 1, 1979, CAND filed a "Supplemental Appeal with Particular Objections, Before the Atomic Safety and Licensing Appeal Board Panel." In this submission, CAND indicated the basis for its prior discovery request Number 18, and

7911080207

G



asked that the information described in that request be provided by the Applicants. Although this submission was directed to the Appeal Board, Applicants treat it as the response called for by the Licensing Board's August 24 Order.

In discovery request Number 18, CAND has requested detailed information about the manufacture of the reactor pressure vessels fabricated for the Susquehanna plant. In its September 1 filing, CAND indicates that this interrogatory was propounded in order to determine whether or not the reactor pressure vessels at Susquehanna could be among those mentioned in a November, 1969 article discussing the problems confronted by Babcock and Wilcox (B&W) in the start-up of a manufacturing facility in Mt. Vernon, Indiana. See Fortune, November 1969 at 123 et. seq. The article states that three pressure vessels which were being fabricated for General Electric by B&W were transferred to Chicago Bridge & Iron (CB&I) for completion in 1969. Id. at 172. For the convenience of the Licensing Board, a copy of the Fortune article is attached.

The two reactor pressure vessels for the Susquehanna facility are not among those referred to in the Fortune article. The Susquehanna pressure vessels were shop fabricated in sections, and the sections then field erected at the Susquehanna site, by CB&I and CB&I Nuclear Co. (a joint venture of CB&I and General Electric). B&W had no role in the design, shop fabrication, or field erection of the Susquehanna pressure vessels. See FSAR, §5.3.3.



Applicants believe that this response provides the information which CAND seeks about the origin of reactor pressure vessels at Susquehanna. To the extent that CAND would continue to request the information called for in its discovery request Number 18, Applicants would renew their objections to this interrogatory as stated in their June 29, 1979 filing with the Board.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By

  
Jay E. Silberg  
Alan R. Yuspeh

1800 M Street, North West  
Washington, D. C. 20036  
(202) 331-4100

Dated: September 17, 1979



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Answer to Citizens Against Nuclear Dangers' 'Supplemental Appeal' Regarding Discovery Request Number 18" were served by deposit in the U. S. Mail, first class, postage prepaid, this 17th day of September, 1979, to all those on the attached Service List.

  
Jay E. Silberg

Dated: September 17, 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  
ALLGEHENY ELECTRIC COOPERATIVE, INC. )  
(Susquehanna Steam Electric Station, )  
Units 1 and 2) )

SERVICE LIST

Secretary of the Commission U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Docketing and Service Section Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555
Charles Bechhoefer, Esquire Chairman Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Dr. Judith E. Johnsrud Co-Director Environmental Coalition on Nuclear Power 433 Orlando Avenue State College, Pennsylvania 16801
Mr. Glenn O. Bright Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Susquehanna Environmental Advocates c/o Gerald Schultz, Esquire 500 South River Street Wilkes-Barre, Pennsylvania 18702
Dr. Oscar H. Paris Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Mrs. Irene Lemanowicz, Chairman The Citizens Against Nuclear Danger Post Office Box 377 R. D. 1 Berwick, Pennsylvania 18603
Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Ms. Colleen Marsh 558 A, R. D. #4 Mt. Top, Pennsylvania 18707
Atomic Safety and Licensing Appeal Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Mr. Thomas M. Gerusky, Director Bureau of Radiation Protection Department of Environmental Resources Commonwealth of Pennsylvania P. O. Box 2063 Harrisburg, Pennsylvania 17120
James M. Cutchin, IV, Esquire Office of the Executive Legal Director U. S. Nuclear Regulatory Commission Washington, D. C. 20555	