

SHAW, PITTMAN, POTTS & TROWBRIDGE

1800 M STREET, N. W.
WASHINGTON, D. C. 20036

RAMSAY D. POTTS
STEWART L. PITTMAN
GEORGE F. TROWBRIDGE
STEPHEN D. POTTS
GERALD CHARNOFF
PHILIP D. BESTWICK
R. TIMOTHY HANLON
GEORGE M. ROGERS, JR.
JOHN B. RHINELANDER
BRUCE W. CHARNOCK
LESLIE A. NICOLSON, JR.
MARTIN D. KEALL
RICHARD J. KENCALL
JAY E. SILBERG
BARBARA M. FOSSCOTT
GEORGE V. ALLEN, JR.
WILLIAM BRADFORD REYNOLDS
FRED A. LITTLE
FRED DRASNER
NATHANIEL P. BREED, JR.
MARK AUGENBUCK
ERNEST L. BLAKE, JR.
CARLETON S. JONES
THOMAS A. BAXTER
JAMES M. BLISSER
SPENCER J. WEISEL
JOHN A. McCLOUGH
J. PATRICK F. DKEY
JAMES THOMAS LENHART

STEVEN L. MELTZER
DEAN D. AULICK
JOHN ENGEL
STEPHEN B. HUTTNER
WINTROP N. BROWN
JAMES B. HAMLIN
ROBERT E. ZAHLER
RICHARD E. GALLEN
ROBERT B. ROBBINS
LAURA K. FARRANO
MATIAS F. TRAVIESO-QUIZ
VICTORIA J. PERKINS
JOHN H. O'NEILL, JR.
JAY A. EPSTEIN
GEORGE D. CROWLEY, JR.
MICHAEL D. HAYS
THOMAS M. MCCORMICK
SUSAN D. FALKSON
STEVEN M. LUCAS
RAND L. ALLEN
ALAN J. WEISBARD
WILLIAM R. SARR
ALAN R. YUSPEN
JOHN L. CARR, JR.
PHILIP J. HARVEY
KAY L. RICHMAN
TIMOTHY B. McBRIDE
CHARLES W. SURASKY

RELATED CORRESPONDENCE

October 25, 1979

(202) 331-4100

TELECOPIER
(202) 296-0694 & 296-1760

TELEX
89-2693 (SHAWLAW WSH)
CABLE "SHAWLAW"

JOHN H. SHARON
EDWARD B. CROSLAND
COUNSEL

*NOT ADMITTED IN D. C.

Charles Bechhoefer, Esquire
Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

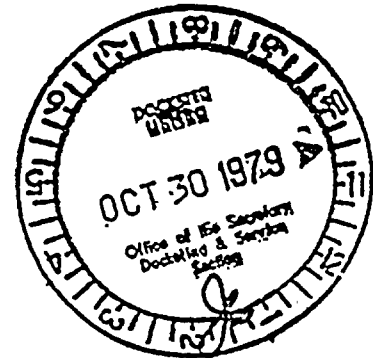
Mr. Glenn O. Bright
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Pennsylvania Power & Light Co.
and Allegheny Electric
Cooperative, Inc., Docket Nos.
50-387 and 50-388

Gentlemen:

In ECNP's October 22, 1979 "Response to Applicants' Motion to Dismiss ECNP", ECNP continues to rely heavily on events which took place in the Three Mile Island, Unit 2 operating license proceeding as a basis for refusing to answer Applicants' discovery requests. Putting aside the lack of relevance of the TMI proceeding to this case, one impression left by ECNP's filing should be corrected.



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SHAW, PITTMAN, POTTS & TROWBRIDGE

Atomic Safety and Licensing Board Panel

October 25, 1979

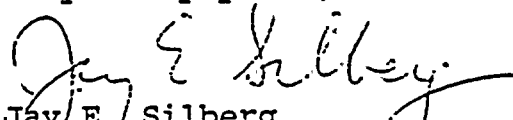
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In again declining to comply with its obligation to answer Applicants' discovery requests, ECNP states that it "[does] not, in general, have any specific sources of information upon which to rely." Rather, ECNP states that its "expected methodology is to show through cross examination and advocacy that the Applicants' case is incomplete." ECNP then states that "our approach in the two still-unresolved issues at the TMI-2 proceeding was not dependent on the presentation of even a single document", thus implying that ECNP presented no direct case and relied only upon "cross examination and advocacy."

In fact, ECNP did present direct evidence, including written testimony, in the TMI-2 proceeding and has offered to present additional direct testimony. See, e.g., Metropolitan Edison Co. (Three Mile Island Nuclear Station, Unit No. 2), LBP-77-70, Initial Decision, 6 NRC 1185, 1223 (December 17, 1977); ALAB-525, 9 NRC 111, 113 (February 1, 1979); Intervenor's Motion to Present Witnesses and... Affidavits on Aircraft Flight Patterns, dated December 27, 1978; Summary of Testimonies of Intervenor's Witnesses Concerning Overflights of TMI-2, dated March 18, 1979.

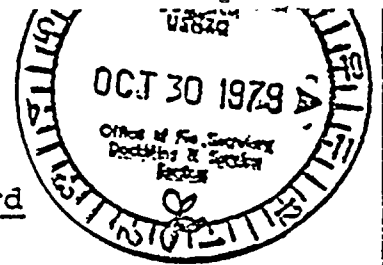
Thus, even if it were relevant to compliance with a discovery request that a party intended to rely only in "cross examination and advocacy", ECNP has not accurately characterized its TMI-2 participation.

Very truly yours,


Jay E. Silberg
Counsel for Applicants

cc: Service List Attached

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)

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 H. 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
James M. Cutchin, IV, Esquire Office of the Executive Legal Director 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
Atomic Safety and Licensing Appeal Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	