

11/27/79

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' ANSWER TO ECNP
MOTION FOR PROTECTIVE ORDER

In a document entitled "Intervenors' Response to Licensing Board Memorandum and Order of October 30, 1979", Environmental Coalition on Nuclear Power included another motion for protective order, seeking among other things "that no more discovery upon ECNP (or any other Intervenors) be permitted by the Staff and Applicant . . ." Intervenors' Response, p. 11. For the reasons set out in detail by the Licensing Board in its October 30, 1979 Memorandum and Order on Discovery Motions (II), ECNP's motion should be rejected.

Respectfully submitted,
SHAW, PITTMAN, POTTS & TROWBRIDGE

By Jay E. Silberg
Jay E. Silberg
Counsel for Applicants

1800 M Street, North West
Washington, D. C. 20036

Dated: November 27, 1979

UNITED STATES OF AMERICA

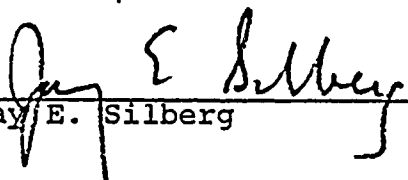
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
PENNSYLVANIA POWER & LIGHT COMPANY)	Docket Nos. 50-387
and)	50-388
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' Answer to ECNP Motion for Protective Order" were served by deposit in the U. S. Mail, First Class, postage prepaid, this 27th day of November, 1979, to all those on the attached Service List.



Jay E. Silberg

Dated: November 27, 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

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

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

Atomic Safety and Licensing Appeal
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

James M. Cutchin, IV, Esquire
Office of the Executive Legal
Director
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

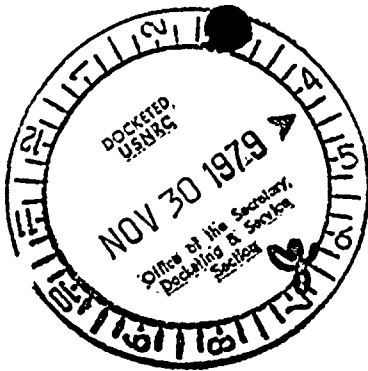
Dr. Judith E. Johnsrud
Co-Director
Environmental Coalition on
Nuclear Power
433 Orlando Avenue
State College, Pennsylvania 16801

Susquehanna Environmental Advocates
c/o Gerald Schultz, Esquire
500 South River Street
Wilkes-Barre, Pennsylvania 18702

Mrs. Irene Lemanowicz, Chairman
The Citizens Against Nuclear Danger
Post Office Box 377
R. D. 1
Berwick, Pennsylvania 18603

Ms. Colleen Marsh
558 A, R. D. #4
Mt. Top, Pennsylvania 18707

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Department of Environmental Resources
Commonwealth of Pennsylvania
P. O. Box 2063
Harrisburg, Pennsylvania 17120



174 Machell Avenue
Dallas, Pennsylvania 18612
November 27, 1979

11/27/79

Mr. Samuel Chilk, Secretary
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket #'s 50-387
50-388

Dear Mr. Chilk:

I am writing to request time to make a limited appearance statement at the licensing hearings for PP&L's nuclear power plant.

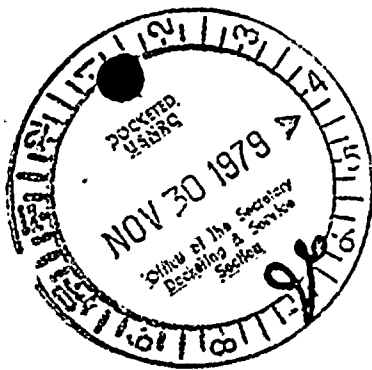
Please notify me of the date, time and place of the hearing.

Sincerely,

Linda B. Schultz

Linda B. Schultz

Acknowledged by card... 11/30/79



174 Machell Avenue
Dallas, Pennsylvania 18612
November 27, 1979

Mr. Samuel Chilk, Secretary
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket #'s 50-387
50-388

Dear Mr. Chilk:

I am writing to request time to make a limited appearance statement at the licensing hearings for PP&L's nuclear plant.

I strongly oppose the licensing and operation of this plant.

Please notify me of the time and place of the hearing.

Sincerely,

Gerald R. Schultz

Acknowledged by [unclear] 11/30/79.....