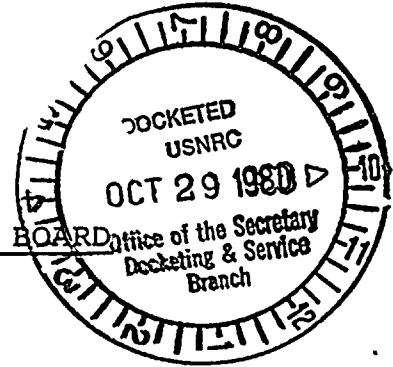


October 27, 1980

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' MOTION FOR SUMMARY DISPOSITION  
OF CONTENTION 16 (COOLING TOWER DISCHARGE)

Pennsylvania Power & Light Company and Allegheny Electric Cooperative Inc. ("Applicants") move the Atomic Safety and Licensing Board, pursuant to §2.749 of the Commission's Rules of Practice (10 C.F.R. §2.749) and the Special Prehearing Conference Order of March 6, 1979, LBP-79-6, 9 NRC 291, 328, for summary disposition in Applicants' favor of Contention 16 in this proceeding which alleges that seventy million gallons of radioactive evaporated water will be vented daily from the two cooling towers of the Susquehanna facility, posing an economic threat to the dairy industry in the Eastern-Central area of Pennsylvania. As grounds for their Motion, Applicants allege that there is no genuine issue of material fact to be heard with respect to Contention 16 and that Applicants are entitled to a decision in their favor on it as a matter of law.

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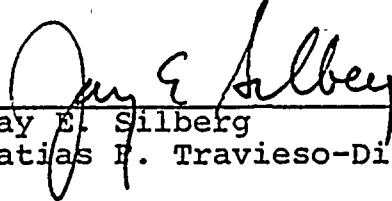
This Motion is supported by the Applicants' Statement of Material Facts as to Which There Is No Genuine Issue to be Heard (Contention 16), and the Affidavit of Walter J. Rhoades in Support of Summary Disposition of Contention 16, all filed simultaneously herewith, together with all pleadings and other papers in this proceeding.

As set forth in the March 6, 1979, Special Prehearing Conference Order, supra, 9 NRC at 328, responses to this Motion are due three weeks from its filing date.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

BY

  
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Dated: October 27, 1980

