

January 15, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In The Matter Of:

PENNSYLVANIA POWER & LIGHT CO. and Berwick Atomic Power Plant
Susquehanna Units 1 and 2
ALLEGHENY ELECTRIC COOPERATIVE, INC. Docket Nos. 50-387-388

RECEIVED DISTRIBUTION SERVICES UNIT

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US NRC DISTRIBUTION SERVICES BRANCH

CITIZENS AGAINST NUCLEAR DANGERS
RESPONSES TO DISCOVERY
ON HEALTH AND SAFETY CONTENTIONS

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in accordance with the directives of the Licensing Board, the Citizens Against Nuclear Dangers (Citizens) hereby submit the following timely response to the NRC and Applicants' discovery interrogatories on the public health and safety contentions.

The Citizens will telescope their investigation of the Berwick Nuke by analysing, almost exclusively, the Emergency Plan (which will be dealt with in a filing prior to the February 23, 1981, deadline), the Final Environmental Statement (FES), the Safety Evaluation Report (SER), and the Safety Evaluation Report Supplement. The burden of proof is surely on the government and the Applicants to show that the public's health and safety is going to be fully protected. The above, yet to be released documents (Emergency Plan received) should shed considerable light on the heretofore shadowy proceedings, and present definitive information on the health and safety issues. The Citizens testimony is predicated on the reception of this data.

OFFICE OF THE SECRETARY
DOCKETING & SERVICE SECTION
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20540

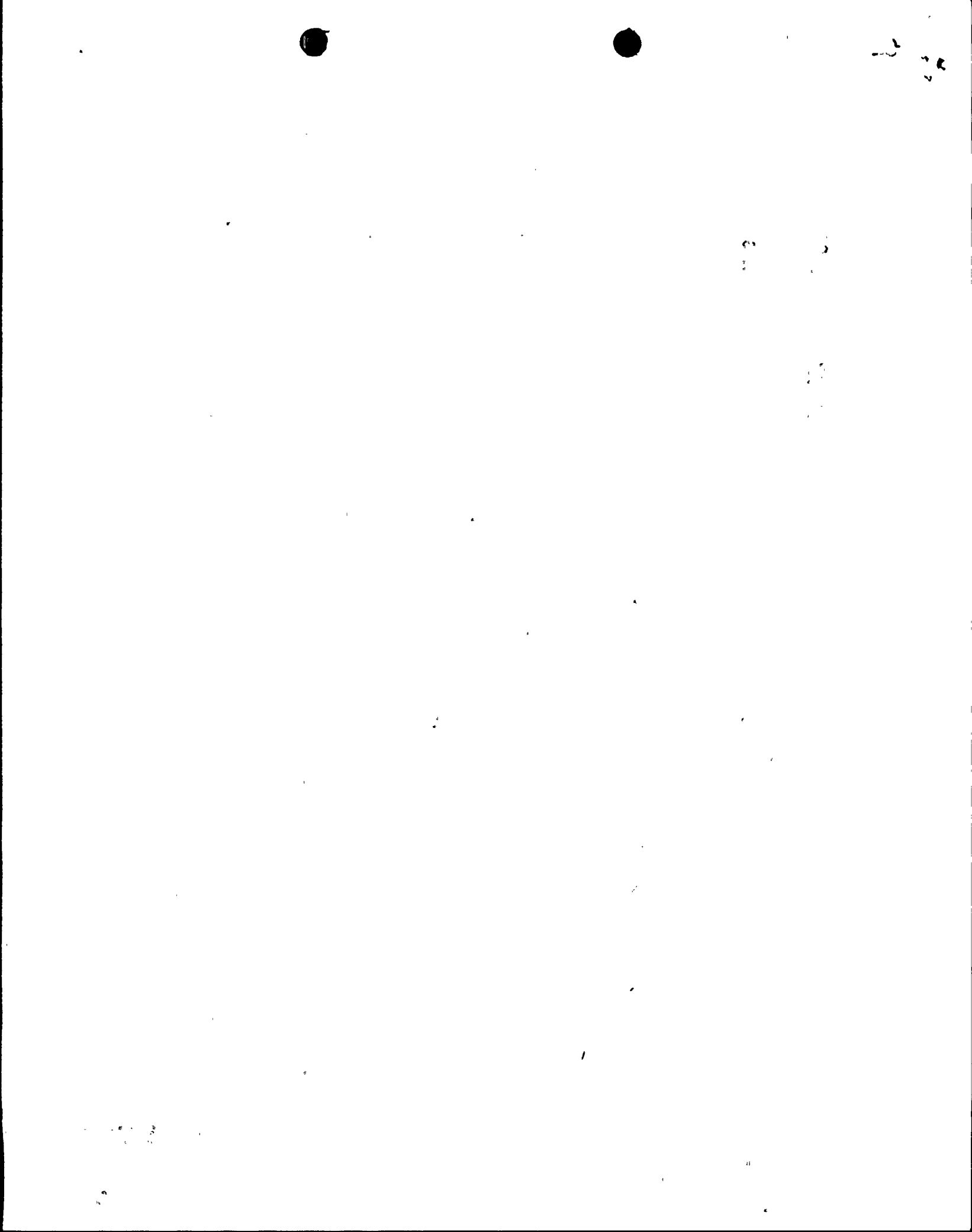
Concise discovery responses will be promptly submitted as soon as the following necessary steps are taken. Factual replies to the NRC staff and Applicants' health and safety interrogatories will be derived from the answers and documents submitted to the Citizens by the NRC, the Applicants and the State, in response to our supplemental

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discovery interrogatories pertaining to the Emergency Plan, the FES, the SER, and the SER Supplement. This is new and relevant information that is most important to the Citizens case, and a prerequisite to answering the NRC and Applicants questions. It is simply not feasible for the Citizens to respond in any other way. It is not the fault of the interveners that these reports are over a year late in delivery. The interveners cannot be directed to issue false information or statements based on assumptions about the contents of the SER and the other reports, prior to their publication. These reports must be researched in order to develop testimony and respond to the interrogatories. The Citizens must have this pertinent data in order to proceed intelligently on behalf of the concerned people of Northeastern Pennsylvania.

The Citizens' case will be based almost entirely on the information to be received in response to its supplemental discovery interrogatories. Full compliance with the current timetable can, therefore, only be reached when the Citizens, and quite probably the other interveners, obtain the above mentioned documents, that apparently are soon to be published. The Citizens do not intend, nor can they be compelled, to forward outdated and obsolete information that will no longer be utilized, because it would be based primarily on previous speculation about the Emergency Plan, and gusstimates about the FES, etc.

It is imperative, in order to expedite matters, that all parties receive the aforementioned reports as soon as possible, so the interveners can proceed quickly and submit their supplemental



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interrogatories, receive the Applicants' and the governments' replies, and then complete their discovery responsibilities.

Dated: January 15, 1981.

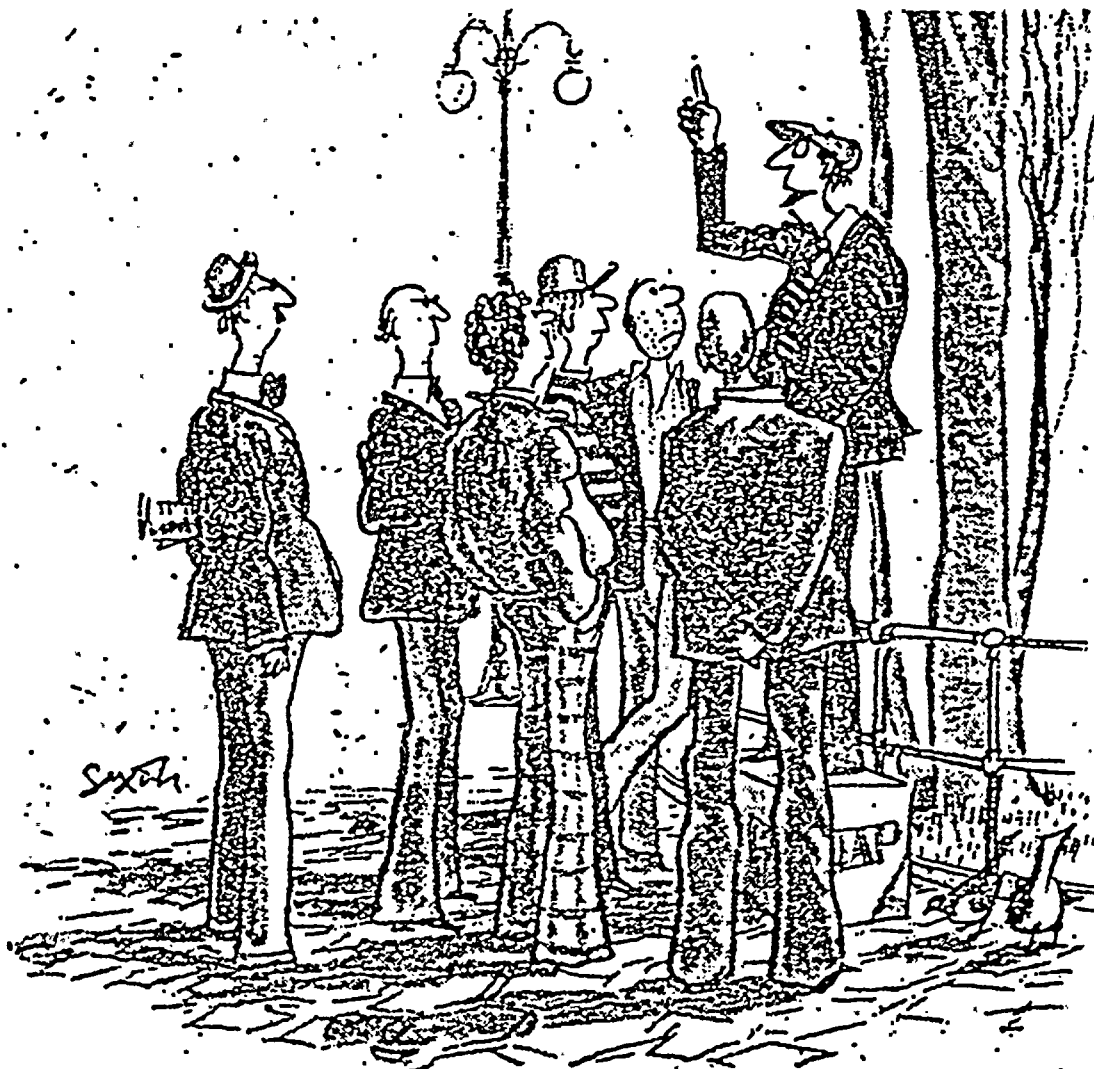
Thomas J. Halligan
Correspondent

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens Against Nuclear Dangers Responses to Discovery on Health and Safety Contentions have been served on the following by deposit in the United States mail, first class, this 15th day of January, 1981.

SERVICE LIST

Mr. Charles Bechhoefer, Esq.	Atomic Safety & Licensing Board
Mr. Glenn O. Bright	Atomic Safety & Licensing Appeal Bd.
Dr. Oscar H. Paris	Dr. Judith H. Johnsrud
Mr. Richard S Salzman, Esq.	Mrs. Colleen Marsh
Dr. John H. Buck	Mr. Gerald Schultz, Esq.
Mr. Thomas S. Moore	Mr. Robert W. Adler, Esq.
Mr. James M. Citchin, Esq.	Mr. Jay Silberg, Esq.
Sec. NRC Comm. Docket. & Service	



"And why won't they release the information to us, my friends? I'll tell you why. Because they can't find the information, that's why."