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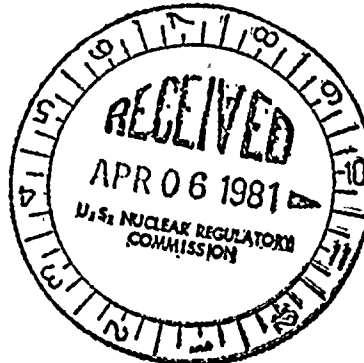
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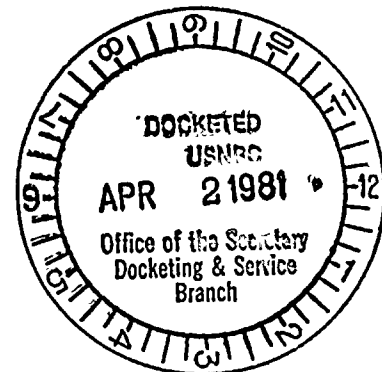
March 31, 1981

James P. Gleason, Chairman
Atomic Safety and Licensing Board
513 Gilmore Drive
Silver Spring, Maryland 20901

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

Administrative Judge Paul W. Purdom
245 Gulph Hills Road
Radnor, Pennsylvania 19087

Re: Pennsylvania Power & Light Company
Allegheny Electric Cooperative, Inc.
Susquehanna Steam Electric Station,
Units 1 and 2
Docket Nos. 50-387, 50-388



Gentlemen:

On March 3, 1981, Applicants filed a motion for an order compelling three intervenors in this proceeding, Environmental Coalition on Nuclear Power (ECNP), Citizens Against Nuclear Dangers (CAND), and Susquehanna Environmental Advocates (SEA),

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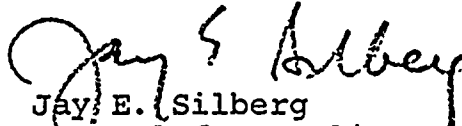
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to answer Applicants' first round interrogatories on Contention 6. The NRC Staff on March 18, 1981 filed a response in support. Neither ECNP nor CAND have filed any responses to this motion.

SEA has also not filed a response to the motion. However, on or about March 17, 1981, Applicants received from SEA an undated filing entitled "SEA Answers to Interrogatories on Emergency Plan and New Contentions". Applicants will deal with the issues relating to the "new contentions" in a separate filing. The purpose of this letter is to point out that SEA's filing totally ignored the interrogatories which it was supposed to answer. Those interrogatories, set forth in Applicants' May 25, 1979 discovery request, were directly related to Contention 6 as defined in the Special Prehearing Conference Order, LBP-79-6, 9 NRC 291, 310 (1979). None of the material set forth in SEA's filing appears to respond to Applicants' Contention 6 interrogatories.

Therefore, Applicants would respectfully request that in ruling on Applicants' March 3, 1981, Motion to Compel Discovery on Contention 6, the Licensing Board recognize that SEA's "answers" do not address the outstanding interrogatories. The Licensing Board should therefore promptly order ECNP, CAND and SEA to answer the outstanding discovery requests on Contention 6.

Very truly yours,


Jay E. Silberg
Counsel for Applicants

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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Washington, D. C. 20555

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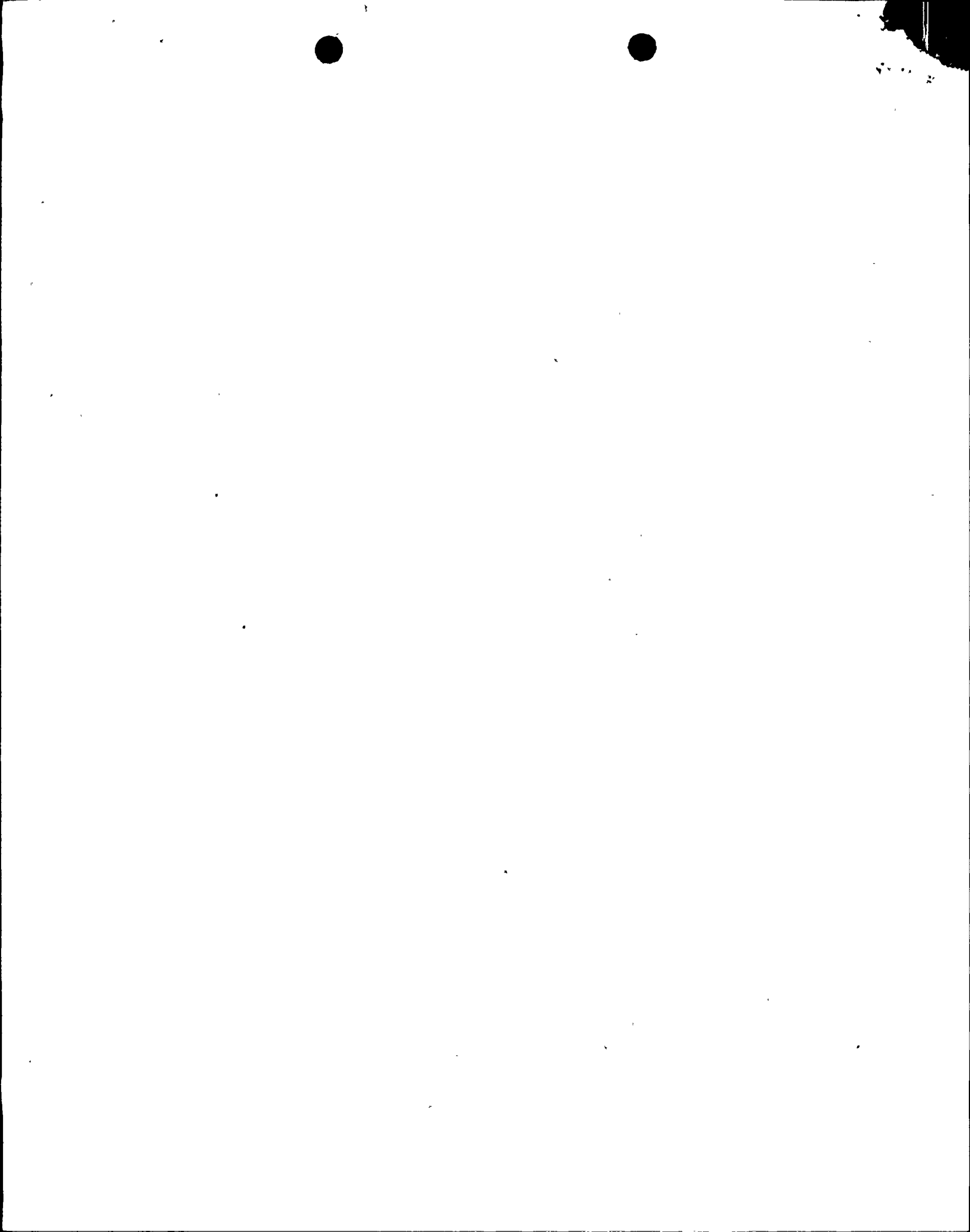
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