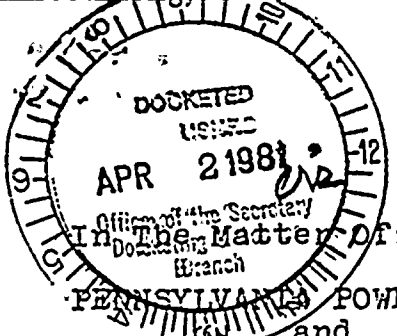


March 27, 1981

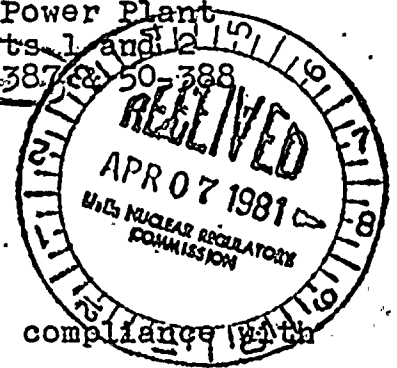
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



PENNSYLVANIA POWER & LIGHT CO.
and
ALLEGHENY ELECTRIC COOPERATIVE, INC.

Berwick Atomic Power Plant
Susquehanna Units 1 and 2
Docket Nos. 50-387 & 50-388

CITIZENS AGAINST NUCLEAR DANGERS
STATEMENT ON INTERROGATORIES AND
MOTIONS BEFORE THE LICENSING BOARD



The Citizens Against Nuclear Dangers (Citizens), in compliance with the directive of the Licensing Board, dated February 27, 1981, hereby inform all the parties to the intervention that the Citizens currently do not possess any of the discovery information sought by the NRC and the Applicants, relevant to the health and safety contentions. It is more than likely that, upon receipt of the relevant documents in this case, such as the SER, the Citizens will be able to change this answer and promptly submit substantive responses to the NRC and the Applicants, which we understand is permissible according to the order cited above.

In this regard, the Citizens call attention to a communication from the NRC Division of Licensing, dated February 20, 1981, which vindicates our position by proving that the Applicants were not in compliance with NRC timetables. The Applicants failed to respond with factual information in a timely manner to about 200 important questions pertaining to safety problems at Berwick that the NRC will need answers to, in order to complete the SER. Some of these currently outstanding questions are relevant to the health and safety contentions. How the Applicants will ultimately answer the array of technical questions from the NRC will determine the course of events at the public hearings.

The Citizens believe that the Applicants were stalling all along, while their procedural maneuvering was intended to deny the interveners

8104080342

DS03
50/1



the opportunity to obtain the damaging evidence in time to study this material and utilize it in their replies to interrogatories, etc., thereby clearly denying due process! It has also not gone unnoticed (by review agencies) that the Licensing Board at no time imposed any public hearing procedural sanctions or restrictions on the Applicants-- as they should have--for their flagrant violations of not responding properly and fully to the government (and the interveners interrogatories) which the record in this case reveals.

The Citizens move the Licensing Board to order the NRC to withhold the issuance of any license at this time pertaining to the Applicants' application for a special nuclear material license for uranium fuel. This superseding application was filed on or about December 16, 1980. The Citizens move the Licensing Board to conduct a special public hearing on this matter at Wilkes-Barre, Pa., with all parties participating. This application, among other things, calls for a major deviation from the original plans, which will require a scientific evaluation by all parties, and, because of the contentions pending in this licensing case directly dealing with the health and safety issue of the uranium fuel cycle. Therefore, the Citizens oppose the issuance of any separate fuel license until a special public hearing is conducted to show cause why these changes are needed and how they will impact on the cost-benefit ratio, the human environment, and the health and safety of the public.

The Citizens move the Licensing Board to, concurrently with the above requested special hearing, hold an inquiry into the Applicants' plan to construct a so-called "holding facility" for low-level radioactive materials on the Berwick site at a cost of 11.5 million dollars.

This is a major change and plant addition that must be evaluated by all parties to the intervention. The Citizens oppose the Applicants plan to apply for a separate NRC license to build and operate any such holding facility. There are contentions pending in this case dealing with radiation levels at and near the Berwick Nuke, and this planned on-site storage of radioactive garbage is a significant public health and safety issue that should be commented upon at public hearings, even if for no other reason, because its quite probable that the PP&L will try to institute a scheme to allow other utilities to store their nuclear garbage there as well. The Citizens, therefore, move the Licensing Board to deny the issuance of any separate license for this facility to the Applicants, at least until the interveners have an opportunity to participate in the deliberations.

Finally, the Citizens, taking note of the scores of individuals who have submitted written requests to the NRC seeking to present limited appearance testimony, hereby move the Licensing Board to convene such public hearings, to be conducted primarily in the evening hours and on a Saturday, in the very near future, in the cities of Wilkes-Barre, Scranton, Stroudsburg, Bethlehem, Bloomsburg and Lewisburg, Pa., for the purpose of receiving such testimony from these public interested citizens.

Dated: March 27, 1981.

Thomas J. Halligan
Correspondent

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens Against Nuclear Dangers Statement On Interrogatories And Motions Before The Licensing Board have been served on the following by deposit in the United States mail, first class, this 27th day of March, 1981.

SERVICE LIST

Mr. James P. Gleason, Chm.	Dr. Judith H. Johnsrud
Mr. Glenn O. Bright	Mr. Gerald Schultz, Esq.
Dr. Paul W. Purdom	Mrs. Colleen Marsh
Ms. Jessica H. Laverty, Esq.	Mr. Robert W. Adler, Esq.
Sec. NRC Comm. Docket & Service	Mr. Jay Silberg, Esq.
Atomic Safety & License Bd. & Appeal Bd.	