

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,)
Unit No. 1))

Docket Nos. 50-387
50-388

5/28/81

APPLICANTS' ANSWER TO CITIZENS AGAINST NUCLEAR
DANGERS MOTION TO ADMIT NEW CONTENTION

In a filing entitled "Citizens Against Nuclear Dangers Motion Opposed to Dismissal of Contention 10, and New Contention on the Potential Dangerous Flow in the Design of the Primary Cooling System", dated May 12, 1981, Citizens Against Nuclear Dangers ("CAND") submitted a new contention based on the recent NRC report NUREG-0785, "Safety Concerns Associated With Pipe Breaks In The Boiling Water Reactor Scram System" (March 1981). Applicants do not oppose the admission of a contention based upon the scram discharge volume issue discussed in NUREG-0785.

Applicants have previously stated that they did not object to a similar contention submitted by Susquehanna Environmental Advocates. See "Applicants' Answer to Susquehanna Environmental Advocates' Motion for Allowance of New Contentions", dated May 21, 1981, p. 6. As stated in that filing, we would request that the

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two contentions be consolidated. Applicants would suggest the following wording for a consolidated contention:

Applicants have not adequately considered the consequences of a break in the scram discharge volume system, including the possibility that the break could not be isolated thus causing the uncovering of the core and the possibility that the flow from such a break could disable emergency core cooling system equipment.

This language covers all aspects of both SEA's and CAND's contentions and would therefore be an appropriate consolidation.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 
Jay E. Silberg
Matias F. Travieso-Diaz
Counsel for Applicants
1800 M Street, N. W.
Washington, D. C. 20036
(202) 822-1000

Dated: May 28, 1981

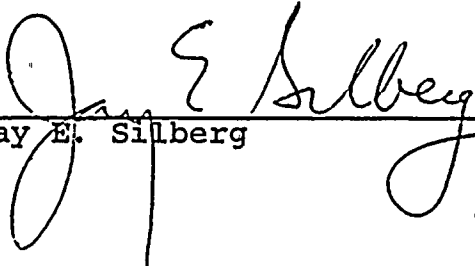
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing "Applicants' Answers to Citizens Against Nuclear Dangers Motion to Admit New Contention" was served by deposit in the United States Mail, First Class, postage prepaid, this 28th day of May, 1981, to all those on the attached Service List.



Jay E. Silberg

Dated: May 28, 1981

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(Susquehanna Steam Electric Station,)
Units 1 and 2)

SERVICE LIST

Secretary of the Commission U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Dr. Judith H. Johnsrud Co-Director Environmental Coalition on Nuclear Power 433 Orlando Avenue State College, Pennsylvania 16801
Administrative Judge James P. Gleason 513 Gilmore Drive Silver Spring, Maryland 20901	Susquehanna Environmental Advocates c/o Gerald Schultz, Esquire Post Office Box 1560 Wilkes-Barre, Pennsylvania 18703
Mr. Glenn O. Bright Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Mr. Thomas J. Halligan, Correspondent The Citizens Against Nuclear Dangers Post Office Box 5 Scranton, Pennsylvania 18501
Dr. Paul W. Purdom 245 Gulph Hills Road Radnor, Pennsylvania 19087	Ms. Colleen Marsh Box 558 A, R. D. #4 Mt. Top, Pennsylvania 18707
Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Jessica H. Laverty, 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	

Karin W. Carter, Esquire
Department of Environmental Resources
Commonwealth of Pennsylvania
505 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

Larry Chandler, Esquire
Office of the Executive Legal
Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

