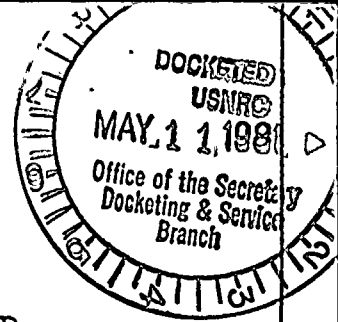


May 6, 1981



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

MOTION FOR ALLOWANCE OF NEW CONTENTIONS

Pursuant to 10CFR2.730, Intervenor SUSQUEHANNA ENVIRONMENTAL ADVOCATES comes now and respectfully moves that the Board allow and accept the following new contentions in the above-captioned matter. Each and all of them are based on information and/or documents which are new or have only recently been made available to SEA.

I. EMERGENCY PLANS
(Proposed Contention 20)

The emergency evacuation plans submitted by Luzerne County and the State of Pennsylvania do not meet the requirements of NUREG-0654 in at least 15 specific ways, outlined in documents submitted previously by SEA. No operating license should be issued until these plans meet NRC requirements.

II. CLASS 9 ACCIDENTS
(Proposed Contention 21)

Applicants' supplement to the Draft Environmental Statement vastly understates the health and economic effects of a Class 9 accident. In addition, it relies on invalid statistical analyses. In addition, it relies on the Rasmussen Report, which itself did not take into consideration human error. In addition, it is not site specific, as required by NRC regulations.

III. PIPE BREAKS IN G.E. REACTORS
(Proposed Contention 22)

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Hot, radioactive water from an SDV (Scram Discharge Volume)

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break can disable the residual heat removal system, the RCIC system, the core sprays and the high-pressure coolant injection pumps - in short, all major safety systems except the containment - in a short time.

Respectfully submitted,

Gerald R. Schultz
Gerald R. Schultz, Esq.

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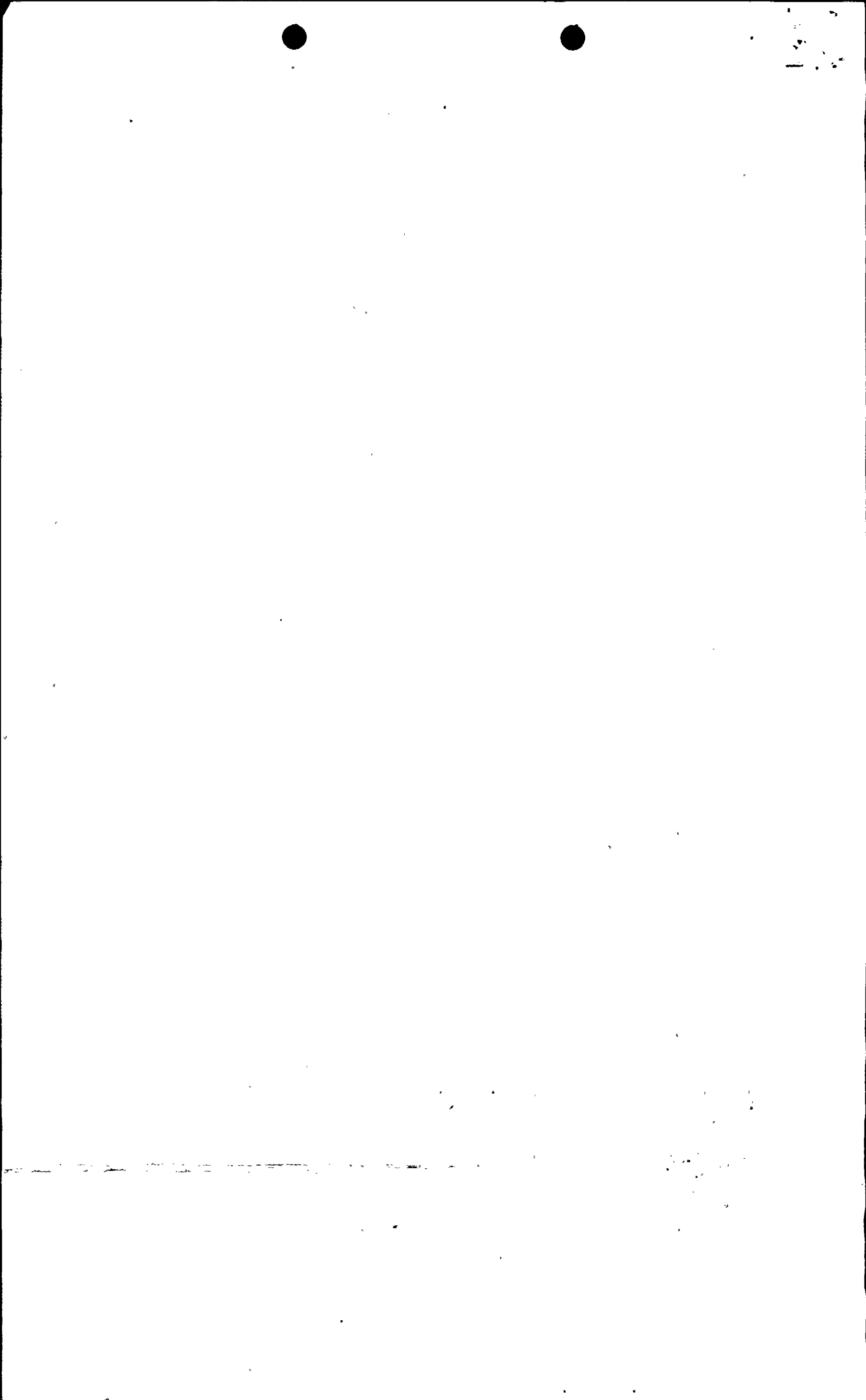
CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Intervenor's Motion for Allowance of New Contentions was served by deposit in the United States Mail, First Class, postage prepaid this 6th day of May, 1981, to all those on the attached Service List.

Patricia Kellmer

Patricia Kellmer

Dated: May 6, 1981



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)

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