

occurring at Susquehanna. But that is a matter of factual proof, not of legal prescription.

Id.

As shown in the Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 19), and the Affidavit of Junius William Millard in Support of the Summary Disposition of Contention 19, the sequence of events which occurred at TMI is very unlikely to occur at Susquehanna as a result of the differences in design and operation between the Susquehanna boiling water reactors and the TMI pressurized water reactors. Having made the factual showing contemplated in the Licensing Board's Memorandum and Order which admitted Contention 19, Applicants respectfully submit that summary disposition of that contention is now appropriate.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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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

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