

8/6/79

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

APPLICANTS' ANSWER TO MOTION FOR  
PROTECTIVE ORDER OF COLLEEN MARSH ET AL.

In the introduction to their Answers to First Round Applicant Interrogatories (undated, but accompanied by an affidavit dated July 20, 1979), Colleen Marsh et al. ("Marsh") asked that the Licensing Board issue a protective order pursuant to 10 CFR §2.740(c) addressed to those interrogatories which Marsh did not answer.


Applicants have reviewed the answers which Marsh has submitted, both to Applicants' interrogatories and to those of the Staff. Based upon that review, it appears to Applicants that Marsh has answered Applicants' first round interrogatories to the extent of information currently available to her. Applicants therefore see no necessity for a motion to compel discovery. Similarly, the Marsh motion for protective order would appear moot.

Applicants assume that Marsh will supplement her answers to interrogatories as required by 10 CFR §2.740(e), i.e. as to expert witnesses and their testimony (Interrogatory 19)

and as to matters which though correct when made are no longer true.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By   
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Dated: August 6, 1979

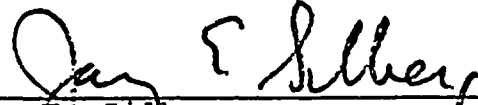
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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing  
"Applicants' Answer to Motion for Protective Order of Colleen  
Marsh et al." were served by deposit in the U. S. Mail, first  
class, postage prepaid, this 6th day of August, 1979, to all  
those on the attached Service List.

  
\_\_\_\_\_  
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Dated: August 6, 1979

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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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