

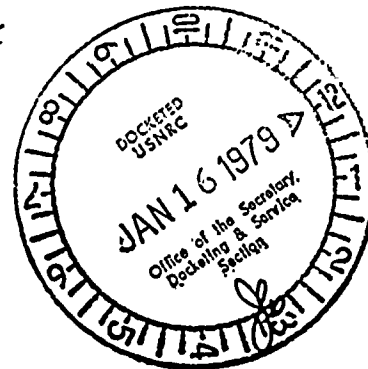
January 12, 1979

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

1/12/79

Att'n.: Docketing on Service Section

Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Jay Silberg, Esquire  
Shaw, Pittman, Potts, Trowbridge & Madden  
1800 M Street, N. W.  
Washington, D. C. 20036

Re: P.P.&L. Co., et al.  
Docket Nos. 50-387 and 50-388

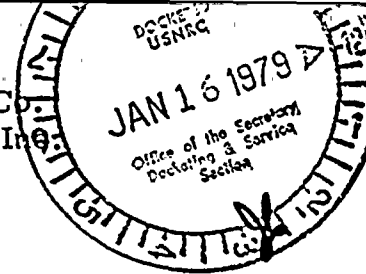
Dear Gentlemen:

Enclosed please find Supplement to Petition for Leave to Intervene and list of contentions in above matter.

Sincerely,

*Colleen Marsh*

In Re: Pennsylvania Power & Light Co.  
and Alleghany Electric Cooperative, Inc.  
Susquehanna Steam Electric Station,  
Units 1 and 2.



NUCLEAR REGULATORY  
COMMISSION

DOCKET NOS. 50-387 and  
50-388

**SUPPLEMENT TO PETITION FOR LEAVE TO INTERVENE  
OF COLLEEN MARSH ET AL. OUTLING AND LISTING CONTENTIONS**

NOW come Colleen Marsh and Eleven Others, Petitioners herein, and Supplement their Petition For Leave To Intervene to include the following contentions:

1. The proposed project creates an unreasonable risk of harm to the health and safety of Petitioners and other members of the public due to the following specific reasons or bases:

A. Applicants design fails to resolve the problem of pump flywheel missiles generated by coolant pump overspeed in the boiling water reactors which poses an un reasonable risk of harm to the health and safety of Petitioners and others. The electrical braking proposed by Applicant is not sufficient to prevent this problem.

B. Applicant fails to provide adequate on-site storage facilities in its design to safely store both high and low level radioactive materials. The design contemplates temporary storage on-site of low level materials, yet since no avenues remain open for applicant to dispose of all radioactive waste, spent fuel and materials elsewhere, the Applicant may have to store the spent materials longer, up to 10 to 15 years, than it is prepared safely to contain and monitor for such a period of time on-site.

C. Applicant has failed to provide, or demonstrate in its application, adequate plans for the safe transportation in connection with the radioactive materials produced in connection with the operation of Susquehanna Steam Electric Station.

D. Applicant's design fails to solve the problem of flow-induced vibration in the core, thereby creating in-vessel sparger failure.

2. Applicants proposed facilities creates an unreasonable risk of harm to the private property of Petitioners and other members of the public located within 50 miles of facilities for all the reasons set for in Paragraph One, A-D of this Supplement to Petition.

3. Petitioners and the Public are exposed to unreasonable risk of harm to personal safety and property due to the protection of the Power Company under the Federal Price-Anderson Act which limits its liability.

4. Due to the facts and circumstances set forth in Paragraph One, A-D, Applicants proposed facilities violate this Commission's Standards for protection against radiation set down in 10CFR 20.1 et seq. and 10 CFR 20.105 (a) which provides for permissible levels in unrestricted areas and the environment around the Facilities.

5. Applicants proposed Facilities are unreasonably costly and uneconomical both to Petitioners and the public due to the following reasons and bases:

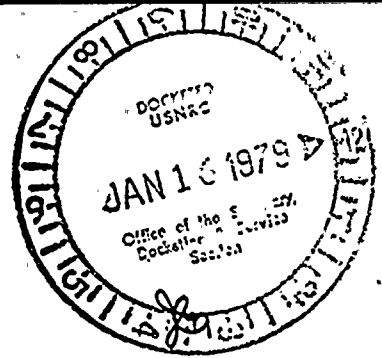
A. The output of electricity to be produced by the proposed facilities, in relation to cost, will be lower than electricity generated by existing forms of energy and therefore more expensive to Petitioners and others.

B. The projected cost of facilities of Applicant fails to account for, or include, the expected cost of decommissioning the facilities after its estimated useful life of 30 years. Such cost is at least equal to the cost of construction and will be borne by future consumers and taxpayers.

C. The facilities are unnecessary and wasteful as the electric capacity of PP&L in 1977 was 40% greater than customer needs and demands from existing facilities. Latest projections of energy use and requirements during the next 30 years for the PP&L service area, the period equal to the projected plants "useful life", show that PP&L can meet the needs of its customers through existing facilities and sources without investing in a costly and unreasonably dangerous nuclear facility.

D. Pennsylvania Utility Commission regulations would permit Applicant to base its rates, in part, according to capital investment in facilities, and thereby double utility rates for PP&L as its total investment for all facilities will be doubled after completion of the projected facilities. This cost will be borne by local PP&L customers, yet the unneeded electricity will be sold outside of the PP&L service area.

6. The Applicants fail to adequately provide plans for informing the public as to evacuation procedures including drills and warnings in the event of radiation leakage.



AFFIDAVIT

STATE OF PENNSYLVANIA

SS:

COUNTY OF LUZERNE

The undersigned, being duly sworn, deposes and states that she is one of the Petitioners named in the within Petition, and that the facts therein contained are true and correct to the best of her knowledge and belief.

*Kathryn F. Farrell*

Sworn to and subscribed before me  
this 12<sup>th</sup> day of January, 1979.

*Kathryn F. Farrell*

KATHRYN F. FARRELL, Notary Public  
Wilkes-Barre, Pa. 18701  
Commission Expires Jan. 29, 1983