

May 25, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PENNSYLVANIA POWER AND LIGHT COMPANY and) Docket Nos. 50-387
ALLEGHENY ELECTRIC COOPERATIVE, INC.) 50-388
)
(Susquehanna Steam Electric Station,)
Units 1 and 2))

APPLICANTS' FIRST REQUEST TO INTERVENOR
SUSQUEHANNA ENVIRONMENTAL ADVOCATES
FOR THE PRODUCTION OF DOCUMENTS

In accordance with Special Prehearing Conference Order, LBP-79-6, and pursuant to 10 CFR §2.741, Applicants request that Intervenor, Susquehanna Environmental Advocates ("Intervenor") respond in writing to the following request for production of documents and produce the original or best copy of each of the documents requested below, on or before June 29, 1979, at the office of Bryan Snapp, Esquire, Pennsylvania Power & Light Company, or at a place mutually convenient to the respective parties.

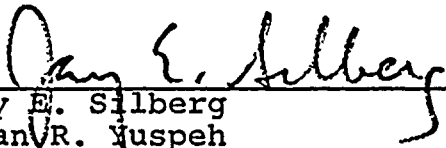
"Documents" means all writings and records of every type in the possession, control or custody of Intervenor, including but not limited to memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, speeches, articles, transcripts and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of Intervenor.

Applicants request that Intervenor produce each and every document identified or described in the answers to Applicants' First Round of Interrogatories to Intervenor Susquehanna Environmental Advocates.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By 
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Dated: May 25, 1979