

September 7, 1978

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

Attention: Docketing and Service Section

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



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

RE: PP&L Co., et al.
Docket Nos. 50-387 and 50-388.

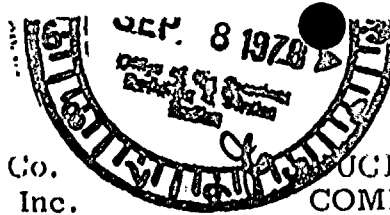
Dear Gentlemen:

Enclosed please find a copy of Petition for Leave to Intervene and/or Request for Hearing in the above matter.

Sincerely,

Colleen Marsh

Acknowledged by card *9/13 S.A.*



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

NUCLEAR REGULATORY
COMMISSION

DOCKET NOS. 50-387 and
50-388

PETITION FOR LEAVE TO INTERVENE
AND/OR REQUEST FOR HEARING

NOW come Petitioners, in accordance with 10 CFR Section 2.714 et seq and Petition the United States Nuclear Regulatory Commission as follows:

1. Petitioners, adult individuals and sui juris, are residents of the Commonwealth of Pennsylvania, whose names and addresses are more particularly set forth in Schedule "A", attached hereto and made a part hereof by reference thereto.

2. Petitioners reside in or about the County of Luzerne, Pennsylvania within a 50-mile radius of the proposed premises situate Salem Township, Luzerne County, Pennsylvania whereupon Pennsylvania Power and Light Company and Allegheny Electric Cooperative, Inc. (hereinafter referred to as "Applicants") desire to possess, use and operate two boiling water nuclear reactors known as the Susquehanna Steam Electric Station, Units 1 and 2 (hereinafter referred to as "Facilities").

3. Petitioners are proper parties to this proceeding under the Atomic Energy Act of 1954 (the "Act") as the nature of their right is based upon considerations of health, safety to person and property, finance and environment not only of Petitioners, but of those members of the public who reside in Unrestricted Areas (as defined by the Act) in and about and/or surrounding, and in all events within 50 miles of the geographic area of the Facilities proposed by Applicants.

4. The interests of Petitioners which would be affected by the Applicants' possession, use and operation of the proposed Facilities are as follows, to wit:

A. An unreasonable risk of harm to the health and safety of Petitioners, and other members of the public as hereinbefore stated;

B. An unreasonable risk of harm to the safety of the private property of Petitioners and others, and the public property located with the 50-mile radius of Facilities;

C. The increased cost of electricity, to be borne by Petitioners and others of the public who are customers of Applicants is far greater than other electricity produced by existing forms of energy;

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

E. The environment within the aforesaid geographic area of 50 miles may be contaminated and square miles of land and water may become useless all to the detriment of Petitioners and others.

5. The facts and circumstances upon which Petitioners base their Petition are as follows:

A. Applicants' proposed Facility violated this Commission's Standards for Protection Against Radiation set forth in 10 CFR 20.1 et seq., and in particular, 10 CFR Section 20.105 (a) which provides for permissible levels in unrestricted areas and the environment around the Facilities.

B. Applicants' "Summary of Environmental Consequences" (full range of accidents reported under N. R. C. guidelines), filed with this Commission, sets forth in its Table 7.1-17 "Assessment of Likelihood of Event" that "Class 8.1" accidents involving "small pipe" or "large pipe" are "extremely rare" whereas these accidents are common to the design of Applicants' Facilities, the probability or likelihood is great, and the effluents emitted into the surrounding geographic areas would be in amounts and quantities prohibited by 10 CFR 20.1 et seq..

C. Applicants' design of Facilities fails to resolve the problem of reactor coolant pump overspeed in the boiling water reactors, and thereby poses an unreasonable risk of harm to the health and safety of Petitioners and others.

D. Applicants have failed to adequately respond to and comply with this Commission's Notice of Violation issued to Applicants by letter of May 10, 1978, stemming from inspection of Facilities March 20-23, 1978, involving preliminary alignment of safety related core insulation tolerance exceeding .002 inches established by field engineer supervisor.

E. Applicants have failed to adequately respond to, and comply with this Commission's letter of June 27, 1978 directing response to I. E. Bulletin Number 78-10 in Re: Bergen Paterson product defects.

F. Applicants' operation and use of Facilities is more costly and less efficient than the generation of electricity by existing forms of energy.

G. Applicants' operation and use of Facilities as proposed creates an unreasonable risk of harm to Petitioners and the public which outweighs those

benefits derived by permitting the Applicants to proceed with the Facilities.

H. 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.

6. An order by this Commission granting Applicants a facility operating license for the Facilities would adversely affect the interests of Petitioners, as herein set forth, by permitting Applicants to possess, use and operate the aforesaid Facilities.

7. Petitioners desire to intervene in these proceedings as they relate to the specific items listed or identified herein.

WHEREFORE, the Petitioners respectfully request they be permitted to intervene in these proceedings, or in the alternative, be granted a hearing with respect to the issuance of the operating license as the same relates to the interests of Petitioners.

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.

Catherine M. ...

Sworn to and subscribed before me this 7th day of September, 1978.

Beverly A. Bartkowitz

BEVERLY A. BARTKOVITZ, Notary Public
WILKES-BARRE, LUZERNE COUNTY
MY COMMISSION EXPIRES MAY 27 1982
Member, Pennsylvania Assoc. of Notaries



SCHEDULE "A"

NAME

ADDRESS

Charles Pina
Ellen Humphries
Marie Gutowski
Ann Langman
Karen Sajan
~~*Janet (Peterson)*~~
Anty Jones
Claudia A. Marti
Margaret Jadelis
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 12 Kings St. ~~Wilkes Barre~~
 4 3rd St Pittston Pa
 304 S. Franklin St, Wilkes-Barre,
 400 Susquehanna Ave - W. Pittston
 80 S. River St., Wilkes-Barre Pa.
 558 A, R.D #4, Mt. Top Pa.
 18707



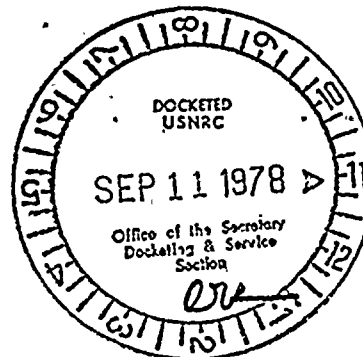
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DOCKET #50-387,388
PROC. & UTIL. FAC.

4-035116E250 09/07/78 ICS IPMMTZZ CSP WSHB
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THE SECRETARY OF THE COMMISSION
US NUCLEAR REGULATORY COMMISSION
ATTN DOCKETING AND SERVICE SECTION
WASHINGTON DC 20555



THE CITIZENS AGAINST NUCLEAR DANGERS (THE CITIZENS), BERWICK PENNSYLVANIA HEREBY PETITION TO INTERVENE BEFORE THE NUCLEAR REGULATORY COMMISSION IN THE APPLICATION FOR A FACILITY OPERATING LICENSE FROM PENNSYLVANIA POWER AND LIGHT COMPANY AND ALLEGHENY ELECTRIC COOPERATIVE INCORPORATED (DOCKET #50-387 AND #50-388) TO OPERATE THE SUSQUEHANNA STEAM ELECTRIC STATION, UNIT ONE AND TWO (BERWICK PLANT) LOCATED AT SALEM TOWNSHIP PENNSYLVANIA

THE CITIZENS ALSO REQUEST THAT PUBLIC HEARINGS BE CONDUCTED BY THE NRC IN THIS CASE. THE CITIZENS HAVE ACTIVELY PURSUED DEVELOPMENTS AT THE BERWICK PLANT FOR SEVERAL YEARS IN THE PUBLIC INTEREST, AND THE PUBLIC INTEREST WILL DEFINITELY BE EFFECTED BY THESE PROCEEDINGS, THEREFORE, THE CITIZENS SEEK STANDING IN THIS CASE BEFORE THE NRC.

THE CITIZENS SPECIFY THE REASONS WHY INTERVENTION SHOULD BE PERMITTED AS THE FOLLOWING;

1. THE MARKET VALUE AND PROPERTY RIGHTS OF CITIZENS IN THE EFFECTED AREAS ARE PLACED IN JEOPARDY BY THE BERWICK PLANT
2. IF THE PUBLIC INTEREST IS TO BE SERVED, PUBLIC TESTIMONY IS REQUIRED UNDER THE RIGHT OF DUE PROCESS GUARANTEED BY THE US CONSTITUTION
3. THE EFFECTS ON THE ENVIRONMENT BY THE BERWICK PLANT WILL LINGER FOR GENERATIONS, AND THE EIS MUST BE CAREFULLY AND SCIENTIFICLY EVALUATED NOW.
4. THE SAFETY OF THE SYSTEMS AND MODES OF DELIVERY AT THE BERWICK PLANT ARE THE PROPER SUBJECT FOR TESTIMONY BY EXPERTS -- WHICH THE CITIZENS WILL PRESENT BEFORE THE NRC. THE CITIZENS IDENTIFY THE SPECIFIC ASPECTS OF THE SUBJECT MATTER AS THE PROBABLE DANGERS TO PUBLIC HEALTH AND SAFETY FROM THE OPERATION OF THE BERWICK PLANT CONCERNING;
 1. STORAGE OF RADIOACTIVE FUEL AND RADIOACTIVE WASTE ON THE PREMISES
 2. TRANSPORTATION OF RADIOACTIVE MATERIALS TO AND FROM THE BERWICK PLANT
 3. CATASTROPHIC BREAKDOWN AT THE BERWICK PLANT
 4. ADEQUACY OF EVACUATION PLANS IN CASE OF EMERGENCIES
 5. OTHER ENVIRONMENTAL HEALTH DANGERS

MRS IRENE LEMANOWICZ
CHAIRPERSON

delivered by card. 9-11-78. ene



THE CITIZENS AGAINST NUCLEAR DANGERS

PO BOX 377

RD 1

BERWICK PA 18603

12:45 EST

MGMCOMP MGM