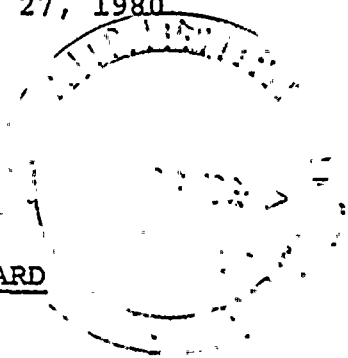


October 27, 1980

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' STATEMENT TO MATERIAL
FACTS AS TO WHICH THERE IS NO GENUINE
ISSUE TO BE HEARD (CONTENTION 16)

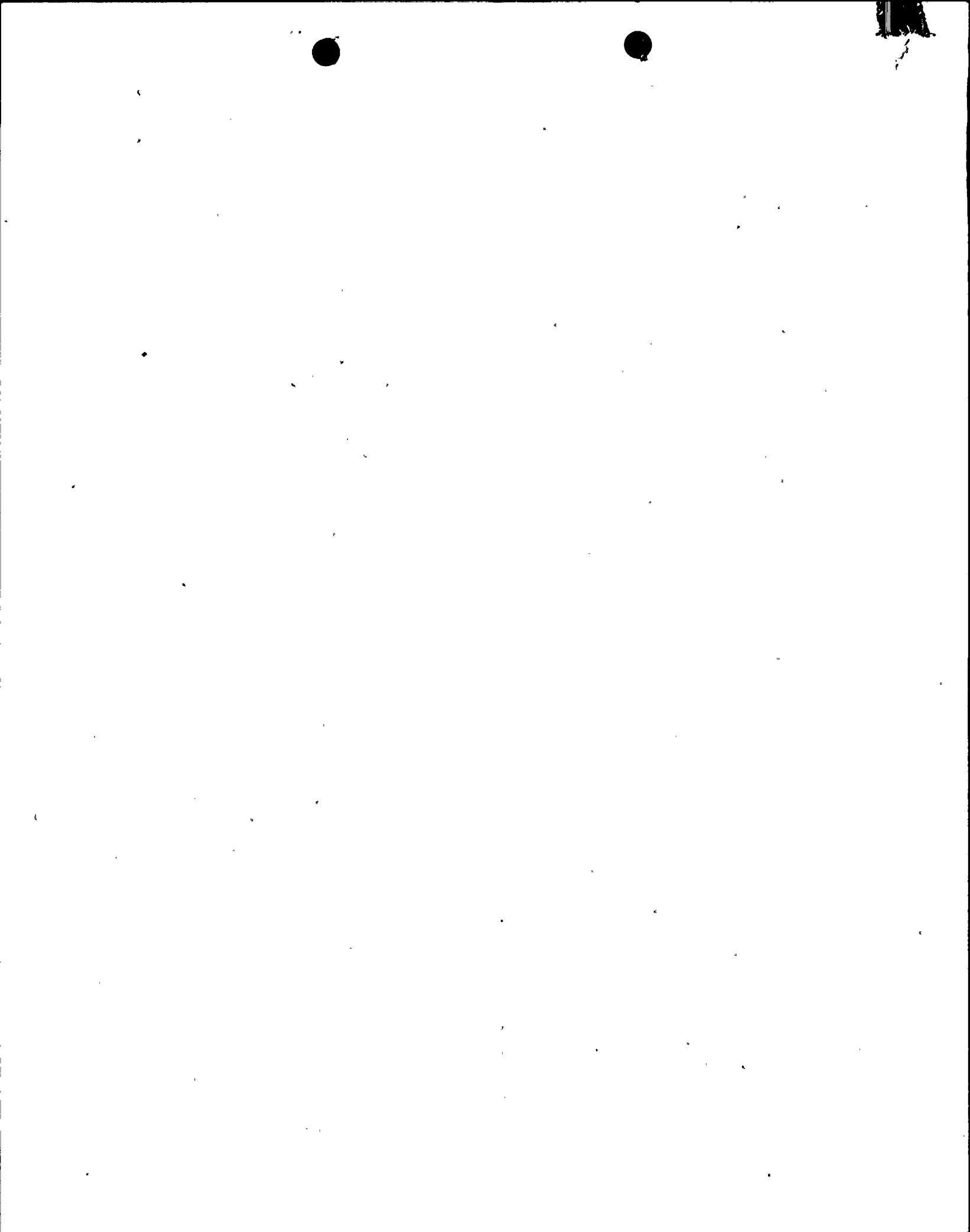
Pursuant to 10 C.F.R. §2.749(a) Applicants state, in support of their Motion for Summary Disposition of Contention 16 (Cooling Tower Discharge) in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Water evaporated from the Susquehanna cooling towers comes from the three sources of water supplied to the towers: makeup water, the return flow from the Circulating Water System, and the return flow from the Service Water System. Affidavit of Walter J. Rhoades In Support of Summary Disposition of Contention 16 (Cooling Tower Discharge) (hereinafter "Rhoades Affidavit"), para. 3.
2. Since none of the three sources of water supplied to the cooling towers is radioactive, the water evaporated from the towers is not radioactive. Rhoades Affidavit, para. 3.
3. Makeup water supplied to the cooling towers to replace water lost by evaporation comes from the Susquehanna River, is not

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mixed with any other plant water and therefore cannot be the source of radioactive contamination. Rhoades Affidavit, paras. 4-5.

4. Two independent methods keep radioactive fluids from coming into contact with the Circulating Water and Service Water Systems. Rhoades Affidavit, para. 6.

5. The first independent method which keeps radioactive fluids from coming into contact with the Circulating Water and Service Water Systems is the presence of physical barriers (i.e. tube walls in heat exchangers) between the water which eventually flows to the cooling towers and any radioactive fluids. Rhoades Affidavit, para. 6.

6. The second independent method which keeps radioactive fluids from coming into contact with the Circulating Water and Service Water Systems is the pressure differentials between the radioactive fluids and the two Systems. Rhoades Affidavit, para. 6.

7. Because the Circulating Water and Service Water Systems operate at a higher pressure than the systems which contain radioactive fluids, if there is a breach in any of the physical barriers, the flow will be from the Circulating Water and Service Water Systems into the systems containing radioactive fluids rather than from the systems containing radioactive fluids into the Circulating Water and Service Water Systems. Rhoades Affidavit, para. 6.

8. The only equipment cooled by the Circulating Water System is the main turbine condenser. Rhoades Affidavit, para. 7.

9. With respect to the Circulating Water System, both the physical barriers (i.e. stainless steel condenser tubes) and the

pressure differential assure that there will be no exchange between the steam which is condensed in the main turbine condenser after passing through the turbine and the Circulating Water System. Rhoades Affidavit, para. 7.

10. The Service Water System cools nineteen groups of equipment of which only four contain potentially radioactive fluids. Rhoades Affidavit, para. 8.

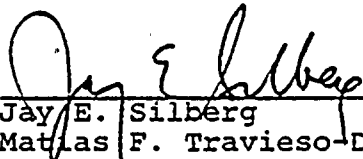
11. With respect to the Service Water System, both the physical barriers (i.e. tube walls in heat exchangers) and the pressure differentials assure that there will be no exchange between potentially radioactive fluids and the Service Water System. Rhoades Affidavit, para. 9.

12. Based upon the system design of the Susquehanna facility, the water which will be evaporated from the Susquehanna cooling towers on a daily basis will not contain radioactivity from the facility. Rhoades Affidavit, paras. 2, 10.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

BY


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