

November 24, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

PENNSYLVANIA POWER & LIGHT CO. (Berwick Atomic Power Plant)
and (Susquehanna Units 1 and 2)
ALLEGHENY ELECTRIC COOPERATIVE, INC. (Docket Nos. 50-387 & -388)

CITIZENS AGAINST NUCLEAR DANGERS
PETITION AND MOTIONS ON SUMMARY DISPOSITION

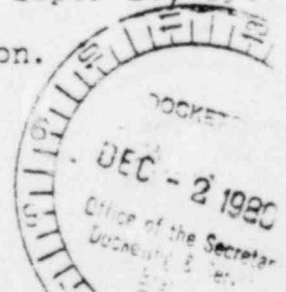
Concerning the Applicants' motion for summary disposition on the ozone section of Contention 17, the Citizens petition the Licensing Board to issue a ruling on the motion which appears on page four of the Citizens' filing of September 10, 1980, to the Licensing Board which reads: "...the PP&L has constructed special sub-stations along the route of the UHV lines. These lines can be energized at 500 kV and higher and tested for ozone levels during rain, sleet and snow (storms) prior to the public hearings, and the Citizens move the Licensing Board to so direct the Applicants. Safety and environmental health tests should be conducted on the actual UHV lines by the EPA and the DOE, on behalf of the NRC, and results made public."

In our judgement this motion is the most important issue of substance to be brought before the Licensing Board in the two year duration of these proceedings. We believe it takes precedent and merits a definitive resolution at this time, because, if ordered, the tests on the Berwick UHV lines will show conclusively the extent of the environmental dangers caused by ozone. Summary disposition, on the other hand, is not the solution. In fact, it will simply be part of the problem. The Citizens also reaffirm all other contentions against the Applicants (response dated Sept. 10, 1980 as sufficient argument for dismissal of Applicants' motion.

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The Citizens now submit significant new information concerning the environmental impacts of UHV transmission lines. On October 2, 1980 an expert biophysicist testifying in Federal Court in Philadelphia cited scientific studies that indicate serious adverse effects caused by 500 kV transmission extending 2,000 feet from the UHV lines. This certifiable evidence convinced Judge Clarence C. Newcomer (Eastern District of Pennsylvania) to grant an injunction stopping Philadelphia Electric (PE) from installing the UHV lines because the plaintiff's rights of due process had been violated. On October 21, 1980, U.S. Supreme Court Justice William J. Brennan upheld that injunction ruling.

The biophysicist's plausible testimony of certifiable human risk in the PE case will be obtained by the Citizens from the Court records and incorporated into direct testimony on Contention 17. The PE lines in question are similar to the Berwick UHV lines, and both of these transmission systems are designed to be interconnected at a substation in Lehigh County, Pa., thus making the PE case information most relevant.

The Citizens hereby move the Licensing Board to deny the Applicants' summary disposition on Contention 2 (section on Chlorine) or at least delay further consideration on this matter until the U.S. Council on Environmental Quality publishes latter this year their new studies linking chlorinated drinking water and cancer. These studies show that the relationships between cancer rates and chlorinated compounds in drinking water are below the safe level established by the EPA. Dr. Robert Harris, a member of the CEQ's three member panel, said recently that the new government findings "are going to make the EPA standards look ridiculous." The Citizens will include these scientific findings in their direct testimony on Contention 2.

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Furthermore, a significant development has occurred regarding Contention 2. A firm known as Synfuel Energy Corp. is planning to construct a \$100 million fuel grade ethanol production facility on a 200-acre site in the Nanticoke Industrial Park along the Susquehanna River, about 15 miles upstream from the Berwick Nuke. This massive project will consume 18 million bushels of corn a year to produce 45 million gallons of ethanol annually. By-products will include 175,000 tons of distillers dried grain and 120,000 tons of liquid carbon dioxide. The hundreds of millions of gallons of liquid wastes discharge from this ethanol operation into the Susquehanna River upstream from Berwick will, among other things, cause a substantial increase in the cumulative growth of slime-forming biolife in the river that in turn will necessitate a considerable increase in the chlorination of the various water treatment systems at Berwick. The steady discharge from Berwick of this heavily chlorinated waste water will endanger the aquatic ecosystems downstream, and especially endanger the health of 15,00 people living in Danville, Pa. who receive their drinking water directly from the Susquehanna River.

The Citizens will cite in direct testimony at the public hearings the detailed impacts of this and several other planned upstream projects that will further degrade the quality of river water that will be entering the Berwick treatment systems. Therefore, the Citizens move the Licensing Board to deny the Applicants' motion for summary disposition on the Chlorine part of Contention 2.

Dated: November 24, 1980.

Thomas J. Halligan
Correspondent

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens Against Nuclear Danger
Petition And Motions On Summary Disposition have been served on the
following by deposit in the United States mail, first class,
this 24th day of November, 1980

Dated: November 24, 1980.

Thomas J. Halligan

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