

August 28, 1981

RELATED CORRESPONDENCE

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' MOTION FOR PARTIAL
SUMMARY DISPOSITION OF
CONTENTION 1 (FUEL CYCLE DOSES)



Pennsylvania Power & Light Company and Allegheny Electric Cooperative, Inc. ("Applicants") move the Atomic Safety and Licensing Board, pursuant to § 2.749 of the Commission's Rules of Practice (10 C.F.R. § 2.749) and the Special Prehearing Conference Order of March 6, 1979, LBP-79-6, 9 NRC 291, 328, for summary disposition in Applicants' favor of the portion of Contention 1 in this proceeding that questions the magnitude of the radioactive doses that will be imparted on the public by the release of all isotopes (other than radon-222 and technetium-99) during the fuel cycle for the Susquehanna Steam Electric Station ("Susquehanna").

As grounds for their Motion, Applicants allege that there is no genuine issue of material fact to be heard with respect to the magnitude of the doses resulting from radioactive releases (other than radon-222 and technetium-99) for the fuel cycle from Susquehanna,

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and Applicants are entitled to a decision in their favor or them as a matter of law.

This Motion is supported by the Applicants' Statement of Material Facts As To Which There is No Genuine Issue To Be Heard (Contention 1) (Fuel Cycle Doses), and the Affidavit of Morton I. Goldman, both filed simultaneously herewith, together with all pleadings and other papers in this proceeding.

As set forth in the March 6, 1979, Special Prehearing Conference Order, supra, 9 NRC at 328, responses to this Motion are due three weeks from its filing date.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By Matias F. Travieso-Diaz
Jay E. Silberg
Matias F. Travieso-Diaz

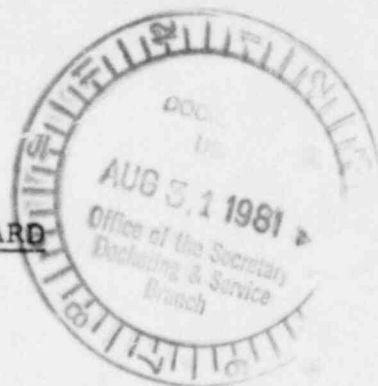
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Dated: August 28, 1981.

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Motion for Partial Summary Disposition of Contention 1 (Fuel Cycle Doses)", "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 1) (Fuel Cycle Doses)", and "Affidavit of Morton I. Goldman in Support of Partial Summary Disposition of Contention 1 (Fuel Cycle Doses)", were served by deposit in the U. S. Mail First Class, postage prepaid, this 28th day of August, 1981 to all those on the attached Service List.

Matias F. Travieso-Diaz

Matias F. Travieso-Diaz

Dated: August 28, 1981.

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