

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

PENNSYLVANIA POWER & LIGHT CO.
and
ALLEGHENY ELECTRIC COOPERATIVE, INC.

BERWICK ATOMIC POWER PLANT
SUSQUEHANNA UNITS 1 & 2
DOCKET NOS. 50-387 & 50-388

CITIZENS AGAINST NUCLEAR DANGERS
RESPONSES TO ASLB DIRECTIVES
AND MOTIONS ON TESTIMONY AND PUBLIC HEARINGS CONFERENCE

The ASLB in its Memorandum of August 14, 1981, has erred in at least two instances. One, the date that this correspondence is required to be mailed is stated as August 25th. Forty days in advance of October 6th is August 27th. Much more importantly, the order of consideration of intervenor contentions at public hearings incorrectly lists only two aspects of Contention 2, to be examined in the first and eleventh order. The fact is, there are three separate aspects of Contention 2, as we well know. So, there is some oversight on the part of the ASLB in scheduling.

It is our understanding that the Coalition will cross-examine and possibly present a direct case at the commencement of the hearings concerning cesium, cobalt, iodine and the other radioactive garbage to be dumped into the Susquehanna River.

Much later in the proceedings, in the eleventh order of business, the Citizens are planning to present their case concerning the radiation dangers to pregnant women and the unborn that will be caused by the Berwick Nuke. The Citizens will in a timely fashion file direct testimony with resumè, etc. on this part of Contention 2.

Also, presumably at that time, the Chlorine aspect of Contention 2 will be debated, provided the ASLB, among other things, grants the

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Citizens' motion for the protective order, filed August 16, 1981. The Citizens oppose the Applicants latest motion to dismiss the Chlorine part of Contention 2. Their overreaction on discovery is further evidence that the PP&L is desperately trying to avoid being forced to present incriminating testimony under oath on the chlorine problems before the ASLB, subject to a test of truthfulness by cross-examination. Thousands of persons downstream who will be drinking the river water containing Berwick's excessive amounts of Chlorine (turned to Chloroform when mixed with chemical pollution in the river) deserve definitive explanations from the NRC in direct testimony, from the PP&L in direct testimony, and from the Commonwealth of Pennsylvania in direct testimony on this subject. The ASLB should direct them to do so, and the Citizens hereby move the ASLB to order the above parties to testify accordingly!

One good reason for this is because the PP&L on/or about August 14, 1981, signed a Consent Decree with the Pennsylvania Department of Environmental Resources admitting to sustained polluting of the Susquehanna River from their Sunbury electric power plant. There have also been scores of major pollution violations of the Clean Streams Act by the PP&L over the years, where they have also admitted they were guilty as charged (consent decrees) of contaminating Susquehanna river water. The PP&L has a very bad track record. The Chlorine issue cannot go uncontested by the government!

ASLB decisions must reflect a real concern for obtaining a complete record on the drinking water issue in the public interest, or face public skepticism and wrath, and, of course, the inevitable delays to licensing that court appeals from these aggrieved people will entail. The same can be expected from aggrieved citizens in

the case of the UHV transmission line leases that apparently were fraudulently obtained. But, that aspect will be a matter for the FCC and the Federal Bureau of Investigation to deal with, not the ASLB.

The Citizens certainly oppose the Applicants unexpected summary disposition motion concerning the low-level radioactive releases part of Contention 2, and likewise oppose the Applicants unexpected motion to summarily dismiss Contention 17 (UHV transmission). The Citizens will oppose any attempt to dismiss Contention 4 (need for power and alternative energy) that may be in the works by the NRC, and also strongly oppose the Applicants attempt to deny the Citizens the opportunity to cross-examine on the decommissioning contention. There are also other Applicant motions to dismiss aimed at the other interveners that were unexpected.

The timetable called for in Part 3 of the August 14th ASLB Order cannot possibly be properly and strickly adhered to by the interveners with all of the above listed complications. Therefore, the Citizens move the ASLB to convene one more pre-hearing conference at Wilkes-Barre, Pa. by September 10th, to rectify the situation by clarifying the ambiguities involved, allow the Citizens and other interveners to respond in opposition directly to these unfair attempts to scuttle the public hearings, by the above cited unexpected surprise motions of the Applicants that have just cropped-up, which in turn are making the issues more and more confusing by the day!

If there is to be an intelligent, coherent and open public hearing, as there certainly should be on all the issues, then there has to be a termination of the Applicants grossly unfair tactics!

Finally, the Citizens move the ASLB to publish a comprehensive order on the subject of the Limited Appearance Statements that will explain in laymans terms every detail and procedure involved and promptly distribute the document to the approximately two-hundred applicants who requested to testify!

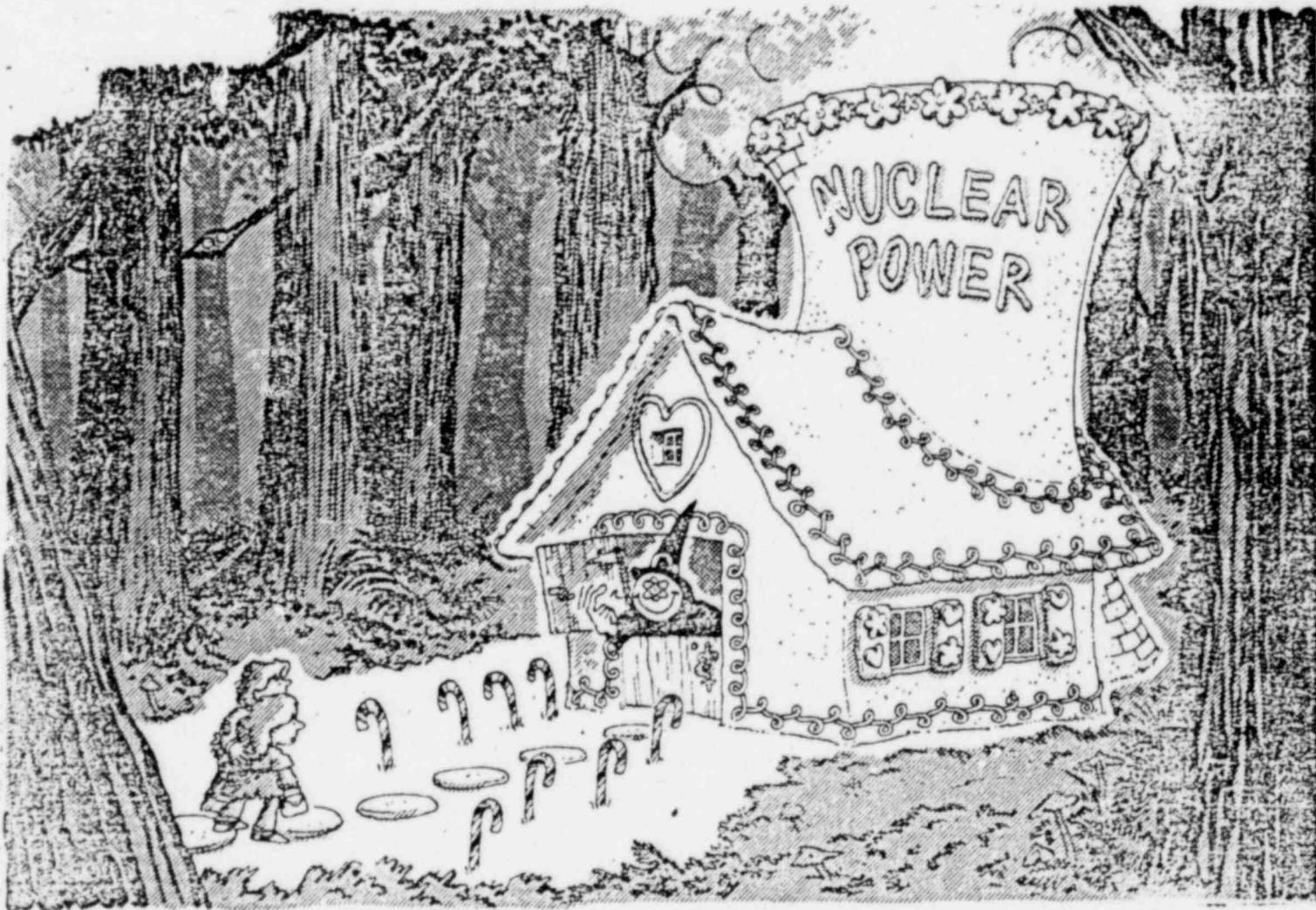
Respectfully submitted

Thomas J. Halligan
Correspondent

Dated: August 27, 1981

CERTIFICATE OF SERVICE

I hereby certify that copies of Citizens Against Nuclear Dangers Responses To ASLB Directives And Motions On Testimony And Public Hearings Conference have been served on all parties to this proceeding by deposit in the U.S. mail, first calss, this 27th day of August, 1981.



COULD THIS BE PP&L's NEW PUBLIC INFORMATION CENTER ?