



September 9, 1981

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 SUMMARY  
DISPOSITION OF MODIFIED  
CONTENTION 2 (CHLORINE)

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 chlorine portion of Contention 2 in this proceeding. The chlorine contention, as modified by the Board's Memorandum and Order of March 16, 1981, LBP-81-8, 13 NRC \_\_\_\_\_, slip op. at 12, states that "no assessment has been made of the health effects of a higher level of chlorination [at the Susquehanna Steam Electric Station "Susquehanna")]" should a higher level become necessary because of

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the discharge of organic wastes into the river upstream from the plant. Nor have the quantities and health effects of trihalomethanes and halomethanes to be released been adequately assessed, at anticipated or higher-than-anticipated levels of chlorination." As grounds for their Motion, Applicants state that there is no genuine issue of material fact to be heard with respect to the modified chlorine contention and Applicants are entitled to a decision in their favor on it 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 2 (Chlorine)), and the Supplemental Affidavit of James Rios, 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.

Dated: September 9, 1981.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By Matias F. Travieso-Diaz  
Jay E. Silberg  
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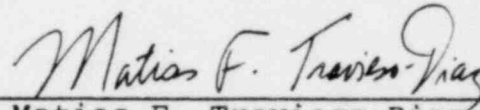


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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Motion for Summary Disposition of Modified Contention 2 (Chlorine)", "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 2 (Chlorine))", and "Supplemental Affidavit of James Rios in Support of Summary Disposition of Contention 2 (Chlorine)", were served by deposit in the U.S. Mail First Class, postage prepaid, this 9th day of September, 1981 to all those on the attached Service List.

  
\_\_\_\_\_  
Matias F. Travieso-Diaz

Dated: September 9, 1981

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SERVICE LIST

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