

CITIZENS AGAINST NUCLEAR DANGERS
MOTION BEFORE THE ATOMIC SAFETY AND LICENSE
CONCERNING THE BERWICK EMERGENCY PL.

- 1) CAND hereby moves the ASLB:
To order the Applicants to conduct a complete re-test of
Emergency Plan as prescribed by law; only this time all twenty-
communities should be fully participating.
- 2) The ASLB should also order the NRC Solicitor General & Inspector
General, or other investigative officer, to review the public hearing
testimony on Contentions 6 and 20, and identify the apparent instances
of misrepresentation and/or perjury by the Applicants, PEMA and FEMA.
These findings should then be turned over to the Justice Department.
- 3) The ASLB should order the inclusion of all Applicant, PEMA, FEMA,
NRC, and local government documents pertaining to the test emergency
drills cited above which are all definitely relevant to Contentions 6
and 20, be included in the public hearing record, and copies of all
these papers be forwarded to all parties to the intervention. Otherw
ex parte communication violations will continue to occur, which is
contrary to NRC rules, and another issue that will have to be appeal

Respectfully submitted

Thomas Halligan
Correspondent

Dated: March 26, 1982

CERTIFICATE OF SERVICE

8203310161 820326
PDR ADOCK 05000387
PDR

I hereby certify that copies of Citizens Against Nuclear Dangers
Proposed Findings Of Fact And Conclusions Of Law For The Emergency
Evacuation Plans and Motion Before The ASLB Concerning The Berwic
Emergency Plan have been served on all parties to this proceeding
deposit in the U.S. mail, first class, this 26th day of March, 19