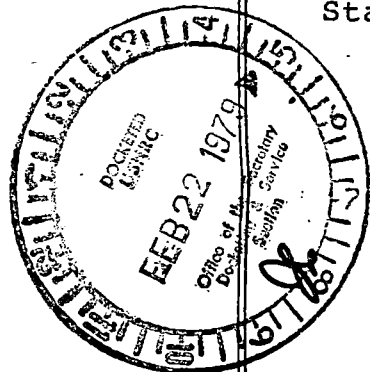


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of : DOCKET NO. STN-50-272  
Public Service Electric : Proposed Issuance of  
& Gas Co. : Amendment to Facility  
(Salem Nuclear Generating : Operating License  
Station, Unit #1) : No. DPR-70  
:



THE INTERVENOR LOWER ALLOWAYS CREEK TOWNSHIP  
AMENDED ANSWERS TO LICENSEE'S INTERROGATORIES  
(SET NO. 1)

1. The calculations may be referred to which are contained in NUREG-404, Vol. 1 and 2, and the Report to the President by the Interagency Task Force dated October, 1978 - Draft #TID-28817.

2. Insofar as NUREG-404, Vol. 1 and 2, and the Report to the President by the Interagency Task Force Dated October, 1978 - Draft #TID-28817 are a study or analysis there may be some reliance on conclusions and data.

3. NUREG-404, Vol. 1 and 2, and the Report to the President by the Interagency Task Force Dated October, 1978 - Draft #TID-28817.

4. Yes - research is presently being done by Dr. John Lamarsh, Dr. William Harding and Dr. George Luchak.

a) The research is ongoing and has not produced any document - the next work session is scheduled for February 9, 1979.

b) The research is being conducted independently by the above named persons.

c)

- -

d) The ongoing research is focused on whether adequate consideration has been given to the alternative of expansion of the spent fuel pool. The alternative of permitting expansion may be a statutory regulatory responsibility pursuant to 42 U.S. Code, Section 5877, in that such action by the Nuclear Regulatory Commission would insure and promote action by the Utilities and the Department of Energy for the immediate safe and permanent disposal of spent fuel away-from-reactor sites. By permitting the alternative of re-racking the Nuclear Regulatory Commission is avoiding its statutory obligation and perpetuating a potentially unsafe condition. The question of safety and health of the public is paramount. The ramifications of storing 24 cores at Salem #1, Salem #2, and Hope Creek #1 and #2, within a 17 year period is the natural consequences of permitting re-racking at Salem #1.

5. In addition to the original answers to interrogatories, the following names are supplied:

George Luchak  
59 MacLean Avenue  
Princeton, N.J.

William Harding,  
113 Valley View Road  
Norristown, Pennsylvania

6. Dr. George Luchak - Dr. Luchak's professional qualifications are attached. Other expert witnesses are in the process of being obtained.

LOWER ALLOWAYS CREEK TOWNSHIP

BY: Samuel E. Donilgon Mayor  
SAMUEL E. DONILGON

GEORGE LUCHAK, Ph.D.  
59 Maclean Avenue  
Princeton, N.J.

PROFESSIONAL QUALIFICATIONS

Presently a Professor of Civil Engineering at Princeton University teaching undergraduate courses in Systems Engineering and Solid Mechanics and a graduate course on "American Nuclear Power Systems and the Energy Economy".

Graduated from the University of Toronto in 1942 with a B.A., M.A., and a Ph.D. in 1953 in Mathematics and Physics.

Past experience includes seven years with the government in the fields of atomic, biological and chemical warfare, 10 years with industry (General Electric and Radio Corporation of America) with team efforts on an ad-hoc basis with Grumman Aircraft, Lockheed Aircraft and others, and nine years with Princeton as a full professor.

The systems engineering work in industry ranged from ballistics missile early warning system to requirements for missile systems to the design of the lunar excursion modular for Apollo. While involved in ballistics missile early warning systems managed a group responsible for determining the decision process to be used to defend the nation against enemy missile attack and the automation of such processes by computer controls.

In Apollo, managed the system reliability and safety team which was responsible for allocating reliability, performance, weight and cost between the various subsystems of the lunar excursion modular in order to ensure a successful mission and a safe system.

During the Apollo program proposed a new management system to match the design process necessary for the development of the system.

Prior to civilian career, spent four years with the Canadian Corp. of Signals with a discharge rank of Captain.

Also graduated from the British Air Ministry Weather Forecaster's Course and acted as an Air Force Meteorologist, and graduated from the British Joint Services Staff College which prepares military men and civilian scientists for posts in NATO at the level of Colonel and above.

Various papers on the magnetic fields of the earth, sun and stars to papers on Colloid Chemistry, the theory of queues and the theory of smokes to mechanics.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
Before the Atomic Safety and Licensing Board

In The Matter of

PUBLIC SERVICE ELECTRIC

& GAS CO.

(Salem Generating Station  
Unit #1)

:

:

:

:

DOCKET NO. STN-50-272

CERTIFICATE OF SERVICE




I hereby certify that copies of Lower Alloways Creek Township's Amended Answers to

Interrogatories (Set #1)

in the above captioned matter have been

served upon the attached list by deposit in the United States mail

this 15th day of Feb. , 19 79.

  
CARL VALORE, JR., Special Legal Counsel  
TOWNSHIP OF LOWER ALLOWAYS CREEK

Dated: February 15, 1979

Gary L. Milhollin, Esq.  
Chairman, Atomic Safety  
& Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin, 53711

Glen O. Bright  
Member, Atomic Safety  
& Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

Dr. James C. Lamb, III  
Member, Atomic Safety &  
Licensing Board Panel  
313 Woodhaven Road  
Chapel Hill, N.C. 27514

Chairman, Atomic Safety and  
Licensing Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

Chairman, Atomic Safety &  
Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

Barry Smith, Esq.  
Office of the Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

Mark L. First, Esq.  
Deputy Attorney General  
Department of Law & Public Safety  
Environmental Protection Section  
36 West State Street  
Trenton, N.J., 08625

Mark J. Wetterhahn, Esq.  
for Troy B. Conner, Jr., Esq.  
1747 Pennsylvania Avenue, N.W.  
Suite 1050  
Washington, D.C., 20006

Richard Fryling, Jr., Esq.  
Assistant General Solicitor  
Public Service Electric &  
Gas Company  
80 Park Place  
Newark, N.J., 07101

R. William Potter, Esq.  
Assistant Deputy Public Advocate  
Department of the Public Advocate  
Division of Public Interest  
Advocacy  
P.O. Box 141  
Trenton, N.J., 08601

Sandra T. Ayres, Esq.  
Department of the Public Advocate  
520 East State Street  
Trenton, N.J., 08625

Mr. Alfred C. Coleman, Jr.  
Mrs. Eleanor G. Coleman  
35 "K" Drive  
Pennsville, N.J., 08070

Office of the Secretary  
Docketing and Service Section  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

June D. MacArtor, Esq.  
Deputy Attorney General  
Tatnall Building, P.O. Box 1401  
Dover, Delaware, 19901