

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

VIRGINIA ELECTRIC AND POWER COMPANY

(North Anna Power  
Station, Units 1 and 2)

Docket Nos. 50-338 SP  
50-339 SP

(Proposed Amendment to  
Operating License NPF-4)

POTOMAC ALLIANCE STATEMENT OF MATERIAL FACTS  
AS TO WHICH THERE IS A GENUINE ISSUE  
TO BE HEARD

In response to VEPCO's Motion for Summary Disposition and pursuant to 10 CFR 2.749(a), Potomac Alliance (the Alliance), submits this statement of material facts as to which the Alliance contends there exists a genuine issue to be heard.

The Alliance contends that there is a genuine issue to be heard with respect to the following facts, as numbered by paragraph in VEPCO's Statement Of Material Facts As To Which There Is No Genuine Issue To Be Heard (May 11, 1979):

THERMAL EFFECTS

4, 5, 9, 12, 14, 15, 16, 19, 20-25, 27-41, 46-53

RADIOACTIVE EMISSION

58-70, 72, 74-79, 81-91, 94, 98, 100, 101, 103, 112, 113, 114

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MISSILE ACCIDENTS

115, 118-122, 124-131, 133, 134

OCCUPATIONAL EXPOSURE

135, 136, 138-143, 145-156

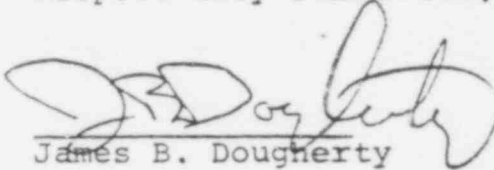
ALTERNATIVES

157, 160, 161, 162, 163, 165, 167, 169, 170, 174, 175,  
176, 177.

Respectfully submitted,

Of counsel:

Gloria M. Gilman, Esq.

  
James B. Dougherty

Dated this 5th day  
of June, 1979



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AFFIDAVIT OF JAMES B. DOUGHERTY

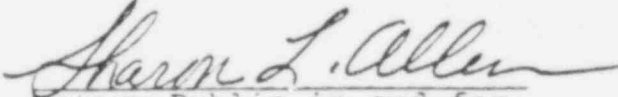
I hereby affirm that the facts set forth in the foregoing POTOMAC ALLIANCE ANSWER TO VEPCO'S MOTION FOR SUMMARY DISPOSITION are true to the best of my information and belief.

Dated at Washington, D.C.  
this 5th day of June, 1979

  
James B. Dougherty

Counsel for the  
Potomac Alliance

SUBSCRIBED AND SWORN TO before me this 5th day  
of June, 1979.

  
Notary Public in and for  
District of Columbia

My Commission Expires Aug. 14, 1982

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CERTIFICATE OF SERVICE

RELATED CORRESPONDENCE

I hereby certify that copies of the POTOMAC ALLIANCE ANSWER TO VEPCO'S MOTION FOR SUMMARY DISPOSITION, POTOMAC ALLIANCE STATEMENT OF MATERIAL FACTS AS TO WHICH THERE IS A GENUINE ISSUE TO BE HEARD, and AFFIDAVIT OF JAMES B. DOUGHERTY were served this 5th day of May, 1979, by United States Mail, First Class, to the following:

Valentine B. Deale, Esq.,  
Chairman, Atomic Safety  
and Licensing Board  
1001 Connecticut Ave., NW  
Washington, DC 20036

Mr. Ernest Hill  
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P.O. Box 800, L-123  
Livermore, CA 94550

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Seattle, WA 98195

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
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James B. Dougherty

Counsel for the Potomac Alliance

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