

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION (NRC PUBLIC DOCUMENT ROOM)

before the Atomic Safety and Licensing Board

In the Matter of	:	Docket No. 50-272
PUBLIC SERVICE ELECTRIC	:	Proposed issuance of Amendment
& GAS CO.	:	to Facility Operating License
(Salem Nuclear Generating	:	No. DPR-70
Station, Unit #1)	:	

RESPONSE TO THE ATOMIC SAFETY AND LICENSING BOARD  
ORDER DATED APRIL 18, 1979

On April 18, 1979, the Atomic Safety and Licensing Board issued an Order presumably pursuant to Rule 2.752(c) or other applicable rule which provides for the submission of evidence addressed to the following questions:

- "1. To what extent did the accident at Three Mile Island affect the spent fuel pool at that site?
2. If there had been an explosion or 'meltdown' at Three Mile Island, what affect would that have had upon the spent fuel pool? To what extent would it have mattered how much spent fuel was present at the pool?
3. If an accident such as the one at Three Mile Island occurred at Salem, to what extent would the accident affect the spent fuel pool? If an explosion or 'meltdown' occurred at Salem, to what extent would it have mattered how much spent fuel was present at the pool at Salem?"



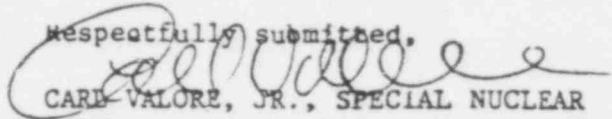
The Intervenor, Township of Lower Alloways Creek, hereby submits the written testimony of Earl A. Gulbransen, Ph.D., P.E., which deals with questions #1, #2 and #3. Dr. Gulbransen's qualifications are

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attached to his testimony.

Respectfully submitted,

  
CARL VALORE, JR., SPECIAL NUCLEAR  
COUNSEL FOR THE TOWNSHIP OF LOWER  
ALLOWAYS CREEK, INTERVENOR

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