

Charles Bechhoefer, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos. 50-387
50-388

Dear Chairman Bechhoefer:

Pursuant to the preliminary schedule in Part II of the Order of the Board, dated March 6, 1979, concerning discovery proceedings, the Citizens Against Nuclear Dangers hereby submit to the Board, and all participants on the service list, timely requests for factual information from the Applicants, and the Commonwealth of Pennsylvania as the interested state.

The attached items, number 1 thru 18, are directed to the Applicants; the PP&L in most instances. The remaining items, number 19, 20, 21, and 22, are directed to the Pennsylvania Bureau of Radiological Health, Department of Environmental Resources.

Several of the requests are for catalogued data, some of which is probably available from computerized retrieval systems. Such detailed listings will aid the Citizens in determining if one or more of the listed documents in each category will be requisitioned as evidence, which in turn should assist the Board in arriving at proper decisions in this licensing case.

The Citizens submit that this preliminary background information is relevant to one or the other of the admitted contentions, and necessary for the preparation of exhibits and testimony.

Yours truly

Irene Lemanowicz

Irene Lemanowicz, Chairperson
Citizens Against Nuclear Dangers

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1. Provide the scientific results and the economic feasibility reports of PP&L's experimental pilot project to produce electricity from solar power generated by wind mills installed near Hazleton, Pa.
2. Send PP&L's Anthracite-fired plant feasibility study, completed by the consulting firm of Skelly & Loy, Harrisburg, Pa.
3. Also, provide detailed reports of all other past and present experiments, conducted or financed by the Applicants, independently or as a joint-venture, to generate electricity using energy sources other than atomic fission (include atomic fussion). We are especially interested in those ventures funded in part by the Federal government.
4. The Applicants are requested to provide all documentation pertaining to their participation in any and all government sponsored energy conservation programs, such as the National Residential Energy Conservation Program and the Governor's Energy Council programs; as well as any industry sponsored energy conservation programs.
5. We will need from PP&L summarized financial reports outlining their methods of raising capital to construct the Berwick plant which identifies the lending institutions and bond brokers, etc.
6. Also, send financial information on any turnkey type agreements concerning Berwick, between the Applicants and any vendor or contractor, such as the General Electric Credit Corporation, the Bailey Meter Company, or the Bechtel Corporation.
7. Forward a copy of the Annual Reports of the Allegheny Electric Cooperative, Inc. and the PP&L for the past ten years; and copies of the monthly PP&L Reporter from 1972 to the present.

8. We request an index of the Applicants' policies that provide all types of commercial and governmental insurance coverage, including risk and self-insurance, on all aspects of the Berwick power plant properties and personnel, and its uranium fuel cycle.
 9. Provide copies of Court Docket title pages for all Federal and state court law suits, past and present, civil or criminal, in which the Applicants were, or are, a plaintiff or a defendant involving litigation in all matters involving the Berwick atomic plant, including the supply of uranium, transmission line right-of-ways, anti-trust, accidents, and alleged defective manufacture or installation of plant components.
 10. Furnish a catalogue of all Applicant documentation, correspondence, etc., on all aspects of the Berwick atomic power plant sent to, or received from: the Pennsylvania Public Utility Commission, the Federal Power Commission, the Susquehanna River Basin Commission, the U.S. Army Corps of Engineers, the U.S. Securities & Exchange Commission, and the U.S. Department of Energy.
 11. Provide a catalogue of all company minutes, transcriptions, memos, communications, reports, announcements, press releases, and all other records on file of public meetings, hearings, conferences, and sessions of any kind involving the Applicants and public officials, whether elected, appointed, or civil service, at all levels of government, citing date, location, sponsorship and/or public involvement, that has in any way dealt with the Berwick atomic power plant.
 12. Furnish summaries of the types of records cited above that deal specifically with sessions between representatives of the PP&L and the Board of Supervisors of Salem Township, Luzerne County, Pennsylvania, during the past ten years.
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13. Forward copies of annual reports and scientific environmental studies and tests conducted to date for the Applicants in conjunction with the Berwick project site dealing with milk, air and water quality, aquatic and wildlife, etc., by the Ichthyological Associates Inc., Ithaca, N.Y. and by Radiation Management Corp. of Philadelphia, Pa.
14. Send information describing the ongoing experimental project to study aquaculture in the warm-water outflow of power plants along the Susquehanna River. We are referring to the two year project which is a joint venture of PP&L, Kraft Inc., and the Franklin Institute. Include a copy of the contractual papers.
15. Provide mining maps (small scale) with explanatory data, identifying exact locations and boundry lines of the land sites that uranium exploration and/or mining (or option to mine) by all technologies, which has commenced or will be undertaken by the Applicants, their subsidiaries, agents, or as a joint venture, in connection with the Applicants stated plans to become partially self-sufficient in the extraction and production of uranium for the Berwick atomic power plant. We are referring to (but not limiting our request to) such agreements as the Hemi/West Properties drilling and exploration program for some 400 contiguous mining claims covering about 8,000 acres of land in San Juan County, Utah.
16. Furnish a transmission line (230,000 to 500,000volt) right-of-way listing, associated with the Berwick station, identifying the name and address of each Grantor (seller or lessor) with a property line map (approximately 1" - 100' scale) pinpointing the location of each tract. Also list the Index-to-Deed Book number and page number for each

Grantor-Grantee transaction document and/or Affidavit of Value for eminent domain cases, on file at the office of the Recorder of Deeds in the several Pennsylvania counties involved, namely: Susquehanna, Lackawanna, Luzerne, Columbia, Montour, Northumberland, Snyder, Carbon, Northampton, Schuylkill and Lehigh. This information should be readily available at the Applicants' General Office, Right-of-Way Sections.

17. Forward a catalogue on the Applicant's participation in research programs co-sponsored with the Electric Power Research Institute. Also send summary reports of PP&L's participation in research by High Voltage Power Corp. on extra-high voltage underground transmission.

18. Furnish a complete record of the manufacture of the atomic reactor pressure vessels purchased by the PP&L for Units 1 and 2 at Berwick. Documentation should trace the pressure vessels from their present location all the way back to the foundries where they were forged several years ago. Include a description of all welding modifications performed on the pressure vessels at all stages of the production process. Document exactly the plant sites where the pressure vessels were welded and fabricated. Include concise pressure vessel weld inspection reports. We also need to know the manufacturing role of pressure vessel work that may have been performed at the B. & W. Mount Vernon, Indiana plant; the Chicago Bridge & Iron Memphis, Tenn. plant; and the Combustion Engineering Chattanooga, Tenn. plant; among other facilities.

19. Provide a catalogue containing a complete listing of the documents, reports and correspondence, etc., in the files of the Bureau of Radiological Health, Department of Environmental Resources (DER), Commonwealth of Pennsylvania, on the subject of PP&L's Berwick atomic power plant.

20. We also wish to obtain from the Bureau of Radiological Health complete official documentation, including field monitoring reports and milk sampling results, on the affects of the radiation fallout in October, 1976 resulting from the Chinese bomb test of September 26, 1976.

21. Also needed from the Bureau will be a current catalogue of all relevant data compiled by the Bureau concerning radiation monitoring and milk sampling already conducted, plus on-going survey results when they become available, dealing with the radiation releases in the vicinity of the Three-Mile-Island plant since the March 28, 1979 accident.

22. From the appropriate office of the DER we also wish to obtain the public records pertaining to the Applicants permit application to discharge industrial wastes into the Susquehanna River from the Berwick atomic power plant.