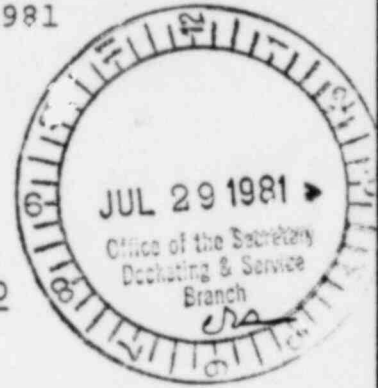


July 28, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

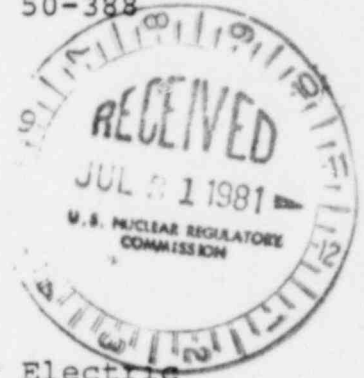
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
PENNSYLVANIA POWER & LIGHT COMPANY)
and)
ALLEGHENY ELECTRIC COOPERATIVE, INC.)
(Susquehanna Steam Electric Station,)
Units 1 and 2))

Docket Nos. 50-387
50-388

APPLICANTS' MOTION FOR PARTIAL
SUMMARY DISPOSITION OF CONTENTION 11



Pennsylvania Power & Light Company and Allegheny Electric Cooperative, Inc. ("Applicants") move the Atomic Safety and Licensing Board, pursuant to §2.749 of the Commission's Rules of Practice (10 CFR §2.749) and the Special Prehearing Conference Order of March 6, 1979, LBP-79-6, 9 NRC 291, 328, for summary disposition in Applicants' favor of that part of Contention 11 in this proceeding which deals with the onsite storage of spent fuel. As grounds for their Motion, Applicants allege that there is no genuine issue of material fact to be heard with respect to that portion of Contention 11 and that Applicants are entitled to a decision in their favor as a matter of law.

This Motion is supported by Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 11 -- Onsite Storage of Spent Fuel) and the Affidavits of Clair Herrington and D. W. James in Support of Partial Summary Disposition

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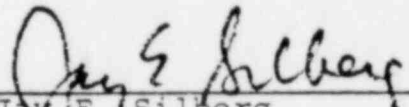
of Contention 11, both filed simultaneously herewith, together with all pleadings and other papers in this proceeding.

As set forth in the March 6, 1979 Special Prehearing Conference Order, supra, 9 NRC at 328, responses to this motion are due three weeks from its filing date.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


Jay E. Silberg
Matias F. Travieso-Diaz

Counsel for Applicants

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Dated: July 28, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

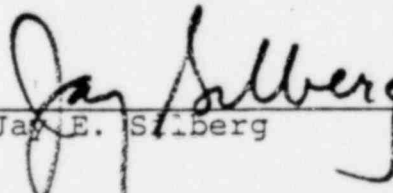
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
PENNSYLVANIA POWER & LIGHT COMPANY) Docket Nos. 50-387
and) 50-388
ALLEGHENY ELECTRIC COOPERATIVE, INC.)
(Susquehanna Steam Electric Station,)
Units 1 and 2))

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Motion for Partial Summary Disposition of Contention 11", "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 11 -- Onsite Storage of Spent Fuel)", "Affidavit of D. W. James in Support of Partial Summary Disposition of Contention 11", and "Affidavit of Clair C. Herrington in Support of Partial Summary Disposition of Contention 11", were served by deposit in the U. S. Mail, First Class, postage prepaid, this 28th day of July, 1981, to all those on the attached Service List.



Jay E. Silberg

Dated: July 28, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PENNSYLVANIA POWER & LIGHT COMPANY)	
)	
AND)	Docket Nos. 50-387
)	50-388
ALLEGHENY ELECTRIC COOPERATIVE, INC.)	
)	
(Susquehanna Steam Electric Station,)	
Units 1 and 2))	

SERVICE LIST

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