

August 31, 1981

RELATED CORRESPONDENCE

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 SUMMARY
DISPOSITION OF CONTENTION 7C



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 C.F.R. § 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 Contention 7C in this proceeding, which alleges that the "BWR core spray nozzles occasionally crack, a problem which reduces their effectiveness."

As grounds for their Motion, Applicants allege that there is no genuine issue of material fact to be heard with respect to Contention 7C and Applicants are entitled to a decision in their favor on it as a matter of law.

DS03
50/1

This motion is supported by the Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 7C), and the Affidavit of Joseph C. Lemaire in Support of Summary Disposition of Contention 7C, 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 Matias F. Travieso-Diaz
Jay E. Silberg
Matias F. Travieso-Diaz

Counsel for Applicants

1800 M Street, N. W.
Washington, D. C. 20036
(202) 822-1000

Dated: August 31, 1981.

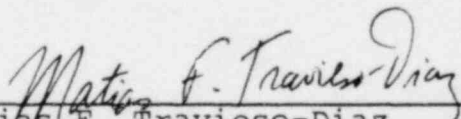
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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))	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Motion for Summary Disposition of Contention 7C", "Applicants' Statement of Material Facts As To Which There Is No Genuine Issue To Be Heard (Contention 7C)", and "Affidavit of Joseph C. Lemaire in Support of Partial Summary Disposition of Contention 7C", were served by deposit in the U. S. Mail First Class, postage prepaid, this 31st day of August, 1981 to all those on the attached Service List.



Matias F. Travieso-Diaz

Dated: August 31, 1981.

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

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

SERVICE LIST

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Administrative Judge James P. Gleason
13 Gilmore Drive
Silver Spring, Maryland 20901

Mr. Glenn O. Bright
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Paul W. Purdom
40 Gulph Hills Road
Madnor, Pennsylvania 19087

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

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

Dr. Judith H. Johnsrud
Co-Director
Environmental Coalition on
Nuclear Power
433 Orlando Avenue
State College, Pennsylvania 16801

Susquehanna Environmental Advocates
c/o Gerald Schultz, Esquire
Post Office Box 1560
Wilkes-Barre, Pennsylvania 18703

Mr. Thomas J. Halligan, Correspondent
The Citizens Against Nuclear Dangers
Post Office Box 5
Scranton, Pennsylvania 18501

Ms. Colleen Marsh
Box 558 A, R. D. #4
Mt. Top, Pennsylvania 18707

Jessica H. Laverty, Esquire
Office of the Executive Legal
Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Robert W. Adler, Esquire
Department of Environmental Resources
Commonwealth of Pennsylvania
605 Executive House
Post Office Box 2357
Harrisburg, Pennsylvania 17120

James M. Cutchin, IV, Esquire
Office of the Executive Legal
Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

DeWitt C. Smith
Director
Pennsylvania Emergency Management Agency
Transportation and Safety Building
Harrisburg, Pennsylvania 17120

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Department of Environmental
Resources
Commonwealth of Pennsylvania
Post Office Box 2063
Harrisburg, Pennsylvania 17120

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