

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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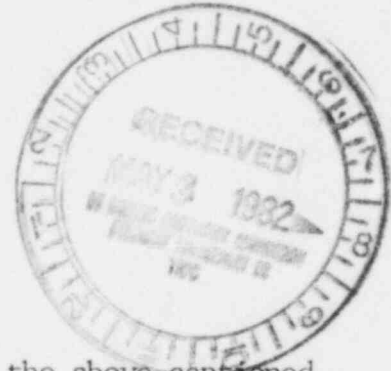
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In the Matter of:

PENNSYLVANIA POWER & LIGHT CO. :  
and :  
ALLEGHENY ELECTRIC COOPERATIVE, :  
INC. (Susquehanna Steam Electric :  
Station, Units 1 and 2) :

Docket Nos. 50-387  
50-388

COMMONWEALTH OF PENNSYLVANIA'S  
EXCEPTIONS TO THE ASLB INITIAL  
DECISION DATED APRIL 12, 1982



I. Introduction

The Commonwealth of Pennsylvania participated in the above-captioned proceeding as an "interested state" pursuant to 10 C.F.R. §2.715(c). 10 C.F.R. §2.715(c) affords interested state participants the right to file exceptions pursuant to 10 C.F.R. §2.762.

II. Exceptions to the Partial Initial Decision

The Commonwealth of Pennsylvania takes exception to the Atomic Safety and Licensing Board's Initial Decision dated April 12, 1982 and states that the Licensing Board erred in the following respects:

(1) The Board erred as a matter of law in failing to consider and to rule upon the Commonwealth's proposed findings of fact and conclusions of law regarding the availability of dosimetry for off-site emergency workers (Commonwealth's Proposed Findings 20-29). Initial Decision at 39-40.

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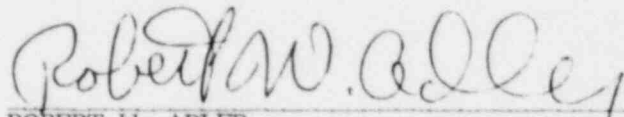
(2) The Board erred in finding that there is no substantive disagreement regarding the recommended number of dosimeters for each off-site emergency worker, according to federal guidance. Initial Decision at 39.

(3) The record supports a finding that there is a deficiency in the supply of dosimeters for distribution to off-site emergency workers in the plume exposure pathway emergency planning zone for the Susquehanna Steam Electric station. The Board erred in failing to make this finding. (¶92)

(4) The Board erred in finding that dosimetry requirements for off-site emergency workers can be met on a "loan basis" or by allocating the "existing limited state supply to provide an approximate amount of coverage." (¶93).

(5) The Board erred as a matter of law in failing to conclude that adequate supplies of dosimeters are required to be available for distribution to all off-site emergency workers identified in the state and county emergency plans as requiring dosimetry, prior to the issuance of a full power license for the Susquehanna Steam Electric Station.

Respectfully submitted,

A handwritten signature in cursive script that reads "Robert W. Adler". The signature is written in dark ink and is positioned above the printed name and title.

ROBERT W. ADLER  
Assistant Counsel  
Commonwealth of Pennsylvania

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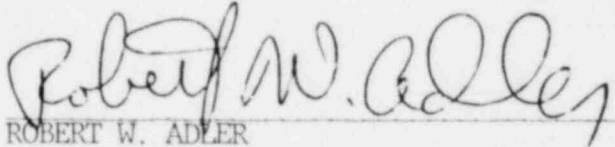
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Commonwealth of Pennsylvania's  
Exceptions to the ASLB Initial Decision Dated April 12, 1982" were  
served on the persons on the attached service list, this 28th day of  
April, 1982 by first class U.S. Mail, postage prepaid.

  
ROBERT W. ADLER  
Attorney for the  
Commonwealth of Pennsylvania

Attachment

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