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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
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BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
DUQUESNE LIGHT COMPANY, ET AL.) Docket No. 50-412
(Beaver Valley Power Station,)
Unit 2))

Statement of Concerns of the Commonwealth of Pennsylvania

In anticipation of the Board's forthcoming ruling on proposed contentions filed by petitioners, ECNP and OCRE, the Commonwealth hereby advises the Board of the matters raised by the proposed contentions in which the Commonwealth has a particular interest.¹ These contentions raise matters that are of particular concern to Pennsylvania because of the state's responsibility to protect the public health and safety. The NRC staff's safety and environmental evaluations are not expected to be completed until well into 1984. Because the analysis to be provided in these reports is not yet available, the Commonwealth

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In previous NRC proceedings in which the Commonwealth has participated, licensing boards have asked it to indicate particular matters on which it desires to participate as permitted under 10 C.F.R. § 2.715(c). See, e.g., Pennsylvania Power and Light Company (Susquehanna Steam Electric Station, Units 1 and 2), Order of July 27, 1981 (unpublished).

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believes it appropriate to inform the Board of its concerns at this time, while the Board considers whether to admit proposed contentions.

By enumerating certain contentions, the Commonwealth does not specifically adopt or endorse the language of the contentions. Further, in highlighting certain contentions, the Commonwealth does not intend to either restrict the scope of its participation in the proceeding, or imply a position regarding the merits of any of the proposed contentions. 10 C.F.R. § 2.715(c) allows the representative of an interested state

a reasonable opportunity to participate and to introduce evidence, interrogate witnesses, and advise the Commission without requiring the representative to take a position with respect to the issues.

The Commonwealth has a particular interest in the matters raised by the following contentions:

(1) ECNP Contention 6

The Commonwealth is concerned that important safety issues be fully addressed prior to plant operation. With regard to safety issues the Commission has identified as unresolved generic issues, the Commonwealth's concern is that the plant may be operated safely notwithstanding the fact that such issues remain unresolved.

(2) ECNP Contention 7

Issues with regard to auxiliary safety equipment have been raised and litigated in other proceedings involving pressurized water reactors, including the TMI-1 restart proceeding. The Commonwealth is therefore concerned that safety issues concerning such equipment be resolved satisfactorily prior to plant operation.

(3) ECNP Contention 8

As in the case of ECNP Contention 6 above, the Commonwealth is concerned that it be demonstrated that Beaver Valley 2 can operate safely, pending final resolution of the generic issue of the safety consequences of pressurized thermal shock.

(4) ECNP Contention 10

The Commonwealth has a particular interest in evacuation planning and emergency response issues due to its responsibility for development and review of offsite emergency plans. In particular, the Commonwealth is interested in ensuring the adequacy of radiological monitoring for offsite emergency workers, including sufficient dosimetry.

The Commonwealth urges the Board to consider its concerns in its forthcoming ruling on proposed contentions.

Respectfully submitted,

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Assistant Counsel

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Date: _____

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Docket No. 50-412 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "Statement of Concerns of the Commonwealth of Pennsylvania" in the above - captioned proceeding have been served in the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Commonwealth of Pennsylvania's internal mail system, this 30th day of November, 1983:

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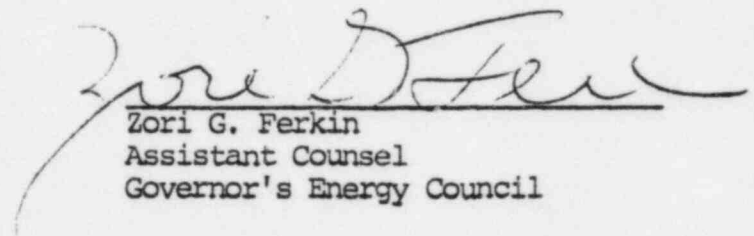
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Atomic Safety and Licensing Board
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Date: November 30, 1983