

GRANTED
For the Licensing Board

AUG 03 1983

Lawrence Branner

UNITED STATES OF AMERICA **Administrative Judge**
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
Philadelphia Electric Company) Docket Nos. 50-352
(Limerick Generating Station,) 50-353
Units 1 and 2))

SERVED AUG 4 1983

MOTION FOR EXTENSION OF TIME TO SERVE SUBPOENAS

The Atomic Safety and Licensing Board's Order Confirming Schedules Established During Prehearing Conference (May 16, 1983) established August 1, 1983 as the last day to serve requests for discovery with regard to, inter alia, Contentions V-3a and V-3b. Despite having made a timely request for the identification of experts and potential expert witnesses on June 3, 1983 and after having made repeated efforts to obtain such information,^{*/} only on the afternoon of August 1, did Applicant receive a postcard from Mr. R.L. Anthony which for the first time identifies Intervenor Friends of the Earth's "potential experts." A copy of the postcard is attached.

Efforts were made to contact the designated individuals by telephone, but as of the time of service of this pleading

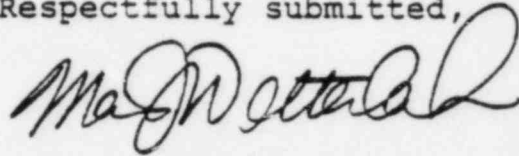
*/ See, for example, Letter to R.L. Anthony from M.J. Wetterhahn dated July 18, 1983 previously sent to the Board and parties.

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AUG 03 1983

were unsuccessful in every case. Applicant submits that these circumstances constitute good cause and moves for an extension of one week until August 8, 1983 for the limited purpose of obtaining and serving subpoenas to the designated potential experts. Inasmuch as Mr. Anthony is still in Maine, no attempt could be made to reach him to discuss this request.

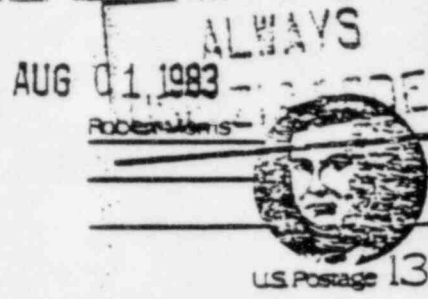
Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn
Counsel for the Applicant

August 1, 1983

R.L. ANTHONY
GEN. DELIVERY
ELLSWORTH, ME. 04605



P.S. Dear Mr. Wetherham,
I'm sorry to send you
this longhand message.
I know you want the
information and I am
not near a typewriter so
am sending it anyway.
I hope it will be useful
to you in this form.
R.L. Anthony

MR. MARK J. WETTER
1747 PENNA. AVE. N.
WASHINGTON, D.C. 2

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Mr. M.J. Wetherham
1747 Penna Ave. Wash 20006
R.L. Anthony + P.O.E. in the Delaware Valley
Reference to M.J. Wetherham's letters 7/15 and 7/20

Our research is still in progress. Up to now our
reports are: U.S. Dept. of Transp. - Materials Transport Bureau
Pipeline Safety Dept. Frank Fulton, Supt. and
Edward Cygan DMT-63 system Information Division
Washington 20590.

David A. Tossi, Wilson Hill Associates Wash
20005, contractor to U.S. Dept. Transp., Hazardous
Materials Information

Penn. Public Utility Commission, Safety
Compliance, Pipeline Safety, Harrisburg, Pa. 17

We disagree with applicant that our interrogat
42 through 47 are not within the scope of our contract.