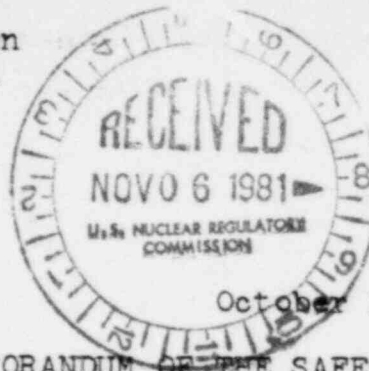


U.S. Nuclear Regulatory Commission  
Atomic Safety and Licensing Board

Re: Philadelphia Electric Company  
Limerick Generating Station



Docket # 50- 352  
50- 353

October 25, 1981

RESPONSE TO ORDER AND MEMORANDUM OF THE SAFETY  
AND LICENSING BOARD, JUDGE LAWRENCE BRENNER, CHAIR-  
MAN, DATED 10/14/81, FROM ROBERT L. ANTHONY FOR HIMSELF  
AND FRIENDS OF THE EARTH IN THE DELAWARE VALLEY.

In connection with the seventeen sworn affidavit. included  
with the petition to intervene filed by Robert L. Anthony on Sept.  
18, 1981, two of these individuals are members of Friends of the  
Earth (FOE), Elizabeth P.S. Anthony and Anne S. McIndoo (Mrs. McIndoo  
applied for membership after filing the affidavit).

The other fifteen affiants are residents of the area affected  
by the Limerick plant who are known to Robert and Elizabeth Anthony.  
They expressed confidence in the former's ability to represent their  
interests and stated their endorsement of FOE principles and their  
identification with FOE representations in the Limerick operating  
license proceedings. Without this representation these individu-  
als would have no way to present the threat caused by the Limerick  
plant to their health, well being, and economic security. AND they  
would be deprived of the involvement in decisions affecting their  
vital interests provided for under NEPA, 40CFR Sect. 1500 and following.

Furthermore, Ms. Kathleen O'Leary, chairperson of FOE, in her af-  
fidavit of Sept. 16, 1981, stated that she was directed by the 500 FOE  
members and the Board to intervene in the Limerick proceeding through  
the petition of Robert L. Anthony. Some of those members who live  
in closest proximity to Limerick and who have the greatest threat are:

M. & M. E. Stewart, Jr.	838 Lewis Rd., Limerick, Pa.	(Approx. miles)	1
Everett Rodebaugh R.D. 2	309 Pottstown	19464	3
M. & M. Samuel W. Morris R.D.	Bx. 360 " "	" "	3
M. & M. Henry H. Hayman R.D. 1	Bx. 284 Spring City	19475	4
Mrs Dorothy N. Lloyd Bx. 153	Route 1 " "	" "	4
William F. Brinton P.O. Bx. 215	Phoenixville	19460	7
David L. Toth	502 Carlisle Ave. " "	" "	7
Ms. Nancy N. Iannuzzelli	109 Develin Dr. R.D. 2	Phoenixville	8
Ms. Elaine Milito R.D. 2	Phoenixville	19460	8
Douglas E. Baker Kimberton Rd.	R.D. 2 Bx. 337 " "	" "	8
Henry F. Bisbeff	3350 Stump Hall Rd. Collegeville	19426	9

Respectfully submitted,

*Robert L. Anthony*

Sworn to and subscribed before me  
this 24th day of Oct. 1981

*Sarah W. Jenkins*  
Notary Public, Nether Providence Twp., Del. Co.  
My Commission Expires August 27, 1983.

C.C. via 1st class mail 10/26/81

Judge Lawrence Brenner NRC. Wash.

" Richard F. Cole " "

" Peter A. Morris " "

Counsel for NRC Staff " "

Troy B. Connor, Jr. Washington 20006

Phila Elec Co. Edw. G. Bauer, Jr. Phila

Bobt. W. Adler, Asst. Counsel Harrisburg

Thomas Gerusky, Dir. D.E.R. " " (OVER)

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PDR ADDCK 05000352  
PDR

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