



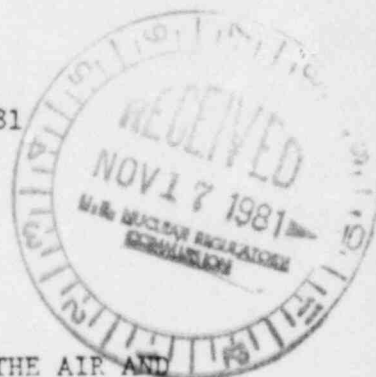
AIR and WATER Pollution Patrol

BROAD AXE, PA.

'81 NOV -9 P2:55

November 6, 1981
OFFICE OF SECRETARY
& SERVICE
ANCH

BOOKET NUMBER
PROD. & UTIL. REG. 50-352,353



U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

REQUEST FOR ADDITIONAL TIME FOR PREPARATION OF CONTENTIONS BY THE AIR AND WATER POLLUTION PATROL AND FRANK R. ROMANO, TOGETHER AND SEPARATELY.

Under the present schedule established by Chairman Brenner in his memorandum and Order of October 14, 1981 all contentions must be received in Washington D.C. by November 17, 1981.

In addition, the Board has requested intervenors to attempt to coordinate "their filings and if possible to even make a joint statement of contentions". While the Board may feel that this will result in more organized contentions, this will not be possible under the present schedule for the following reasons:

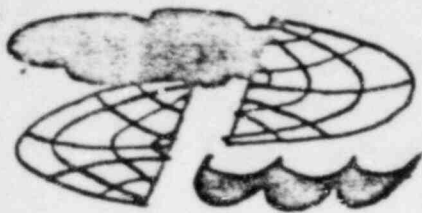
- 1) UNAVAILABILITY OF EROL IN PARTICULAR RECENT PAGE REVISIONS AND SUPPLIMENTS.

Revisions made in the EROL after docketing arrived at the Pottstown Library within the past week. The librarians are attempting to incorporate these changes, but are shorthanded and have not done so yet. Many of these changes relate to water supply information. In addition EROL direction towards separate cover supplemental information relating to "micrometeorological" data, first was unincorporated and second was of such poor copy and print-size that could not be read by me and others.

- 2) DIFFICULTY OF COORDINATING WITH OTHER PARTIES

It is not possible to know exactly what contentions other parties may wish to file and there is no authority to specify which party must forego contention. Also who will pay for organizing coordination expenses: pay bills, travel expenses, lost time from work or other expenses involved in contacting other parties? As a volunteer citizen's organization we are hardpressed on time preparing our own case making it impossible to have time to contact the 15 or more petitioners who are having time problems also.

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AIR and WATER Pollution Patrol

BROAD AXE, PA.

November 6, 1981

(B)

- 3) 10 CRF Section 2.714 (b) states that contentions are due no later than 15 days before the special prehearing conference. The Board has presently scheduled this for January 1982. This indicates it is possible to permit more time. Part (b) also states that additional time for filing may be granted if good cause can be shown.

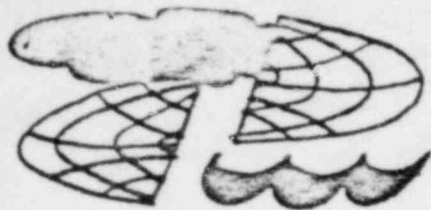
In response to section (a) (1) I hereby present my argument for an extension of the November 17 deadline. Change of specific rules to be followed, namely aspects vs no aspects; your modification requesting "group" coordination of contention resulting in loss of time in the failure of such effort, and the incomplete organization and coordination of revisions and supplements at the Pottstown Library doubled my estimated time of preparation. For example, Philadelphia Electric's letter of October 1, 1981 to Mr. Robert L. Tedesco, Assistant Director of Licensing of the NRC, involved one contention of mine re "effect of quarry blasting on poured concrete at the Limerick reactor".

This five month delay in answer by the applicant adds to a pattern of keeping opponents of the reactor from timely information. I only became aware of the delayed applicant's letter on November 2, 1981 while looking through piles of unsorted supplements, letters, etc. sent by the NRC to the Pottstown Library.

Under 2.715 (a) all the delays discussed will prejudice my right to an individual, fair, and reasonable time in which to assemble necessary specific information both to protect me and my family from radiation harm as well as to add information the Board can profit by. I will need at least three more weeks.

As a pollution chemist, with formal nuclear training sufficient to feel a personal danger to me, my family and the members (in particular those whose affidavits accompanied my original request for a hearing) indicate I must, rather than someone else, represent my personal interests above.

Further, as a licensed pilot, I have experienced engine failure with the threat of fatal consequences due to carburetor ice caused by high moisture conditions, such as the reactor will produce, together with other cloud and turbulence effects which are improperly calculated and therefore minimized in the EROL.



AIR and WATER Pollution Patrol


BROAD AXE, PA.

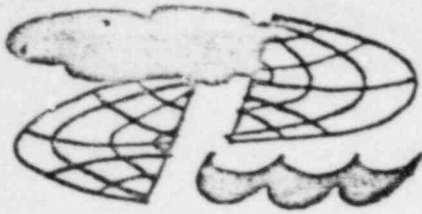
November 6, 1981

(C)

Since the Federally operated VOR is approximaetly $1\frac{1}{2}$ miles from the reactor and is used for navigational purposes modified weather conditions not included in Flight Service Information can result in fatal accidents both to me and passengers in other planes. Such experience will help develop a sound record.

Very truly yours,
AIR & WATER POLLUTION PATROL


Frank R. Romano, Chairman
61 Forest Ave.
Ambler, Pa. 19002



**AIR and WATER
Pollution Patrol**
BROAD AXE, PA.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PHILADELPHIA ELECTRIC COMPANY

Docket Nos. 50-352
50-353

(Limerick Generating Station,
Units 1 and 2)

CERTIFICATE OF SERVICE

I hereby certify that copies of Letter for Additional Time in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 6th day of November, 1981:

Lawrence Brenner, Esq., Chairman
Administrative Judge
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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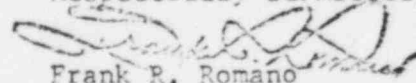
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Respectfully submitted,


Frank R. Romano

AIR AND WATER POLLUTION PATROL

Ambler, Pa.
November 6, 1981