

LAW OFFICES  
CONNER & WETTERHAHN, P.C.  
1747 PENNSYLVANIA AVENUE, N. W.  
WASHINGTON, D. C. 20006

TROY B. CONNER, JR.  
MARK J. WETTERHAHN  
ROBERT M. RADER  
ARCH A. MOORE, JR.\*  
ROBERT H. PURL  
OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 24, 1983

DOCKETED  
USNRC

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(202) 833-3500

CABLE ADDRESS: ATOMLAW

Judge Lawrence Brenner  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Richard F. Cole  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Peter A. Morris  
Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

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

Gentlemen:

I have been asked by counsel for the NRC Staff and counsel for Limerick Ecology Action, who is coordinating discovery matters for the intervenors, to submit the joint report on informal discovery requested by the Atomic Safety and Licensing Board in its orders of June 1 and October 20, 1982. I am attaching letters from Ms. Dorsey dated January 17, 1983 and Ms. Hodgdon dated January 21, 1983 which state their positions regarding the Board's inquiries.

In subsequent telephone conversations, Ms. Dorsey asked that I report the following additional items to the Licensing Board.

(1) Marvin Lewis has stated that he has made oral requests to the Philadelphia Electric Company for certain documents which have all been provided to him. He wishes this informal process to continue.

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Judge Lawrence Brenner  
Judge Richard F. Cole  
Judge Peter A. Morris  
January 2

4, 1983

Page 2

(2) Limerick Ecology Action has requested documents from the Department of Environmental Resources of the Commonwealth of Pennsylvania related to emergency planning. The requests were for the implementing procedures for Annex E of the Disaster Operations Plan of the Commonwealth of Pennsylvania related to fixed nuclear facilities. As detailed in the letter from Robert W. Adler, counsel for the Commonwealth of Pennsylvania, to Charles W. Ellicott dated January 18, 1983 sent to the service list, all requests have been fulfilled with the exception of a revised procedure which is to be sent when available

In addition to the information provided by the intervenors and NRC Staff, the following represents Applicant's comments on the status of discovery:

(1) In response to the discovery requests filed by Limerick Ecology Action and the two filed by Mr. Romano, over 150,000 pages of material is being made available for inspection in Philadelphia. In order to assure that the Board and parties are aware of the status of this effort, my letters to Ms. Dorsey and Mr. Romano are attached.

(2) The Applicant's response to the Friends of the Earth December 17, 1982 request for documents is expected to be sent this week.

(3) Applicants do not object to the continuation of informal discovery for a reasonable period, but will request formal discovery under the Commission's rules as necessary and appropriate. Counsel for Limerick Ecology Action and Applicant have agreed that it would be premature to request formal discovery and take dispositions of Limerick Ecology Action's potential witnesses at this time.

(4) In fulfillment of the requirement that the parties shall "jointly identify portions of the application for which information had not been fully provided by the Applicant prior to the special prehearing conference for which essentially complete information is available at the time the joint report is filed," the information in Appendix A hereto, categorized by contentions admitted by the Licensing Board, is submitted by Applicant. For a number of

Judge Lawrence Brenner  
Judge Richard F. Cole  
Judge Peter A. Morris  
January 2

4, 1983

Page 3

the contentions, Applicant believes that its application for an operating license including the Final Safety Analysis Report, Environmental Report - Operating License Stage, fulfills all regulatory requirements without additional information. Nevertheless, Applicant will submit specific testimony as to its position on these matters. The indication that material is complete also does not imply that the NRC Staff may not in the future ask its customary additional questions concerning the subject material.

Sincerely,

Mark J. Wetterhahn  
Counsel for Philadelphia  
Electric Company

MJW:sdd

Enclosures

APPENDIX A  
COMPLETED PORTIONS OF THE APPLICATION  
RELATED TO ADMITTED CONTENTIONS

<u>Contentions</u>	<u>Status</u>
Contentions I-1 through I-32 (PRA)	Applicant's Probabilistic Risk Assessment is complete. Additional information on certain of these contentions will be found in an Environmental Report Operating License revision to respond to NRC questions regarding compliance with "NRC Interim Position on Accident Considerations Under NEPA" to be submitted in March, 1983.
Item under Contention I-33E, response to Section III.D.1.1 is complete.	
Contention I-35	Complete
Contention I-39	Complete
Contention I-40	Complete
Contention I-41A	Complete
Contention I-41B	Complete
Contention I-43A	Complete
Contention I-44	Complete
Contention I-46	Complete
Contention I-58	Complete
Contention I-59	Complete
Contention I-60	Complete
Contention I-60A	Complete
Contention I-60B	Complete



<u>Contention</u>	<u>Status</u>
Contention I-60C	Complete
Contention I-60D	Complete
Contention I-62	Complete
Contention V-3a	Complete
Contention V-3b	Complete
Contention V-4	Complete
Contention V-8	Complete

JAN 21 1983

JUDITH A. DORSEY

LAW OFFICES  
1315 WALNUT ST., SUITE 1632  
PHILADELPHIA, PA. 19107  
215 733-7200

January 17, 1983

Mark J. Wetterhahn, Esq.  
Conner and Wetterhahn  
1747 Pennsylvania Ave., NW  
Washington, DC 20006

Re: Limerick Generating Station, Docket Nos. 50-352,  
50-353

Dear Mr. Wetterhahn,

Pursuant to the NRC Licensing Board's Orders of June 1 and October 20, 1982, I request that the following report be included in the joint report to the Board on informal discovery, due January 24:

Status of Informal Discovery  
Requests of Intervenors as of 1/17/83

Four intervenors/consolidated intervenors have submitted informal discovery requests to the Applicant (PECO) and/or the NRC staff.

1) Robert Anthony (FOE) submitted a request for documents related to his contentions V-3A and V-3B on Nov. 22, to PECO. He has not yet received a reply.

2) Marvin Lewis submitted a request to the NRC staff on August 18, 1982, related to his contention I-62, pressurized thermal shock. On Sept. 23, Mr. Lewis was informed by the staff that his request did not meet the guidelines for informal discovery as outlined in the Board's June 1, 1982 Order, and that his questions would be answered when formal discovery began.

Additional information has come to Mr. Lewis' attention recently that leads him to believe that informal discovery to PECO on this matter would be beneficial. Thus Mr. Lewis requests that informal discovery continue.

3) Mr. Frank Romano and Mr. Marvin Lewis jointly submitted discovery requests (through Mr. Romano) on Sept. 3 and Sept. 23, 1982, related to contention VI-1, quality assurance/control. In a letter received on January 17, 1983, PECO stated its intention to make available those documents responsive to the request, at a site near PECO headquarters in Philadelphia. Since the documents will not be available for inspection and copying until January 19, Mr. Romano and Mr. Lewis request that informal discovery be permitted to continue -- it may be that additional such discovery would be useful after they have had the opportunity to review the documents thus far offered.

It should also be mentioned that it appears that some of intervenors' requests related to contention VI-1 have been misinterpreted or misunderstood. Further informal discovery will provide the opportunity for clarification.

4) Mr. Frank Romano submitted requests concerning his contention V-4, on carburetor icing, on Sept. 3 and Sept. 23, 1982. In a letter received January 17, PECO responded as in item #3 above.

5) On August 26, 1982, LEA submitted a discovery request on contentions I-59 and -60 to the NRC. (These contentions relate to the setting of design basis for Limerick, and to the control of radioactive releases from the site, respectively.) On January 17, 1983, the NRC staff indicated by phone that a response would be forthcoming.

6) On August 26, 1982, LEA submitted to PECO a series of discovery requests related to its PRA contentions, its accident monitoring contentions, and contentions I-33A and I-43. By letter received January 14, PECO responded as in item #3 above.

7) On December 29, 1982, LEA made a discovery request to the NRC related to PRA contentions. LEA has been informed that the NRC is presently working on a response to that request.

Due to the fact that responses to various discovery requests made by intervenors are only recently beginning to arrive, I request that informal discovery continue.

Mark and Ann: Please let me know if you have any problems with the substance of the above. If not, please include it along with the NRC estimated release dates for NRC review documents and PECO's status report on incomplete application sections. Thanks.

Sincerely,

*Judith A. Dorsey*  
Judith A. Dorsey

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WASHINGTON, D.C. 20006

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MARK J. WETTERHAHN  
ROBERT M. RADER  
ARCH A. MOORE, JR.\*  
ROBERT H. PURL  
OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 20, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Judith A. Dorsey, Esq.  
Suite 1632  
1315 Walnut Street  
Philadelphia, Pennsylvania 19107

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

Dear Ms. Dorsey:

This letter is a followup to my letter of January 11, 1983 to you and our telephone conversations of January 14 and 20, 1983 regarding the status of the Philadelphia Electric Company's response to your August 26, 1982 informal discovery request.

The material being made available for your review next week represents 150,000 pages of material. As you are aware, certain of the documents related to the Limerick Probabilistic Risk Assessment are proprietary to the General Electric Company. Proprietary material, including computer input and output, has been so designated and segregated and will be made available for your inspection and duplicated for your use in accordance with the proprietary agreement which you have executed. I have forwarded to Mr. Elliott, who I understand from you will be reviewing the documents being made available, an agreement regarding disclosure of this information to be executed and forwarded to the General Electric Company for approval.

With regard to your request to inspect the third volume of the Design Assessment Report, while the consent of one of the owners of the information has been obtained, the other owner, KWU, has not yet responded. I will endeavor to make this material available to you as soon as possible. As we discussed on January 14, 1983, the Company will endeavor to make any large-size drawings associated with the

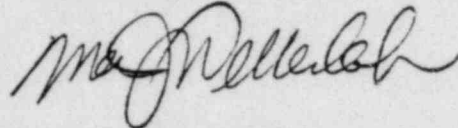


Judith A. Dorsey, Esq.  
January 20, 1983  
Page 2

Probabilistic Risk Assessment available for your inspection should you so desire. Finally, for your information, the cost to reproduce a microfiche is 30¢ per fiche.

If you have any questions concerning any of these matters, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn". The signature is fluid and cursive, with the first name "Mark" being more prominent.

Mark J. Wetterhahn  
Counsel for Philadelphia  
Electric Company

MJW:sdd

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WASHINGTON, D.C. 20006

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ROBERT M. RADER  
ARCH A. MOORE, JR.\*  
ROBERT H. PURL  
OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 11, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Mr. Frank Romano  
Air and Water Pollution Patrol  
61 Forest Avenue  
Ambler, Pennsylvania 19002

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

Dear Mr. Romano:

This letter is reply to your September 3, 1982 and September 23, 1982 letters to Mr. Conner concerning informal discovery in the captioned proceeding. In order to keep track of discovery items, we have designated your September 3 and September 23 letters "Discovery 2" and "Discovery 3," respectively. All classes of documents which are being produced are labeled accordingly. The documentary material responsive to your request in the Company's possession as described below will be made available for your inspection during normal business days from 9:00 a.m. to 4:30 p.m. beginning next Wednesday at a room near Philadelphia Electric Company's headquarters. Please call Edward Cullen, Esq. at 215/841-4273 to make specific arrangements at least one day in advance in order to gain access to the documents. Any copies that you wish made of this material as the result of your review should be marked and copies will be made at the commercial rate of approximately 7¢ per page. Hard copies of microfiche will be made at a rate of approximately 35¢ per page.

The following information explains the Company's responses to your requests.

Discovery 2

1. Items A, B, C, E, F and G - Philadelphia Electric Company does not have any documentation which is responsive to your requests in these paragraphs. As you are aware, there are summaries of meteorological data contained in the Final Safety Analysis Report ("FSAR") and Environmental Report Operating License Stage ("ER-OL"). We are also providing a four volume document entitled "Micrometeorologi-

cal Data and Analysis for the Limerick Generating Station Environmental Report - Operating License Stage and Final Safety Analysis Report Submittals." This document supplements the information in the FSAR and ER-OL and presents summary and frequency descriptions for the following meteorological parameters:

- Wind speed and direction
- Atmospheric stability
- Ambient temperature
- Temperature lapse rate
- Precipitation
- Relative humidity and dew point
- Joint frequency distribution of the above parameters
- Fog at National Weather Service stations located at Philadelphia and Allentown, Pennsylvania

In addition to these summaries, Philadelphia Electric Company has on magnetic tape the raw data for a ten year period, with measurements made on an hourly basis from the onsite meteorological instrumentation. While it would be costly, the Company would be willing to provide, at your expense, either a copy of the magnetic tapes or a printout of this data.

2. Items D and L - While the Company has conducted no studies specific to the Limerick Generating Station responsive to these requests, it is making available to you a document entitled "Chalk Point Cooling Tower Project, Salt Loading, Modeling, and Aircraft Hazard Study" by the Applied Physics Laboratory of The Johns Hopkins University.

3. Item H - The Company declines to respond to this paragraph as beyond the scope of the contentions and not designed to lead to admissible evidence.

4. Items I, J and K - Documents responsive to these requests are being provided. A contract for electrical service with Pottstown Municipal Airport is not being provided as being beyond the scope of the contention.

5. Enclosure 1, Item 1 - No documents responsive to this request have been identified.

6. Enclosure 1, Items 2, 3, 4, 5 and 6 - Documents responsive to this request are being provided.

7. Enclosure 1, Item 7 - No documents responsive to this request have been identified. However, see generally the documents produced in response to Items 2-6 above.



8. Enclosure 1, Items 8 and 9 - The Company has not been able to determine the originator of the sketch which was attached to the NRC letter to which you apparently refer. However, see generally the documents produced in response to Items 2-6, above.

9. Enclosure 2, Items 1, 2 and 3 - Documents responsive to these requests are being provided.

10. Enclosure 2, Items 4, 5 and 6 - Documents responsive to these requests are being provided. The Company is exploring whether and under what conditions, because of the need to preserve the individual's rights of privacy, certain of the requested documents can be released.

11. Enclosure 2, Item 7 - Documents responsive to this request are being provided.

12. Enclosure 2, Item 8 - No documents responsive to this request have been identified. However, see generally the documents produced in response to Items 2-6 above.

13. Enclosure 2, Item 9 - No specific documents responsive to this request have been identified. However, see generally the documents produced in response to Items 2-6 above. It should be noted that no safety-related welded pipe has been received from ITT Grinell Industrial Piping, Inc.

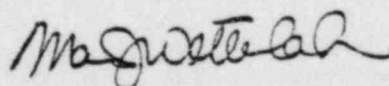
14. Enclosure 3, Items 1-5 - Documents responsive to this request relating to the Limerick Generating Station will subsequently be produced for your inspection. The ASME Code Stress Report for the Limerick vessels is expected to be completed in late February at which time all documents responsive to your request will be made available for inspection.

Discovery 3

15. Item 1 - Documents responsive to this request are being provided.

16. Item 2 - See response to Item 14, above.

Sincerely,



Mark J. Wetterhahn  
Counsel for the Applicant

bcc: Eugene J. Bradley, Esq.  
Judith A. Dorsey, Esq.



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WASHINGTON, D.C. 20006

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OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 11, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Judith A. Dorsey, Esq.  
1315 Walnut Street  
Suite 1632  
Philadelphia, PA 19107

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

Dear Miss Dorsey:

This letter is reply to your August 26, 1982 letter to Mr. Conner concerning informal discovery in the captioned proceeding. In order to keep track of discovery items, we have designated your August 26 letter "Discovery 1." All classes of documents which are being produced are labeled accordingly. The documentary material responsive to your request in the Company's possession as described below will be made available for your inspection during normal business days from 9:00 a.m. to 4:30 p.m. beginning next Wednesday at a room near Philadelphia Electric Company's headquarters. Please call Edward Cullen, Esq. at 215/841-4273 to make specific arrangements at least one day in advance in order to gain access to the documents. Any copies that you wish made of this material as the result of your review should be marked and copies will be made at the commercial rate of approximately 7¢ per page. Hard copies of microfiche will be made at a rate of approximately 35¢ per page.

The following information explains the Company's responses to your requests.

Discovery 1

1. Item A.1 - As we discussed, first priority has been given to production of the input and output listing of the CRAC code. This information is available for your inspection in microfiche form. The remainder of the requested information is presently being segregated.

2. Items A.2, A.4 - Documents responsive to this request in Applicant's possession are being provided. As additional material is located in PRA contractor files, it will be provided. To the extent material within these categories are claimed to be proprietary, it will be segregated and made available in accordance with the Agreement Regarding Disclosure of Confidential Commercial Information executed by you and your consultant.

3. Item A.3 - Aside from the cited reference, no documents in Applicant's possession have been located which are responsive to this request.

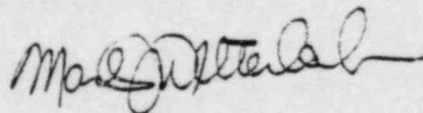
4. Item B.1 - As further clarified by our discussion, the specifications, calibration report, acceptance test procedures, and vendor literature, as available, is being provided for the following systems:

Drywell High Range Monitor  
Standby Gas Treatment System  
North Stack Broad Range Accident Monitoring System  
Main Steam Line Monitor  
Main Condenser Air Ejector Off Gas Radiation Monitor

6. Item C.1 - The requested document is being provided.

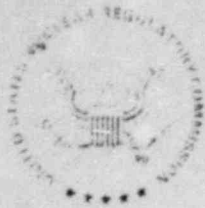
7. Item D.1 - As soon as approval for the form of a protective order is received from Pennsylvania Power & Light Company and Kraftmark Union Aktiengesellschaft, I will send you a copy for execution after which the requested document will be provided.

Sincerely,



Mark J. Wetterhahn  
Counsel for the Applicant

bcc: Eugene J. Bradley



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 21 1983

January 21, 1983

Mark J. Wetterhahn, Esq.  
Conner and Wetterhahn  
1747 Pennsylvania Ave., N.W.  
Washington, D.C. 20006

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Jocket Nos. 50-352 and 50-353

Dear Mr. *Mark* Wetterhahn,

Pursuant to the NRC Licensing Board's Orders of June 1 and October 20, 1982, the NRC Staff requests that the following information be included in the joint report on informal discovery to be submitted to the Board on January 24, 1983:

Status of Informal Discovery and Current Estimated Schedule for Issuance of the Staff's Draft and Final Environmental Statements, Safety Evaluation Report and Review of Probabilistic Risk Assessment

- 1) The NRC Staff has not addressed any informal discovery requests to intervenors.
- 2) On January 20, 1983, the Staff filed written responses to LEA's requests for informal discovery dated August 26, 1982, and December 29, 1982.
- 3) The status of responses to intervenors' requests of the Staff other than those noted in (2) is as stated in the section of this report entitled Status of Informal Discovery Requests of Intervenors as of 1/17/83.
- 4) In view of the fact that intervenors have requested that informal discovery continue and that it has been working successfully, the Staff believes that it should continue.

- 5) The current estimated schedule for issuance of the Staff's documents is as follows:

Review of the Limerick Generating Station  
Probabilistic Risk Assessment issued as a  
NUREG document .....March 11, 1983

Draft Environmental Statement issued .....May 1983

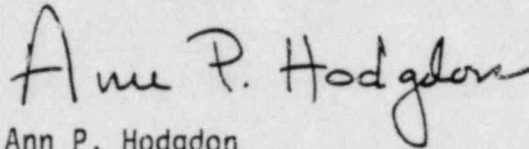
Safety Evaluation Report issued.....August 1983

Final Environmental Statement issued.....October 1983.

The estimated issuance schedule for documents other than the PRA Review has not changed since the Staff previously reported to the Board regarding this matter. The circumstances surrounding the delay in the issuance of the PRA Review are set forth in the attached memoranda.

If you believe that the information as stated above is incomplete or incorrect, please let me know. Also, in view of your offer to compile and coordinate the joint report, please feel free to make adjustments as necessary to suit the format of your choice.

Sincerely,



Ann P. Hodgdon  
Counsel for NRC Staff

Attachments: As stated

cc: Judith A. Dorsey, Esq.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20535

JAN 20 1983

MEMORANDUM FOR: Darrell G. Eisenhut, Director -  
Division of Licensing

Themis Speis, Director  
Division of Safety Technology

FROM: Al Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing

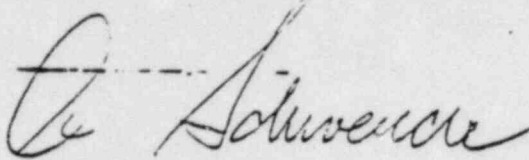
Ashok Thadani, Chief  
Reliability and Risk Assessment Branch  
Division of Safety Technology

SUBJECT: REVISED SCHEDULE FOR CONTRACTOR REPORT FOR LGS PRA

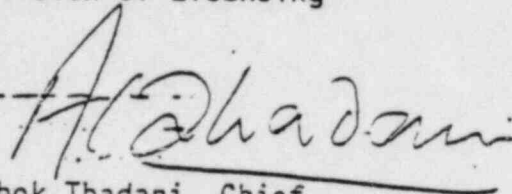
The Brookhaven National Laboratory, under contract FIN A-3393, is preparing a report for RRAB that evaluates the Probabilistic Risk Assessment on the Limerick Generating Station. Brookhaven has requested an additional delay in issuing the report owing to the diversion of their resources to work on the hearing support for the Indian Point plants.

The Accident Evaluation Branch is being provided with the support because the present consequence analysis on the Indian Point plants is considered obsolete (F. Rowsome, RES, to R. Mattson, DSI, 11/30/82). The Indian Point plant's consequence analysis needs updating because (a) there are new accident sequence likelihoods, (b) design and procedure changes have altered the dominant contributors, (c) errors were discovered in the characterization of two release categories of the conventional source term, and (d) the coupling of the emergency response model to both internal and external accident initiators has been discovered to be important.

The resulting delay in the Brookhaven report on the Limerick PRA is estimated to be about three weeks. We recommend that the final report milestone be changed from February 18, 1983 to March 11, 1983. Also, we recommend that the Limerick Board be notified concerning the delay.



Al Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing



Ashok Thadani, Chief  
Reliability and Risk Assessment Branch  
Division of Safety Technology

cc: M. Ernst  
T. Novak  
A. Hodgdon



BROOKHAVEN NATIONAL LABORATORY  
ASSOCIATED UNIVERSITIES, INC

Upton, Long Island, New York 11973

Department of Nuclear Energy

(516) 282-2435  
FTS 666

December 22, 1982

Erulappa S. Chelliah  
Reliability and Risk Assessment Branch  
Division of Safety Technology  
Mail Stop 216  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

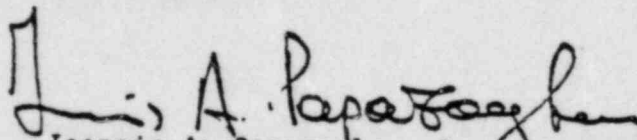
Dear Erul:

Owing to the NRC need for BNL personnel to divert resources to work on other projects in support of the Indian Point hearing, the milestones for the BNL final report on the "Review of the Limerick PRA" must change. As per discussions between R. A. Bari (BNL) and F. Coffman (RRAB) this diversion of resources will result in a forward shift of the milestone dates. As per our discussions the new milestone dates are as follows:

Submission of final draft to NRR	February 4, 1983
Receipt of NRC comments on final draft	February 11, 1983
Submission of camera ready copy	February 18, 1983

If you have any comments please let me know as soon as possible.

Best regards,

  
Ioannis A. Papazoglou, Group Leader  
Risk Evaluation Group

IAP/dm

cc: W. Kato  
R. Bari  
R. Hall  
W. T. Pratt  
A. Thadani  
A. Schwencer  
F. Coffman



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 21 1983

January 20, 1983

Judith A. Dorsey, Esq.  
1315 Walnut Street, Suite 1632  
Philadelphia, PA 19107

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353

Dear Ms. Dorsey:

This is in further response to your request on behalf of Limerick Ecology Action for informal discovery, dated August 26, 1982, (attached), which was the subject of our telephone conversation of Monday, January 17, 1983.

The Staff is now engaged in preparing its Draft Environmental Statement (DES), which is scheduled to be issued in May, 1983, and Safety Evaluation Report (SER), scheduled for issuance in August, 1983. These documents, which will be made available to all persons on the service list, will address the matters identified in your request for informal discovery.

You are no doubt aware that these matters were addressed in the FES and SER issued in connection with the Construction Permit proceeding for the Limerick station. Those documents can be found in the Local Public Document Room located in Pottstown, Pennsylvania. Any other CP-stage documents which might relate to these matters would also be available in the LPDR at Pottstown.

Sincerely,

*Ann P. Hodgdon*

Ann P. Hodgdon  
Counsel for NRC Staff

Attachment: As stated

cc: See next page



cc:

Lawrence Brenner, Esq.  
Dr. Richard F. Cole  
Peter A. Morris  
Frank R. Romano  
Edward G. Bauer, Jr.  
Troy B. Conner, Jr., Esq.  
Mark J. Wetterhahn, Esq.  
Marvin I. Lewis  
James M. Neill, Esq.  
Joseph H. White, III  
Dr. Judith H. Johasrud  
Thomas Gerusky  
Dir. Pa. Emer. Mgmt. Agency

Robert L. Anthony  
Alan J. Noguee  
Charles W. Elliott, Esq.  
W. Wilson Goode  
Walter W. Cohen  
Robert W. Adler  
Steven P. Hershey, Esq.  
Robert J. Sugarman, Esq.  
Donald S. Bronstein, Esq.  
Atomic Safety & Licensing Board  
Atomic Safety & Licensing Appeal Panel  
Docketing and Service Section

JUDITH A. DORSEY

LAW OFFICES  
1315 WALNUT ST., SUITE 1832  
PHILADELPHIA, PA. 19107  
215 735.7200

August 26, 1982

Stephen H. Lewis, Esq.  
Office of the Executive Legal  
Director  
U.S. NRC  
Washington, DC 20555

Dear Steve,

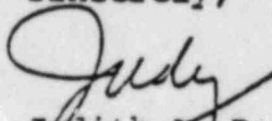
Pursuant to the Limerick Board's order concerning informal discovery of existing documents, Limerick Ecology Action requests the following materials:

Contentions I-59 and -60

All NRC documents relating to any determination of "credibility" of Limerick accidents for purposes of acceptance of design basis, or for determination of site acceptability under 10 CFR Part 100 [see 10 CFR §100.11(a), footnote 1].

I look forward to a prompt reponse to my request.

Sincerely,



Judith A. Dorsey  
Counsel for Limerick Ecology Action

xc: Service list



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

January 20, 1983

Charles W. Elliott, Esq.  
123 North Fifth Street  
Allentown, PA 18102

In the Matter of  
PHILADELPHIA ELECTRIC COMPANY  
(Limerick Generating Station, Units 1 and 2)  
Docket Nos. 50-352 and 50-353

Dear Mr. Elliott:

This is in further response to your letter of December 29, 1982 requesting the Staff's assistance in obtaining copies of documents relating to the Staff's review of the Limerick PRA. (Letter attached) Pursuant to our telephone conversation of January 17, 1983, copies of documents in the first category, consisting of thirteen documents identified by Central Files Accession numbers, will be placed in the Local Public Document Room at Pottstown, Pa.

The Staff has identified five documents as responsive to your request in categories 2 and 3. Those documents are:

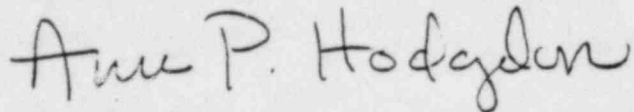
- (1) NUREG/CR-2934 (Sandia National Laboratories) Review and Evaluation of the Indian Point Probabilistic Safety Study (IPPSS)
- (2) Sandia's August 25, 1982 Letter Report on the IPPSS
- (3) Sandia's March 5, 1982 Letter Report on the Zion Probabilistic Safety Study
- (4) Brookhaven's Peer Review of the IPPSS
- (5) Brookhaven's Peer Review of the Zion Probabilistic Safety Study

These documents will be placed in the LPDR at Pottstown, as will a transcript of the ACRS meeting held on November 3, 1982, about which we spoke on the telephone January 17. That meeting concerned the Sandia review of the IPPSS and Brookhaven's review of the Limerick PRA.

The printouts constituting the fourth category of documents which you have requested have not yet been pulled from Brookhaven's files. Brookhaven personnel associated with the Limerick PRA review have been engaged on a priority basis in updating the consequence analysis for the Indian Point plants.

As soon as Brookhaven personnel are available to address the matter, we will inform you of how the information you have requested in your fourth category may be made available.

Sincerely,



Ann P. Hodgdon  
Counsel for NRC Staff

Attachment: As stated

cc:

Lawrence Brenner, Esq.  
Dr. Richard F. Cole  
Peter A. Morris  
Frank R. Romano  
Edward G. Bauer, Jr.  
Troy B. Conner, Jr., Esq.  
Mark J. Wetterhahn, Esq.  
Marvin I. Lewis  
James M. Neill, Esq.  
Joseph H. White, III  
Dr. Judith H. Johnsrud  
Thomas Gerusky  
Dir. Pa. Emer. Mgmt. Agency

Robert L. Anthony  
Alan J. Nogee  
Judith A. Dorsey, Esq.  
W. Wilson Goode  
Walter W. Cohen  
Robert W. Adler  
Steven P. Hershey, Esq.  
Robert J. Sugarman, Esq.  
Donald S. Bronstein, Esq.  
Atomic Safety & Licensing Board  
Atomic Safety & Licensing Appeal Panel  
Docketing and Service Section



THOMAS AND HAIR  
ATTORNEYS AT LAW  
SUITE 101  
123 NORTH FIFTH STREET  
ALLENTOWN, PENNSYLVANIA 18102

JOHN P. THOMAS  
CHARLES J. HAIR  
(PENNA., N.Y.)  
CHARLES W. ELLIOTT  
WILLIAM M. THOMAS  
DAVID J. JORDAN, JR.

TELEPHONE  
(215) 621-8100

December 29, 1982

Ann P. Hodgdon, Esquire  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Re: Philadelphia Electric Co. (Limerick) Docket  
Nos. 50-352,353

Dear Ann:

Pursuant to the order of the Board concerning informal discovery of existing documents, I would appreciate your assistance in obtaining copies of the following documents:

(1) The following documents are apparently located in Central Files, are filed under the Limerick docket number as Category A Application/Construction Stage documents and correspondence and have been assigned the accession numbers on the left hand column:

<u>Accession Number</u>	<u>Date</u>
8008040023	7/29/80
8006120121	5/23/80
8008080565	7/15/80
8009230523	9/8/80
8010270176	10/2/80
8010270178	10/2/80
8010300443	10/9/80
8011040503	10/27/80
8101160537	1/5/81
8101230140	1/5/81
8103180770	3/12/81
8103300239	3/24/81
8103300262	3/24/80

The accession numbers are derived from the printout of titles of construction stage documents which the staff provided to the parties pursuant to Board order.

Ann P. Hodgdon, Esquire

-2-

December 29, 1982

(2) All reports from Sandia National Laboratory in its "Review of Detailed Reliability Analysis for Zion Units 1 and 2, Indian Point, Units 2 and 3, and Limerick".

(3) All reports from Brookhaven National Laboratory pursuant to its "Review of Residual Risk for Zion Units 2 and 3, Indian Point Units 2 and 3, and Limerick" (FINA-3347).

(4) The computer printouts for each Limerick site specific CRAC code version run performed by Brookhaven National Laboratories, including the complete output of each run, including the printout of any recompilation of the CRAC version performed during the run, the print back of all results, and copies of any sensitivity studies or analyses made from any changes in input for any run.

Thank you for your anticipated cooperation with this request.

Very truly yours,



CHARLES W. ELLIOTT

CWE:seh

xc: service list

LAW OFFICES  
CONNER & WETTERHAHN, P.C.  
1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006

TROY B. CONNER, JR.  
MARK J. WETTERHAHN  
ROBERT M. RADER  
ARCH A. MOORE, JR.\*  
ROBERT H. PURL  
OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 21, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

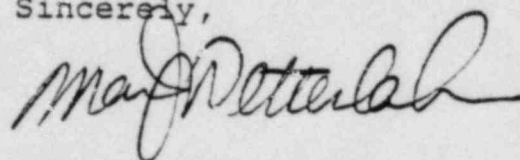
Judith A. Dorsey, Esq.  
Suite 1632  
1315 Walnut Street  
Philadelphia, Pennsylvania 19107

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

Dear Ms. Dorsey:

As we discussed today, enclosed is an "Agreement Regarding Disclosure of Confidential Commercial Information" relating to Volume III of the Design Assessment Report. I would appreciate your review and execution of this agreement such that the report may be made available for your inspection.

Sincerely,



Mark J. Wetterhahn  
Counsel for Philadelphia  
Electric Company

MJW:sdd

Enclosure

w/o enclosure

LAW OFFICES  
CONNER & WETTERHAHN, P.C.  
1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006

TROY B. CONNER, JR.  
MARK J. WETTERHAHN  
ROBERT M. RADER

ARCH A. MOORE, JR.\*  
ROBERT E. PURL

OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 20, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Judith A. Dorsey, Esq.  
Suite 1632  
1315 Walnut Street  
Philadelphia, Pennsylvania 19107

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

Dear Ms. Dorsey:

This letter is a followup to my letter of January 11, 1983 to you and our telephone conversations of January 14 and 20, 1983 regarding the status of the Philadelphia Electric Company's response to your August 26, 1982 informal discovery request.

The material being made available for your review next week represents 150,000 pages of material. As you are aware, certain of the documents related to the Limerick Probabilistic Risk Assessment are proprietary to the General Electric Company. Proprietary material, including computer input and output, has been so designated and segregated and will be made available for your inspection and duplicated for your use in accordance with the proprietary agreement which you have executed. I have forwarded to Mr. Elliott, who I understand from you will be reviewing the documents being made available, an agreement regarding disclosure of this information to be executed and forwarded to the General Electric Company for approval.

With regard to your request to inspect the third volume of the Design Assessment Report, while the consent of one of the owners of the information has been obtained, the other owner, KWU, has not yet responded. I will endeavor to make this material available to you as soon as possible. As we discussed on January 14, 1983, the Company will endeavor to make any large-size drawings associated with the

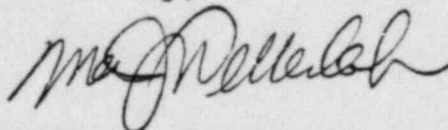


Judith A. Dorsey, Esq.  
January 20, 1983  
Page 2

Probabilistic Risk Assessment available for your inspection should you so desire. Finally, for your information, the cost to reproduce a microfiche is 30¢ per fiche.

If you have any questions concerning any of these matters, please let me know.

Sincerely,

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

Mark J. Wetterhahn  
Counsel for Philadelphia  
Electric Company

MJW:sdd

LAW OFFICES  
CONNER & WETTERHAHN, P.C.  
1747 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006

TROY B. CONNER, JR.  
MARK J. WETTERHAHN  
ROBERT M. RADER  
ARCH A. MOORE, JR.\*  
ROBERT H. PURL  
OF COUNSEL  
\*NOT ADMITTED IN D.C.

January 24, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Mr. Frank R. Romano  
61 Forest Avenue  
Ambler, Pennsylvania 19002

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

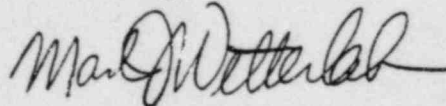
Dear Mr. Romano:

As a followup to my letter to you dated January 11, 1983, I wish to provide you the following information.

With regard to your September 3, 1982 letter, Enclosure 1, Item 4, Applicant has located a number of documents responsive to the request which relate to claims made by individuals living near the Limerick site regarding quarry blasting. These documents are being provided for your inspection. However, to maintain the privacy of the individuals involved the names, addresses and other identifying information has been deleted.

With regard to Enclosure 2 of the September 3, 1982 letter, the Bechtel Power Corporation which was apparently the employer of the individual involved and is custodian of all related records has stated that it is its policy not to release employment records except in response to a subpoena or other lawful process.

Sincerely,



Mark J. Wetterhahn  
Counsel for Philadelphia  
Electric Company

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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 Applicant's Letter to the Licensing Board Regarding Informal Discovery dated January 24, 1983, in the captioned matter have been served upon the following by deposit in the United States mail this 24th day of January, 1983:

Judge Lawrence Brenner (2)  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Richard F. Cole  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Ann P. Hodgdon, Esq.  
Elaine I. Chan, Esq.  
Counsel for NRC Staff  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Peter A. Morris  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Philadelphia Electric Company  
ATTN: Edward G. Bauer, Jr.  
Vice President &  
General Counsel  
2301 Market Street  
Philadelphia, PA 19101

Mr. Frank R. Romano  
61 Forest Avenue  
Ambler, Pennsylvania 19002

Mr. Robert L. Anthony  
Friends of the Earth of  
the Delaware Valley  
P. O. Box 186  
103 Vernon Lane  
Moylan, Pennsylvania 19065

Mr. Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149

Judith A. Dorsey, Esq.  
1315 Walnut Street  
Suite 1632  
Philadelphia, PA 19107

Charles W. Elliott, Esq.  
123 N. 5th Street  
Suite 101  
Allentown, PA 18102

Mr. Alan J. Nogee  
3700 Chestnut Street  
Philadelphia, PA 19104

Robert W. Adler, Esq.  
Assistant Counsel  
Commonwealth of Pennsylvania  
DER  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA 17120

Thomas Gerusky, Director  
Bureau of Radiation  
Protection  
Department of Environmental  
Resources  
5th Floor, Fulton Bank Bldg.  
Third and Locust Streets  
Harrisburg, PA 17120

Walter W. Cohen, Esq.  
Consumer Advocate Office of  
Attorney General  
1425 Strawberry Square  
Harrisburg, PA 17120

W. Wilson Goode  
Managing Director  
City of Philadelphia  
Philadelphia, PA

Steven P. Hershey, Esq.  
Community Legal  
Services, Inc.  
Law Center  
North Central Beury Bldg.  
3701 North Broad Street  
Philadelphia, PA 19140

Donald S. Bronstein, Esq.  
1425 Walnut Street  
Philadelphia, PA 19102

Mr. Joseph H. White, III  
8 North Warner Avenue  
Bryn Mawr, PA 19010

Dr. Judith H. Johnsrud  
Co-Director, ECNP 433  
Orlando Avenue State  
College, PA 16801

Robert J. Sugarman, Esq.  
Sugarman & Denworth  
Suite 510  
North American Building  
121 South Broad Street  
Philadelphia, PA 19107

James M. Neill, Esq.  
Box 217  
Plumsteadville, PA 18949

Director Pennsylvania  
Emergency Management Agency  
Basement, Transportation  
and Safety Building  
Harrisburg, PA 17120

  
Mark J. Wetterhahn