

JUDITH A. DORSEY

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June 17, 1983

Lawrence Brenner, Chair
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Peter A. Morris
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Re: Limerick Generating Station, Units 1 and 2
Philadelphia Electric Company
Docket Nos. 50-352, 50-353

Gentlemen,

Please find enclosed on-site emergency planning contentions for Limerick Ecology Action, in response to the Board's May 16, 1983 Memorandum and Order. LEA, as lead intervenor for emergency planning, did not receive contentions from any other parties for joint submission to the Board.

The scope of the contentions is contained in the attached document. LEA notes that the distinction between on-site and off-site emergency planning is a somewhat superficial distinction, as noted also by the Board at the May 9-11, 1983 prehearing conference. Off-site and on-site issues may indeed merge at various points as litigation of these matters progresses.

LEA also notes for the Board's consideration that LEA was put in the position of filing many on-site emergency planning contentions that allege a lack of information, realizing that the Board would prefer not to have such contentions before it. Since it was the Applicant's position that very few changes would be necessary for its on-site plan, the Board set June 21 for the submission of contentions related to on-site planning.

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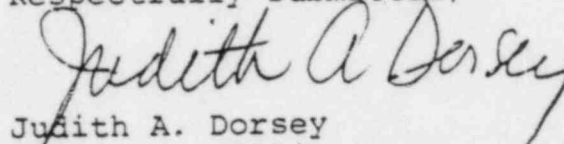
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Brenner, page 2.

Since LEA does not wish to prejudice itself by failing to allege informational deficiencies in the plan, it does so, recognizing that such contentions may again be denied without prejudice to a later filing.

Finally, LEA notes for the Board's information that it has not attempted in this filing to maintain the numbering system for emergency planning contentions that was used in its first filing, other than to retain the prefix "VIII." That is, contentions that are very similar to or the same as original contentions, do not necessarily retain their original numbers, since intervenors are essentially "starting over," as discussed at the May 9-11 conference.

Respectfully submitted,

A handwritten signature in cursive script, reading "Judith A. Dorsey". The signature is written in dark ink and is positioned above the typed names.

Judith A. Dorsey
Charles W. Elliott

Counsel for Limerick Ecology Action