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April 29, 1983

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CABLE ADDRESS: ATOMLAW

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DOCKETING & SERVICE
BRANCH

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:

In accordance with the "Memorandum and Order Continuing Informal Discovery, Providing for Further Specification of Conditionally Admitted Contentions and Noting Dismissal of ECNP" (February 10, 1983) and "Notice and Order of Second Special Prehearing Conference" (March 21, 1983), Applicant is submitting the joint reports requested by the Atomic Safety and Licensing Board.

The report on the status of emergency planning and the schedule for the filing and litigation of onsite and offsite emergency planning contentions is contained in Attachment 1, hereto. The status of informal discovery and proposal for the form and schedule of further discovery are contained in Attachment 2. Attachment 3 contains a suggestion of Limerick Ecology Action as to another item which it believes should be discussed at the prehearing conference scheduled

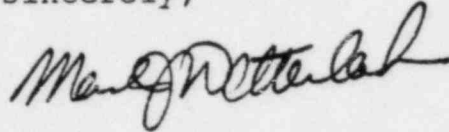
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Judge Lawrence Brenner
Judge Richard F. Cole
Judge Peter A. Morris
April 28, 1983
Page 2

to begin on May 9, 1983. No other such matters were raised
by any other parties.

Sincerely,

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

Mark J. Wetterhahn
Counsel for Philadelphia
Electric Company

MJW:sdd

cc: Service List

Attachment 1

The Status of Emergency Planning Reviews and the Schedule for the Filing and Litigation of Onsite and Offsite Emergency Planning Contentions

Onsite Planning

The latest revision to the onsite emergency plan was made in March 1983. While revisions are being made as onsite planning continues, they are not expected to be significant.

Emergency Response Facilities

The Technical Support Center ("TSC") construction is completed. The TSC will be operational the last quarter of 1983.

The Operations Support Center ("OSC") location is presently under review. The OSC will be operational the last quarter of 1983.

The Emergency Operations Facility ("EOF") is under construction. The EOF will be operational the last quarter of 1983.

The Emergency News Center ("ENC") has been identified. The ENC will be operational the last quarter of 1983.

The Headquarters Emergency Support Center ("HESC") is operational.

Emergency Communications

Emergency communication system design is underway. An order has been placed for telephone equipment. Radio system design is underway. Communications equipment will be operational by the last quarter of 1983.

Public Alert System

Studies are underway to determine the best public alert system. A decision is scheduled to be made in May 1983.

Designation of Plume EPZ

Emergency planning officials have completed the designation of the specific boundaries of the plume exposure pathway EPZ.

Offsite Emergency Plans

Offsite emergency plans are presently being developed by the Pennsylvania Emergency Management Agency ("PEMA") with the assistance of the Applicant and its consultants. The concepts of how the involved counties and municipalities will carry out their responsibilities upon the declaration of an emergency at the Limerick Station are complete. Drafts of municipal plans have been developed within all 42 involved municipalities. First drafts of county plans have been prepared and await revision based upon the developing municipal plans. First drafts of school emergency plans been developed and second drafts are being prepared. Drafts

of health care and special institution plans have been developed and are being renewed by these institutions. Graterford and Pennhurst plans are being developed directly by PEMA. PEMA has commented on the various drafts of plans prepared by Applicant and its consultants, and these comments are being included in the next draft. It is presently planned to forward a revised set of the offsite plans to PEMA for its comment at the end of August. The full-scale emergency planning exercise is scheduled for February 1984.

Filing and Litigation of Emergency Planning Contentions

As evidenced by the above studies, Applicant is of the view that emergency planning for the Limerick Generating Station is sufficiently developed to permit the formulation of contentions with regard to both the onsite and offsite efforts, notwithstanding the fact that further work may permit withdrawal of a number of the filed contentions. The Staff and Intervenor have not yet seen the latest correspondence and draft emergency planning material which was recently sent to them pursuant to the Board's Order. Intervenor is not yet prepared to take a position on whether formulation of emergency planning contentions is appropriate.

Attachment 2

The Status of Discovery and Procedures
and Schedule for Further Discovery

Responses to all informal discovery requests are now complete. The parties are not opposed to permitting informal discovery to continue until formal discovery begins. Applicant, Staff and LEA are of the view that formal discovery on admitted contentions permitting use of all techniques allowed by the Commission regulations should begin upon the issuance of a special prehearing conference order. Applicant, Staff and LEA are of the view that discovery on these matters should be also for a fixed period of time, with discovery reopening for a fixed period of time upon the issuance of new Applicant or Staff documents as to any new matters contained therein. Applicant, Staff and LEA believe that 60 days for service of discovery requests is reasonable and that 20 days for service of requests after publication of any new documents is also reasonable.

Attachment 3

Other Suggested Items for Discussion at May 9 Prehearing Conference (pursuant to March 21 Notice and Order of Second Special Prehearing Conference)

Limerick Ecology Action ("LEA") requests that one emergency planning contention, VIII-5, parts (2) and (4), be discussed at the May 9 special prehearing conference. Emergency plans are presently being developed at the institutional, municipal and county levels, within an approximate 10-mile radius of the Limerick plants. It is LEA's position that postponement of a decision regarding whether or not any emergency planning outside of the 10-mile EPZ should take place, and if so, what type of planning, will confuse and prolong the emergency planning process, licensing review, and potential litigation, unnecessarily. LEA requests that time be set aside during the May 9 conference to discuss the possibility of an accelerated schedule for consideration of contention VIII-5(2) and (4). While the Applicant believes that the matter which LEA proposes to raise is a challenge to the Commission's rules regarding emergency planning and would be more properly raised in a written filing, it has no objection to discussing a schedule for disposition of this matter by the Licensing Board. The Staff has no objection to the discussions of the matter raised by LEA at the second special prehearing conference.